

CONTROL OF VOC EMISSIONS FROM  
FLAT WOOD PANELING  
SURFACE COATING PROCESSES  
*25 Pa. Code* Chapters 121 and 129  
*39 Pa.B.* 6061 (October 17, 2009)  
Environmental Quality Board Regulation #7-447  
(Independent Regulatory Review Commission #2801)

Comment and Response Document

## Flat Wood Paneling Surface Coating Processes

On October 17, 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 flat wood paneling surface coating processes (39 Pa.B. 6061). 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 flat wood paneling surface coating processes. The proposal would add § 129.52c (relating to control of VOC emissions from flat wood paneling surface coating processes) and would amend §§ 121.1 and 129.51 (relating to definitions; and general).

The comment period opened on October 17, 2009, and closed on December 21, 2009. Three public hearings were held on the proposed rulemaking as follows:

November 17, 2009 2:00 PM	Department of Environmental Protection Southcentral Regional Office Susquehanna Room A 909 Elmerton Avenue Harrisburg, PA 17110
November 19, 2009 2:00 PM	Department of Environmental Protection Southeast Regional Office Delaware Conference Room 2 East Main Street Norristown, PA 19401
November 20, 2009 2:00 PM	Department of Environmental Protection Southwest Region Office Waterfront A & B Conference Room 400 Waterfront Drive Pittsburgh, PA 15222-4745

This document summarizes the written comments received during the public comment period as well as those received from the Independent Regulatory Review Commission (IRRC). There was no testimony received during the public hearings. The Board invited each commentator to prepare a one-page summary of the commentator's comments. One one-page summary was 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 final-form 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**  
**Flat Wood Paneling Surface Coating Processes Rulemaking #7-447**  
**(IRRC #2801)**

<b>ID</b>	<b>Name/Address</b>	<b>Submitted one page Summary for distribution to EQB</b>	<b>Provided Testimony</b>	<b>Requested Copy of Final Rulemaking following EQB Action</b>
1	Michael L. Steele Environmental Engineer CraftMaster Manufacturing, Inc. Towanda, PA 18848	√		
2	Independent Regulatory Review Commission (IRRC) 333 Market Street, 14 <sup>th</sup> Floor Harrisburg, PA 17101			

Acronyms used in this Comment/Response Document

- BAT – Best Available Technology
- CTG – Control Techniques Guideline
- HAP – Hazardous Air Pollutant
- MACT – Maximum Achievable Control Technology
- NESHAP – National Emission Standard for Hazardous Air Pollutant
- NSR – New Source Review
- OTR – Ozone Transport Region
- RACT – Reasonably Available Control Technology
- SCO – Surface Coating Operation
- SIP – State Implementation Plan
- WBP – Wood Building Product

**Applicability**

**1. Comment:** The Department needs to clarify what Surface Coating Operations (SCOs) would be subject to the proposed Reasonably Available Control Technology (RACT) rulemaking. Specifically, what Wood Building Product (WBP) subcategories from the 2003 WBP National Emission Standard for Hazardous Air Pollutants (NESHAP) § 63.4681(a)(1)-(5) would be subject to the proposed regulation? (1)

**Response:** The Department’s final-form rulemaking is based on the 2006 EPA Control Techniques Guidelines (CTG) for Flat Wood Paneling Coatings, not the WBP NESHAP. The CTG states, “This CTG applies to facilities that apply flat wood paneling coatings that emit at least 6.8 kg/day (15 lb/day) of VOC before consideration of controls. Flat wood paneling coatings means wood paneling products that are any interior, exterior or tileboard (class I

hardboard) panel to which a protective, decorative, or functional material or layer has been applied.”

A facility’s surface coating processes would be subject to the final-form rulemaking if the operation is for one of the product types that is defined in § 121.1 and has a limit set in § 129.52c, Table I (relating to emission limits of VOCs for flat wood paneling surface coatings).

The Department asks that CraftMaster evaluate its products in light of the definitions and applicability requirements included in the final-form rulemaking.

**2. Comment:** Based on Table I and the definitions of § 121.1, the proposed RACT would seem to apply to subcategories 3 and 4 of the 2003 WBP NESHAP and to the Siding and Trimboard products of subcategory 5 of the 2003 WBP NESHAP. The activities under subcategories 1 and 2 and the “primed doorskin” product under subcategory 5 would not be subject to the proposed RACT. Please confirm that this is the Department’s intent. (1)

**Response:** The Department agrees that products in subcategories 3 and 4 from the 2003 WBP NESHAP, as listed in the comment, would be subject to the final-form flat wood paneling rulemaking. All products of subcategory 5 would also be subject, including primed doorskin, provided that the panels fall into one of the defined categories with one of the defined finishes or materials.

