

CONTROL OF VOC EMISSIONS FROM
LARGE APPLIANCE AND METAL FURNITURE
SURFACE COATING PROCESSES

25 Pa. Code Chapter 129

40 Pa.B. 420 (January 16, 2010)

Environmental Quality Board Regulation #7-449
(Independent Regulatory Review Commission #2813)

Comment/Response Document

**Control of VOC Emissions from
Large Appliance and Metal Furniture Surface Coating Processes**

On January 16, 2010, the Environmental Quality Board (Board, EQB) published a notice of public hearings and comment period on a proposed rulemaking concerning amendments to 25 *Pa. Code* Chapter 129 (relating to standards for sources) to regulate emissions of volatile organic compounds (VOC) from large appliance and metal furniture surface coating processes (40 *Pa. B.* 420). The public comment period closed on March 22, 2010.

Three public hearings were held on the proposed rulemaking as follows:

February 16, 2010 1 p.m.	Department of Environmental Protection Southwest Regional Office Waterfront Conference Rooms A and B 400 Waterfront Drive Pittsburgh, PA 15222
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February 17, 2010 1 p.m.	Department of Environmental Protection Rachel Carson State Office Building Conference Room 105 400 Market Street Harrisburg, PA 17105
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February 18, 2010 1 p.m.	Department of Environmental Protection Southeast Regional Office Delaware River Conference Room 2 East Main Street Norristown, PA 19401
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No comments or testimony were received from the public during the public comment period. The Independent Regulatory Review Commission submitted comments, which are summarized in this document. No comments were received from the Senate or House Environmental Committees. If adopted as a final-form rulemaking, the final regulation will be submitted to the U.S. Environmental Protection Agency (EPA) as a revision to the State Implementation Plan (SIP).

Table of Commentators to the Environmental Quality Board
Control of VOC Emissions from Large Appliances and Metal Furniture
Surface Coating Processes Rulemaking # 7-449
(IRRC # 2813)

ID	Name/Address	One Page Summary Submitted for Distribution to EQB	Provided Testimony	Requested Copy of Final Rulemaking after EQB Action
1.	Independent Regulatory Review Commission			

Recordkeeping - Clarity

1. **Comment:** Proposed subsection 129.52a(d) (relating to compliance monitoring procedures), which requires the owners and operators of the regulated surface coating processes to maintain certain records, is unclear as to the format in which these records must be maintained. This should be clarified in the final-form regulation. (1)

Response: The Department respectfully disagrees. Requiring regulated facilities to maintain records is a standard requirement. This requirement is found in many Board-approved regulations, including § 129.52(g) (relating to surface coating processes), for instance. Neither the Department nor the regulated sources have had difficulty understanding or complying with this requirement.

2. **Comment:** Proposed subsection 129.52a(e) (relating to recordkeeping and reporting requirements), which requires that the records required under subsection 129.52a(d) be submitted to the Department “upon request,” is unclear as to whether this request will be made orally or in writing. This should be clarified in the final-form regulation. (1)

Response: The Department agrees and has revised the final-form rulemaking to specify that the records shall be submitted to the Department upon receipt of a written request.