



February 20, 2018

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Secretary Patrick  
McDonnell, Ex-officio

Honorable Patrick McDonnell  
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 Industrial Cleaning Solvents; General Provisions; Aerospace Manufacturing and Rework; and Additional RACT Requirements for Major Sources of NOx and VOCs (RACT 2) (25 Pa. Code Chapters 121 and 129)

Dear Secretary McDonnell:

On February 20, 2018, the Citizens Advisory Council (“CAC” or “Council”) discussed the final rulemaking draft Annex A to amend 25 Pa. Code Chapters 121 and 129 (relating to general provisions and standards for sources). The final rulemaking draft Annex A adds provisions to Chapter 129 at § 129.63a to reduce volatile organic compound (VOC) emissions from the use and application of industrial cleaning solvents not regulated elsewhere in Chapter 129. These industrial cleaning solvents 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 for industrial cleaning solvents are designed to meet the Clean Air Act “reasonably available control technology” (RACT) requirements for ozone nonattainment areas. The VOC emission limits and work practice standards are consistent with the recommendations of the United States Environmental Protection Agency set forth as RACT in the 2006 Control Techniques Guidelines for Industrial Cleaning Solvents. The final rulemaking draft Annex A also includes revisions to §§ 121.1 and 129.73 (relating to definitions; and aerospace manufacturing and rework), and several minor amendments to correct grammatical, typographic or numberings errors.

Honorable Patrick McDonnell  
Secretary  
Department of Environmental Protection  
February 20, 2018  
Page 2

Clarifying amendments have been added to §§ 129.96, 129.97, 129.99, and 129.100 under Additional RACT Requirements for Major Sources of NOx and VOCs (RACT 2) to update the VOC presumptive RACT regulations for which RACT 2 does not apply. RACT 2 was promulgated April 23, 2016 (46 Pa. B. 2036).

Council voted 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 a final rulemaking.

Sincerely,



Donald S. Welsh, Chair  
Citizens Advisory Council

cc: Krishnan Ramamurthy, Director, PA DEP BAQ  
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