

Comments of the Independent Regulatory Review Commission



Environmental Quality Board Regulation #7-490 (IRRC #3110)

Control of Volatile Organic Compound Emissions from Automobile and Light-Duty Truck Assembly Coating Operations and Heavier Vehicle Coating Operations

November 12, 2015

We submit for your consideration the following comments on the proposed rulemaking published in the August 8, 2015 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (RRA) (71 P.S. § 745.5b). Section 5.1(a) of the RRA (71 P.S. § 745.5a(a)) directs the Environmental Quality Board (EQB) to respond to all comments received from us or any other source.

Implementation procedures.

EQB establishes a compliance date of January 1, 2016, in this proposed regulation. However, in the Preamble, EQB notes that it is considering changing the compliance date to May 1, 2016. We recommend that EQB establish a compliance date that allows for the proper development of a final-form regulation and full compliance by the regulated community.

Additionally, EQB states in the Preamble that the owner or operator of a separate coating line at an automobile and light-duty truck assembly coating facility, and the owner or operator of a facility that coats a body or body part for a new heavier vehicle, would have the option to elect to be regulated under this proposed rulemaking instead of proposed rulemaking #7-491 (IRRC #3109), which EQB intends to adopt as a final-form rulemaking concurrently with adoption of this final-form regulation. We ask EQB to ensure that the two rulemakings are adopted on the same date.