

**Proposed Reasonably Available Control Technology (RACT)
for Volatile Organic Compounds (VOC)
Determination for the 2015 8-Hour Ozone
National Ambient Air Quality Standards (NAAQS)**

September 24, 2021

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1.0 Background

Pursuant to the 2015 8-Hour Ozone National Ambient Air Quality Standards (NAAQS) Implementation Rule ([83 Fed. Reg. 62998](#); December 6, 2018), nonattainment areas are required to submit to the U.S. Environmental Protection Agency (EPA) a State Implementation Plan (SIP) revision demonstrating that a state has implemented all necessary Reasonably Available Control Technology (RACT) controls on all major stationary sources of volatile organic compounds (VOCs) and oxides of nitrogen (NOx). RACT is defined as the lowest emission limit that a particular source is capable of meeting by the application of control technology that is reasonably available, considering technological and economic feasibility.

This VOC RACT evaluation supports the District of Columbia's (District) RACT determination for the 2015 8-hour ozone NAAQS. It concludes with a certification that previously adopted RACT controls and the addition of regulations of screen printing (discussed in more detail in Section 2.4) represents RACT for the 2015 ozone NAAQS with respect to VOCs. A separate RACT evaluation will address RACT with respect to NOx.

1.1 RACT Requirements

To help determine RACT, EPA developed control techniques guidelines (CTGs) and alternative control techniques (ACT) documents. While CTGs from the 1970s through the 1990s are still used to presumptively limit RACT for VOC sources, there are no CTG-like presumptive RACT limits for NOx sources. ACTs were developed for VOCs and NOx in the late 1980s and 1990s, and describe available control technologies and their respective cost-effectiveness. ACTs provide historical background on controls but do not identify RACT. Additionally, since RACT can change over time, states must consider newly available information to supplement ACT documents and when establishing NOx RACT requirements.

In addition to the evaluation of economic feasibility for RACT Determinations, DOEE also considers current ozone levels in its evaluation of RACT. The District is required under its marginal ozone classification to achieve levels at or below 0.070 parts per million (ppm) by August 3, 2021. Using the 2017-2019 design value, ozone levels at the lead monitor in the District (McMillan Reservoir) are 0.071 ppm and at the lead monitor in the Washington, DC-MD-VA nonattainment area (Beltsville, MD) are 0.072 ppm, so decisions concerning RACT standards must be made in light of these levels.

States implementing the 2015 8-hour ozone standard must assure their RACT determination is met either with a RACT regulation, or a certification (with supporting information) that previously required RACT controls represent RACT for 8-hour implementation purposes.¹

In the 2008 ozone NAAQS Implementation Rule, EPA states that, “in some cases, a new RACT determination under the 2008 standard would result in the same or similar control technology as the initial RACT determination under the 1-hour or 1997 standard because the fundamental control techniques, as described in the CTGs and ACTs, are still applicable. In cases where controls were applied due to the 1-hour or 1997 NAAQS ozone RACT requirement, we expect that any incremental emissions reductions from application of a second round of controls would be small and, therefore, the cost for advancing that small additional increment of reduction would not be reasonable” ([80 Fed. Reg. 12279](#)). In the 2015 ozone NAAQS Implementation Rule, EPA states that it is “retaining existing general RACT requirements for purposes of the 2015 ozone NAAQS,” which implies that the previous statement still holds ([83 Fed. Reg. 63007](#)).

The District was designated as a marginal nonattainment area for the 2015 ozone NAAQS. According to CAA Section 182(a)(2)(A), states in marginal nonattainment of a NAAQS must submit a “RACT fix-up,” which is “a revision that includes such provisions to correct requirements in (or add requirements to) the plan concerning [RACT] as were required [prior to November 15, 1990].”

1.2 Major Source Thresholds

The District was designated as a marginal nonattainment area for the 2015 ozone NAAQS. According to Clean Air Act (CAA) Section 182(a)(2)(A), states in marginal nonattainment of a NAAQS need to submit a “RACT fix-up,” which is “a revision that includes such provisions to correct requirements in (or add requirements to) the plan concerning [RACT] as were required [prior to November 15, 1990].” However, since the District is a member of the Ozone Transport Region (OTR)², CAA Section 184 is applicable, which requires states in the OTR to implement more stringent moderate area RACT at a minimum for:

- All volatile organic compounds (VOCs) covered by a CTG (CAA § 184(b)(1)(B)); and
- Any stationary source that has the potential to emit (PTE) at least fifty tons per year (tpy) of VOC, which shall be subject to major source “moderate” area requirements (CAA § 184(b)(2)); where

¹ In the case of VOCs, states may also certify their RACT determination with a negative declaration that there are no sources in the nonattainment area covered by a specific CTG category that would require RACT.

