

## ***Advocacy Supports EPA's Proposed Guidance to Reduce Emissions of Volatile Organic Compounds***

On August 4, 2006, the Environmental Protection Agency (EPA) proposed control techniques guidelines (CTGs) for the control of volatile organic compounds (VOC) emissions from each of five product categories. These CTGs will provide guidance to the states concerning EPA's recommendations for reasonably available control technology (RACT) level controls for these product categories. Advocacy supports EPA's decision to issue control techniques guidelines, rather than promulgating formal rules, and agrees that the CTG approach will result in additional VOC emission reductions over the rule approach.

See Advocacy's letter to the Environmental Protection Agency at:  
[www.sba.gov/advo/laws/comments/](http://www.sba.gov/advo/laws/comments/) .

- The proposed CTGs for Lithographic and Letterpress Printing Materials, Flexible Packaging Printing Materials, and Industrial Cleaning Solvents utilize cost-effective approaches to VOC control that will help states achieve the ambient ozone standards (VOC emissions are precursor pollutants to ozone formation).
- As a result of EPA's outreach to the small business community, the proposed CTGs provide a balance between environmental protection and regulatory flexibility.
- Advocacy encourages EPA to continue to conduct significant pre-proposal outreach when it issues other guidance documents in the future, consistent with EPA's 2003 Small Business Strategy, and the Office of Management and Budget's 2005 Proposed Bulletin on "Good Guidance Practices."<sup>1</sup>
- The CTGs offer flexibility to the states establishing RACT standards to consider the particular industrial scenarios and to tailor the VOC standards as appropriate. The added flexibility will yield significant cost savings for thousands of facilities, while still providing substantial VOC emission reductions.

For more information about the rule, visit Advocacy's website at [www.sba.gov/advo](http://www.sba.gov/advo) or contact Assistant Chief Counsel Kevin Bromberg at (202) 205-6533.

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<sup>1</sup> Office of Management and Budget, Proposed Bulletin for Good Guidance Practices, available online at: [http://www.whitehouse.gov/omb/inforeg/regpol/good\\_guidance\\_preamble.pdf](http://www.whitehouse.gov/omb/inforeg/regpol/good_guidance_preamble.pdf), was published in the November 30, 2005, *Federal Register*.