

TITLE V APPLICATION REVIEW

Facility Name: **EM Industries, Inc.**

City: Savannah

County: Chatham

AIRS #: 04-13-051-00037

Application #: TV- 9569

Date Application Received: Dec. 3, 1996

Date Application Deemed

Administratively Complete: Dec. 18, 1996

Date of Draft Permit:

Permit No: 2816-051-0037-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Alan Leake	Sam Buckles
SSCP/ASU	Jack Taylor	Lou Musgrove
ISMP	George Garten	Richard Taylor
TOXICS		Neeraj Verma

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V operating permit. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being proposed pursuant to: (1) Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to EM Industries, Inc. and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

- 1. Facility Name: EM Industries, Inc.
- 2. Parent/Holding Company Name: E. Merck, Darmstadt, Germany
- 3. Previous and/or Other Name(s): None
- 4. Facility Location

O’Leary Road, Georgia Highway 21 & I-95

- 5. Attainment or Non-attainment Area Location

Attainment area

- 6. Class I Area Impacts

The facility is located within 100 km of a Class I area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the “Permit” file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2861-025-9916	5/20/88, amended 11/4/88, 9/13/94, 6/27/95, 3/26/97		X

D. Process Description

- 1. SIC Code(s)

2861

2. Description of Product(s)

This facility produces three types of products: pigments based on titanated mica, pigments based on bismuth oxychloride, and high-purity inorganic salts under the name “patinals.”

3. Overall Facility Process Description

In the mica-based pigment process, the raw mica is thermally stabilized in a kiln and then sized in a grinder. Oversized particles are recycled. The mica fractions are then separated in sedimentation tanks. The mica slurry is a raw material for the pigment reactors. In the pigment reactors, mica is coated with various solutions in a batch process. The pigment slurry is then refined, dried, and packaged. The drying process is completed in a pressure drum, pan dryer, and rotary kiln. The dried pigment is then gravity-fed to vibrating screens. After passing through the screens, the pigment is held in baskets until it is packaged. To achieve the specification of the finished products, blending of the batches may be completed prior to the packaging.

In the ferric chloride process, ferric chloride is produced in a two step process. The first step involves the dissolution of electrolyte iron in hydrochloric acid to form ferrous chloride solution. The second step is the oxidation of ferrous chloride to ferric chloride with chlorine. Approximately 20 hours is required for each step in the process. The first reaction step is controlled by a water scrubber. The second reaction step is controlled by a scrubber using ferrous chloride as the scrubbant. Ferric chloride solution is used in the pigment manufacturing.

In the bismuth-based pigment process, bismuth metal is dissolved in nitric acid and reacted with hydrochloric acid to form bismuth oxychloride. Nitrogen oxides are generated by the process and the emissions are controlled in two parallel scrubbers. The solution is neutralized with ammonia, or caustic, depending upon the final product to be produced and the intermediate product powder is formed as an insoluble powder. The solution tanks and powder reactors vent to the general facility scrubber or the ammonia scrubber. The powder solution is decanted from the solid product. The solid product (powder) is washed with water and then undergoes a series of steps to dry the powder and compound it into final product form. The sequence of unit operations for drying and compounding is different for each of the four product lines. High lustre products are dried in a vacuum dryer. ESQ products are dried on trays and refined in a magnetic classifier. The white powder products are centrifuged and dried in tray dryers, and the coated powder products are dried in a spray drier. The bismuth-based pigments process is a batch process with manual transfer of intermediates and products in trays, drums, and other portable bins.

The application has listed the facility as being applicable to 40 CFR, Part 61, subpart FF, NESHAP for Benzene Waste Operations, because it is a chemical manufacturing plant. However, since there is not any benzene processed at the facility, the facility is exempt from all standards contained in the subpart.

4. Overall Process Flow Diagram (optional)

The process flow diagrams for each process are given in the application in Appendix B.