² States in the OTR include Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, and the Consolidated Metropolitan Statistical Area that includes the District of Columbia.

- The requirements for major stationary sources of VOCs also apply to major sources of NOx (CAA § 182(f)), where a “major stationary source” directly emits or has the potential to emit one hundred tons per year or more of any pollutant.

For the District’s 2015 NAAQS RACT analysis, despite classification as a marginal nonattainment area for the 2015 ozone NAAQS, the OTR major source thresholds of 50 tpy for VOCs and 100 tpy for NOx apply.³

³ **Per Appendix I guidance:** “For purposes of meeting the 8-hour RACT requirement, the State’s RACT analysis only needs to include an evaluation of RACT for CTG sources and for non-CTG major sources based on the area’s 8-hour classification. We note, however, that under the anti-backsliding requirements, the State may not remove RACT requirements for sources that were subject to RACT for the 1-hour standard (but that would not be subject to RACT based on the area’s 8-hour classification). Similarly, if the State has never met the RACT requirement for one or more sources for the 1-hour standard, the anti-backsliding requirements require the State to meet that obligation. The anti-backsliding provisions can be found at 40 C.F.R. § 51.905 and apply to all former 1-hour non-attainment areas.”

2.0 Existing VOC RACT in the District

2.1 Compliance with RACT requirement for previous ozone NAAQS

2.1.1 1979 1-hour ozone NAAQS

To comply with the 1-hour ozone NAAQS, the District submitted a RACT determination for approval into the District's SIP on June 21, 1985. The submittal consisted of the District's Air Pollution Control Act (APCA) of 1984, which covered a variety of air pollution control programs and addressed RACT requirements for major stationary sources of VOCs (*i.e.*, related to the printing industry, found at 20 DCMR § 710) and Stage II gasoline vapor recovery (to meet CAA § 182(b)(3), found at 20 DCMR § 705). EPA approved portions of the SIP revision on August 4, 1992 (57 Fed. Reg. 34251).

Under the Clean Air Act Amendments of 1990, the District was classified as a serious nonattainment area for the 1979 1-hour ozone NAAQS.

On April 8, 1993, the District submitted a negative declaration for 25 source categories of VOCs covered by CTGs issued prior to November 15, 1990. On October 22, 1993, updates to the APCA were submitted to EPA as a SIP revision with new regulations and amendments to 20 DCMR Chapters 5 (Source Monitoring and Testing) and 7 (VOCs) for sources that emit or have the potential to emit (PTE) 50 tons per year (tpy) or more of VOCs to comply with RACT. On September 4, 1997, a supplement to the October 1993 SIP submission included a negative declaration for additional categories of VOC sources covered by CTGs prior to 1990 and non-major CTG sources. Additional amendments to definitions and to RACT for specific source categories were submitted on December 16, 1998. EPA approved all remaining 1-hour ozone RACT provisions on October 27, 1999 ([64 Fed. Reg. 57777](#)).

In 2002, EPA proposed to issue a finding that the District failed to attain the 1-hour ozone NAAQS by the deadline of November 15, 1999. Despite having a SIP in place, monitored air quality was not attaining the standards. In January 2003, the District's nonattainment classification was "bumped up" from serious to severe nonattainment for the 1-hour standard, and the District was required to perform RACT evaluations on point sources with a PTE of 25 tpy for either VOC or NO_x (68 Fed. Reg. 3410). Revisions to the District's VOC RACT provisions to redefine major source thresholds were adopted into the SIP on December 28, 2004 ([69 Fed. Reg. 77645](#)). The final attainment demonstration for the 1-hour NAAQS was approved on March 13, 2005 ([70 Fed. Reg. 25687](#)).

2.1.2 1997 8-hour ozone NAAQS

The District was classified as a moderate nonattainment area for the 1997 8-hour ozone NAAQS.

The District adopted RACT requirements based on OTC Phase I Model Rules for five VOC categories, though not all of the revisions were approved into the SIP at once.

On September 22, 2008, the District submitted its certification of VOC RACT provisions under the 1997 8-hour ozone NAAQS. This certification was adopted into the District's SIP effective July 16, 2009 ([74 Fed. Reg. 28447](#), June 16, 2009).

