

Air Quality Technical Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

February 11, 2016

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

Re: Proposed Rulemaking for Control of VOC Emissions from Industrial Cleaning Solvents
(25 *Pa. Code* Chapter 129)

Dear Secretary Quigley:

On February 11, 2016, the Air Quality Technical Advisory Committee (Committee) discussed the proposed rulemaking draft Annex A to amend 25 *Pa. Code* Chapter 129 (relating to standards for sources). The proposed rulemaking draft Annex A adds provisions to Chapter 129 at § 129.63a to reduce the emissions of volatile organic compounds (VOC) from industrial cleaning solvents not regulated elsewhere in Chapters 129 and 130 (relating to standards for products) and which are used to remove a contaminant, including an adhesive, ink, paint, dirt, soil, oil, grease or the like, from a cleaning unit operation production-related work area or from a part, product, tool, machinery, equipment, vessel, floor, wall or the like.

The amendments are proposed to meet the Clean Air Act “reasonably available control technology” requirements for ozone nonattainment areas. The proposed VOC emission limits and work practice standards are consistent with the recommendations of the United States Environmental Protection Agency included in the Control Techniques Guideline document for this source category.

The Committee previously considered the proposed rulemaking draft Annex A on February 20, 2014. Changes to the draft Annex A language have been made to address concerns about the applicability threshold, exceptions and exemptions, daily recordkeeping, and clarity of language, as well as flexibility for small businesses requested by the Small Business Compliance Advisory Committee during its review of the draft Annex A on February 23, 2014.

The proposed rulemaking draft Annex A also includes revisions to § 129.73 (relating to aerospace manufacturing and rework) to amend a numbering error in Table II (relating to allowable content of VOCs in aerospace coatings). The limit for the high-temperature coating category (Table II (20(a))) was incorrectly promulgated on April 10, 1999 (29 *Pa. B.* 1879), as a subset of the fuel-tank coating category (Table II (20)).

The Committee voted 15-2-0 to concur with the Department's recommendation to present the proposed rulemaking amendments to the Environmental Quality Board for consideration for adoption and publication as a proposed rulemaking for public comment.

Sincerely,



Patrick K. O'Neill Esq.
Chair

cc: AQTAC Members

Joyce Epps, Director, PA DEP BAQ

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