

Facility Name: **Gold Kist – Ball Ground Protein Recovery Plant**

City: Ball Ground

County: Cherokee

AIRS #: 04-13-057-00008

Application #: 16231

Date SIP Application Received: June 3, 2005

Date Title V Application Received: June 3, 2005

Permit No: 2077-057-0008-V-01-3

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. 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 issued pursuant to: (1) Sections 391-3-1-.03(1) and 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 following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. 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 comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2077-057-0008-V-01-0	May 29, 2003	X	
2077-057-0008-V-01-2	February 9, 2005	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2077-057-0008-V-01-0	Initial Title V Permit
2077-057-0008-V-01-2	Authorized the use of landfill gas, vegetable oil and chicken fat oil as fuels for the existing boilers.

B. Regulatory Status

1. PSD/NSR/RACT

The main purpose of this permit amendment is to authorize the construction and operation of four new semi-continuous hydrolyzers. The Gold Kist-Ball Ground facility is already a NSR major source for VOC emissions since their emissions exceed the Atlanta non-attainment major source threshold of 25 tons per year. Due to a previous modification and emission increases, this facility currently operates under a NSR avoidance limit of 87.3 tons per year. To avoid a PSD/NSR review for this modification, Gold Kist has accepted a new facility wide NSR avoidance limit of 72.3 tpy. This limit replaces the existing limit of 87.3 tpy and will become effective immediately upon issuance of this permit. This limit was established by determining the current actual VOC emissions to be 55.39 tpy and adding a 25% increase expected due to the fourth hydrolyzer. By adding only 16.22 tpy Gold Kist, is reserving 8.5 tpy to allow additional expansion within the next five years and still having the increase remain below the 25 ton per year de minimus.

VOC RACT analysis was necessary for this modification, since it involves the installation of new equipment and the emissions from this facility exceed the Rule 391-3-1-.02(2)(tt) threshold of 25 tpy. The VOC RACT determination was received by the Division on July 20, 2005. The existing control equipment, including Scrubbers SS2, SS2A and new Scrubber SS3, which will control the new hydrolyzers, was found to allow the new equipment to comply with RACT requirements. To assure RACT control efficiencies are maintained, scrubber monitoring is required by this permit amendment. Additional VOC performance tests are also required to be

conducted on emissions controlled by Scrubbers SS2, SS2A and SS3. Two scrubbant scenarios are required to be tested, one while using chlorine dioxide and the second while using both chlorine dioxide and ozone scrubbants. These tests will ensure that the emission rate while using either scrubbing scenario is equal to or lower than the emission rate established in the previous RACT determination. Each scenario must be tested in the summer and the winter since it has been previously determined that control efficiencies differ depending on the overall weather.

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	Yes			✓
PM ₁₀	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes	✓		
CO	Yes			✓
TRS	Yes			✓
H ₂ S	Yes			✓
Individual HAP	Yes			✓
Total HAPs	Yes			✓

II. Proposed Modification

A. Description of Modification

Chicken feathers and blood are currently processed through eight feather hydrolyzers (part of Group No. SS2B). This permit amendment authorizes Gold Kist to construct and operate four new semi-continuous hydrolyzers to replace the eight existing batch hydrolyzers. The eight existing hydrolyzers will be decommissioned once the four new hydrolyzers are installed. Each new hydrolyzer will be heated using steam generated from the existing boilers. The vapors from the four new hydrolyzers will be treated in the same manner as vapors from the decommissioned hydrolyzers; specifically by ducting the vapors through water cooled condensers and two separate packed tower scrubbers (ID Nos. SS2 and SS2A), in series, before being emitted into the atmosphere. The four new hydrolyzers will be housed in a new building which will contain an additional building ventilation scrubber (SS3), providing odor control for the building. This building ventilation scrubber is a packed tower scrubber capable of operating with either a combination of ozone and chlorine dioxide as scrubbants or chlorine dioxide exclusively as the scrubbant. The facility is not authorized to operate this scrubbing system while using ozone scrubbant exclusively.

The operation of the new hydrolyzers will be similar to the existing hydrolyzers, except that the operation will be semi-continuous versus the current batch configuration. The semi-continuous operation will be achieved, in part, through staggered loading of the cookers.