2.1.3 2008 8-hour ozone NAAQS

The District was classified as a marginal nonattainment area for the 2008 8-hour ozone NAAQS.

A series of SIP revisions were submitted in 2010, 2011, and 2012, to adopt second generation OTC Model Rules for five source categories, and consistent with EPA's CTGs for seven source categories. Negative declarations were submitted for four source categories. EPA finalized approval of the VOC rulemakings on April 29, 2013 ([78 Fed. Reg. 24992](#)).

On August 29, 2018, the District submitted its certification of VOC RACT provisions under the 2008 8-hour ozone NAAQS. This certification was adopted into the District's SIP effective November 12, 2019 ([84 Fed. Reg. 54507](#), October 10, 2019).

2.1.4 2015 8-hour ozone NAAQS

The District was classified as a marginal nonattainment area for the 2015 8-hour ozone NAAQS.

A third generation OTC model rule (Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations Phase II) was also submitted for approval into the District's SIP and adopted effective October 10, 2019 ([84 Fed. Reg. 47437](#), September 10 2019). A negative declaration was submitted for one source category (Oil & Natural Gas Industry CTG), which EPA approved on March 6, 2020 ([85 Fed. Reg. 13055](#)).

A regulation impacting VOC emissions from screen printing operations will be adopted in the District and was published concurrently. This regulation was found to be consistent with cost-effective regulations adopted by other jurisdictions in the OTR ([COMAR 26.11.19.18, N.J.A.C. 7:27-16.7](#)). Given that other jurisdictions subject to the same OTR RACT requirements have adopted emissions limits of this magnitude, the Districts submits that the emission limits outline in 20 DCMR 762 are reasonably available (discussed in more detail in Section 2.4).

2.2 CTG and ACT Source Categories

EPA states that "Control Techniques Guidelines (CTGs) are used to presumptively define VOC RACT while Alternative Control Techniques (ACTs) describe available control technologies and their respective cost effectiveness."⁴ The Clean Air Act also states that "The [EPA] Administrator shall from time to time review, and, as appropriate, modify, and reissue any criteria or

⁴ <https://www.epa.gov/ground-level-ozone-pollution/control-techniques-guidelines-and-alternative-control-techniques>. Accessed July 20, 2020.

information on control techniques issued pursuant to this section (42 U.S. Code § 7408 (c).” The District agrees that CTGs are presumptive RACT for the source categories covered and that stricter requirements are not reasonable, because if it were the case that CTGs are no longer presumptive RACT, EPA would have reviewed and modified these categories as is required under the Clean Air Act.

The following table explains how the District has addressed VOC requirements for each CTG category.

Table 1. Control Techniques Guidelines (CTGs) in the District’s SIP

| CTG Documents | Where are Requirements Met? | EPA Approval Date (Fed. Reg. Citation) |
|---|--|--|
| Pre-1990, Group 1 | | |
| Stage I Vapor Control Systems – Gasoline Service Stations (November 1975) | 20 DCMR § 704 | 10/27/1999 (64 FR 57777) |
| Vol II: Surface Coating of Cans, Coils, Paper, Fabrics and Vinyl, Automobiles, and Light-Duty Trucks (May 1977) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777); 6/16/2009 (74 FR 28447) |
| Refinery Vacuum Producing Systems, Wastewater Separators and Process Unit Turnarounds (October 1977) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777); 6/16/2009 (74 FR 28447) |
| Solvent Metal Cleaning (November 1977) | 20 DCMR § 708 | 10/27/1999 (64 FR 57777); 6/16/2009 (74 FR 28447) |
| HCs from Tank Truck Gasoline Loading Terminals (December 1977) | 20 DCMR § 703 | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Vol III: Surface Coating Metal Furniture (December 1977) | Negative Declaration: 40 C.F.R. § 52.470(e)** | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Vol IV: Surface Coating for Insulation of Magnet Wire (December 1977) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Vol V: Surface Coating Large Appliances (December 1977) | Negative Declaration: 40 C.F.R. § 52.470(e)** | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Bulk Gasoline Plants and Terminals (December 1977) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Storage of Petroleum Liquids in Fixed Roof Tanks (December 1977) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Use of Cutback Asphalt (December 1977) | 20 DCMR § 709.1 | 10/27/1999 (64 FR |

