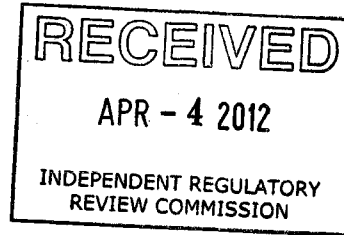




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2930



March 29, 2012

Mr. Michael L. Krancer
PA Department of Environmental Protection
Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477

Re: Comments On Proposed § 129.67b Control of VOC emissions from flexible package presses

Dear Mr. Krancer:

This letter is in response to changes to § 129.67a - Control of VOC emissions from flexible package printing presses that appeared in the February 11, 2012 issue of the Pennsylvania Bulletin. The Flexographic Technical Association (FTA) appreciates the opportunity to provide input on the proposal.

As background, the Flexographic Technical Association represents the flexo industry throughout the United States and has more than 1200 member locations. FTA's members include printers using all flexo press sizes and types, suppliers, prepress providers, consumer products companies and educators.

Overall, FTA supports the PADEP in its use of the U.S. Environmental Protection Agency's 2006 Control Techniques Guidelines for Flexible Package Printing in the modification of the RACT requirements for the flexible package printing industry. FTA, however, is concerned with the proposed rule which requires daily recordkeeping that will be extremely burdensome to printers without any clear benefit.

129.67a (e) Recordkeeping and reporting requirements. Beginning January 1, 2012, the owner or operator of a flexible packaging printing press subject to this section shall maintain records sufficient to demonstrate compliance with the requirements of this section. At a minimum, the owner or operator shall maintain daily records of the following information:

- (1) The following parameters for each VOC-containing material, including ink, coating, thinner, component or cleaning solvent, as supplied:
 - (i) The name and identification number of the ink, coating, adhesive, thinner, component or cleaning solvent.
 - (ii) The amount used.
 - (iii) The density or specific gravity.
 - (iv) The VOC content (weight % or pounds/gallon)
- (2) The VOC content of each ink, coating, adhesive thinner, component or cleaning solvent as applied.

If you have any questions, please don't hesitate to contact me.

Best regards,

Doreen M. Monteleone, Ph.D.
Director of EHS, Membership & Special Projects

Flexographic Technical Association
Foundation of Flexographic Technical Association

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