

Air Quality Technical Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

November 7, 2014

Honorable Dana K. Aunkst
Acting Secretary
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: Final-form rulemaking amendments for Additional Requirements for Major Sources of NO_x and VOCs

Dear Acting Secretary Aunkst:

On November 7, 2014, the Air Quality Technical Advisory Committee (Committee) discussed the final rulemaking to amend 25 *Pa. Code* Chapters 121 and 129 (relating to general provisions; and standards for sources) to add additional requirements for major sources of nitrogen oxide (NO_x) and volatile organic compound (VOC) emissions. The final rulemaking amends § 121.1 (relating to definitions) to add or revise terms and definitions and 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, municipal waste combustors, cement kilns, and other sources that are not regulated elsewhere in 25 *Pa. Code* Chapter 129. The final rulemaking also adds requirements for an averaging program and for case-by-case evaluations for sources that cannot meet the presumptive RACT requirements and RACT emission limitations.

The Committee recommends that the preamble to the final rulemaking include the clarifications requested at the November 7, 2014, meeting for the following rulemaking provisions:

- § 129.96(c) and § 129.97(c) – applicability to sources emitting less than 1 ton.
- § 129.100(a) – calculations for the 30-day rolling average.

The Committee voted 11–5–0 (yes; no; abstain) to concur with the Department's recommendation to present the final-form rulemaking amendments to the Environmental Quality Board for consideration.

Sincerely,



Patrick K. O'Neill Esq.
Chair

Hon. Dana K. Aunkst

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

Dana K. Aunkst