

Small Business Compliance Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

April 23, 2014

Honorable E. Christopher Abruzzo
Secretary
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: Proposed Rulemaking for Control of VOC Emissions from Fiberglass Boat Manufacturing Materials (*25 Pa. Code*, Chapter 129)

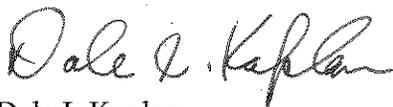
Dear Secretary Abruzzo:

On April 23, 2014, the Small Business Compliance Advisory Committee (Committee) discussed the proposed rulemaking to amend *25 Pa. Code* Chapter 129 (relating to standards for sources). The proposed amendments would add § 129.74 (relating to control of VOC emissions from fiberglass boat manufacturing materials) to adopt reasonably available control technology (RACT) requirements and RACT emission limitations for stationary sources of volatile organic compound (VOC) emissions from fiberglass boat manufacturing materials including open molding resin, gel coat and cleaning materials. The proposed rulemaking would also add terms and definitions in § 129.74 to support the proposed amendments.

The amendments are proposed to meet the requirements of the Clean Air Act to implement reasonably available control measures, including RACT, for ozone nonattainment areas. The proposed VOC emission and content limits and other requirements are consistent with the recommendations of the EPA set forth as RACT in the Control Techniques Guideline document issued for this source category.

The Committee encourages the Department to consider flexibility for small businesses in the development of the proposed rulemaking. The Committee voted 10-0-0 to concur with the Department's recommendation to present the proposed rulemaking amendments to the Environmental Quality Board for consideration for adoption and publication as a proposed rulemaking for public comment.

Sincerely,



Dale I. Kaplan
Chair

cc: Joyce Epps, Director, PA DEP BAQ
Susan Hoyle, PA DEP BAQ
Susan Foster, PA DEP BAQ