Proposed Rulemaking:
25 \textit{Pa. Code} Chapter 129
Control of VOC Emissions from Fiberglass Boat Manufacturing Materials

Environmental Quality Board Meeting
May 21, 2014
• 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
• 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
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
• 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
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
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
• 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
• April 23, 2014: Small Business Compliance Advisory Committee
• March 18, 2014: Citizens Advisory Council
• Dec. 12, 2013: Air Quality Technical Advisory Committee
• 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
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