Products in category 1 would most likely not be subject; however, trim, molding, baseboards, window frames and door framing made from solid wood (all the other substrates are not solid wood) could fall into the printed interior panel category if the surface is flat when coated. The Department agrees that products in category 2, flooring, would not be subject to the final-form rulemaking.

The final-form rulemaking is based on the 2006 EPA CTG for Flat Wood Paneling Coatings; the WBP NESHAP does not guide this rulemaking. Please also see the response to Comment #1 concerning the applicability of the final-form rulemaking.

**3. Comment:** SCOs that are already subject to one or more of the following programs should not be subject to RACT:

1. Maximum Achievable Control Technology (MACT) under the 2003 WBP SCO NESHAP.
2. Pennsylvania Best Available Technology (BAT) determination in the last ten years.
3. Emissions offset provisions of Pennsylvania New Source Review (NSR). (1)

**Response:** The Department disagrees.

1. State regulations to control VOC emissions from flat wood paneling surface coating operations with RACT are required under the Clean Air Act and its implementing regulations. For moderate ozone nonattainment areas (all of this Commonwealth due to its inclusion in the Ozone Transport Region (OTR)), states must revise their SIPs to include RACT for sources of VOC emissions covered by a CTG document. MACT regulations are for controlling hazardous air pollutants (HAP) and VOCs that are HAPs, not for controlling all VOCs as precursors of

ground-level ozone. Nevertheless, some HAPs are VOCs, so actions taken at an SCO to satisfy MACT requirements may coincide with the requirements for RACT in this final-form rulemaking.

2. SCOs that have been subject to BAT may also meet the requirements of the final-form rulemaking because the BAT determined at the time of the review may be as stringent or more stringent than the requirements of this final-form rulemaking. However, if the BAT is less stringent than the requirements contained in this final-form rulemaking, the SCO must comply with the more stringent requirements.

3. The EPA does accept Pennsylvania's BAT determinations and recent NSR applicability determinations as fulfillment of RACT for facilities that are **not** covered by a CTG, for which controls are installed after December 9, 1997 (62 FR 64722), the date that the EPA approved the Department's NSR program, because this date draws the line between an existing source subject to RACT and a new source subject to NSR.

### **VOC Content Limit**

4. **Comment:** According to § 129.52c(c)(1) each "as applied" coating must meet the limit in Table I of 2.9 Lbs VOCs per gallon coating solids. The limit should be applicable to an entire SCO or category of Flat Wood Paneling Product processed on a SCO, on a weighted-average basis of all coatings applied, rather than to each individual coating. The weighted average approach was discussed with Mr. Lynn Dail of the EPA Office of Air Quality Planning and Standards (OAQPS), who told CraftMaster that this approach would meet the intent of the rule. (1)

**Response:** The Department agrees that the weighted-average approach is acceptable. The Department added subparagraph (ii) to § 129.52c(c)(1) to allow for calculating a daily weighted-average VOC content for all materials used within a single surface coating process line. The EPA requested that the equation to calculate the weighted average be included in the rulemaking and the Department has added the equation. Also, demonstrating equivalency with the requirements in § 129.52c is allowed under § 129.51(a) in the final-form rulemaking. The weighted-average approach could be specified in a plan approval application and memorialized in a permit under the equivalency provision if a company desires to proceed in that fashion and obtains permit approval.

5. **Comment:** The owner or operator of a facility should be able to use "as purchased" VOCs data instead of calculating "as applied" data. Calculation of "as applied" should be limited to a situation where one or more components of a blend are not a "complying coating" on its own. (1)

**Response:** The Department agrees that "as purchased" VOC data can be used under specific circumstances instead of "as applied" data, as described in this response. If there is no thinning or mixing of additional regulated VOCs with the as purchased material, but only blending of two or more compliant coatings (each less than 2.9 lbs VOC/gal coating solids), the company could make a statement in its recordkeeping documents to this effect and not provide calculations. For example: "No additional regulated VOCs are added to our coatings and the as applied values are

the same as the as purchased values.” However, if mixing of thinners or other noncompliant VOC containing coatings with the “as purchased” material occurs, the “as applied” coating VOC content must be calculated. The Department reserves its right to sample a coating, even if the company has provided a written statement that the coating is compliant as mixed.