E. Regulatory Status

TITLE V APPLICATION REVIEW

1. PSD/NSR

On August 30, 1978, EM Laboratories, Inc. filed for a permit to construct a pigment production plant. The plant was determined to be subject to the PSD regulations because the uncontrolled potential emissions of particulate matter from the plant were over 250 tons per year. However, the allowable particulate matter emissions for the plant were specified by permit conditions to be less than 50 tons per year. With these low emission rates and with no impact on a Class I area, a full PSD review was not required. The requirement for a BACT analysis, air quality review, monitoring, and additional impact analysis was not needed.

With today's PSD regulations, the plant would not be subject to the PSD review if a limit on the pollutant was less than the 250 tpy threshold.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓			✓
NO _x	✓	✓		
CO	✓			✓
TRS	n/a			✓
H ₂ S	n/a			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

None

4. Program Applicability

Program Code	Applicable (Yes/No)
Program Code 6 - PSD	N
Program Code 8 - Part 61 NESHAP	Y
Program Code 9 - NSPS	N
Program Code M - Part 63 NESHAP	N
Program Code V - Title V	Y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None

B. Applicable Rules and Regulations

● Rules and Regulations Assessment -

The facility is applicable to 40 CFR, Part 61, subpart FF, NESHAP for Benzene Waste Operations because it is a chemical manufacturing plant. However, since there is not any benzene processed at the facility, the facility is exempt from all standards contained in the subpart.

● Emission and Operating Standards -

None

C. Compliance Status

In Compliance

D. Operational Flexibility

None

E. Permit Conditions

None

III. Regulated Equipment Requirements

A. Brief Process Description

Same as given in Section I above.

B. Equipment List for the Process

Emission Unit ID No.	Emission Unit Description	Applicable Permit Condition No.(s)	Applicable Requirement/Standard	APCD ID No.(s)	APCD Description
D001	Line 1 Drying Process	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C011	Sintamatic Cartridge Dust Collector
D002	Line 2 Drying Process	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C012	“
D003	Line 3 Drying Process	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C013	“
D004	Line 4 Drying Process	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C014	“
D005	Line 5 Drying Process	3.4.8, 3.4.9, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C020	“
D006	Line 6 Drying Process	3.4.8, 3.4.10, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C021	“
D007	Line 7 Drying Process	3.4.2, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	SN502	Baghouse
D102	Spray Dryer 102 with Product Collector	3.4.3 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	SN102	Baghouse
D401	Coated Powder Spray Dryer	3.4.4 3.4.8	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	na	na
P001	Line 1 Product Collection Process	3.4.1, 3.4.8, 5.2.4	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	na	na
P002	Line 2 Product Collection Process	3.4.1, 3.4.8	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	na	na
P003	Line 3 Product Collection Process	3.4.1, 3.4.8	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	na	na
P004	Line 4 Product Collection Process	3.4.1, 3.4.8	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	na	na
P005	Line 5 Product Collection Process	3.4.1, 3.4.8	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	na	na
P006	Line 6 Product Collection Process.	3.4.1	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	na	na
P007	Line 7 Product Collection Process	3.4.2, 3.4.8	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	na	na
R001	Line 1 Reactors	3.4.1, 3.4.8, 5.2.1, 5.2.2, 5.2.7	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C004	HCL Scrubber 4 th Floor

