

# Small Business Compliance Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

April 27, 2016

Honorable John Quigley  
Secretary  
Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063

Re: Final Rulemaking for Control of VOC Emissions from Automobile and Light-duty Truck Assembly Coating Operations and Heavier Vehicle Coating Operations  
(25 *Pa. Code*, Chapter 129)


Dear Secretary Quigley:

On April 27, 2016, the Small Business Compliance Advisory Committee (Committee) discussed the final rulemaking draft Annex A to amend 25 *Pa. Code*, Chapter 129 (relating to standards for sources). The final rulemaking draft Annex A adds provisions to Chapter 129 at § 129.52e to further reduce volatile organic compound (VOC) emissions from automobile and light-duty truck assembly coating operations and heavier vehicle coating operations. The proposed rulemaking was published in the *Pennsylvania Bulletin* on August 8, 2015 (45 *Pa. B.* 4351).

The amendments are being added to meet the Clean Air Act “reasonably available control technology” (RACT) requirements for ozone nonattainment areas. The final-form VOC emission rates and content limits and the work practice requirements are consistent with the recommendations of the United States Environmental Protection Agency set forth as RACT in the 2008 Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings.

The Committee voted unanimously to concur with the Department’s recommendation to present the final rulemaking amendments to the Environmental Quality Board for consideration for adoption and publication as final rulemaking.

Sincerely,



Dale I. Kaplan  
Chair

cc: Joyce Epps, Director, PA DEP BAQ  
Susan Hoyle, PA DEP BAQ  
Susan Foster, PA DEP BAQ  
Nancy Herb, PA DEP BAQ  
Jesse Walker, PA DEP BRC