

COMMENT AND RESPONSE DOCUMENT

Proposed BAQ-GPA/GP-19 (Dry Abrasive Blasting Operations)

On March 11, 2006, notice was published in the *Pennsylvania Bulletin*, 36 Pa. B. 1187, regarding the availability of the air quality general plan approval and/or general operating permit (General Permit), BAQ-GPA/GP-19. This General Permit applies to the construction, operation and modification of both new and existing dry abrasive blasting operations. In accordance with 25 Pa. Code Section 127.612 (relating to public notice and review period), the Department provided a 45-day comment period for the receipt of comments from the U.S. Environmental Protection Agency, Region 3 (EPA Region 3) and the general public. EPA Region III submitted the following comments on the General Permit:

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

Comment: The General Permit does not provide for the observation for visible emissions from the baghouse or collector. The permit calls for no visible emissions and the standard is 20%. Once a day or once a week observations similar to that in GP-14 would probably be sufficient. This would be the likely standard for those operations that would be occurring at Title V sources.

Response: Condition 15 has been revised to add an observation requirement as set forth below:

15. Monitoring, Recordkeeping and Reporting

a. The permittee shall observe once a day for any visible emissions from the fabric collector (baghouse) or cartridge collector. If any visible emissions are observed, the permittee shall take immediate action to eliminate the emissions.