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**Clean Air, Safe Water,  
Healthy Land for Everyone**

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# **SIP Revision: Gila County, Arizona RACT Analysis and Negative Declarations for the 2015 Ozone NAAQS**

*Air Quality Division  
January 29, 2025 Proposed*

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## COMPLETENESS CRITERIA

### (40 C.F.R. PART 51, APPENDIX V, § 2.0)

#### Appendix V § 2.1 - Administrative Materials

**(a) A formal signed, stamped, and dated letter of submittal from the Governor or his designee, requesting EPA approval of the plan or revision thereof (hereafter “the plan”). If electing to submit a paper submission with a copy in electronic version, the submittal letter must verify that the electronic copy provided is an exact duplicate of the paper submission.**

See the cover letter for this State Implementation Plan (SIP) submission and attached delegation of authority from Karen Peters, Deputy Director of Arizona Department of Environmental Quality (ADEQ), to Daniel Czecholinski, Director of the ADEQ Air Quality Division, authorizing Daniel Czecholinski, to perform any act the ADEQ Director is authorized to perform under the state air quality statutes, including the submission of SIPs to EPA.

This SIP submittal was conducted electronically via online EPA’s Central Data Exchange, State Plan Electronic Collection System (SPeCS). Therefore, no paper copies were submitted.

**(b) Evidence that the State has adopted the plan in the State code or body of regulations; or issued the permit, order, consent agreement (hereafter “document”) in final form. That evidence shall include the date of adoption or final issuance as well as the effective date of the plan, if different from the adoption/issuance date.**

See the cover letter for this document wherein the state adopts and submits this SIP revision to EPA. This is the method of Arizona state adoption. ADEQ did not conduct a rulemaking as part of this SIP revision.

**(c) Evidence that the State has the necessary legal authority under State law to adopt and implement the plan.**

ADEQ has primary responsibility for air pollution control and abatement, and as such, is required to adopt and "maintain a state implementation plan that provides for implementation, maintenance and enforcement of national ambient air quality standards and protection of visibility as required by the clean air act." A.R.S. § 49-404(A). ADEQ also maintains authority to issue and administer rules, adopt county rules, and to submit such rules for approval into the SIP. Copies of Arizona Revised Statutes (A.R.S.), sections 49- 104, 49-106, 49-112, 49-402, 49-404, 49-406, and 49-425, are included in Appendix B.

**(d) A copy of the actual regulation, or document submitted for approval and incorporation by reference into the plan, including indication of the changes made (such as redline/strikethrough) to the existing approved plan, where applicable. The submission shall include a copy of the official State regulation/document, signed, stamped, and dated by the appropriate State official indicating that it is fully enforceable by the State. The effective date of any regulation/document contained in the submission shall, whenever possible, be indicated in the regulation/document itself; otherwise the State should include a letter signed, stamped, and dated by the appropriate State official indicating the effective date. If the regulation/document provided by the State for approval and incorporation by reference into the plan is a copy of an existing publication, the State submission should, whenever possible, include a copy of the publication cover page and table of contents.**

No new rules are being adopted as part of this SIP revision.

**(e) Evidence that the State followed all of the procedural requirements of the State's laws and constitution in conducting and completing the adoption/issuance of the plan.**

Evidence that ADEQ followed the procedural requirements of Arizona state laws and constitution in adopting this plan is included in Appendix A.

**(f) Evidence that public notice was given of the proposed change consistent with procedures approved by EPA, including the date of publication of such notice.**

Proof that ADEQ gave notice of the SIP Revision in accordance with A.R.S. § 49-444 is attached as Appendix A.

**(g) Certification that public hearing(s) were held in accordance with the information provided in the public notice and the State's laws and constitution, if applicable and consistent with the public hearing requirements in 40 CFR 51.102.**

The certification and other documents related to the public hearing are attached as Appendix A.

**(h) Compilation of public comments and the State's response thereto.**

A compilation of public comments and a responsiveness summary addressing relevant comments is contained in Appendix A.

