



## Mojave Desert Air Quality Management District

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Visit our web site: <http://www.mdaqmd.ca.gov>

Eldon Heaston, Executive Director

May 26, 2015

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

**Project Title: Adoption of MDAQMD *Federal Negative Declarations for Nineteen Control Technique Source Categories***

Dear Ms. Sutkus:

The Mojave Desert Air Quality Management District (MDAQMD) requests that the California Air Resources Board submit the MDAQMD *Federal Negative Declarations for Nineteen Control Technique 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<sub>x</sub>) 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, portions of the District have 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 Mojave Desert Air Quality Management District (MDAQMD).

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 May 26, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan J. De Salvio". The signature is stylized with several overlapping loops and a long horizontal stroke extending to the right.

**Alan J. De Salvio**  
Deputy Director – Mojave Desert Operations

AJD/tw

CARB SIP Submittal Request 2015 FND