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:


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 L. Kaplan
Chair
cc: Joyce Epps, Director, PA DEP BAQ
    Susan Hoyle, PA DEP BAQ
    Susan Foster, PA DEP BAQ