

February 16, 2011

**Allegheny County**  
Cynthia Carrow  
John J. Walliser, Esquire

**Bucks County**  
Richard J. Manfredi

**Carbon County**  
James J. Clauser

**Crawford County**  
Burt A. Waite

**Cumberland County**  
Eric R. Conrad, P.G.  
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**Delaware County**  
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**Erie County**  
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**Jefferson County**  
David L. Strong

**Lackawanna County**  
Joyce A. Hatala

**Lancaster County**  
Jolene E. Chinchilli

**Lehigh County**  
Janet B. Keim

**Montgomery County**  
Curtis N. Kratz

**Tioga County**  
Thaddeus K. Stevens

**Union County**  
Peter R. Wilshusen, Ph.D.

The Honorable Michael L. Krancer  
Acting Secretary  
Department of Environmental Protection  
Rachel Carson Office Building, 16th Floor  
Harrisburg, PA 17101-2301

Dear Secretary Krancer:

On January 24, 2011, the Citizens Advisory Council's (CAC) Air Committee convened a conference call to discuss with Bureau of Air Quality (BAQ) staff a Draft Proposed Rulemaking addressing flexible package, lithographic and letterpress printing. This proposed rulemaking is based on a control technique guideline issued by the U.S. Environmental Protection Agency to provide states with recommendations on how to control volatile organic compounds from a specific type of product or source category in ozone nonattainment areas and the Ozone Transport Region.

BAQ staff reviewed a number of expected changes resulting from discussion with the Air Quality Technical Advisory Committee; most of these edits would simplify and/or clarify sections of the proposed rulemaking. Additional discussion areas with the CAC Air Committee included:

- The need to work with the graphics arts trade association to try to better clarify the number of affected facilities. The trade association membership likely includes many who will not be subject to these regulations.
- The need to conduct outreach through the trade association and other small business groups to potentially affected facilities regarding compliance and recordkeeping requirements.
- The need to clarify the estimated reduction in emissions and cost of implementation of the proposed regulation.
- The status of similar rulemakings in other states in the Ozone Transport Region.

On the recommendation of the Air Committee, the CAC concurs with presenting the proposed rulemaking to the Environmental Quality Board in order to seek broader public comment.

We thank BAQ for the opportunity to comment on this package and for providing regular updates on air issues, policies and regulations. If there are any questions, please contact Sue Wilson, Council's Executive Director, at 787-4527.

Sincerely,



Joyce Hatala  
Chair  
Citizens Advisory Council

Sincerely,



John Walliser  
Chair  
Air Committee