## **Appendix V § 2.2 - Technical Support**

**(a) Identification of all regulated pollutants affected by the plan.**

This SIP revision applies to the 2015 Ozone National Ambient Air Quality Standards (NAAQS) and ozone precursors (NO<sub>x</sub> and VOCs).

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**(b) Identification of the locations of affected sources including the EPA attainment/nonattainment designation of the locations and the status of the attainment plan for the affected areas(s).**

This SIP revision is applicable to the Gila County portion of the 2015 Phoenix-Mesa ozone nonattainment area as defined in 40 C.F.R. § 81.303.

**(c) Quantification of the changes in plan allowable emissions from the affected sources; estimates of changes in current actual emissions from affected sources or, where appropriate, quantification of changes in actual emissions from affected sources through calculations of the differences between certain baseline levels and allowable emissions anticipated as a result of the revision.**

The SIP revision does not contain changes to allowable emissions.

**(d) The State's demonstration that the national ambient air quality standards, prevention of significant deterioration increments, reasonable further progress demonstration, and visibility, as applicable, are protected if the plan is approved and implemented. For all requests to redesignate an area to attainment for a national primary ambient air quality standard, under section 107 of the Act, a revision must be submitted to provide for the maintenance of the national primary ambient air quality standards for at least 10 years as required by section 175A of the Act.**

The SIP revision contains demonstrations that all Clean Air Act reasonably available control technology (RACT) requirements for the Gila County, AZ portion of the 2015 Phoenix-Mesa ozone nonattainment area have been met through submission of negative declarations.

**(e) Modeling information required to support the proposed revision, including input data, output data, models used, justification of model selections, ambient monitoring data used, meteorological data used, justification for use of offsite data (where used), modes of models used, assumptions, and other information relevant to the determination of adequacy of the modeling analysis.**

No modeling was performed for this SIP revision.

**(f) Evidence, where necessary, that emission limitations are based on continuous emission reduction technology.**

No emission limitations are adopted as part of this SIP revision.

**(g) Evidence that the plan contains emission limitations, work practice standards and recordkeeping/reporting requirements, where necessary, to ensure emission levels.**

No emission limitations are adopted as part of this SIP revision.

**(h) Compliance/enforcement strategies, including how compliance will be determined in practice.**

No compliance/enforcement strategies are contained within this SIP revision.

**(i) Special economic and technological justifications required by any applicable EPA policies, or an explanation of why such justifications are not necessary.**

Not applicable.



## 1 INTRODUCTION

### 1.1 Statement of Introduction and Purpose

On October 7, 2022, the U.S. Environmental Protection Agency (EPA) took final action to reclassify the Phoenix-Mesa, Arizona ozone nonattainment area from marginal to moderate for the 2015 ozone National Ambient Air Quality Standards (NAAQS).<sup>1</sup> This federal action was triggered by the area's failure to attain the 2015 ozone NAAQS by the statutory attainment date based on complete, quality-assured and certified ozone air quality monitoring data for the period 2018–2020.<sup>2</sup> Under Clean Air Act (CAA) section 110(a), states are required to submit regulations that control volatile organic compounds (VOCs) and oxides of nitrogen (NO<sub>x</sub>) emissions. In addition, CAA sections 182(b)(2) and 182(f) require each state in which a moderate ozone nonattainment area is located to submit a revision to the state implementation plan to require the implementation of reasonably available control technology (RACT), as defined under CAA section 172(c)(1).

RACT requirements are applicable to all sources covered by an EPA Control Technique Guideline (CTG) document and for all major non-CTG sources of VOCs or NO<sub>x</sub> located within the ozone nonattainment area. For moderate ozone nonattainment areas, the major source threshold for VOCs and NO<sub>x</sub> is 100 tons per year (tpy). For the Phoenix- Mesa ozone nonattainment area, three separate agencies have jurisdiction to evaluate and implement RACT.<sup>3</sup> Those agencies are the Arizona Department of Environmental Quality (ADEQ) for the Gila County portion of the nonattainment area, Maricopa County Air Quality Department (MCAQD) for the Maricopa County portion of the nonattainment area, and Pinal County Air Quality Control District (PCAQCD) for the Pinal County portion of the nonattainment area. This state implementation plan revision only addresses RACT requirements for the Gila County, Arizona portion of the nonattainment area.

