



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Air Quality

Proposed Rulemaking: 25 Pa. Code Chapter 129

Control of VOC Emissions from Fiberglass Boat Manufacturing Materials

Environmental Quality Board Meeting May 21, 2014

Purpose of Proposed Rulemaking

- Establishes Reasonably Available Control Technology (RACT) for fiberglass boat manufacturing materials
- VOC emission reductions required to attain and maintain the 1997 and 2008 8-hour NAAQS for ozone
- RACT for these sources is required statewide because of the Ozone Transport Region

Basis of the Proposed Rulemaking

- EPA's 2008 Control Techniques Guideline for Fiberglass Boat Manufacturing Materials
- VOC content limits and work practices in the CTG are based on federal HAP content limits and work practices
- EPA determined the emissions from this source category are mostly styrene monomer, which is both a HAP and a VOC

Affected Parties

- Owners or operators of fiberglass boat manufacturing facilities
- There is one known affected facility which is likely already in compliance with the proposed requirements
- There may be other facilities

Exceptions

Exemptions provided in the proposed rulemaking:

- Resin application process in a closed molding operation
- Surface coating applied to a fiberglass boat
- Surface coating for a fiberglass and metal recreational boat
- Industrial adhesive used in the assembly of a fiberglass boat

Compliance Options for Resin and Gel Coat Materials

- Three compliance options:
 - Low-VOC content open molding resin and gel coat materials
 - Averaging of VOC emissions
 - Operation of a VOC emissions capture system and add-on air pollution control device
- One or more options may be used

Additional Requirements

Establishes RACT requirements for the following:

- Work practices for resin and gel coat materials
- VOC content limits and work practices for cleaning materials
- Compliance and monitoring
- Sampling and testing and
- Recordkeeping and reporting

Economic Impact

Minimal economic impact on affected owners and operators is anticipated.

- Compliant materials are readily available
- Non-atomizing application technology

Compliant materials and non-atomizing application technology less than installation and operation of add-on air pollution controls

Environmental Impact

- Reduced emissions of VOCs
- Reduced disposal and spillage of high-VOC content resin, gel coat and cleaning materials
- Reduce loading on water treatment plants and groundwater impacts

Advisory Committee Review

- April 23, 2014: Small Business Compliance Advisory Committee
- March 18, 2014: Citizens Advisory Council
- Dec. 12, 2013: Air Quality Technical Advisory Committee

Recommended Public Participation Process

- 60-day public comment period and three public hearings
- Final rulemaking will be submitted to the EPA for approval as a revision to the State Implementation Plan



Bureau of Air Quality

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