

Summary of Comments on PADEP Proposed RACT Regulations for Flat Wood Paneling Surface Coating Processes

1. **Applicability:** The Department needs to clarify what Surface Coating Operations (SCO's) would be subject to the proposed RACT. A listing of Wood Building Product (WBP) subcategories from the 2003 WBP SCO National Emission Standards for Hazardous Air Pollutants (NESHAP's) is presented for consideration.
2. **Coatings VOC's Content Limit:** According to § 129.52c.(c)(1) each "as applied" coating must meet the limit in Table I of 2.9 Lbs VOC's per gallon coating solids. The limit should be applicable to an entire SCO or category of Flat Wood Paneling Product processed on a SCO, on a weighted-average basis of all coatings applied, rather than to each individual coating.
3. **VOC content "as applied":** A facility should be able to use "as purchased" VOC's data in lieu of calculating "as applied" data. Calculation of "as applied" should be limited to a situation where one or more components of a blend are not a "complying coating" on its own.
4. **Required Overall Efficiency of a Control System:** When multiple coatings are applied on a SCO in multiple steps, what VOC content shall be input to the equation to calculate the required overall control efficiency (O)? Also please specify that capture efficiency and destruction efficiency testing be performed per the 2003 WBP SCO NESHAP's, §§ 63.4765 and 63.4766.
5. **Daily Recordkeeping:** Daily recordkeeping is an unnecessary burden with no known benefit, especially for SCO's where "complying coatings" are used exclusively. The 2006 USEPA Control Techniques Guidelines (CTG) makes no mention of daily recordkeeping.
6. **Coating Application Methods:** The application methods noted in the proposed regulations may not be technically feasible for all SCO's subject to the proposed RACT regulations. The 2003 WBP SCO NESHAP's and the 2006 CTG do not specify requirements for coating application methods.
7. **De minimus quantity:** Please specify if an individual VOC can be considered de minimus exempt if it is present in an as-purchased coating at less than 1% by weight, or 0.1% by weight for carcinogens. This is the federal criteria used in Material Safety Data Sheet (MSDS) preparation and in the 2003 WBP SCO NESHAP.
8. **Potential VOC Reductions:** It is estimated that the Flat Wood Paneling SCO emissions in PA are about 141.1 tons. This is significantly less than the 440.4 tons noted in the preamble. The possible VOC's reductions for the highest emitting facility range from 5.3 to 9.0 tons per year. This is substantially less than the 15.2 tons per year estimated in the preamble.
9. **Compliance Costs:** The costs noted in the proposed RACT represent only those costs associated with changing from solvent-based coatings to water-based coatings. For one SCO it is estimated that the capital costs to install a Regenerative Thermal Oxidizer (RTO) control device would be \$3.46 million, with annual costs of \$1.51 million. The cost per ton of VOC's controlled is \$43,000 – far greater than any known RACT cost-effectiveness criteria.
10. **Work Practice Requirements:** The requirement to fully enclose coatings, coating-related wastes, and coating-related clean-up materials handling systems should not be applicable in all instances. Under the 2003 WBP SCO NESHAP's, work practice requirements such as these are not applicable to "complying coatings".
11. **Cost-Effectiveness:** The proposed RACT should consider cost-effectiveness in a similar manner as the "case-by-case" RACT of PA Code 25 § 129.92(b)(4).