For the Gila County portion of the Phoenix-Mesa 2015 ozone NAAQS nonattainment area, ADEQ reviewed all CTG source categories to determine if there are sources in the area in each source category and evaluated RACT for non-CTG major sources of VOCs and NO<sub>x</sub>. ADEQ did not identify any CTG-covered sources or non-CTG major sources of VOCs or NO<sub>x</sub> emissions within the Gila County portion of the nonattainment area. Based on this review, ADEQ hereby adopts and submits negative declarations for all CTG source categories and for non-CTG major sources of VOCs or NO<sub>x</sub> emissions located in the Gila County, Arizona portion of the Phoenix-Mesa 2015 ozone NAAQS nonattainment area. A full list of CTG source categories and non-CTG major source negative declarations included in this SIP are listed in Section 2.2 and Table 2-1.

### 1.2 Regulatory Background

On October 1, 2015, EPA revised the primary 8-hour ozone NAAQS to a level of 0.070 parts per million (ppm) or 70 parts per billion (ppb).<sup>4</sup> Subsequently, on June 4, 2018 the EPA finalized area designations for the 2015 ozone NAAQS and designated portions of Maricopa, Pinal, and Gila counties as

<sup>1</sup> 87 Fed. Reg. 60897 (October 7, 2022). Effective Nov. 7, 2022.

<sup>2</sup> *Id.* at 60898.

<sup>3</sup> County authority to adopt RACT rules at Arizona Revised Statutes (A.R.S.) Title 49, Chapter 3, Article 3 and A.R.S. §§ 49-112 and 49-402.

<sup>4</sup> 80 Fed. Reg. 65292 (Oct 26, 2015).

a marginal nonattainment area (i.e., Phoenix-Mesa, AZ nonattainment area) effective August 3, 2018.<sup>5</sup> On October 7, 2022, EPA took final action to reclassify the Phoenix-Mesa, Arizona ozone nonattainment area from marginal to moderate for the 2015 ozone NAAQS.<sup>6</sup>

### 1.3 Nonattainment Area Description

The Phoenix-Mesa, Arizona nonattainment area for the 2015 ozone NAAQS includes portions of Maricopa, Pinal, and Gila counties. A map of the nonattainment area is included in Figure 1 below. As can be seen in the map, the Gila County portion of the nonattainment area represents only a small portion of the overall nonattainment area with an area of approximately 26 sq. miles or 0.5% of the total nonattainment area (5,291 sq. miles). The Gila County portion of the nonattainment area is entirely comprised of National Forest and National Park land. Land ownership for the Gila County portion of the nonattainment area is included in Figure 2 below. The Tonto National Monument is located within this portion of the nonattainment area, as well as the Roosevelt Lake Marina, which is part of the Tonto National Forest. These recreational sites include visitor centers, a ranger station, campgrounds, and a mobile home park, as well as a general store and restaurant located at the marina. The Gila County portion of the nonattainment area was originally recommended by the Arizona Governor in his September 27, 2016 area designation submission pursuant to CAA section 107(d) due to the violations of the 2015 primary 8-hour ozone NAAQS at the Tonto National Monument air quality monitoring site.<sup>7</sup> However, the Gila County portion of the nonattainment area was only included based on the violating monitor and not based on emission generating sources or activities located within the area that were found to be contributing to violations of the 2015 primary 8-hour ozone standard.

