

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: Final-form Rulemaking for Control of VOC Emissions from Flexible Packaging Printing Presses and Offset Lithographic Printing Presses and Letterpress Printing Presses (FPP-LLP rulemaking)

Dear Secretary Abruzzo:

On July 24, 2013, the Small Business Compliance Advisory Committee (Committee) discussed the final-form rulemaking to amend 25 *Pa. Code* Chapters 121 and 129. The final-form rulemaking adds §§ 129.67a and 129.67b to establish volatile organic compound (VOC) content limit, add-on control requirements, and work practice standards for the owners and operators of affected flexible packaging printing presses, offset lithographic printing presses and letterpress printing presses in this Commonwealth to reduce VOC emissions from the use and application of inks, coatings, adhesives, fountain solutions and cleaning materials. The final-form rulemaking also includes amendments to the adhesives, sealants, primers and solvents regulations in Chapters 129 and 130 to clarify the applicability of the adhesive, sealant, primer and solvent requirements to the adhesives used or applied on or with the printing presses to be regulated under this final-form rulemaking.

It is the understanding of the Committee that this final-form rulemaking may impact small businesses in Pennsylvania, so we encourage the Department to conduct outreach to make sure that these companies are aware of this final-form rulemaking when it is finalized. The Committee voted 6-2-0 to concur with the Department's recommendation to present the final-form rulemaking amendments to the Environmental Quality Board for consideration for publication as final-form rulemaking.

Sincerely,



Dale I. Kaplan
Chair

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