### **Required Overall Efficiency of a Control System**

**6. Comment:** Required overall efficiency of a control system: When multiple coatings are applied on a SCO in multiple steps, what VOC content shall be input to the equation to calculate the required overall control efficiency (O)? (1)

**Response:** The as applied VOC content of each coating is to be used to calculate overall control efficiency. Typically, the owner or operator of a facility might calculate the control efficiency that their highest VOC content coating would require and set the control efficiency of the control device to that level.

**7. Comment:** Please specify that capture efficiency and destruction efficiency testing be performed per the 2003 WBP SCO NESHAP, §§ 63.4765 and 63.4766. (1)

**Response:** The Department disagrees with specifying NESHAP testing methods in the final-form rulemaking. There may be overlapping requirements for SCOs subject to the WBP NESHAP and the final-form rulemaking; however, the WBP NESHAP is applicable only to major sources of HAPs and this final-form rulemaking is applicable only to operations that have actual VOC emissions of 15 lbs/day from all flat wood paneling operations listed in Table 1, including cleaning operations. Therefore, the final-form rulemaking requires in § 129.52c(c)(1)(ii) that testing be in accordance with 25 *Pa. Code* Chapter 139 (relating to sampling and testing). Further, it would not be appropriate for the owners and operators of facilities that are not subject to the WBP NESHAP to have to do testing according to that NESHAP.

### **Recordkeeping**

**8. Comment:** Daily recordkeeping is an unnecessary burden with no known benefit, especially for SCOs where "complying coatings" are used exclusively. SCOs currently subject to monthly recordkeeping, that are satisfying the applicable Title V Operating Permit and 2003 WBP SCO NESHAP requirements, should be allowed to continue on that basis. The 2006 EPA CTG makes no mention of daily recordkeeping. (1)

**Response:** The Department disagrees with the commentator’s comments regarding the appropriate frequency of recordkeeping. While it is true the CTG does not discuss daily recordkeeping, the Department is requiring daily recordkeeping because the applicability for the final-form rulemaking is based on emissions of VOC equal to or greater than 15 lbs per day, before control. Therefore, in order to demonstrate inclusion or exemption from the regulation, and to enable the Department to ascertain compliance at any time, daily records must be kept. Furthermore, since daily records will be necessary in order to satisfy the requirements for

monthly records, the recordkeeping burden should be minimal. The Department disagrees that there are any additional costs associated with daily recordkeeping.

**9. Comment:** CraftMaster asserts that the daily recordkeeping required under this subsection is burdensome with no known benefit. In the Preamble to the final-form regulation, the Board should explain the basis and need for requiring daily recordkeeping. (2)

**Response:** The daily recordkeeping requirement will be discussed in the Order of the final-form rulemaking. See also response to Comment #8.

**10. Comment:** Subsection (e) is unclear as to what format the records should be maintained. This should be clarified in the final-form regulation. (2)

**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. The owners and operators of regulated sources have not 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.

**11. Comment:** Will requests under subsection (e) for submission of records by the Department be made orally or in writing? This should be clarified in the final-form regulation. (2)

**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.

**12. Comment:** How does one calculate the VOC content in lbs VOC per gallon of coating solids for a cleaning solvent as required under § 129.52c(d)(2)? (1)

**Response:** The final-form regulation specifies “VOC content.” The VOC content of the as applied cleaning solvent is to be expressed in units of weight VOC/volume of solvent, while the VOC content of as applied coatings is expressed in units of weight VOC/volume of coating solids.

### **Application Methods**

**13. Comment:** The application methods noted in the proposed regulations may not be technically feasible for all SCOs subject to the proposed RACT regulations. Airless sprays are used in many instances. The 2003 WBP SCO NESHAP and the 2006 CTG do not specify requirements for coating application methods. It is requested that the requirements regarding coating application methods be removed. (1)

**Response:** The Department agrees that airless sprays can be used for flat wood paneling surface coating operations. The proposed rulemaking included high volume-low pressure spray; proposed § 129.52c(f)(7) also allowed for other coating application methods to be approved in writing by the Department, if the request is submitted in writing and if the method achieves an

equivalent or better transfer efficiency than those in paragraphs (1)-(6). For clarity, airless, air-assisted airless and electrostatic spray coating methods have been added to § 129.52c(f) in the final-form rulemaking. The Department's final-form rulemaking is based on the 2006 EPA CTG for Flat Wood Paneling Coatings, not the WBP NESHAP. The 2006 CTG lists coating application methods, including "spray techniques," on page 5 under Section IV, subsection B, Sources of VOC Emissions.