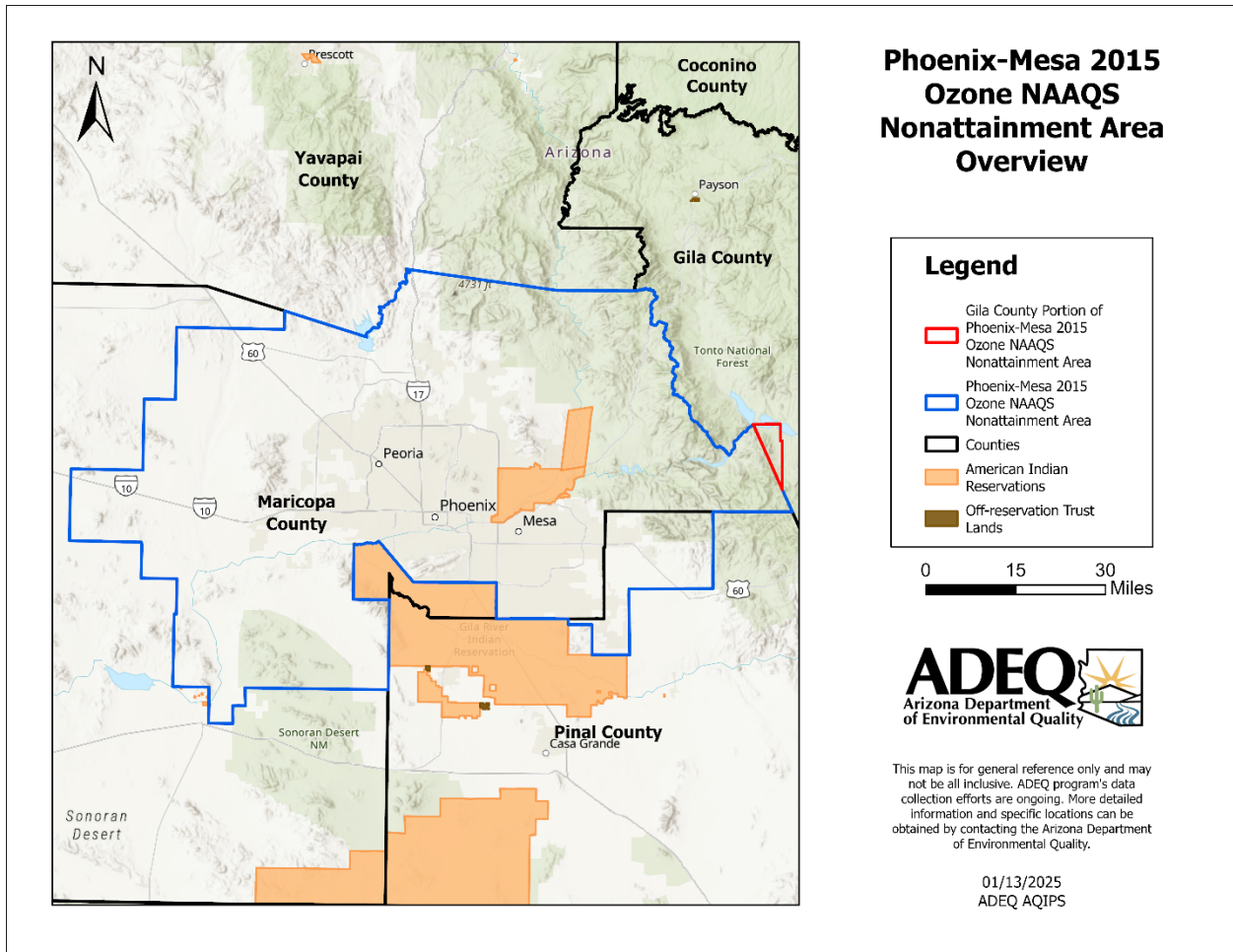
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<sup>5</sup> See 40 Code of Federal Regulations (C.F.R.) § 81.303.