TITLE V APPLICATION REVIEW

Emission Unit ID No.	Emission Unit Description	Applicable Permit Condition No.(s)	Applicable Requirement/Standard	APCD ID No.(s)	APCD Description
R002	Line 2 Reactors	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C004	“
R003	Line 3 Reactors	3.4.1, 3.4.8, 5.2.1, 5.2.2, 5.2.7	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C006	H ₂ SO ₄ Scrubber
R004	Line 4 Reactor	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C006	“
R005	Line 5 Reactor	3.4.1, 3.4.8, 5.2.1, 5.2.2, 5.2.7	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C016	HCL Scrubber 3 rd Floor
R006	Line 6 Reactors	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C016	“
BL01	Product Blender 1	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C015	Packaging Area Dust Collector
BL02	Product Blender 2	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C015	“
BL03	Product Blender 3	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C015	“
BL04	Product Blender 4	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C015	“
BL05	Product Blender 5	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C015	“
BL06	Product Blender 6	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C015	“
BP01	Bismuth Reaction Process	5.2.1, 5.2.2, 5.2.7	na	C026 & C027	No _x Scrubbers
BP02	Bismuth Process Solution Tanks & Powder Reactors	5.2.1, 5.2.2, 5.2.7	na	C028 or C029	Ammonia Scrubber or General Scrubber
FE01	Iron Chloride Reactors	3.5.1, 5.2.1, 5.2.2, 5.2.6, 5.2.8	na	C022 & C023	Iron Chloride HCL Scrubber & Iron Chloride CL ₂ Scrubber
B001	Boiler 1 8.37 MMBtu/hr	3.4.5, 3.4.6 3.4.7, 5.2.9, 5.3.4	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	na	na
B002	Boiler 2 10.5 MMBtu/hr	3.4.5, 3.4.6 3.4.7, 5.2.9, 5.3.4	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	na	na
B003	Boiler 3 5.23 MMBtu/hr	3.4.5, 3.4.6 3.4.7, 5.2.9, 5.3.4	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	na	na
MP01	Mica Preparation	3.4.1, 3.4.8, 5.2.1, 5.2.2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	C003	Mica Dust Scrubber

C. Equipment & Rule Applicability

TITLE V APPLICATION REVIEW

- Emission and Operating Caps - The equipment that is listed in Operations Group OG01 is limited to 2.2 lb/hr or 9.6 tons/yr of particulate matter emissions. This group includes Source Codes D001-D006, P001-P006, R001-R006, BL01-B106, and MP01.

- Applicable Rules and Regulations -

Rules and Regulations Assessment: The equipment that is listed in the table above is subject to Georgia Rules 391-3-1-.02(2)(e), (b), (d), and/or (g). The equipment listed is subject because they are either fuel-burning equipment or manufacturing processes that generate particulate matter emissions.

Emission and Operating Standards: None

D. Compliance Status

In compliance.

E. Operational Flexibility

None

F. Permit Conditions

Part 3.0 of the Title V permit will include Condition 3.4.1 that limits the particulate matter emissions to 2.2 lb/hr and 6.9 tpy. This condition was in the original construction and operation permit that limited the facility so that a PSD review was not needed. Conditions 3.4.2, 3.4.3, and 3.4.4 limits the particulate matter emissions for certain equipment. These limits were derived by using Georgia Rule (e). All other conditions will remain the same unless they are obsolete.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

None of the applicable regulations require performance testing; therefore, the permit does not contain any specific testing requirements. The permit does specify that a performance test may be required at anytime upon request by the Division to determine compliance with the limits in Part 3 of their Title V permit, and test methods for measuring emissions are listed in Condition 4.1.3.

1. Exceptions to General Testing Requirements - Not Applicable.

B. Specific Testing Requirements

1. Individual Equipment - Not Applicable.
2. Equipment Groups (all subject to the same test requirements) - Not Applicable.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)

A. General Monitoring Requirements

The facility uses baghouses, dust collectors and sintamatic cartridge-type dust collectors to control particulate matter emissions from several of the production processes. A condition to record the pressure drop across each baghouse, to inspect each baghouse cleaning system and to conduct daily Visible Emissions checks is included. A condition requiring the reporting of deviations from these operational practices for the baghouses is also included to show compliance with rules (b) and (e).

The facility also uses scrubbers to control particulate matter emissions from several of the production processes. A condition to record the pressure drop and the scrubbant flow is included. A condition requiring the reporting of deviations from these operational practices for the baghouses is also included to show compliance with rules (b) and (e).

The facility has no control equipment on Source Codes P001-P007. These processes are subject to 391-3-1-.02(2)(e) & (b) and a condition to conduct daily Visible Emissions checks is included in the permit. A condition requiring the reporting of deviations from these operational practices for the baghouses is also included.

