

Small Business Compliance Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

January 31, 2011

Michael L. Krancer
Acting Secretary
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Received

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Compliance and Enforcement Division

Re: Proposed Rulemaking for Control of VOC Emissions from Flexible Packaging Printing Presses and Offset Lithographic Printing and Letterpress Printing Presses (FPP-LLP rulemaking)


Dear Acting Secretary Krancer:

On January 26, 2011, the Small Business Compliance Advisory Committee (Committee) discussed proposed amendments to 25 *Pa. Code* Chapters 121 and 129 (relating to general provisions; and standards for sources). The proposed rulemaking would add provisions to Chapter 129 to establish volatile organic compound (VOC) emission limits and work practice standards for flexible packaging printing presses and offset lithographic and letterpress printing presses. These provisions are consistent with the VOC emissions control recommendations of the 2006 control techniques guidelines for these two categories issued by the United States Environmental Protection Agency to meet the Clean Air Act "reasonably available control measures" requirement for ozone nonattainment areas.

The proposed amendments would add §§ 129.67a and 129.67b (relating to control of VOC emissions from flexible packaging printing presses; and control of VOC emissions from offset lithographic printing and letterpress printing presses). The proposed rulemaking would also add definitions to § 121.1 (relating to definitions) and make minor changes to §§ 129.51 and 129.67 (relating to general; and graphic arts systems) to support the flexible packaging printing press and offset lithographic printing and letterpress printing press provisions added to Chapter 129.

It is the Committee's understanding that this proposed rulemaking may impact small businesses in Pennsylvania, so we encourage the Department to conduct outreach to make sure that these companies are aware of this proposed rulemaking and can comment on it before it is finalized. The Committee voted 4-0-1 to concur with the Department's recommendation to present the draft proposed FPP-LLP rulemaking to the Environmental Quality Board for consideration for publication as a proposed rulemaking.

Sincerely,


Dale I. Kaplan
Chair

Acting Secretary Krancer

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January 31, 2011

cc: Susan Foster, PA DEP BAQ
Susan Hoyle, PA DEP BAQ