

# Small Business Compliance Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

January 28, 2015

Honorable John Quigley  
Acting Secretary  
Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063

Re: Final Rulemaking for Control of VOC Emissions from Fiberglass Boat Manufacturing Materials (*25 Pa. Code*, Chapter 129)

Dear Acting Secretary Quigley:

On January 28, 2015, the Small Business Compliance Advisory Committee (Committee) discussed the final rulemaking to amend *25 Pa. Code* Chapter 129 (relating to standards for sources) by adding § 129.74 (relating to control of VOC emissions from fiberglass boat manufacturing materials) to adopt reasonably available control technology (RACT) requirements and RACT emission limitations for stationary sources of volatile organic compound (VOC) emissions from fiberglass boat manufacturing materials including open molding resin, gel coat and cleaning materials. The final rulemaking also adds terms and definitions in § 129.74 to support the final amendments. The amendments are designed to meet the requirements of the Clean Air Act to implement reasonably available control measures, including RACT, for ozone nonattainment areas. The final-form VOC emission and content limits and other requirements are consistent with the recommendations of the EPA set forth as RACT in the Control Techniques Guideline document issued for this source category.

It is the Committee's understanding that the owners and operators of the one known facility affected by the final rulemaking are already in compliance with and do not have a concern with the final-form requirements. The Committee voted 8-0-0 to concur with the Department's recommendation to present the final rulemaking amendments to the Environmental Quality Board for consideration for adoption as a final-form regulation.

Sincerely,



Dale I. Kaplan  
Chair

cc: Joyce Epps, Director, PA DEP BAQ  
Susan Hoyle, PA DEP BAQ  
Susan Foster, PA DEP BAQ