

Air Quality Technical Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

August 1, 2013

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

Re: Final-form Rulemaking for Control of VOC Emissions from Flexible Packaging Printing Presses and Offset Lithographic Printing Presses and Letterpress Printing Presses (FPP-LLP rulemaking)

Dear Secretary Abruzzo:

On August 1, 2013, the Air Quality Technical Advisory Committee (AQTAC, Committee) discussed the final-form rulemaking to amend 25 *Pa. Code* Chapters 121 and 129 (relating to general provisions; and standards for sources). The final-form rulemaking adds provisions to Chapter 129 to establish requirements for flexible packaging printing presses and offset lithographic printing presses and letterpress printing presses. These provisions are consistent with the volatile organic compound (VOC) emission 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 final-form amendments 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 presses and letterpress printing presses) to establish VOC content limit, add-on control requirements, and work practice standards for the owners and operators of affected flexible packaging printing presses, offset lithographic printing presses and letterpress printing presses in this Commonwealth to reduce VOC emissions from the use and application of inks, coatings, adhesives, fountain solutions and cleaning materials.

The final-form rulemaking adds definitions to § 121.1 (relating to definitions) and makes 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 press and letterpress printing press provisions added to Chapter 129.

The final-form rulemaking also includes amendments to the adhesives, sealants, primers and solvents regulations in Chapters 129 and 130 to clarify the applicability of the adhesive, sealant, primer and solvent requirements to the adhesives used or applied on or with the printing presses to be regulated under this final-form rulemaking.

The Committee voted 11-1-1 to concur with the Department's recommendation to present the final-form rulemaking amendments, with the changes suggested today by the Committee members and reflected in the minutes, to the Environmental Quality Board for consideration for adoption and publication as final-form rulemaking. AQTAC takes no position on the comments provided on the draft final-form Annex A by the industry representative present in the audience at today's meeting. The industry comments are reflected in the minutes of today's meeting.

Sincerely,

A handwritten signature in cursive script that reads "Patrick K. O'Neill". The signature is written in black ink and is positioned above the typed name and title.

Patrick K. O'Neill Esq.
Chair

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