**14. Comment:** Based on CraftMaster's comments, the Board should consider adding airless sprays to the list, or explain why airless sprays should not be included. (2)

**Response:** The Department agrees with the commentator. Airless, air-assisted airless and electrostatic coating methods have been added under § 129.52c(f) in the final-form rulemaking. Please also see the response to Comment #13.

### **De minimis quantity**

**15. Comment:** A single coating with annual usage less than 50 gallons should be considered *de minimis* regardless of the amount of coatings used elsewhere in the facility. (1)

**Response:** The Department disagrees. The intent of the 50 gallon per year limit for a single coating, and a total of 200 gallons per year for all noncomplying coatings combined, is to provide flexibility to the owner or operator to allow for testing and special runs of noncomplying coatings. The intent is not to exempt over 200 gallons of special runs with noncompliant coatings, because such an exemption could eliminate the emission reductions achieved by limiting VOC emissions in the first place.

The exemption in the final-form rulemaking is consistent with other Board-approved regulations, specifically, the surface coating requirements in §§ 129.52(h)(1) and 129.101(f)(1) (relating to general provisions and applicability).

**16. Comment:** Please specify if an individual VOC can be considered *de minimis* exempt if it is present in an as purchased coating at less than 1% by weight, or 0.10 % by weight for carcinogens. This is the Federal criteria used in Material Safety Data Sheet (MSDS) preparation and in the 2003 WBP SCO NESHAP. (1)

**Response:** The Department's final-form rulemaking makes no specific exemption for an individual VOC present in a coating at less than 1% by weight or 0.1% by weight for carcinogens. The VOC content of each as applied coating must be evaluated on the basis of weight of total VOC per volume of coating solids. Further, this final-form rulemaking is for VOC RACT purposes only, not for regulating HAP.

### **Potential VOC Reductions**

**17. Comment:** The commentator estimated that the 2008 Flat Wood Paneling SCO emissions in Pennsylvania are about 141.1 tons, considering 41.7 tons from the other ten facilities and 99.4 tons from CraftMaster. This is significantly less than the 440.4 tons noted in the Preamble. The



possible VOC reductions for the highest emitting facility (CraftMaster) range from 5.3 to 9.0 tons per year. This is substantially less than the 15.2 tons per year estimated in the Preamble. (1)

**Response:** The 440.4 tons listed in the Preamble to the proposed rulemaking were estimated actual emissions from all 11 facilities in 2008 (398.7 from CraftMaster and 41.7 from others). These were listed as estimated actual emissions because at the time the proposed rulemaking documents were finalized, not all facility VOC emissions had been reported to the Department and verified for 2008; additionally, a few facilities do not report emissions. The 440.4 tons assumed every SCO at a facility would be subject to the proposed rulemaking. Because CraftMaster had the greatest actual emissions, the Department contacted representatives at the facility prior to proposing this rulemaking and determined that there were only some interior flat wood paneling surface coating processes at the facility that were potentially subject and not in compliance with the limits in the proposed rulemaking, and the 2008 emissions for those operations were 75.9 tons. Therefore, the Department estimated a potential maximum VOC reduction from CraftMaster to be 15.8 tons (75.9 tons x 20% EPA estimated reduction for interior flat wood paneling coating).

The Department appreciates the subsequent work CraftMaster staff have completed to determine the potential emissions from subject lines (99.4 tons) and the amount that can be reduced (5.3 to 9.0 tons). The emission reduction estimates have been revised in the Order accompanying the final-form rulemaking to reflect the estimates provided by CraftMaster in its comments.

### **Compliance Costs**

18. **Comment:** The costs noted in the proposed RACT represent only those costs associated with changing from solvent-based coatings to water-based coatings. (1)

**Response:** The Department agrees. The cost estimates used by the Department were taken from those used in the 2006 CTG for flat wood paneling on pages 10 and 11. The cost estimates are for using lower VOC-content coatings as a means of control because it is believed that would be how most flat wood paneling surface coating facilities would come into compliance with the state requirements.

