



Bureau of Air Quality

Proposed Rulemaking **25 Pa. Code Chapter 129**

**Control of VOC Emissions from
Miscellaneous Metal Parts Surface Coating Processes,
Miscellaneous Plastic Parts Surface Coating Processes
and Pleasure Craft Surface Coatings**

Environmental Quality Board Meeting
Oct. 21, 2014

Purpose of Proposed Rulemaking

- The proposed rulemaking establishes Reasonably Available Control Technology (RACT) requirements for the facilities that conduct surface coating of miscellaneous metal or plastic parts.
- VOC emission reduction measures required to attain and maintain the 1997 and 2008 8-hour National Ambient Air Quality Standards (NAAQS) for ozone.
- RACT for these sources is required statewide because Pennsylvania is included in the Ozone Transport Region.

Basis of the Proposed Rulemaking

- The proposal is consistent with Control Techniques Guideline (CTG) for Miscellaneous Metal and Plastic Parts Coatings issued by EPA in 2008.
- VOC content limits and work practices in the CTG are based on federal hazardous air pollutant content limits and work practices promulgated in 40 CFR Part 63, Subparts MMMM and PPPP.

Affected Parties

- The proposed rulemaking would apply to an owner or operator of a miscellaneous metal part surface coating process or plastic part surface coating process, or both.
- DEP identified 160 facilities that may be subject to the proposed rulemaking.
- The Small Business Development Centers Environmental Management Assistance Program identified 3,080 small business-sized facilities in Pennsylvania that may be subject to the proposed rulemaking.

Compliance Options

- Compliance options and emission limit requirements restrict the amount of VOC emissions from an affected facility.
- Three compliance options:
 - Compliant materials
 - Combination of compliant materials and operation of VOC emissions capture system and add-on control device
 - Operation of a VOC emissions capture system and add-on control device meeting an overall control efficiency of 90% or more without any compliant materials

Additional Requirements

The proposal establishes additional VOC reduction requirements including the following:

- Work practices for coating-related activities and cleaning materials;
- Coating application methods;
- Compliance and monitoring;
- Measurements and calculations; and
- Recordkeeping and reporting.

Environmental Impact

- VOC emission reductions through complying with the three compliance options are estimated at approximately 1,600 tons annually.
- Work practices for coating and cleaning materials also provide VOC reductions.
- Actual VOC emission reductions may be lower because some affected facilities already comply with various elements of the proposed rulemaking.

Economic Impact

- The cost-effectiveness of reducing VOC emissions from these sources is estimated to be from \$920 to \$1,758 per ton of VOC emissions reduced.
- RACT considers costs to the affected owners and operators.

Advisory Committee Review

The following committees voted unanimously to concur with DEP's recommendation to move the proposed rulemaking to the EQB for consideration:

- Air Quality Technical Advisory Committee on Feb. 20, 2014
- The Citizens Advisory Council on March 18, 2014
- The Small Business Compliance Advisory Committee on April 23, 2014

Recommended Public Participation Process

- A 60-day public comment period
- Public hearings in Harrisburg, Norristown and Pittsburgh
- The final rulemaking will be submitted to the EPA for approval as a revision to the State Implementation Plan upon final-form publication in the *Pennsylvania Bulletin*



Bureau of Air Quality

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