

# 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 Automobile and Light-duty Truck Assembly Coating Operations (*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 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 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