| CTG Documents | Where are Requirements Met? | EPA Approval Date (Fed. Reg. Citation) |
|--|--|---|
| | | 57777); 6/16/2009 (74 FR 28447) |
| Pre-1990, Group 2 | | |
| Vol VI: Surface Coating Misc. Metal Parts and Products (June 1978) | Negative Declaration: 40 C.F.R. § 52.470(e)** | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Vol VII: Surface Coating Flat Wood Paneling (June 1978) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Leaks from Petroleum Refinery Equipment (June 1978) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Manufacture of Synthesized Pharmaceutical Product (December 1978) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Manufacture of Pneumatic Rubber Tires (December 1978) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Vol VIII: Graphic Arts – Rotogravure and Flexography (December 1978) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Petroleum Liquid Storage in External Floating Roof Tanks (December 1978) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Perchloroethylene Dry Cleaning (perchloroethylene has been exempted as a VOC, so this CTG is no longer relevant; there is a MACT standard now) | 20 DCMR § 707 | REPEALED, 12/30/2011 (58 DCR 11286) |
| Leaks from Gasoline Tank Trucks and Vapor Collection Systems (December 1978) | 20 DCMR § 704.4 | 10/27/1999 (64 FR 57777); 6/16/2009 (74 FR 28447) |
| Pre-1990, Group 3 | | |
| Large Petroleum Dry Cleaners (September 1982) | 20 DCMR § 706 | 10/27/1999 (64 FR 57777); 6/16/2009 (74 FR 28447) |
| Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins (November 1983) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Equipment Leaks from Natural Gas/ Gasoline Processing Plants (December 1983) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |

| CTG Documents | Where are Requirements Met? | EPA Approval Date (Fed. Reg. Citation) |
|---|--|---|
| Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (March 1984) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry (SOCMI) (December 1984) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| 1990-2005 | | |
| Reactor Processes and Distillation Operations in SOCMI (August 1993) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Offset Lithographic Printing | 20 DCMR § 716 | 10/27/1999 (64 FR 57777); |
| Wood Furniture Manufacturing Operations (April 1996) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Shipbuilding and Ship Repair Operations (Surface Coating) ACT (August 1996) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| Aerospace Coatings (December 1997) | Negative Declaration: 40 C.F.R. § 52.470(e) | 10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447) |
| 2006 | | |
| Flat Wood Paneling Coatings | Negative Declaration: 40 C.F.R. § 52.470(e) | 4/29/2013 (78 FR 24992) |
| Lithographic & Letterpress Printing Materials | 20 DCMR § 716 | 4/29/2013 (78 FR 24992) |
| Flexible Packaging Printing Materials | 20 DCMR § 710 | 4/29/2013 (78 FR 24992) |
| Industrial Cleaning Solvents | 20 DCMR §§ 770-771 | 4/29/2013 (78 FR 24992) |
| 2007 | | |
| Paper, Film, and Foil Coatings | Negative Declaration: 40 C.F.R. § 52.470(e) | 4/29/2013 (78 FR 24992) |
| Metal Furniture Coatings | 20 DCMR § 714** | 4/29/2013 (78 FR 24992) |
| Large Appliance Coatings | 20 DCMR § 714** | 4/29/2013 (78 FR 24992) |
| 2008 | | |
| Auto & Light Duty Truck Original Equipment Manufacturer (OEM) Assembly Coatings | Negative Declaration: 40 C.F.R. § 52.470(e) | 4/29/2013 (78 FR 24992) |
| Fiberglass Boat Manufacturing Materials | Negative Declaration: 40 C.F.R. § 52.470(e) | 4/29/2013 (78 FR 24992) |
| Misc. Metal Products Coatings | 20 DCMR § 714** | 4/29/2013 (78 FR 24992) |
| Misc. Plastic Parts Coatings | 20 DCMR § 714 | 4/29/2013 (78 FR 24992) |
| Misc. Industrial Adhesives | 20 DCMR §§ 743-749 | 4/29/2013 (78 FR 24992) |

| CTG Documents | Where are Requirements Met? | EPA Approval Date (Fed. Reg. Citation) |
|------------------------------|--|--|
| 2016 | | |
| Oil and Natural Gas Industry | Negative Declaration: 40 C.F.R. § 52.470(e) | 3/6/2020 (85 FR 13055) |

* There are no refineries in the District, so this SIP revision includes a negative declaration for the “Refinery Vacuum Producing Systems, Wastewater Separators and Process Unit Turnarounds” CTG (October 1977) that was overlooked, according to Notice of Intent to sue EPA⁵.

** The District has adopted a rule for this category although the District believes that there are no sources within the District.

