

Mark DeWalt

March 22, 2007

John Guth
Northwest Region Air Program Coordinator
PA DEP, Meadville Office

Dear Mr. Guth,

This letter is in reference to Plan Approval No. 61-210A, the Glenn O Hawbaker Inc. asphalt production plant. Please accept the following comments as an addendum to the comments I have previously provided at the Public Hearing held in Barkeyville on March 8, 2007.

I continue to object to this plan approval for 3 primary reasons outlined in my first commentary on March 8. They are: 1) Legality of the zoning permit, 2) Insufficient monitoring, 3)BAT non-compliance

Legality:

The zoning permit for Glenn O Hawbaker Inc. continues to be in dispute. A zoning hearing is scheduled for April 11, 2007 to consider the conformity of the plant to the Barkeyville Borough zoning ordinance's conditions. The PA DEP should withhold any approvals until the zoning question has been settled in a court of law.

Monitoring: Section D.VII.029 (a)

The proposed HMA plant is an "artificial" minor source. If production limits were to increase, the pollution levels could easily exceed the federal limits on SOX, NOX, VOC, PM, and CO. It is in the public interest that any increases in production levels be supported by mandatory stack tests. The DEP should never "in its sole discretion" grant the applicant "a waiver of stack testing when increasing the production rate." Stack tests should accompany any production level increases and all plan approval modifications should be subject to public notice and comment.

BAT- Section D #007 (a)

According to "COMPILATION OF AIR POLLUTANT EMISSION FACTORS, AP-42 FIFTH EDITION, VOLUME I: STATIONARY POINT AND AREA SOURCES" . . . "between 70 and 90 percent of HMA is produced using natural gas as the fuel to dry and heat the aggregate." Hawbaker Inc. can not reasonably claim that natural gas is not an economically feasible fuel. The use of natural gas as a primary fuel has not been seriously pursued by this applicant. Considering the huge increase in SOX that would result from coal combustion, it should be rejected.

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Section D.VI, Work Practice Environments.

A no-idling policy for trucks at the facility should be included in the plan approval. The plant should enforce a 5-minute maximum on idling vehicles (with the limit modified to 20 minutes for periods of extreme cold or heat). Within the BAT analysis, the DEP should consider the economics of requiring the installation of pollution control technology on the diesel trucks. Cost-effectiveness of diesel particulate filters or diesel oxidation catalysts should be considered on all or a portion of the company's diesel fleet as part of the BAT/work practices analysis.

In conclusion, the plan approval needs to take into account the closeness of the residential community to the plant site, the cumulative effect of coal burning, and the cost burden that will be carried by local taxpayers. The Hawbaker plant has the potential to be a "good neighbor", but not unless significant changes are made to this plan.

Thank you,

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