

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

STATEMENT OF REASONS

Proposed Negative Declaration

**Pleasure Craft Coatings Portion of the Control Techniques Guidelines for Miscellaneous
Metal and Plastic Parts Coatings**

February 16, 2018

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RULE JUSTIFICATION

Background

The Sacramento Metropolitan Air Quality Management District (District) is currently designated as severe nonattainment for the 2008 federal 8-hour ozone standard. The federal Clean Air Act (CAA) specifies that State Implementation Plans (SIPs) for nonattainment areas must include “reasonably available control measures” (RACM), including “reasonably available control technology” (RACT), for sources of emissions¹. The CAA also provides that for nonattainment areas classified as “moderate” or worse, states must revise their SIPs to include RACT for sources of volatile organic compounds (VOC) emissions for each category of VOC sources covered by a Control Techniques Guidelines (CTG) documents issued after November 15, 1990, and prior to the area’s date of attainment². The U.S. Environmental Protection Agency (EPA) defines RACT as “the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility³.” In developing CTG documents, EPA evaluates, among other things, the sources of VOC emissions and the available control approaches for addressing these emissions, including the costs of such approaches⁴. CTG documents establish the presumptive minimum recommendations for RACT.

As an alternative to adopting a RACT rule, a state or local agency may adopt a negative declaration documenting that it has no stationary sources or emitting facilities to which a particular CTG is applicable. The negative declaration must go through the same public review requirements as any other SIP submittal⁵. Negative declarations become part of California’s State Implementation Plan at Title 40 of the Code of Federal Regulations (CFR) Part 52, Section 52.222. The Board has previously adopted negative declarations for 24 source categories.

CTG for Miscellaneous Metal and Plastic Parts Coatings

In 2008, EPA promulgated a CTG document for Miscellaneous Metal and Plastic Parts Coatings⁶. The CTG contains RACT guidelines and recommendations, including VOC content limits, specific exemptions, and recommended work practices, for coatings applied in six different types of operations: miscellaneous metal parts and products, miscellaneous plastic parts and products, transportation plastic parts, business machine plastic parts, pleasure craft, and motor vehicle materials. The CTG applies to any facility with actual VOC emissions of 2.7 tons or more per 12-month rolling period from all of these coating operations combined, including related cleaning operations.

Under Section 182(b)(2) of the CAA, the District is required to implement RACT for all of the coating operations included in the CTG. Staff’s strategy to satisfy the RACT requirement consists of four parts:

¹ Clean Air Act § 172(c)(1).

² Clean Air Act § 183(b)(2)(A).

³ Federal Register Notice 44 FR 53761, September 17, 1979.

⁴ Clean Air Act §§ 108(b) and (c).

⁵ Clean Air Act § 110.

⁶ U.S. Environmental Protection Agency. *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings*, EPA-453/R-08-003. Washington DC: September 2008.

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- RACT requirements for miscellaneous metal parts and products have been incorporated into Rule 451 – Surface Coating of Miscellaneous Metal Parts and Products. The District adopted these amendments to Rule 451 on October 28, 2010.
- RACT requirements for motor vehicle materials have been incorporated into Rule 459 – Automotive, Mobile Equipment, and Associated Parts and Components Coating Operations. The District adopted these amendments to Rule 459 on August 25, 2011.
- Proposed Rule 468 – Surface Coating of Plastic Parts and Products will satisfy RACT requirements for the coating of miscellaneous plastic parts and products, transportation plastic parts, and business machine plastic parts. Staff is planning to propose this rule for adoption at the March 22, 2018 Board of Directors meeting.
- A negative declaration stating that the District does not have any pleasure craft surface coating operations subject to the CTG will be submitted to EPA to satisfy the RACT requirements for pleasure craft coating operations. This negative declaration is the subject of this Statement of Reasons.

CTG Source Category Analysis

The CTG for Miscellaneous Metal and Plastic Parts Coatings applies only to facilities with actual uncontrolled VOC emissions of 2.7 tons or more per 12-month rolling period from the coating of pleasure craft, together with the coating of metal parts, plastic parts, and the application of motor vehicle materials. According to the CTG document, the VOC emission threshold is equivalent to the evaporation of approximately two gallons of solvent per day. In the District, coating facilities that use more than one gallon per day of coating materials and solvents are required by District Rule 201 – General Permit Requirements to obtain a Permit to Operate. Staff reviewed the District permit records and identified one facility that has applied for a permit to apply repair coatings on pleasure craft. Based on the information provided by the applicant, the facility's proposed potential to emit for its pleasure craft coating operation is much less 2.7 tons of VOC per 12-month rolling period.

In 2015, Staff conducted an emission inventory survey requesting information on coating types and usages from facilities that may be coating pleasure craft or plastic parts. To identify facilities that may coat pleasure craft, Staff compiled a list of candidate facilities from the Yellow Pages and the California Employment Development Department database and sent surveys to each of these facilities. Only one of the facilities responded that it applies coatings to pleasure craft. Based on its survey response, the VOC emissions from this boat repair facility are approximately 0.05 tons per year, which is much less the CTG threshold.

ENVIRONMENTAL COMPLIANCE

In adopting this negative declaration, the District is not adopting new requirements for emission sources. No source will need to change its operations to comply with a requirement. Staff finds that the adoption of this negative declaration is not subject the California Environmental Quality Act (CEQA) because it is an activity that will not result in a direct or reasonably foreseeable indirect physical change in the environment⁷.

⁷ Public Resources Code 21084(a) and Preliminary Review, Section 15060(c)(2) State CEQA Guidelines.

CONCLUSIONS AND RECOMMENDATIONS

Staff's analysis shows that there are no sources within the District to which the pleasure craft coating portion of the CTG applies. There are no pleasure craft coating facilities with emissions great enough to exceed the CTG emission threshold of 2.7 tons of VOC per 12-month rolling period, and none are expected in the future. Staff recommends that the District satisfy the RACT requirements of CAA Section 182(b) by adopting a negative declaration for the pleasure craft coating portion of the following CTG:

Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coating.
U.S. EPA Publication No. EPA-453/R-08-003, September 2008.

REFERENCES

Sacramento Metropolitan Air Quality Management District. *SMAQMD 2015 Area Source Methodology for Plastic Parts & Products Coatings*. Sacramento, CA: December 15, 2016.

U.S. Environmental Protection Agency. *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings*, EPA-453/R-08-003. Washington, DC: September 2008.