

## **RACT SIP Review for Northern VA:**

- Sections 182(b)(2) and 182(f) of the CAA requires ozone nonattainment areas to implement RACT for sources subject to CTGs issued by EPA and for “major sources” of VOC and NO<sub>x</sub>.
- According to the Phase II guidance, areas classified as moderate nonattainment or higher must submit a demonstration that their current rules fulfill 8 hour zone RACT for all CTG categories and all major, non-CTG sources as a revision to the SIP.
- SIP is due September 15, 2006.
- If new controls are necessary, must be installed and operational by May, 2009.
- CTG’s: About 30 CTG categories, and about 26 ACT categories
  - Negative declaration for categories where no applicable sources exist in NoVA.
  - May rely on existing EPA guidance docs.
- Non-CTG major sources:
  - About 17 facilities
  - Power plants, IC engines, and cement plants complying with NO<sub>x</sub> SIP call may be assumed to meet RACT.
  - Recertification must be done on facilities with PTE, including federally enforceable limits, of 50 tpy VOC or more and/or 100 tpy NO<sub>x</sub> or more.
  - For any facility where the 1 hour RACT determination showed that no additional controls were necessary, a new RACT analysis will be needed. (Probably 2 or 3 facilities in NoVA)
- Reduction Potential
  - Most categories in the CTG/ACT listing that have been updated are already taken into account in our inventory, such as solvent cleaning, autobody refinishing, IC engines, etc.
  - The 2 or 3 facilities needing new RACT determinations are not very large emitters.
  - May not net very many emission reductions.