



Bureau of Air Quality

Final-form Rulemaking: Control of VOC Emissions from Large Petroleum Dry Cleaners, Shipbuilding and Repair Coating Operations, and SOCMI Reactors, Distillation, and Air Oxidation Processes

Environmental Quality Board
October 12, 2022

Tom Wolf, Governor

Ramez Ziadeh, P.E., Acting Secretary

Overview

Purpose

- Control emissions from certain existing sources
- Assist in certifying Control Techniques Guidelines (CTG)
Reasonably Available Control Technology (RACT)

Sources addressed by this rulemaking include:

- Large Petroleum Drycleaners
- Shipbuilding and Ship Repair Coatings
- Air Oxidation Processes for Synthetic Organic Chemical Manufacturing Industry (SOCMI)
- Reactor & Distillation Processes for SOCMI

Background

Clean Air Act RACT requirements for CTGs

- CTGs provide EPA's recommendations of what constitutes Reasonably Available Control Technology (RACT).
- Include State Implementation Plans (SIP) for nonattainment areas and Ozone Transport areas.
- Require SIP revisions to implement RACT, which must include VOC source categories covered by CTGs.
- RACT requirements would supersede the requirements specified in a RACT permit issued for an affected source unless the RACT permit is more stringent.

Affected Facilities

Affected facilities in Pennsylvania:

- Two existing shipbuilders already meet CTG requirements in permits.
- There are no large petroleum drycleaners in PA, but this rule will provide existing small petroleum dry cleaners with a RACT exemption limit.
- SOCFI facilities already meet CTG requirements. DEP and facilities will avoid SIP submissions of individual facility New Source Performance Standard (NSPS) and permits requirements.

General Information

- All states with ozone nonattainment areas are required to develop similar rules based upon EPA's CTG recommendations.
- All of Pennsylvania's facilities meet the recommendations provided by the CTGs as adopted in the rulemaking, so very little or no additional costs are anticipated.
- No additional outreach to facilities for compliance purposes appears to be necessary.
- No significant issues were raised during the public comment period.

Comment and Response

The following comments were received on the proposed rulemaking during the comment period:

- A commentator suggested correcting a typo in a footnote to prevent the regulated community from performing an improper calculation when converting from metric units to English/Imperial units.
- IRRC suggested adding a reference to the definition of “Nuclear specialty coating” in this final-form rulemaking.
- IRRC suggested defining the term “as supplied” in this final-form rulemaking.

Comment and Response (cont.)

The Department addressed the comments as follows:

- The Department added the ASTM reference for “Nuclear specialty coating.”
- The Department clarified in the final-form rulemaking comment response document that the term “as supplied” is already defined in § 121.1.
- The Department changed comma to period in the conversion constant in “footnote “b” as requested by the commentator.

Amendments to Final-form Regulation

Amendments were also made to § 129.71a, Table 1, “List of Regulated SOCMI Chemicals” from the proposed rulemaking to this final-form rulemaking to correct the listing of two chemical categories.

Advisory Committee Review

The following advisory committees were presented this final-form rulemaking:

- Air Quality Technical Advisory Committee on August 18, 2022
- Citizens Advisory Council on July 19, 2022
- Small Business Compliance Advisory Committee on August 24, 2022

Recommendation

The Department recommends the Board adopt this final-form rulemaking.



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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