The following categories listed are not in the CTG table because the negative declaration was submitted to EPA in response to an ACT:

Table 2. Negative Declarations for Alternative Control Technology (ACT) Categories

| Category | ACT |
|--|---|
| Coating of plastic parts (business machines, etc)* | Surface Coating of Automotive/Transportation and Business Machine Plastic Parts (February 1994) |
| Shipbuilding and repair** | Surface Coating Operations at Shipbuilding and Repair Facilities (April 1994; superseded by the shipbuilding CTG issued in August 1996) |
| Automobile refinishing*** | Automobile Body Refinishing (April 1994; a national rule was issued in 1998 after the ACT) |
| Industrial wastewater | Air Emissions from Industrial Wastewater (April 1994) |
| Distillation or reactor or batch processes in SOCOMI** | VOCs from Batch Processes (February 1994) |
| Volatile organic storage | Volatile Organic Liquids Storage in Floating and Fixed Roof Tanks (January 1994) |
| Offset lithography* | Offset Lithographic Printing (June 1994) |
| Clean-up solvents* | Industrial Cleaning Solvents (February 1994) |

* EPA subsequently issued a CTG for all or part of this category. The District has adopted the rules listed in Table 1 as required by the release of the applicable CTG

** Part of the category is covered by a CTG, and part is covered by an ACT

*** District has adopted the rule listed in Table 1 for this category but has no major stationary sources in this category.

Since ACTs do not identify RACT, they are not reviewed further in this document.

⁵ See NACAA (May 12, 2015)...

2.3 Major Non-CTG Sources of VOCs

For the 2015 8-hour ozone NAAQS, OTR thresholds for RACT apply. Currently, there are three major stationary sources in the District with a PTE of 50 tons per year or more of VOCs:

- Fort Myer Construction Corporation - Plant #1 (Fort Myer Plant #1) – an asphalt production plant;
- U.S. Department of the Treasury, Bureau of Engraving and Printing (BEP) – a Federal government printing facility of U.S. currency; and
- U.S. Government Publishing Office (GPO) – a Federal government printing facility of official U.S. government information products.

The following chart identifies existing controls and regulations that limit VOC emissions for the types of units at each of these facilities.

Table 3. Emissions Controls and Limits at Major VOC Facilities in the District

| Facility (PTE) | Units & Controls | VOC and Related Limits | EPA Approval Date (Fed. Reg. Citation) | CTG or ACT? |
|---------------------------------------|--|---|--|-------------|
| Fort Myer Plant #1 (50.74 tpy VOC) | Asphalt plant | 20 DCMR 709 – Asphalt Operations | 10/27/99 (64 FR 57777) | Yes |
| | Fuel burning (diesel engines) | Crusher engine has a permitted PTE of 3.04 tons VOC per year (2018 actuals were 0.06 tons) and the screener engine has a permitted PTE of 1.1 tons VOC per year (2018 actuals were 0.05 tons). Given the low PTE and actual levels of emissions from these units they would be considered <i>de minimis</i> . | | N/A |
| BEP (82.28 tpy VOC) | Fuel burning (diesel engines) | Fuel pump engine has a PTE of 0.08 tons VOC per year and emits at a lower rate than that. The two emergency engines have even lower PTEs. Given the low levels of emissions from these units they would be considered <i>de minimis</i> . | | N/A |
| | Printing presses (Intaglio, Letterpress, and Lithographic) | 20 DCMR 710 – Intaglio, Flexographic, and Rotogravure Printing | 4/29/13 (78 FR 24992) | Yes |
| | | 20 DCMR 716 – Offset Lithographic and Letterpress Printing | 4/29/13 (78 FR 24992) | Yes |
| | Painting and coating operations | Painting and coating operations had actual emissions of 0.05 tons of VOCs in 2019. Given the low actual levels of emissions from these units they would be considered <i>de minimis</i> . | | N/A |