19. **Comment:** For one SCO it is estimated that the capital costs to install a Regenerative Thermal Oxidizer (RTO) control device would be \$3.46 million, with annual costs of \$1.51 million. The cost per ton of VOCs controlled is \$43,000 -- far greater than any known RACT cost-effectiveness criteria. NOx emissions associated with operating the RTO are estimated at 4.7 tons per year. (1, 2)

**Response:** The Department appreciates the work CraftMaster staff undertook to determine the cost of installation of a control device. The 2006 flat wood paneling CTG does not address costs for RTOs or other add-on control devices, only costs for lower VOC-content coatings. The Department estimates that the annual cost for the owners or operators of CraftMaster to change the company's noncomplying interior flat wood paneling surface coating processes over to processes using compliant coatings would be \$10,070 (5.3 tons VOC emissions reduced x

\$1900/ton) (using the emission reductions provided by CraftMaster in its comment letter and costs provided by the EPA in the CTG).

The final-form rulemaking allows but does not require the installation of an add-on control device to meet the emission limitations. It is a facility owner or operator's choice whether to use compliant coatings or add-on controls. Compliant coatings are available.

The Department recognizes that there is an increase in NOx emissions with the operation of an RTO.

Should CraftMaster average the VOC contents of all materials used within a single surface coating process line under final-form § 129.52c(c)(1)(ii), the facility might not have any noncompliant surface coating process lines and no additional emission reductions would be required at the facility. Please see response to Comment #4.

**20. Comment:** The additional costs associated with daily recordkeeping and the enclosing of all coatings, coating-related wastes and coating related clean-up materials handling systems have not been evaluated and could be significant. (1, 2)

**Response:** The Department disagrees that there are any additional costs with daily recordkeeping. Please see response to Comment #8. See response to Comment #22 for discussion of "enclosing" of all coatings, coating-related wastes and coating related clean-up materials handling systems.

The Department also does not anticipate increased cost due to the implementation of work practice standards for cleaning materials. The Preamble to the proposed rulemaking stated: "The implementation of the work practices for cleaning materials is expected to result in a net cost savings. The recommended work practices should reduce the amount of cleaning materials used by reducing the amount of cleaning materials lost to evaporation, spillage or waste."

The EPA did not estimate any cost associated with work practice standards in the CTG. On page 7 of the CTG, the EPA states: "To provide structure and consistency to their work practices, facilities can develop and implement a work practice plan. The work practice plan is a proven and traditional approach for cleaning that is easily adopted and managed by various industries, including flat wood paneling coatings."

**21. Comment:** The Board should address the fiscal impact concerns raised by CraftMaster in the Preamble and RAF that accompany the final-form rulemaking. (2)

**Response:** The final-form rulemaking Regulatory Analysis Form and Order will address these concerns.

### **Work Practice Requirements**

**22. Comment:** The requirement to fully enclose coatings, coating-related wastes, and coating-related clean-up materials handling systems should not be applicable in all instances.

CraftMaster asserts that it is not technically feasible or cost effective to enclose materials where coatings are water-based "complying coatings," the cleaning material is limited to water and wastes are treated onsite. The Board should explain why it is necessary to fully enclose all coatings and coating-related waste materials. (1, 2)

**Response:** The Department is not requiring a facility to fully enclose all coatings, coating-related wastes and coating-related clean-up materials handling systems. Neither the proposed nor final-form rulemaking requires this. The requirements are to: (1) store VOC-containing materials in closed containers; (2) minimize spills of VOC-containing materials and clean up spills immediately; (3) convey VOC-containing materials from one location to another in closed pipes or containers; (4) ensure that mixing and storage containers used for VOC-containing materials are kept closed at all times, except when depositing or removing these materials; and (5) minimize VOC emissions during cleaning of storage, mixing and conveying equipment. The work practice requirements for coating-related activities and cleaning materials in the final-form rulemaking were taken from the 2006 CTG. See also response to Comment #20 concerning costs of these work practice requirements.

**23. Comment:** Exceptions to the requirement to enclose coatings, coating-related wastes, and coating-related clean-up materials handling systems should be made for water based "complying coatings," when cleaning material is limited to water and the wastes are treated on site. (1)

**Response:** The Department disagrees that there is a requirement to enclose all operations. See also responses to Comments #20 - #22 concerning costs and work practice for "enclosing." The Department also disagrees with the commentator about water-based coating exemptions. Water-based coatings and compliant coatings are not necessarily VOC-free. Therefore, a broad-based exemption is not advisable and no changes have been made to the final-form rulemaking.