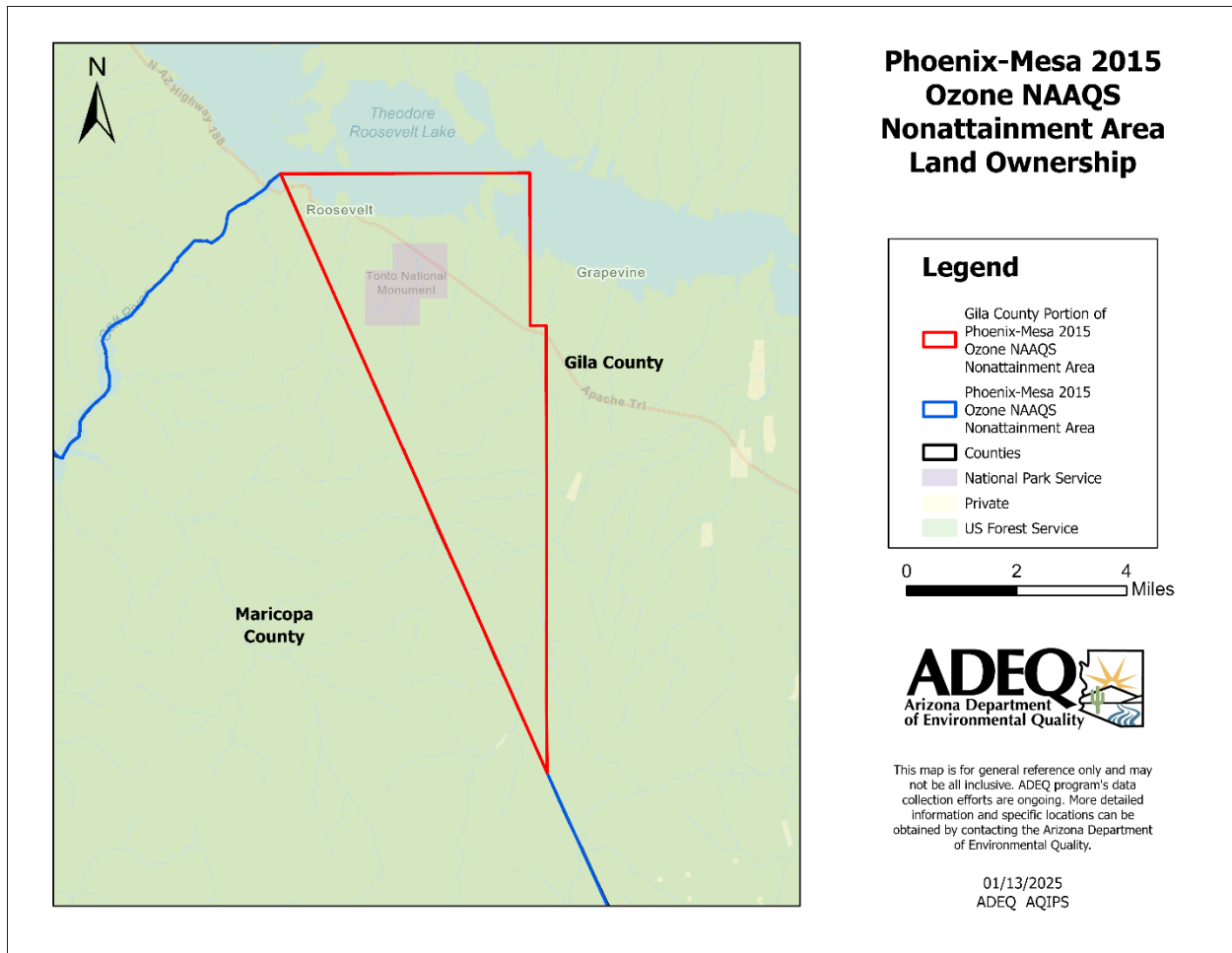
<sup>6</sup> *supra* note 1.

