



Bureau of Air Quality

Proposed Rulemaking

25 Pa. Code Chapter 129

**Control of VOC Emissions from
Automobile and Light-Duty Truck Assembly Coating
Operations and Heavier Vehicle Coating Operations**

**Environmental Quality Board Meeting
April 21, 2015**

Purpose of Proposed Rulemaking

- The proposed rulemaking establishes Reasonably Available Control Technology (RACT) requirements for Automobile and Light-Duty Truck (ALDT) Assembly Coating Operations & Heavier Vehicle Surface Coating Operations.
- VOC emission reduction measures are 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 PA is included in the Ozone Transport Region.

Basis of the Proposed Rulemaking

- The proposed VOC content limits and requirements are consistent with the U. S Environmental Protection Agency's (EPA) recommendations in the Control Techniques Guideline (CTG) for Automobile and Light-Duty Truck (ALDT) Assembly Coatings issued in 2008.
- The EPA VOC content limits and work practices in the CTG are based on the requirements specified in 40 CFR Part 63, Subpart IIII and 40 CFR Part 60 Subpart MM.

Requirements

The proposed rulemaking includes the following requirements:

- VOC content limits
 - primary assembly coatings
 - additional assembly coatings
- Work practices
 - coating-related activities
 - cleaning materials
- Compliance monitoring & recordkeeping requirements
- Measurement, calculation, sampling and testing methodologies

Affected Parties

- The proposed rulemaking would apply to the owner/operator of
 - an automobile assembly coating, or a light-duty truck assembly coating operation that applies an automobile assembly coating or a light-duty truck assembly coating, or both, to
 - a new automobile body or a new light-duty truck body,
 - a body part for a new automobile or for a new light-duty truck, or
 - another part that is coated along with the new automobile body or body part or new light-duty truck body or body part.
 - a facility that performs a coating operation subject to this proposed rulemaking on a contractual basis.
- DEP identified 61 facilities that may be subject to the proposed rulemaking.

Environmental Impact

- VOC emission reductions from the proposed rulemaking are estimated at approximately 524 tons annually.
- These VOC reductions will reduce the formation of ground-level ozone and will also allow the Commonwealth to make progress in attaining and maintaining the ozone national ambient air quality standards.
- Actual VOC emission reductions may be lower because some affected facilities may already comply with various elements of the proposed rulemaking.

Economic Impact

- RACT considers costs to the affected owners and operators.
- The cost-effectiveness of reducing VOC emissions from these sources is estimated to range from \$941 to \$1,758 per ton of VOC emissions reduced.
- The estimated annual cost of compliance for each facility will range from \$10,500 to \$19,514.

Advisory Committee Review

- The following committees voted to concur with DEP's recommendation to move the proposed rulemaking to the EQB for consideration:
 - Air Quality Technical Advisory Committee (April 3, 2014);
 - Citizens Advisory Council (June 17, 2014); and
 - Small Business Compliance Advisory Committee (April 23, 2014).

DEP's 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*.



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DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Air Quality

Kenneth R. Reisinger
Acting Deputy Secretary for
Waste, Air, Radiation and Remediation

Joyce E. Epps
Director, Bureau of Air Quality

Kristen M. Furlan
Bureau of Regulatory Counsel