

**Reasonably Available Control Technology (RACT)
for Volatile Organic Compounds (VOC)
Determination for the 2008 8-Hour Ozone
National Ambient Air Quality Standards (NAAQS)**

July 2018

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1.0 Background

Pursuant to the 2008 8-Hour Ozone National Ambient Air Quality Standards (NAAQS) Implementation Rule (80 Fed. Reg. 12264; March 6, 2015), 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 2008 8-hour ozone NAAQS. It concludes with a certification that previously adopted RACT controls continue to represent RACT for the 2008 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. CTGs from the 1970s through the 1990s are still used to presumptively define VOC RACT. There are no CTG-like presumptive RACT limits for NOx sources. ACTs, developed in the late 1980s and 1990s, describe available control technologies and their respective cost-effectiveness for VOCs and NOx. They provide historical background information on controls but do not identify RACT. Since RACT can change over time, states must consider newly available information to supplement CTG and ACT documents and determine RACT.

States implementing the 8-hour ozone standard must assure that RACT is met either through a RACT regulation, a certification (with supporting information) that previously required RACT controls represent RACT for 8-hour implementation purposes, or a negative declaration that there are no sources in the nonattainment area covered by a specific CTG category.

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).

1.2 Major Source Thresholds

The District was designated as a marginal nonattainment area for the 2008 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)¹, 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
- The requirements for major stationary sources of VOCs also apply to major sources of NO_x (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 2008 NAAQS RACT analysis, despite classification as a marginal nonattainment area for the 2008 ozone NAAQS, the OTR major source thresholds of 50 tpy for VOCs and 100 tpy for NO_x apply.²

¹ 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.

² **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

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).

The Clean Air Act Amendments of 1990 resulted in new RACT requirements. It also introduced a classification system for ozone nonattainment. The District was classified as being in "serious" nonattainment of the 1-hour ozone standard. 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., 77647). The final attainment demonstration for the 1-hour NAAQS was approved on March 13, 2005 (70 Fed. Reg. 25688).

Meanwhile, EPA finalized the first 8-hour ozone standard in 1997. The District was designated as a moderate nonattainment area. 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, a SIP revision was submitted certifying that previously adopted RACT controls approved under the 1-hour ozone NAAQS continued to represent RACT for the 8-hour implementation purposes, and that no facilities exist in the District for several CTG source categories. EPA approved the SIP revision on June 16, 2009 ([74 Fed. Reg. 28447](#)).

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 Phase II 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](#)).

2.1 CTG and ACT Source Categories

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. § 52.478(a)(1)-(2)	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. § 52.478(a)(5)*	*
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. § 52.478(a)(2)**	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. § 52.478(a)(2)	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. § 52.478(a)(2)**	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. § 52.478(a)(4)	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. § 52.478(a)(3)	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 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. § 52.478(a)(2)**	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. § 52.478(a)(2)	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. § 52.478(a)(6)	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. § 52.478(a)(7)	10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447)

CTG Documents	Where are Requirements Met?	EPA Approval Date (Fed. Reg. Citation)
Manufacture of Pneumatic Rubber Tires (December 1978)	Negative Declaration: 40 C.F.R. § 52.478(a)(7)	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. § 52.478(a)(8)	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. § 52.478(a)(3)	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. § 52.478(a)(7)	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. § 52.478(a)(9)	10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447)
Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (March 1984)	Negative Declaration: 40 C.F.R. § 52.478(a)(7)	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. § 52.478(a)(7)	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. § 52.478(b)(6)	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. § 52.478(b)(8)	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. § 52.478(b)(3)	10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447)
Aerospace Coatings (December 1997)	Negative Declaration: 40 C.F.R. § 52.478(b)(2)	10/27/1999 (64 FR 57777) 6/16/2009 (74 FR 28447)
2006		
Flat Wood Paneling Coatings	Negative Declaration: 40 C.F.R. § 52.478(c)(4)	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. § 52.478(c)(3)	4/29/2013 (78 FR 24992)

CTG Documents	Where are Requirements Met?	EPA Approval Date (Fed. Reg. Citation)
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. § 52.478(c)(1)	4/29/2013 (78 FR 24992)
Fiberglass Boat Manufacturing Materials	Negative Declaration: 40 C.F.R. § 52.478(c)(2)	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)

* 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 EPA³.

** 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 in 40 C.F.R. § 52.478 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

40 C.F.R. § 52.478 Section	Category	ACT
(b)(1)*	Coating of plastic parts (business machines and other)	Surface Coating of Automotive/Transportation and Business Machine Plastic Parts (February 1994)
(b)(3)**	Shipbuilding and repair	Surface Coating Operations at Shipbuilding and Repair Facilities (April 1994; superseded by the shipbuilding CTG issued in August 1996)
(b)(4)***	Automobile refinishing	Automobile Body Refinishing (April 1994; a national rule was issued in 1998 after the ACT)
(b)(5)	Industrial wastewater	Air Emissions from Industrial Wastewater (April 1994)
(b)(6)**	Distillation or reactor or batch processes in SOCM I	VOCs from Batch Processes (February 1994)
(b)(7)	Volatile organic storage	Volatile Organic Liquids Storage in Floating and Fixed Roof Tanks (January 1994)
(b)(9)*	Offset lithography	Offset Lithographic Printing (June 1994)
(b)(10)*	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

³ See NACAA (May 12, 2015)...