<sup>7</sup> AQS Site ID: 04-007-0010

Figure 1. Phoenix-Mesa 2015 Ozone NAAQS Nonattainment Area Overview



**Figure 2. Land Ownership for Gila County Portion of the Phoenix-Mesa 2015 Ozone NAAQS Nonattainment Area**



## 1.4 General SIP Approach

### 1.4.1 Clean Air Act RACT Requirements for Moderate Ozone Nonattainment Areas

Under CAA section 110(a), states are required to submit regulations that control VOCs and NO<sub>x</sub> emissions. In addition, CAA sections 182(b)(2) and 182(f) require each state in which a moderate ozone nonattainment area is located to submit a revision to the state implementation plan to require the implementation of RACT as defined under CAA section 172(c)(1).

RACT requirements are applicable to all sources covered by an EPA CTG document and for all major non-CTG sources of VOCs or NO<sub>x</sub> located within the ozone nonattainment area. For moderate ozone nonattainment areas, the major source threshold for VOCs and NO<sub>x</sub> is 100 tpy. For the Phoenix- Mesa ozone nonattainment area, three separate entities have jurisdiction to evaluate and implement RACT. Those entities are ADEQ for the Gila County portion of the nonattainment area, MCAQD for the Maricopa County portion of the nonattainment area, and PCAQCD for the Pinal County portion of the

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nonattainment area. This SIP revision only addresses RACT requirements for the Gila County, Arizona portion of the nonattainment area.

### 1.4.2 EPA Guidance

ADEQ reviewed the following guidance and EPA resources in the development of this RACT analysis:

- *Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area State Implementation Plan Requirements*. 83 Fed. Reg. 62998. Retrieved from: <https://www.govinfo.gov/content/pkg/FR-2018-12-06/pdf/2018-25424.pdf>
- Environmental Protection Agency (EPA). *Ozone NAAQS Resource Document: Due Diligence Review Framework for Air Agencies Developing RACT SIP Revisions*. December 19, 2024. Retrieved from: [https://www.epa.gov/system/files/documents/2024-12/o3\\_ract\\_dd\\_resource\\_12-19-24.pdf](https://www.epa.gov/system/files/documents/2024-12/o3_ract_dd_resource_12-19-24.pdf)
- *State Implementation Plans; General Preamble for Proposed Rulemaking on Approval of Plan Revisions for Nonattainment Areas- Supplement (on Control Technique Guidelines)*. 44 Fed. Reg. 53761 (September 17, 1979). Retrieved from: [https://www.epa.gov/sites/default/files/2016-08/documents/44\\_fedreg\\_53761\\_9-17\\_79\\_general\\_preamble\\_supplement\\_on\\_ract\\_and\\_ctgs.pdf](https://www.epa.gov/sites/default/files/2016-08/documents/44_fedreg_53761_9-17_79_general_preamble_supplement_on_ract_and_ctgs.pdf).
- Environmental Protection Agency (EPA). *Criteria for Determining RACT in Region IV*. Memorandum from John Calcagni to G.T. Helms, Jr. June 19, 1985. Retrieved from: [https://www.epa.gov/sites/default/files/2016-08/documents/criteria\\_for\\_determining\\_ract\\_in\\_region\\_iv\\_6-19-85.pdf](https://www.epa.gov/sites/default/files/2016-08/documents/criteria_for_determining_ract_in_region_iv_6-19-85.pdf).
- Environmental Protection Agency (EPA). *RACT Qs & As – Reasonably Available Control Technology (RACT): Questions and Answers*. From William Harnett to Regional Air Division Directors. May 18, 2006. Retrieved from: [https://www.epa.gov/sites/default/files/2016-08/documents/ract\\_and\\_nsps\\_1dec1988.pdf](https://www.epa.gov/sites/default/files/2016-08/documents/ract_and_nsps_1dec1988.pdf).
- Environmental Protection Agency (EPA). *RACT Requirements in Ozone Nonattainment Areas*. Memorandum from Gerald Emison to William Spratlin. December 1, 1988. Retrieved from: [https://www.epa.gov/sites/default/files/2016-08/documents/ract\\_and\\_nsps\\_1dec1988\\_0.pdf](https://www.epa.gov/sites/default/files/2016-08/documents/ract_and_nsps_1dec1988_0.pdf).

