RACT Plan
Reasonably Available Control Technology
Title V operating permit
Source-specific SIP

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Reasonably Available Control Technology (RACT)

- States have Federally approved RACT regulations for major stationary sources (e.g., a boiler) and sectors (e.g. cement manufacturing) to address NOx/VOC emission and monitoring requirements
- A facility might have a major source that can't meet the state's RACT regulation, or is not covered by the state RACT regulation
- This facility must request a title V operating permit modification to revise, or add new, NOx/VOC RACT limit for the major source
- This facility must submit a RACT plan to the State to demonstrate why they need a revised, or new, NOx/VOC emission limit

Facility → Do I need a RACT plan?

RACT analysis not needed	**RACT analysis needed**
RACT regulations are being met. The source is equipped with RACT.	The source cannot meet the RACT regulation (e.g., emission limit, averaging time, method). The facility will need to demonstrate why and can request a new limit (i.e., title V and SSSIP)

RACT analysis = RACT plan

- The facility must examine all reasonably available controls that are technologically feasible, and those that are must be economically achievability, or demonstrate that no controls are
- The facility works with the Air Agency planning and permitting programs on RACT emission limit/RACT control
- The revised RACT emission limit/RACT control are contained in the draft title V operating permit
- Some states request early engagement with the EPA to review the draft title V RACT modification

Source-specific SIP (SSSIP)

1. Title V modification of RACT is the reason for the Source-specific State Implementation Plan (SSSIP) revision
2. The State initiates a title V operating permit public notice for the proposed RACT emission limit/RACT control
3. If title V is approved, the RACT limit/control is State enforceable
4. The state submits the SSSIP revision (with RACT Plan, RACT emission limit) to the EPA
5. The EPA has 18 months to propose, public comment, and finalize the SSSIP revision
6. If SSSIP is approved, the RACT limit/control, is Federally enforceable

Can RACT change over time?

Yes, because RACT is technology based, and over time new control technology may become reasonably available and in use.

The EPA developed Control Technology Guidelines (CTG) documents with recommend controls that are considered "presumptive" RACT. However, if a CTG has not been updated for some time, the EPA also considers new information and recently adopted/revised regulations in other areas to evaluate for current RACT.

RACT guidance

- EPA RACT/BACT/LAER Clearinghouse, https://www.epa.gov/catc/ractbactlaer-clearinghouse-rblc-basic-information
- EPA CTG website, https://www.epa.gov/ground-level-ozone-pollution/control-techniques-guidelines-and-alternative-control-techniques
- Ozone Transport Commission, https://otcair.org/, go to Materials tab, Model Rules, Regulatory and Technical Guidelines
- EPA RACT guidance, https://www.epa.gov/ground-level-ozone-pollution/ract-information