



Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heaston, Executive Director

August 18, 2015

Carol Sutkus
State of California
Environmental Protection Agency
Air Resources Board
P. O. Box 2815
Sacramento, California 95812

Project Title: Adoption of AVAQMD Federal Negative Declarations (8 hour Ozone Standard) for Twenty Control Technique Guidelines Source Categories

Dear Ms. Sutkus:

The Antelope Valley Air Quality Management District (AVAQMD) requests that the California Air Resources Board submit the AVAQMD *Federal Negative Declarations (8 hour Ozone Standard) for Twenty Control Technique Guidelines Source Categories* to the United States Environmental Protection Agency (USEPA) for inclusion in the State Implementation Plan (SIP).

The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by the United States Environmental Protection Agency (USEPA) for "major sources" of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) which are ozone precursors. Effective May 27, 2008 (73 FR 16436, March 27, 2008), USEPA lowered the primary ozone National Ambient Air Quality Standard (NAAQS) from 0.084 parts per million (ppm) to 0.075 ppm. For purposes of the FCAA, the District has been designated non-attainment for ozone and classified as Severe-15 for the new 0.075 ppm 8-hour standard. As a result of the shift to the 0.075 ppm standard, the District is required to update rules to meet RACT requirements. For those CTG source categories not represented within the area designated non-attainment for ozone, USEPA requires the submission of a Federal Negative Declaration (FND) certifying that those sources are not present. These "Federal Negative Declarations" are different from the Negative Declarations associated with the California Environmental Quality Act (CEQA). Instead, these FNDs, as adopted by the Governing Board, will serve as official certification to the USEPA that there are stationary sources or emitting facilities in these categories located within the area designated as non-attainment for ozone within the AVAQMD.

If you have any questions regarding this submittal, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122. Please note that all documents required for a complete submission were sent electronically on August 18, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alan J. De Salvo', with a long horizontal flourish extending to the right.

Alan J. De Salvo
Deputy Director – Mojave Desert Operations

AJD/tw

CARB SIP Submittal Request 2015 AVAQMD FND