

CONTROL OF VOC EMISSIONS FROM  
PAPER, FILM AND FOIL SURFACE COATING  
PROCESSES

*25 Pa. Code* Chapters 121 and 129

*39 Pa.B.* 6460 (November 7, 2009)

Environmental Quality Board Regulation #7-448  
(Independent Regulatory Review Commission #2807)

Comment/Response Document

## Paper, Film and Foil Surface Coating Processes

On November 7, 2009, the Environmental Quality Board (Board, EQB) published a *Pennsylvania Bulletin* notice of public hearings and written comment period on the proposed amendments to Chapters 121 and 129 (relating to general provisions; and standards for sources) for paper, film and foil surface coating processes (39 *Pa.B.* 6460). The proposed rulemaking would amend Chapter 129 to limit emissions of volatile organic compounds (VOCs) from the use and application of coatings and cleaning materials in paper, film and foil surface coating processes. The proposal would add § 129.52b (relating to control of VOC emissions from paper, film and foil surface coating processes), and amend §§ 129.51 and 129.52 (relating to general; and surface coating processes). The proposal would also amend § 121.1 (relating to definitions).

The comment period opened on November 7, 2009, and closed on January 13, 2010. Three public hearings were held on the proposed rulemaking as follows:

December 9, 2009 1:00 PM	Department of Environmental Protection Southwest Region Office Waterfront A & B Conference Room 400 Waterfront Drive Pittsburgh, PA 15222-4745
December 11, 2009 1:00 PM	Department of Environmental Protection Rachel Carson State Office Building Conference Room 105 400 Market Street Harrisburg, PA 17105
December 14, 2009 1:00 PM	Department of Environmental Protection Southeast Regional Office Delaware Conference Room 2 East Main Street Norristown, PA 19401

This document summarizes the written comments received from the Independent Regulatory Review Commission (IRRC). No written comments were received during the public comment period and no testimony was received during the public hearings. The Board invited each commentator to prepare a one-page summary of the commentator's comments. No one-page summaries were submitted to the Board for this rulemaking. Each comment is listed with the identifying commentator number for each commentator that made the comment. A list of the commentators, including name and affiliation (if any), can be found at the beginning of this document. The final-form rulemaking, if adopted as a final regulation, will be submitted to the U.S. Environmental Protection Agency (EPA) as a revision to the State Implementation Plan (SIP).

**Table of Commentators for the Environmental Quality Board  
Paper, Film or Foil Surface Coating Processes Rulemaking #7-448  
(IRRC #2807)**

ID	Name/Address	Submitted one page Summary for distribution to EQB	Provided Testimony	Requested Copy of Final Rulemaking following EQB Action
1	Independent Regulatory Review Commission (IRRC) 333 Market Street, 14 <sup>th</sup> Floor Harrisburg, PA 17101			

Section 129.52b. - Clarity.

1. **Comment:** Proposed subsection 129.52b(d) (relating to compliance monitoring procedures), which requires the owners and operators of the regulated surface coating processes to maintain certain records, is unclear as to the format in which these records must be maintained. This should be clarified in the final-form regulation. (1)

**Response:** The Department respectfully disagrees. Requiring regulated facilities to maintain records is a standard requirement. This requirement is found in many Board-approved regulations, including § 129.52(g) (relating to surface coating processes), for instance. Neither the Department nor the regulated sources have had difficulty understanding or complying with this requirement. No changes have been made to the final-form rulemaking concerning format in response to this comment.

2. **Comment:** Proposed subsection 129.52b(e) (relating to recordkeeping and reporting requirements), which requires that the records required under subsection 129.52b(d) be submitted to the Department “upon request,” is unclear as to whether this request will be made orally or in writing. This should be clarified in the final-form regulation. (1)

**Response:** The Department agrees and has revised the final-form rulemaking to specify that the records shall be submitted to the Department upon receipt of a written request.