## 2 REASONABLY AVAILABLE CONTROL TECHNOLOGY ANALYSIS

### 2.1 Verifying CTG-covered Sources and Non-CTG Major Sources for RACT Applicability

To perform the RACT analysis for the Gila County portion of the Phoenix-Mesa ozone nonattainment area, ADEQ reviewed its permitting database, internal point source emissions inventory, and the EPA National Emissions Inventory (NEI) to verify that no CTG-covered sources and no non-CTG major sources of VOC or NO<sub>x</sub> emissions that are located in the area (e.g., major sources ≥ 100 tpy for moderate ozone nonattainment areas). During its analysis which was conducted in Fall of 2024, no applicable sources were identified. There are currently no air quality permitted sources within the area. Since there are no covered sources in the area, ADEQ is submitting negative declarations for all CTGs and non-CTG major sources of VOC and NO<sub>x</sub> emissions referenced in Section 2.2 and Table 2-1.

### 2.2 Negative Declarations

ADEQ is submitting negative declarations for the CTGs and non-CTG major sources of VOC and NO<sub>x</sub> contained in Table 2-1 below.

**Table 2-1. List of Negative Declarations**

Pollutant	EPA Report	Description	Negative Declaration
VOC	Non-CTG Major Sources of VOC Emissions	No air quality permitted sources located in area	Yes
NO <sub>x</sub>	Non-CTG Major Sources of NO <sub>x</sub> Emissions	No air quality permitted sources located in area	Yes
VOC	EPA-450/R-75-102 1975/11	<a href="#">Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations</a>	Yes
VOC	EPA-450/2-77-008 1977/05	<a href="#">Control of Volatile Organic Emissions from Existing Stationary Sources – Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks</a>	Yes

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VOC	EPA-450/2-77-022 1977/11	<a href="#">Control of Volatile Organic Emissions from Solvent Metal Cleaning</a>	Yes
VOC	EPA-450/2-77-025 1977/10	<a href="#">Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds</a>	Yes
VOC	EPA-450/2-77-026 1977/10	<a href="#">Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals</a>	Yes
VOC	EPA-450/2-77-032 1977/12	<a href="#">Control of Volatile Organic Emissions from Existing Stationary Sources – Volume III: Surface Coating of Metal Furniture</a>	Yes
VOC	EPA-450/2-77-033 1977/12	<a href="#">Control of Volatile Organic Emissions from Existing Stationary Sources – Volume IV: Surface Coating of Insulation of Magnet Wire</a>	Yes
VOC	EPA-450/2-77-034 1977/12	<a href="#">Control of Volatile Organic Emissions from Existing Stationary Sources – Volume V: Surface Coating of Large Appliances</a>	Yes
VOC	EPA-450/2-77-035 1977/12	<a href="#">Control of Volatile Organic Emissions from Bulk Gasoline Plants</a>	Yes

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VOC	EPA-450/2-77-036 1977/12	<a href="#">Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed-Roof Tanks</a>	Yes
VOC	EPA-450/2-77-037 1977/12	<a href="#">Control of Volatile Organic Emissions from Use of Cutback Asphalt</a>	Yes
VOC	EPA-450/2-78-015 1978/06	<a href="#">Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VI: Surface Coating of Miscellaneous Metal Parts and Products</a>	Yes
VOC	EPA-450/2-78-032 1978/06	<a href="#">Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VII: Factory Surface Coating of Flat Wood Paneling</a>	Yes
VOC	EPA-450/2-78-036 1978/06	<a href="#">Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment</a>	Yes
VOC	EPA-450/2-78-029 1978/12	<a href="#">Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products</a>	Yes
VOC	EPA-450/2-78-030 1978/12	<a href="#">Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires</a>	Yes



