January 31, 2011

Michael L. Krancer  
Acting 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 Flexible Packaging Printing  
Presses and Offset Lithographic Printing and Letterpress Printing Presses (FPP-LLP rulemaking)

Dear Acting Secretary Krancer:

On January 26, 2011, the Small Business Compliance Advisory Committee (Committee) discussed proposed amendments to 25 Pa. Code Chapters 121 and 129 (relating to general provisions; and standards for sources). The proposed rulemaking would add provisions to Chapter 129 to establish volatile organic compound (VOC) emission limits and work practice standards for flexible packaging printing presses and offset lithographic and letterpress printing presses. These provisions are consistent with the VOC emissions control recommendations of the 2006 control techniques guidelines for these two categories issued by the United States Environmental Protection Agency to meet the Clean Air Act “reasonably available control measures” requirement for ozone nonattainment areas.

The proposed amendments would add §§ 129.67a and 129.67b (relating to control of VOC emissions from flexible packaging printing presses; and control of VOC emissions from offset lithographic printing and letterpress printing presses). The proposed rulemaking would also add definitions to § 121.1 (relating to definitions) and make minor changes to §§ 129.51 and 129.67 (relating to general; and graphic arts systems) to support the flexible packaging printing press and offset lithographic printing and letterpress printing press provisions added to Chapter 129.

It is the Committee’s understanding that this proposed rulemaking may impact small businesses in Pennsylvania, so we encourage the Department to conduct outreach to make sure that these companies are aware of this proposed rulemaking and can comment on it before it is finalized. The Committee voted 4-0-1 to concur with the Department’s recommendation to present the draft proposed FPP-LLP rulemaking to the Environmental Quality Board for consideration for publication as a proposed rulemaking.

Sincerely,

Dale I. Kaplan  
Chair
Acting Secretary Krancer

cc: Susan Foster, PA DEP BAQ
    Susan Hoyle, PA DEP BAQ

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