

Comment and Response Document

Proposed General Permit for Human or Animal Crematories (BAQ-GPA/GP-14)

On January 28, 2006, the Pennsylvania Department of Environmental Protection published notice in the *Pennsylvania Bulletin* (36 Pa. B. 447) regarding the availability of the proposed air quality general plan approval and/or general operating permit for human or animal crematories (BAQ-GPA/GP-14). This General Permit applies to the construction, operation and modification of both new and existing human or animal crematories. Consistent with the requirements of 25 Pa. Code Section 127.612(b)(7), a 45-day public comment period was provided by the Department. The following comments were submitted by the U.S. Environmental Protection Agency, Region III:

Commentator: **David J. Campbell, EPA Region 3**

Comment 1:

Condition 8.a.i should indicate that the stack should be observed by the trained operator/observer.

Response:

Instead of changing 8.a.i, we revised Condition 4.c. to read: "The crematory shall be attended by a trained operator at all times when the unit is in operation." Furthermore, Condition 18 of the General Permit details the type of training required for the operator, which includes principles of combustion, operating sequences under normal conditions, and safety and operating procedures under upset conditions, like power interruption, burner malfunction, visible emissions, etc.

Comment 2:

Condition 13.c. should clarify that the burners should be adjusted when switching between approved fuels, not "alternate" fuels.

Response:

The Department agrees and has changed "alternate fuel" to "approved fuel."