

Small Business Compliance Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

July 24, 2013

Honorable E. Christopher Abruzzo
Acting Secretary
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: Proposed rulemaking amendments for Additional Requirements for Major Sources of NO_x and VOCs (RACT 2)

Dear Secretary Abruzzo:

On July 24, 2013, the Small Business Compliance Advisory Committee (Committee) discussed the proposed rulemaking to amend 25 *Pa. Code* Chapters 121 and 129 to add additional requirements for major sources of nitrogen oxide (NO_x) and volatile organic compound (VOC) emissions. The proposed rulemaking adds five sections to Chapter 129 to establish presumptive reasonably available control technology (RACT) requirements and RACT emission limitations for certain major stationary air contamination sources of NO_x and VOC emissions, including combustion units, boilers, process heaters, turbines, engines, municipal solid waste landfills, and municipal waste combustors. The proposed rulemaking amends Chapter 121 to add or revise terms and definitions to support the sections added to Chapter 129.

It is the understanding of the Committee that this proposed rulemaking for additional requirements for major sources of NO_x and VOCs only affects major stationary sources. The Committee supports the Department's rulemaking initiative to standardize the presumptive RACT requirements and RACT emission limitations statewide. The Committee would also like to work with the Department in reaching out to potentially-affected small businesses during the proposed rulemaking process. The Committee voted 8-0-0 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 proposed rulemaking.

Sincerely,



Dale I. Kaplan
Chair

cc: Joyce Epps, Director, PA DEP BAQ
Susan Hoyle, PA DEP BAQ
Susan Foster, PA DEP BAQ