1. Exceptions to General Monitoring Requirements - None

B. Specific Monitoring Requirements

Boilers B001,B002 and B003 are natural gas fired boilers and are subject to Georgia Rules (d) and (g). These sources burn only natural gas with No. 2 fuel oil as a backup. The sulfur content of natural gas in Georgia is insignificant, therefore, no monitoring is required. A condition to certify that each shipment of fuel oil is distillate oil (ASTM D396 numbers 1 and 2) is included to ensure that the fuel oil complies with Georgia Rule (g). To assure compliance with the sulfur limitation for the fuel oil burned in the boilers , sampling and analysis of the fuel oil is required. The Permittee is given the option of either sampling and analyzing the oil (by approved methods) or obtaining from the oil supplier, a statement certifying that the oil has been sampled and analyzed using approved methods. In either case, the Permittee must report the results of the analysis. Particulate matter emissions from the combustion of distillate fuel oil and natural gas are insignificant, therefore, no additional monitoring is required.

Recordkeeping and Reporting Requirements:

Records, including identification of any deviations from applicable monitoring triggers, the cause of such occurrence, and the corrective action taken are required to be kept by the Permittee and reporting is required on a semiannual basis.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

General requirements for the maintenance of all records for a period of five years are included in the permit condition 6.1.1. Prompt reporting of excess emissions from process malfunctions or improper maintenance shall be as described in condition 6.1.2.

B. Specific Record Keeping and Reporting Requirements

1. Plant wide - The facility is required to keep records on the fuel oil certification as mentioned in Condition 5.2.8 and 5.2.9.
2. Individual Equipment - None
3. Equipment Groups - None

VII. Specific Requirements

Note: Be sure to discuss any stratospheric ozone protection requirements (see subsection J.) that may apply to the source.

A. Operational Flexibility

- None

B. Alternative Requirements

- None

C. Insignificant Activities

- refer to §4.10 of the Title V permit application

D. Temporary Sources

- None

E. Short-Term Activities

- None

F. Compliance Schedule/Progress Reports

- None

TITLE V APPLICATION REVIEW

G. Emissions Trading

- None

H. Acid Rain Requirements

- Non-applicable

I. Prevention of Accidental Releases

- Applicable for Chlorine.

J. Stratospheric Ozone Protection Requirements

- the facility has stated that they are potentially applicable

K. Pollution Prevention

- None

L. Specific Conditions

- None

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

TITLE V APPLICATION REVIEW

Closing Block: We have reviewed and recommend issuance of draft Permit No. 2816-051-0037-V-01-0.

Program	Review Engineers	Dates	Review Managers	Dates
SSPP/ASU				
SSCP/ASU				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager

Date

TITLE V APPLICATION REVIEW

Addendum to Narrative

Comments that were received from EM Industries and EPD's responses are as follows.

- 1) Comment: Emission Unit ID No. D401 does not have a recording condition attached to it. Are we required to record the pressure differential at any specific time?

Response: Emission Unit No. D401 does not have any control equipment associated with it in the application.
- 2) Comment: Our original permit did not include Sources D005 & D006 in the 2.2 lbs/hour and 6.9 ton/year limits. We would like to have individual limits for each piece of equipment.

Response: Since those limits were set based on a PSD review on the original equipment, D005 & D006 will not be included in those limits. These two pieces of equipment will be required to meet the limits according to Georgia Rule 2(e).
- 3) Comment: Should permit Condition 3.5.1 be included in the 3.1 Table showing Applicable Permit Conditions? It applies only to Source No. C023, and not C022.

Response: Yes it should be included in the table. The final permit will include this condition in the table for the scrubber.
- 4) Comment: Section 5.0 does not require recording differential pressure on any frequency. What are we required to do?

Response: The Source Monitoring Program explained that the frequency is stated in Condition 5.2.4.
- 5) Comment: We are not sure what Source No. C030 is, in Condition 5.2.1. It seems to be a mistake. Nothing is listed in the 3.1 Table.

