Small Business Compliance Advisory Committee

April 27, 2016

Honorable John Quigley
Secretary
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: Final Rulemaking for Control of VOC Emissions from Miscellaneous Metal Parts Surface Coating Processes, Miscellaneous Plastic Parts Surface Coating Processes and Pleasure Craft Surface Coatings (25 *Pa. Code*, Chapter 129)
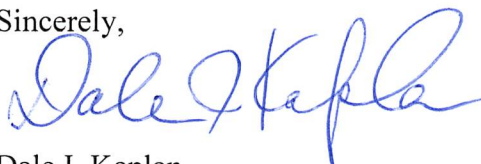
Dear Secretary Quigley:

On April 27, 2016, the Small Business Compliance Advisory Committee (Committee) discussed the final rulemaking draft Annex A to amend 25 *Pa. Code,* Chapter 129 (relating to standards for sources). The final rulemaking draft Annex A adds provisions to Chapter 129 at § 129.52d to further reduce volatile organic compound (VOC) emissions from miscellaneous metal parts surface coating processes and adds provisions to reduce the VOC emissions from miscellaneous plastic parts surface coating processes and from pleasure craft surface coatings. The proposed rulemaking was published in the *Pennsylvania Bulletin* on August 8, 2015 (45 *Pa. B.* 4366).

The amendments are being added to meet the Clean Air Act "reasonably available control technology" (RACT) requirements for ozone nonattainment areas. The final-form VOC content limits and VOC emission rates and the work practice requirements are consistent with the recommendations of the United States Environmental Protection Agency set forth as RACT in the 2008 Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings.

The Committee voted unanimously to concur with the Department's recommendation to present the final rulemaking amendments to the Environmental Quality Board for consideration for adoption and publication as final rulemaking.

Sincerely,

Dale I. Kaplan
Chair

cc: Joyce Epps, Director, PA DEP BAQ
    Susan Hoyle, PA DEP BAQ
    Susan Foster, PA DEP BAQ
    Nancy Herb, PA DEP BAQ
    Jesse Walker, PA DEP BRC