Air Quality Technical Advisory Committee

to the Pennsylvania Department of Environmental Protection PO Box 8468 Harrisburg, PA 17105-8468

April 3, 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 Automobile and Light-duty Truck Assembly Coating Operations (Chapter 129)

Dear Secretary Abruzzo:

On April 3, 2014, the Air Quality Technical Advisory Committee (Committee) discussed the proposed rulemaking Annex A to amend 25 *Pa. Code* Chapter 129 (relating to standards for sources). The proposed rulemaking Annex A adds provisions to Chapter 129 to implement the recommendations of the United States Environmental Protection Agency (EPA) Control Techniques Guidelines for control of emissions of volatile organic compounds (VOC) from automobile and light-duty truck assembly coatings.

The amendments are proposed to meet the requirements of the Clean Air Act to implement "reasonably available control technology" (RACT) measures for ozone nonattainment areas. The proposed VOC emission and content limits for coatings and the work practice requirements for coating-related activities and cleaning materials are consistent with the recommendations of the EPA set forth as RACT in the Control Techniques Guideline document issued for this source category.

The Committee voted 15-0-0 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.

K O'nill

Sincerely,

Patrick K. O'Neill Esq.

Chair

cc: Joyce Epps, Director, PA DEP BAQ Susan Hoyle, PA DEP BAQ Andrew Jenkins, PA DEP BRC