

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 Miscellaneous Metal Parts Surface Coating Processes, Miscellaneous Plastic Parts Surface Coating Processes and Pleasure Craft Surface Coatings (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 further reduce the emissions of volatile organic compounds (VOC) from miscellaneous metal parts surface coating processes and adds provisions to reduce the VOC emissions from miscellaneous plastic parts surface coating processes and from pleasure craft surface coatings.

The amendments are proposed to meet the Clean Air Act “reasonably available control technology” requirements for ozone nonattainment areas. The proposed VOC content limits and VOC emission rates 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