| Facility (PTE) | Units & Controls | VOC and Related Limits | EPA Approval Date (Fed. Reg. Citation) | CTG or ACT? |
|---------------------|--|--|--|-------------|
| | Solvent usage | Degreasing equipment using only solvents with zero VOC content as measured by EPA reference method 24. Given that the permitted PTE for solvent usage is 0 tons VOCS per year, this is now a <i>de minimis</i> process. | | N/A |
| | Rotoclone Ink Mill | This system has an estimated PTE of 0.26 tons VOCs per year. Actual emissions are well below this level. Given the low levels of emissions from this unit it would be considered <i>de minimis</i> . | | N/A |
| GPO (90.17 tpy VOC) | Letterpress and Lithographic printing presses; some with thermal oxidizers | 20 DCMR 716 – Offset Lithographic and Letterpress Printing | 4/29/13 (78 FR 24992) | Yes |
| | Screen printing presses | 20 DCMR 762 – Screen Printing | * | No |
| | Parts washers | Four parts washers that were not regulated under printing regulations have an estimated PTE of 1.32 tons of VOCs. Given the low actual levels of emissions from these units they would be considered <i>de minimis</i> . | | N/A |
| | Painting and coating operations | Painting and coating operations had actual emissions of 0.27 tons of VOCs in 2019. Given the low actual levels of emissions from these units they would be considered <i>de minimis</i> . | | N/A |
| | Misc. sources/support operations | 20 DCMR 743-749 – Adhesives and Sealants & 20 DCMR 700 – Miscellaneous Volatile Organic Compounds (VOCS) | 4/29/13 (78 FR 24992) | Yes |

* Regulation is being added to DC's SIP through this certification.

The District evaluated the equipment at these three facilities to identify equipment not covered by existing VOC RACT standards. Ft. Meyer #1 had two engines; BEP had one fire pump, two emergency engines, and an ink mill, and GPO had none. PTE was examined for all of these units and all were found to produce minimal emissions and thus would not be reasonable to control.

Since all three facilities meet RACT on non *de minimis* sources through regulations adopted by the District there is no need for a case-by-case RACT evaluation with respect to VOCs.

The District also evaluated the equipment at these three facilities to identify equipment covered by an existing CTG. As discussed in Section 2.2, CTGs should be considered presumptive RACT according to EPA so any sources covered by such a rule would be reasonably controlled.

Presumptive RACT for the equipment discussed in this section and found to be non *de minimis* and that are not covered under a CTG is in the next section.

2.4 Evaluation of Presumptive VOC RACT

2.4.1 Screen Printing

The District examined emissions limits in place as in other jurisdictions in the OTR and adopted as RACT for the 2008 Ozone NAAQS and approved by EPA. The District found emissions limits similar in stringency in place in Maryland - [84 FR 5004](#), New York - [82 FR 58342](#), and Vermont - [84 FR 65009](#). The District then conducted a review of the RACT/BACT/LAER clearing house on June 11, 2020, which included a search of permits from 1/1/1980 to date, and found no evidence of permits of screen printing operations that went beyond the emissions limits that were found to be RACT in other OTR jurisdictions. As a result the District finds the emissions limits in these regulations to be presumptive RACT and will submitting a screen printing regulation (20 DCMR 762) that should be included in the District's SIP as federally enforceable.

2.5 VOC RACT Certification

In summary, VOC RACT rules have been adopted at 20 DCMR Chapter 7 for [19 source categories](#):

- 703 – Terminal Vapor Recovery – Gasoline or Volatile Organic Compounds
- 704 – Stage I Vapor Recovery
- 705 – *Stage II Vapor Recovery (no CTG)*
- 706 – Petroleum Dry Cleaners
- 709 – Asphalt Operations
- 710 – Intaglio, Flexographic, and Rotogravure Printing
- 714 – CTGs – Large appliance coatings
- 714 – CTGs – Metal furniture coatings
- 714 – CTGs – Miscellaneous metal products and plastic parts coatings
- 715 – *Major Source and Case-by-Case RACT (no CTG - Note that there are no major sources of VOCs that currently require case by case RACT in the District)*
- 716 – Offset Lithographic and Letterpress Printing
- 718 – *Mobile Equipment Repair and Refinishing (no CTG)*
- 719-737 – Consumer Products
- 743-749 – Adhesives and Sealants (including Miscellaneous Industrial Adhesives)

- 751-758 – Portable Fuel Containers and Spouts
- 762 – Screen Printing (no CTG)
- 763-769 – Solvent Cleaning 770-771 – Industrial cleaning solvents
- 773-778 – Architectural and Industrial Maintenance Coatings

There are 26 CTG VOC source categories covered by a negative declaration, as listed in 40 C.F.R. §§ 52.478(a)-(c).

3.0 Conclusion

The District certifies that existing VOC controls and negative declarations represent VOC RACT for the 2015 8-hour ozone NAAQS as (1) certified and approved by EPA as representing RACT under the 1-hour ozone NAAQS, (2) certified and approved by EPA as representing RACT for the 1997 8-hour NAAQS, (3) certified and approved by EPA as representing RACT for the 2008 8-hour NAAQS, (4) most recently adopted and approved by EPA, and (5) submitted with this SIP revision.