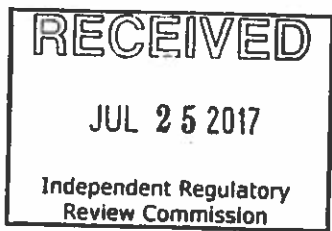


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**PA Hearing on Industrial Cleaning Solvent Rule  
July 19, 2017  
Testimony of Frederick Hartwig, Representing SGIA**

I am Frederick Hartwig representing SGIA.

SGIA is the association representing facilities using screen printing and/or digital printing technologies to produce a wide variety of products.

We thank the Department for the opportunity to offer our comments and support for the proposed rule "Control of VOC emissions from industrial cleaning solvents", PA 129.63a.

SGIA agrees with the Department's statement that this rule impacts more than the 166-facilities EPA estimated would be impacted by this rulemaking.

SGIA estimates that there are 850 screen and digital printing facilities operating in PA; of which most of the screen printing facilities would be impacted by the rule with the applicability threshold of 2.7 tons per 12 month rolling period.

We concur and agree with the Department's proposed language in section (c) – Exceptions and Exemptions, listing digital printing as an exempted category. Including digital printing in this exemption list aligns the Commonwealth's rule with other states – most notably CT and OH.

We also concur and agree with the Department's proposed language contained in section 2(ii) of this same section allowing screen printing operations to utilize cleaning solvents with a VOC content of no more than 4.2 lbs. per gallon or 500 grams per liter. The use of this low VOC technology does represent RACT for our industry sector in industrial solvent cleaning. The inclusion of this section also aligns the Commonwealth's rule with other state regulations.

Thank you once again for the opportunity to appear here today.

SGIA remains committed to working with the Department to craft meaningful environmental regulations – regulations that create environmental benefit while allowing our industry sector to utilize the low VOC technologies developed for our industry sector.