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April 12, 2012

Mr. Michael Krancer  
Environmental Control Board  
Rachel Carlson State Office Building, 16<sup>th</sup> Floor  
400 Market Street  
Harrisburg, PA 17101

Dear Mr. Krancer:

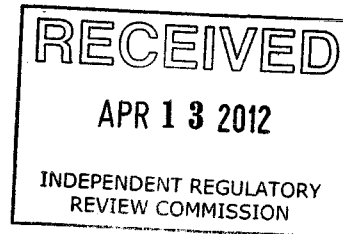
Thank you for allowing Domtar Corporation to comment on the newly proposed VOC regulations from offset lithographic printing presses and letterpress printing presses that appeared in the February 11, 2012, edition of the Pennsylvania Bulletin. We have been in contact with the Graphic Arts Association and also support their comments on the new regulation.

Domtar Corporation is the largest integrated manufacturer and marketer of uncoated freesheet paper in North America and the second largest in the world based on production capacity, and is also a manufacturer of papergrade, fluff and specialty pulp. The Company designs, manufactures, markets and distributes a wide range of business, commercial printing and publishing as well as converting and specialty papers.

Domtar operates a paper mill in Johnsonburg and a converting/distribution center in DuBois. We have over 500 employees in the Commonwealth. We work closely with printers throughout Pennsylvania, both large and small, and realize that the value to the Commonwealth's economy from printing is over \$9 billion each year.

We ask that you take the comments from the printing industry and its trade associations into account as the Environmental Control Board continues its review of the proposed regulations.

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SECRETARY'S OFFICE

APR 13 2012

DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

Michael Krancer Letter  
April 12, 2012  
Page Two

We are in agreement with the printing industry and their concern with several of the proposed rule changes. Domtar is especially concerned with the following:

- Since the majority of the printers in the Commonwealth employ 20 persons or less, the proposed rules are too complicated and burdensome to comply with.
- Conservative material use estimates should be followed that would allow facilities to determine applicability by tracking material use volumes rather than completing complex and time-consuming calculations.
- Printers should be given credit for efficiencies captured on heat set presses.
- The proposed rule requires daily recordkeeping that is complicated and doesn't seem to add any clear benefit.
- Any overall negative effect of small printers to the environment doesn't seem to be clearly shown.

Domtar is our industry's leader in both environmental and sustainability practices. We in no way are against reasonable regulations that would benefit all of the residents in Pennsylvania.

However, we feel the need to offer our opinion and support of the printing industry in the Commonwealth and their concerns over the proposed rule changes.

Thank you for allowing us the opportunity to comment.

Sincerely,



Craig Timm  
Manager, Public Affairs