**24. Comment:** It would not be technically feasible to enclose coatings, coating-related wastes, and coating-related clean-up materials handling systems operations in all instances, nor would it be cost effective.

Under the 2003 WBP SCO NESHAP, work practice requirements such as these are not applicable to "complying coatings." VOC emissions from coating-related wastes can already be accounted for by the change in as-purchased coating inventory. Then no actual reductions in VOC emissions would be realized by enclosing the handling systems – only a change to the emissions pathway. (1)

**Response:** The Department is not requiring a facility to enclose all operations. See also responses to Comments #20 - #22 concerning costs and work practice for "enclosing."

The final-form rulemaking is based on the 2006 EPA CTG for Flat Wood Paneling Coatings, not the 2003 WBP NESHAP. While it is true that the WBP NESHAP does not include work practice requirements for complying coatings, this final-form rulemaking is for VOC RACT purposes, not for regulating HAP.

### **Cost Effectiveness**

25. **Comment:** The proposed RACT should consider cost-effectiveness in a similar manner as the "case-by-case" RACT of § 129.92(b)(4) (relating to RACT proposal requirements). (1)

**Response:** The EPA evaluated the cost effectiveness of lower VOC-content coatings in the CTG and found these limits to be cost effective. See also response to Comment # 4 concerning the option to comply using an equivalency under 129.51(a) and response to Comment #19 concerning RACT costs.

26. **Comment:** It is expected that the installation of a control device on a SCO already complying with the 2003 WBP SCO NESHAP would have a poor cost-effectiveness.

The same may be said for enclosing of all coatings, coating-related wastes and coatings-related clean-up materials handling systems where “complying coatings” are used. (1)

**Response:** The Department agrees.

See responses to Comments #19 and #25 concerning costs of RACT. See also responses to Comments #20 - #22 concerning “enclosing” work practices and costs.

### **Benefits of associated HAPs reductions**

27. **Comment:** The WBP SCO NESHAP for HAPS already covers SCOs included in this RACT. The “serious health threat” from the remaining HAPs is believed to be overstated. (1)

**Response:** The Department agrees that there may be overlapping requirements for SCOs subject to the WBP NESHAP and the final-form rulemaking. However, the WBP NESHAP is applicable only to major sources of HAPs and this final-form rulemaking is applicable to subject operations that have actual VOC emissions of 15 lbs/day or more from all flat wood paneling surface coating processes listed in Table I, including cleaning operations. Therefore, smaller facilities would be subject to the final-form rulemaking and, by reducing VOCs, may also be reducing a significant amount of HAPs. For a source that is already subject to the NESHAP, the HAP reductions achieved from the final-form rulemaking will be less than if it were not already subject to the NESHAP.

### **Section 121.1 Definitions and Clarity**

28. **Comment:** The second sentences in the definitions of "Decorative interior panel," "Exterior siding" and "Exterior trim" contain non-regulatory language. These sentences would be more appropriate in the Preamble and should be deleted from the definitions. (2)

**Response:** The Department disagrees that the sentences should be deleted from the definitions. The Department believes the sentences provide useful information that will help the regulated community, environmental community and Department field staff be better able to identify the

type of product they are dealing with. No changes were made to the final-form rulemaking as a result of this comment.

**29. Comment:** *MDF- Medium density fiberboard-* This definition contains the phrase "engineered wood panel product." To improve clarity, we recommend the Board define this term in the final-form regulation. (2)

**Response:** The Department agrees that "engineered wood panel product" should be a defined term. The Department has amended § 121.1 in the final-form rulemaking to include this term.

**30. Comment:** *Tileboard* -Under this definition, what is a "premium interior wall paneling product"? We recommend that the Board define this term in the final-form regulation.

Also, Section 1.7(e) of the Pennsylvania Code and Bulletin *Style Manual* states that a "...term being defined may not be included as part of the definition." Therefore, the word "Tileboard" at the beginning of the second sentence should be deleted. (2)

**Response:** The Department agrees that "premium interior wall paneling product" should be a defined term. The Department has amended § 121.1 in the final-form rulemaking to include this term. In deference to the *Style Manual*, the Department has removed the word "tileboard" from the definition of "tileboard."