

# 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 Industrial Cleaning Solvents  
(25 Pa. Code, Chapter 129)

Dear Secretary Abruzzo:

On April 23, 2014, the Small Business Compliance Advisory Committee (Committee) discussed the proposed rulemaking Annex A to amend 25 Pa. Code Chapter 129 (relating to standards for sources). The proposed rulemaking adds provisions to Chapter 129 to reduce the emissions of volatile organic compounds (VOC) from industrial cleaning solvents not regulated elsewhere in Chapter 129 and which are used to remove a contaminant, including an adhesive, ink, paint, dirt, soil, oil, grease or the like, from a cleaning unit operation production-related work area or from a part, product, tool, machinery, equipment, vessel, floor, wall or the like.

The amendments are proposed to meet the Clean Air Act "reasonably available control technology" requirements for ozone nonattainment areas. The proposed VOC emission limits and work practice standards are consistent with the recommendations of the United States Environmental Protection Agency included in the Control Techniques Guideline document 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