*** 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.

2.2 Major Non-CTG Sources of VOCs

For the 2008 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 – 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	Units & Controls	VOC and Related Limits	EPA Approval Date (Fed. Reg. Citation)
Fort Myer Plant #1 (50.74 tpy VOC)	Asphalt plant	20 DCMR 709 – Asphalt Operations	10/27/99 (64 FR 57777)
	Fuel burning (diesel engines)	20 DCMR 1406 – Adopts 40 CFR 63, Subpart ZZZZ, Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*	**
BEP	Fuel burning (diesel engines)	20 DCMR 1406 – Adopts 40 CFR 63, Subpart ZZZZ, Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*	**
		Printing presses (Intaglio, Letterpress, and Lithographic)	20 DCMR 710 – Intaglio, Flexographic, and Rotogravure Printing
		20 DCMR 716 – Offset Lithographic and Letterpress Printing	4/29/13 (78 FR 24992)

Facility	Units & Controls	VOC and Related Limits	EPA Approval Date (Fed. Reg. Citation)
	Painting and coating operations	20 DCMR 719-737 – Consumer Products	4/29/13 (78 FR 24992)
		20 DCMR 773-778 – Architectural and Industrial Maintenance Coatings	4/29/13 (78 FR 24992)
		20 DCMR 1409 – Adopts NESHAP* for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	**
	Other cleaning and support operations;	20 DCMR 700 – Miscellaneous Volatile Organic Compounds (VOCS)	4/29/13 (78 FR 24992)
		20 DCMR 763-769 – Solvent Cleaning	4/29/13 (78 FR 24992)
		20 DCMR 770 – Misc. Industrial Solvent Cleaning Operations	4/29/13 (78 FR 24992)
		20 DCMR 771 – Misc. Cleaning and VOC Materials Handling Standards	4/29/13 (78 FR 24992)
	GPO	Printing presses (Letterpress and Lithographic); some with thermal oxidizers	20 DCMR 716 – Offset Lithographic and Letterpress Printing
Solvent cleaning/degreasers		20 DCMR 763-769 – Solvent Cleaning	4/29/13 (78 FR 24992)
Misc. sources/support operations		20 DCMR 700 – Miscellaneous Volatile Organic Compounds (VOCS)	4/29/13 (78 FR 24992)
		20 DCMR 770 – Misc. Industrial Solvent Cleaning Operations	4/29/13 (78 FR 24992)
		20 DCMR 743-749 – Adhesives and Sealants	4/29/13 (78 FR 24992)
		20 DCMR 1403 – Adopts NESHAP* for Halogenated Solvent Cleaning	**
		20 DCMR 1404 – Adopts NESHAP* for Printing and Publishing Industry	**

** NESHAPs control hazardous air pollutants, but they are included in case there may be VOC co-benefits and to show that such sources may be controlled.*

*** 20 DCMR Chapter 14 has not been placed in the SIP, but has been adopted as a District regulation, and is therefore District-enforceable. Since these regulations are adopting federal regulations by reference, they are also federally enforceable.*

In addition, there are New Source Performance Standards (NSPS) for hot mix asphalt facilities (40 C.F.R. 60.92) and stationary compression ignition internal combustion engines (40 C.F.R. 60, Subpart IIII), which may impact any modifications at Fort Myer Construction Corporation Plant #1 or BEP.

The District has evaluated the equipment at BEP to identify if any equipment is not covered by existing VOC RACT standards. At BEP, there is an ink mill with associated ink solids handling equipment controlled by a RotoClone wet dust collector for PM. This system has an estimated PTE of 0.26 tpy of VOCs. Actual emissions are well below this level. With such a low possible benefit of any additional VOC controls the District has concluded that any additional control from this equipment would not be cost-effective.

Similarly, the District has evaluated the equipment at GPO to identify if any equipment is not covered by existing VOC RACT standards. At GPO there are two silk screen printing operations not covered by any existing VOC RACT standards. These two units have a combined PTE of approximately 3.7 tpy of VOCs. Actual emissions from both units, combined, were 0.442 tons in 2016 and 0.401 tons in 2017. With such a low possible benefit of any additional VOC controls the District has concluded that any additional controls installed on these units would not be cost-effective.

2.3 Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations Regulations

The Mobile Equipment Repair and Refinishing (MERR) rule (20 DCMR 718) was adopted by the District in 2004 (51 DCR 3879; April 16, 2004), based on a 2002 OTC Model Rule developed as part of a regional effort to attain and maintain the one-hour ozone NAAQS. It was replaced by the 2009 Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations Regulations (MVMERR) Model Rule, which was adopted by the District as an emergency rulemaking on March 11, 2016 (63 DCR 003792) and as a final rulemaking on December 9, 2016 (63 DCR 15095). This final rulemaking was never included as a federally enforceable measure in the District's SIP. As part of the RACT certification the District is submitting the rulemaking as an amendment to the SIP.

Specifically, the following portions of Title 20, Chapter 7 of the DC Municipal Regulations (DCMR) should be approved as a SIP revision:

- Section 714(3)(a)(1) – entirely replace current section with revised section in SIP;
- Section 718 – entirely replace current section with revised section in SIP;

- Section 799 – entirely replace current section with revised section in SIP.

2.4 VOC RACT Certification

In summary, VOC RACT rules have been adopted at 20 DCMR Chapter 7 for [18 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)*
- 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)
- 773-778 – Architectural and Industrial Maintenance Coatings
- 751-758 – Portable Fuel Containers and Spouts
- 763-769 – Solvent Cleaning
- 770-771 – Industrial cleaning solvents

There are 25 CTG VOC source categories covered by a negative declaration, as listed in 40 C.F.R. §§ 52.478(a)-(c).

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