Response: Source C030 is listed in the application as Filter Baghouse Dust Collector for product conveyors and packaging (insign. source). This will remain in the permit until further information is received to prove otherwise.
- 6) Comment: Table 1 refers to "Mica Slurry-017", it is not listed on the Section 3.1 Table. What is this?

Response: This baghouse that was referenced was inadvertently placed in the permit by mistake. It will be removed from the table.
- 7) Comment: Condition 5.2.3 seems to indicate recording if any visible emissions are present. Condition 8.18 seems to allow up to 40%.

Response: Permit Condition 5.2.3 includes a verification that "no visible emissions" are present. The visible emissions check is an operational check for the purpose of assessing the operation and maintenance of the baghouse. Proper operation and maintenance of the baghouse will assure that the emissions limitation is not exceeded. The presence of visible emissions should alert the facility to any existing and/or developing problems with the performance of the baghouse and allow the facility to commence, without undue delay, any needed corrective action. The "no visible emissions" requirement is not an emissions standard but a "trigger" for the facility to initiate corrective action.
- 8) Comment: Permit Condition 5.2.4 requires that a Preventive Maintenance Program be conducted at least weekly to ensure proper operation of the control equipment. We have already implemented a monthly PMP and feel this, along with the daily operator's log, is sufficient to ensure proper operation. We would like this condition to be changed to a monthly requirement.

TITLE V APPLICATION REVIEW

- Response: The Source Monitoring Program issues this general condition in all permits and it will remain in the permit as it is stated.
- 9) Comment: In Condition 5.2.5, emission points P001-P006 are the Sintamatic Dust Collectors referred to in Emission points D001-D006. This seems to be a duplication of Condition 5.2.3 requirements. We would like this condition eliminated.
- Response: These conditions are similar in one respect but Condition 5.2.3 deals with visible emissions issues only. Condition 5.2.5 is a condition that involves visible emissions as well as mechanical failure or malfunction problems. Condition 5.2.5 will not be eliminated.
- 10) Comment: Condition 5.2.5(b) seems to allow 24 hours to correct a problem with any visible emissions before it becomes an excursion that must be reported. Condition 6.1.2 seems to contradict this condition by requiring written notification if any emissions are not controlled within four hours or less.
- Response: Condition 5.2.5(b) is a monitoring condition which allows up to 24 hours to solve the problem before an excursion occurs. Condition 6.1.2 is a recordkeeping and reporting condition that requires reporting excess emissions that occur for a period of four hours or more. The primary difference between these conditions is 5.2.5(b) concerns increased air emissions and 6.1.2 concerns excess emissions.
- 11) Comment: Condition 5.2.8(b), we do not recharge scrubber C022. It has a fresh water make-up. The only scrubber that we recharge is Source C023.
- Response: This condition will be corrected to reflect the correct scrubber.
- 12) Comment: Condition 5.3.1(a) refers to Section 1.5(c) & (d). These are not included in the draft.
- Response: This condition is referencing Section 1.5 in the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants**. A copy of these procedures can be obtained from the Air Branch.
- 13) Comment: Condition 5.3.4 requires us to report on a quarterly basis, all fuel oil burned and copies of all supplier certifications. We would like this condition changed to be included in the annual report under Condition 5.3.1, or eliminated entirely. Our boilers use natural gas as a fuel source. The fuel oil is used as emergency backup for the gas, to run an emergency generator and to run our diesel fire pump. The fire pump is test run every week, and the boilers are periodically tested to see if they will fire on fuel oil. The emergency generator only runs when electrical power is off due to emergencies. We averaged about 1,400 gallons per month for the last twelve months. This would seem to be an excessive recordkeeping & reporting requirement.
- Response: These records are needed to be able to see what your emissions are as they relate to fuel oil. If for some reason you decided to burn much greater amounts of fuel oil, the records would be there to track the emissions. This condition will not be changed.
- 14) Comment: Condition 5.3.4 refers to Conditions 5.3.6 & 5.3.7. These are not included in the draft permit.
- Response: This reference will be removed. They were inadvertently left in the condition.