



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

CONTROL OF VOC EMISSIONS FROM FIBERGLASS BOAT MANUFACTURING MATERIALS

25 Pa. Code Chapter 129

44 Pa. B. 4502 (July 19, 2014)

Environmental Quality Board Regulation #7-487
(Independent Regulatory Review Commission #3066)

Comment and Response Document

Bureau of Air Quality

Control of VOC Emissions from Fiberglass Boat Manufacturing Materials

On July 19, 2014, the Environmental Quality Board (Board, EQB) published a *Pennsylvania Bulletin* notice of public hearings and the written comment period on the proposed amendments to Chapter 129 (relating to standards for sources) for fiberglass boat manufacturing materials (44 *Pa.B.* 4502). The proposed rulemaking would add provisions to Chapter 129 for the control of emissions of volatile organic compounds (VOC) from fiberglass boat manufacturing materials including open molding resins, gel coats and cleaning materials. The proposed rulemaking would establish VOC emission limitations and other requirements consistent with the reasonably available control technology (RACT) recommendations of the United States Environmental Protection Agency (EPA) 2008 Fiberglass Boat Manufacturing Materials Control Techniques Guidelines (CTG) for these sources in this Commonwealth. See *Consumer and Commercial Products, Group IV: Control Techniques Guidelines in Lieu of Regulations for Miscellaneous Metal Products Coatings, Plastic Parts Coatings, Auto and Light-Duty Truck Assembly Coatings, Fiberglass Boat Manufacturing Materials, and Miscellaneous Industrial Adhesives*, 73 FR 58481, 58483 (October 7, 2008). The EPA's CTG document, *Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials*, EPA 453/R-08-004, Office of Air Quality Planning and Standards, EPA, September 2008, is available on the EPA's website at: www.epa.gov/airquality/ozonepollution/SIPToolkit/ctgs.html.

The comment period opened on July 19, 2014, and closed on September 22, 2014. Three public hearings were held on the proposed rulemaking as follows:

August 19, 2014 1:00 PM	Department of Environmental Protection Southwest Region Office Island Conference Room 400 Waterfront Drive Pittsburgh, PA 15222
August 20, 2014 1:00 PM	Department of Environmental Protection Southeast Regional Office Schuylkill Conference Room 2 East Main Street Norristown, PA 19401
August 21, 2014 1:00 PM	Department of Environmental Protection Rachel Carson State Office Building Conference Room 105 400 Market Street Harrisburg, PA 17105

This document summarizes the written comments received during the public comment period as well as those received from the Independent Regulatory Review Commission (IRRC). No testimony was received during the public hearings. The Board invited each commentator to prepare a one-page summary of the commentator's comments. No one-page summaries were submitted to

the Board for this rulemaking. Each comment is listed with the identifying commentator number for each commentator that made the comment. A list of the commentators, including name and affiliation (if any), can be found on page 4 of this document.

The final-form regulation will be submitted to the U.S. Environmental Protection Agency (EPA) as a revision to the State Implementation Plan (SIP) upon final-form publication in the *Pennsylvania Bulletin*.

Copies of all comments received are posted on the IRRC web site at <http://www.irrc.state.pa.us>. Search by Regulation # 7-487 or IRRC # 3066.

Acronyms used in this Comment/Response Document

PSATS – Pennsylvania State Association of Township Supervisors

VOC – Volatile Organic Compound

Table of Commentators for the Environmental Quality Board
Control of VOC Emissions from Fiberglass Boat Manufacturing Materials
Rulemaking EQB #7-487
(IRRC #3066)

ID	Name/Address	Submitted one page Summary for distribution to EQB	Provided Testimony
1	Elam M. Herr Asst. Executive Director PSATS 4855 Woodland Drive Enola, PA 17025-1291	no	no
2	Independent Regulatory Review Commission (IRRC) 333 Market Street, 14 th Floor Harrisburg, PA 17101	no	no

General Comment on Proposed Rulemaking

1. Comment: The Pennsylvania State Association of Township Supervisors (PSATS) wrote to IRRC, saying that the organization reviewed the Environmental Quality Board’s proposed regulation #7-487 (IRRC #3066) “Control of Volatile Organic Compound Emissions from Fiberglass Boat Manufacturing Materials” and concluded that it has no direct impact or financial cost to PSATS members. PSATS further stated that the proposed rulemaking would benefit PSATS members by controlling and limiting the volatile organic compound emissions from the air. PSATS wrote that, “Although our reading would indicate that the regulation is needed it does not directly impact our members so we will not be taking a position.” (1)

Response: The Board appreciates the comment and thanks IRRC for forwarding the comment to the Board.

Clarity

2. Comment: IRRC recommended that the EQB clarify the requirements for sampling and testing in subsection (n) to provide for how often sampling and testing is to be conducted. (2)

Response: The Board agrees with IRRC’s recommendation. Language clarifying the timing and frequency of testing or sampling was added into final-form subsection (m) to address IRRC’s comment. Compliance of the monomer VOC content of the resin and gel coat materials must be demonstrated within 90 days of receipt of the Department’s written request. Testing of a VOC emissions capture system and add-on air pollution control device must be conducted one time every 5 years starting from completion of the initial testing specified in the plan approval application required under subsection (g).