

December 28, 2020

John W. Busterud
Regional Administrator
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105
busterud.john@epa.gov

Dear Mr. Busterud:

The California Air Resources Board (CARB) is submitting to the U.S. Environmental Protection Agency (U.S. EPA) the *2020 Reasonably Available Control Technology Demonstration for the National Ambient Air Quality Standards for Ozone in San Diego County* (2020 RACT SIP) prepared by the San Diego County Air Pollution Control District (District) as a revision to the California State Implementation Plan (SIP). The District adopted the 2020 RACT SIP on October 14, 2020 to fulfill the Clean Air Act (Act) requirements for reasonable available control technology (RACT) for the 75 parts per billion (ppb) and 70 ppb 8-hour ozone standards.

The Act requires RACT analyses for stationary sources and applicable rules for which U.S. EPA has published Control Techniques Guidelines (CTGs) and for major non-CTG stationary sources in nonattainment areas classified as Moderate or above. In 2016, the District reviewed its stationary sources and applicable rules to determine if they meet RACT requirements as applicable under the 75 ppb 8-hour ozone standard for a Moderate nonattainment area, and adopted and submitted the *2008 Eight-Hour Ozone Reasonably Available Control Technology Demonstration for San Diego County*. Since that time, U.S. EPA classified San Diego County as a Serious nonattainment area for the 75 ppb 8-hour ozone standard. Now based on a new SIP, CARB has requested, under separate cover, that San Diego County be classified as a Severe nonattainment area for both the 75 ppb and 70 ppb 8-hour ozone standards.

In the 2020 RACT SIP, the District reviewed its stationary sources and applicable rules to determine if they meet RACT requirements under the 75 ppb and 70 ppb 8-hour ozone standards for a Severe nonattainment area. The 2020 RACT SIP determined that three District rules need to be amended and adopted in the coming months, and one rule that was amended in 2006 needs to be submitted into the SIP. The 2020 RACT SIP concluded that, with these rules, the District's stationary sources and

applicable rules meet RACT requirements or are not subject to RACT requirements, and included negative declarations certifying that no sources are present in the nonattainment area for the applicable CTGs. Thereby, the 2020 RACT SIP addresses RACT requirements for a Severe nonattainment area as applicable under the 75 ppb and 70 ppb 8-hour ozone standards.

This SIP submittal consists of the following enclosed materials:

1. October 20, 2020 letter from Robert C. Reider, Interim Director at San Diego County Air Pollution Control District, to Richard W. Corey, Executive Officer, California Air Resources Board, transmitting the 2020 RACT SIP and supporting documentation;
 - a. The submission includes a supplement to the 2017 submittal of District Rule 61.3.1, *Transfer of Gasoline into Stationary Underground Storage Tanks*. It is intended to correct the public notice deficiency in that submittal and will allow U.S. EPA to act on the rule as-submitted in 2017; and
2. CARB Executive Order S-20-028 adopting the 2020 RACT SIP as a revision to the California SIP, and CARB SIP Completeness Checklist.

If you have any questions, please contact Ms. Edie Chang, Deputy Executive Officer, at (916) 445-4383, or have your staff contact Dr. Michael Benjamin, Chief of the Air Quality Planning and Science Division, at (916) 201-8968.

Sincerely,



Richard W. Corey
Executive Officer

Enclosures (10)

cc: see next page

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