



Bureau of Air Quality



Final-Form Rulemaking

25 Pa. Code Chapters 121, 129 and 130

Flexible Packaging Printing Presses,
Offset Lithographic Printing Presses and
Letterpress Printing Presses;
Adhesives, Sealants, Primers and Solvents

Environmental Quality Board Meeting
February 18, 2014

Purpose of Final-form Rulemaking

- The final-form rulemaking establishes Reasonably Available Control Technology (RACT) requirements for specific printing press categories.
- The Volatile Organic Compound (VOC) emission reduction measures in the final-form rulemaking are reasonably required to attain and maintain the 1997 and 2008 8-hour National Ambient Air Quality Standards for ozone and to satisfy related Clean Air Act requirements.
- Compliance with RACT is required statewide in Pennsylvania because the entire Commonwealth is included in the Ozone Transport Region established under the Clean Air Act.

Affected Parties & Compliance

- An owner or operator of a flexible packaging printing press, an offset lithographic printing press or a letterpress printing press.
 - Facilities range in size from large major sources to small businesses.
- Compliance options and requirements limit the amount of VOC emissions from an affected facility.
- Recordkeeping, testing, and reporting requirements are established to demonstrate applicability and/or demonstrate compliance.

Environmental Impact

- The maximum VOC emission reductions from the use of add-on air pollution control devices and complying printing materials are estimated at approximately 697 tons per year.
- Work practices for cleaning activities will provide additional VOC reductions.
- Actual VOC emission reductions may be lower because some affected facilities already comply with various elements of the final-form regulation.

Economic Impact

- The economic impact of the final-form rulemaking is expected to be minimal due to the following provisions:
 - Monthly VOC applicability thresholds;
 - Allowing purchase, use, or other production records to estimate VOC emissions;
 - Multiple compliance options to provide maximum flexibility for affected facilities; and
 - January 1, 2015 compliance date.
- The determination of RACT considers costs to the affected owners and operators.

Advisory Committee Review

Advisory committees concurred with the Department's recommendation to present the final-form rulemaking to EQB for consideration:

- The Air Quality Technical Advisory Committee on August 1, 2013.
- The Citizens Advisory Council on September 17, 2013.
- The Small Business Compliance Advisory Committee on July 24, 2013.

Public Participation Process

- The Environmental Quality Board approved the proposed rulemaking on September 20, 2011.
- Notice of the proposed rulemaking was published in Pennsylvania Bulletin on February 11, 2012 (42 Pa.B. 779).
- The Board's 66-day public comment period ended on April 16, 2012.
- Public hearings were held on March 14, 15, and 16, 2012, in Pittsburgh, Norristown and Harrisburg, respectively.
- Public comments were received from four commentators and the Independent Regulatory Review Commission (IRRC).

Extra Public Participation & Effects

- The regulated industry submitted letters after the August 1, 2013, AQTAC presentation and discussion of the draft final-form regulation.
- DEP reviewed and considered concerns and made corrections and clarifications to the draft final-form regulation; the changes were discussed with advisory committees.
- The DEP has developed a final-form rulemaking which satisfies the environmental obligation as well as the regulated industry.
- The DEP will continue to work with the regulated industry and to provide a fact sheet and Frequently Asked Questions (FAQ) document.

Final-Form Rulemaking Recommendation

- The DEP recommends that the Board approve the final-form regulation for flexible packaging printing, offset lithographic printing and letterpress printing presses.
- The DEP will submit the final-form regulation, upon final-form publication, to the EPA for approval as a revision to the State Implementation Plan.



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Air Quality



Vincent J. Brisini
Deputy Secretary for Waste, Air, Radiation
and Remediation

Joyce E. Epps
Director, Bureau of Air Quality

Kristen M. Furlan
Bureau of Regulatory Counsel