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VOC	EPA-450/2-78-033 1978/12	<a href="#">Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VIII: Graphic Arts-Rotogravure and Flexography</a>	Yes
VOC	EPA-450/2-78-047 1978/12	<a href="#">Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks</a>	Yes
VOC	EPA-450/2-78-051 1978/12	<a href="#">Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems</a>	Yes
VOC	EPA-450/3-82-009 1982/09	<a href="#">Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners</a>	Yes
VOC	EPA-450/3-83-008 1983/11	<a href="#">Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins</a>	Yes
VOC	EPA-450/3-83-007 1983/12	<a href="#">Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants</a>	Yes

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VOC	EPA-450/3-83-006 1984/03	<a href="#">Control of Volatile Organic Compound Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment</a>	Yes
VOC	EPA-450/3-84-015 1984/12	<a href="#">Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry</a>	Yes
VOC	EPA-450/4-91-031 1993/08	<a href="#">Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry</a>	Yes
VOC	EPA-453/R-96-007 1996/04	<a href="#">Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations</a>	Yes
VOC	EPA-453/R-94-032 1994/04	<a href="#">Alternative Control Technology Document – Surface Coating Operations at Shipbuilding and Ship Repair Facilities</a>	Yes
VOC	61 FR-44050 8/27/96 1996/08	<a href="#">Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating)</a>	Yes

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VOC	59 FR-29216 6/06/94 1994/06	<a href="#">Aerospace MACT</a>	Yes
VOC	EPA-453/R-97-004 1997/12	<a href="#">Aerospace (CTG &amp; MACT)</a>	Yes
VOC	EPA-453/R-06-001 2006/09	<a href="#">Control Techniques Guidelines for Industrial Cleaning Solvents</a>	Yes
VOC	EPA-453/R-06-002 2006/09	<a href="#">Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing</a>	Yes
VOC	EPA-453/R-06-003 2006/09	<a href="#">Control Techniques Guidelines for Flexible Package Printing</a>	Yes
VOC	EPA-453/R-06-004 2006/09	<a href="#">Control Techniques Guidelines for Flat Wood Paneling Coatings</a>	Yes
VOC	EPA 453/R-07-003 2007/09	<a href="#">Control Techniques Guidelines for Paper, Film, and Foil Coatings</a>	Yes
VOC	EPA 453/R-07-004 2007/09	<a href="#">Control Techniques Guidelines for Large Appliance Coatings</a>	Yes
VOC	EPA 453/R-07-005 2007/09	<a href="#">Control Techniques Guidelines for Metal Furniture Coatings</a>	Yes
VOC	EPA 453/R-08-003 2008/09	<a href="#">Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings</a>	Yes

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VOC	EPA 453/R-08-004 2008/09	<a href="#">Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials</a>	Yes
VOC	EPA 453/R-08-005 2008/09	<a href="#">Control Techniques Guidelines for Miscellaneous Industrial Adhesives</a>	Yes
VOC	EPA 453/R-08-006 2008/09	<a href="#">Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings</a>	Yes
VOC	EPA 453/R-08-002 2008/09	<a href="#">Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations</a>	Yes
VOC	EPA-453/B-16-001 2016/10	<a href="#">Control Techniques Guidelines for the Oil and Natural Gas Industry</a>	Yes

### **3 CONCLUSION**

ADEQ performed a RACT analysis for the Gila County portion of the Phoenix-Mesa ozone nonattainment area and found that no covered sources are located in the area. Based on this review, ADEQ hereby adopts and submits negative declarations for all CTG source categories and for non-CTG major sources of VOCs or NOx emissions located in the Gila County, Arizona portion of the Phoenix-Mesa 2015 ozone NAAQS nonattainment area. ADEQ requests that EPA approve this revision to the Arizona SIP as meeting the moderate area RACT requirements under CAA sections 182(b)(2) and 182(f) for the Gila County portion of the Phoenix-Mesa 2015 ozone NAAQS nonattainment area.