



Bureau of Air Quality

Proposed Rulemaking: 25 *Pa. Code* **Chapter 129** Control of VOC Emissions from Fiberglass Boat Manufacturing Materials

Environmental Quality Board Meeting May 21, 2014

Purpose of Proposed Rulemaking

- Establishes Reasonably Available Control Technology (RACT) for fiberglass boat manufacturing materials
- VOC emission reductions required to attain and maintain the 1997 and 2008 8-hour NAAQS for ozone
- RACT for these sources is required statewide because of the Ozone Transport Region



Basis of the Proposed Rulemaking

- EPA's 2008 Control Techniques Guideline for Fiberglass Boat Manufacturing Materials
- VOC content limits and work practices in the CTG are based on federal HAP content limits and work practices
- EPA determined the emissions from this source category are mostly styrene monomer, which is both a HAP and a VOC



Affected Parties

- Owners or operators of fiberglass boat manufacturing facilities
- There is one known affected facility which is likely already in compliance with the proposed requirements
- There may be other facilities



Exceptions

Exemptions provided in the proposed rulemaking:

- Resin application process in a closed molding operation
- Surface coating applied to a fiberglass boat
- Surface coating for a fiberglass and metal recreational boat
- Industrial adhesive used in the assembly of a fiberglass boat



Compliance Options for Resin and Gel Coat Materials

- Three compliance options:
 - Low-VOC content open molding resin and gel coat materials
 - -Averaging of VOC emissions
 - Operation of a VOC emissions capture system and add-on air pollution control device
- One or more options may be used



Additional Requirements

Establishes RACT requirements for the following:

- Work practices for resin and gel coat materials
- VOC content limits and work practices for cleaning materials
- Compliance and monitoring
- Sampling and testing and
- Recordkeeping and reporting



Minimal economic impact on affected owners and operators is anticipated.

- Compliant materials are readily available
- Non-atomizing application technology

Compliant materials and non-atomizing application technology less than installation and operation of add-on air pollution controls



Environmental Impact

- Reduced emissions of VOCs
- Reduced disposal and spillage of high-VOC content resin, gel coat and cleaning materials
- Reduce loading on water treatment plants and groundwater impacts



Advisory Committee Review

- April 23, 2014: Small Business Compliance Advisory Committee
- March 18, 2014: Citizens Advisory Council
- Dec. 12, 2013: Air Quality Technical Advisory Committee

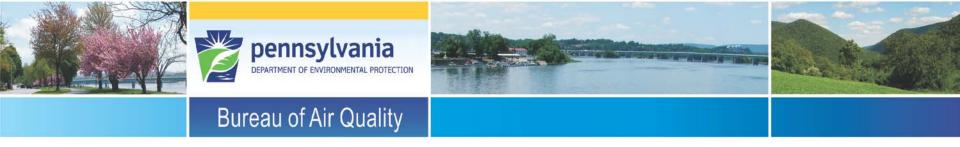


Recommended Public Participation Process

 60-day public comment period and three public hearings

 Final rulemaking will be submitted to the EPA for approval as a revision to the State Implementation Plan





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