Development
Services

Michael Sundblom
Air Quality Director

PINAL • COUNTY
wide open opportunity

Greg Stanley
County Manager

To: Pinal County Board of Supervisors

From: Mike Sundblom
Director, Pinal County Air Quality

Date: November 18, 2016

Re: Reasonably Available Control Technology (RACT) Negative Declaration Document

The Clean Air Act requires certain sources in ozone nonattainment areas to implement control methods called reasonably available control technology (RACT). The United States Environmental Protection Agency 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 feasibility.

The RACT requirement is meant to ensure that ozone nonattainment areas designated either moderate or above (i.e. serious, severe) have RACT in place for all source categories covered by a Control Techniques Guideline (CTG) document and for major sources of volatile organic compounds or oxides of nitrogen that are not subject to a CTG. A local air District adopts the control methods if it has a source in its area subject to a CTG. Alternatively, the local District may declare that there are no sources in its area subject to a RACT requirement, and then the requirement to adopt a rule for those sources is no longer applicable. This is known as a "Negative Declaration". The negative declaration document needs to go through a public process, including a public comment period. As part of the ozone RACT rulemaking to cover the negative declarations requirement, the District developed the following draft document, "Reasonably Available Control Technology (RACT) Analysis, Negative Declaration and Rules Adoption". The draft document was made available for public review and comment on the Pinal County Air Quality Control District's website on August 30th. Pinal County Air Quality staff contacted EPA Region 9 about the document and the public comment period. Additionally, the document was included in the Board of Supervisors Public Hearing Public Notice published in the local newspapers. The District accepted comments on the document through November 14, 2016. No comments were received.

The final version of "Reasonably Available Control Technology (RACT) Analysis, Negative Declaration and Rules Adoption" is included with the two air quality related agenda items for today's public hearing along with the request in both resolutions that the Board of Supervisors approve the negative declaration document and request that it be submitted to EPA.