VOC emissions are expected to increase as a result of this modification, since the new hydrolyzers are expected to increase the overall production throughput capacity by 25 percent. The VOC emissions are expected to increase a maximum of 16.22 tpy, due to this proposed increase in production capacity.

B. Emissions Change

There will be an increase in net emissions as a result of this modification since the four new hydrolyzers will have 25 percent additional throughput capacity compared to current capacity. Because Gold Kist is a NSR major source for VOC, they need to ensure that any increase in VOC emissions does not trigger NSR review. Proposed emissions and past actual emissions were calculated by using the emission factors (based on lb/ton of product) that are specified in the current Title V permit. The average actual annualized VOC emissions for the most recent 24 months prior to application submittal were calculated to be 55.39 tpy from the process scrubbers and 56.07 tpy facility wide. A maximum VOC emissions increase of 16.22 tpy is expected from this proposed increase in production throughput. Based on the increase of 16.22 tpy and average historical facility wide emissions (56.07 tpy), emissions from this facility will now be limited to 72.3 tpy. Because the existing hydrolyzers will be decommissioned and emissions will no longer be produced from these units, Table 4 below reflects the net emissions increases, with offsets from the decommissioned units subtracted out.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	NA	NA
PM ₁₀	Yes	NA	NA
SO ₂	Yes	NA	NA
VOC	Yes	16.22	16.22
NO _x	Yes	NA	NA
CO	Yes	NA	NA
TRS	Yes	NA	
H ₂ S	Yes	NA	NA
Individual HAP	Yes	NA	NA
Total HAPs	Yes	NA	NA

C. PSD/NSR Applicability

The Gold Kist-Ball Ground facility is a major source for VOC under non-attainment NSR regulations, with potential emissions exceeding 25 tons per year. This modification, which allows the construction and operation of four new semi-continuous hydrolyzers is expected to result in an emissions increase for VOC and therefore potentially triggers NSR. However, the potential emission increase expected from this modification is below the 25 ton per year increase per 5 year de minimus provision in the Georgia rules. Gold Kist will be required to ensure that the net emissions increase of the modification made does not exceed the significant emission increase threshold for VOC emissions. To avoid NSR on VOC emissions, Gold Kist has requested a facility wide VOC limit of 72.3 tpy, which prevents VOC increases from exceeding the 25 ton per year de minimus increase level.

Because this facility is a NSR major source for VOC, and the emissions from the four new semi-continuous hydrolyzers have not been verified, this facility will need to confirm through performance tests that emissions from these new sources will remain below the VOC limit at the highest expected production rate.

III. Facility Wide Requirements**A. Emission and Operating Caps:**

As a result of this amendment, Condition 2.1.1 subjects this facility to a new limit of 72.3 tons of VOC emissions during any twelve consecutive months, from the entire plant, to avoid NSR review.

To comply with VOC RACT requirements, Condition 2.3.1 requires this facility to operate the wet scrubbers in a manner so as to the minimize emissions of VOCs and odorous compounds and the Permittee must monitor these control devices in accordance with the associated conditions in Section 5.2.

B. Applicable Rules and Regulations

Rules and Regulations Assessment - Because its emission of VOCs exceeds 25 tons per year and it is located in one of the Atlanta non-attainment area (NAA) counties (Cherokee County), the plant is subject to the requirements of 391-3-1-.02(2)(tt) - "VOC Emissions from Major Sources." Rule(tt) requires that the plant use Reasonably Available Control Technology (RACT). The EPD required the plant to submit a RACT determination for this modification. This plant submitted a RACT determination on July 18, 2005. It was determined that RACT will be the use of 3 scrubbers to control VOC emissions. A number of operational conditions have been incorporated within this permit amendment, requiring the plant to verify that the facility's scrubbers (RACT control equipment) are being operated properly. These conditions include monitoring requirements, located in Section 5.2, and record keeping and reporting requirements, in Sections 6.1 and 6.2 of this permit modification.

All scrubbers will use a chlorine dioxide and ozone feed system to control VOC emissions and odors from rendering operations. This modification includes requirements to establish the worst-case emission factor for each season, (1) while operating with the chlorine system and (2) while operating with both ozone and chlorine systems simultaneously, which must then be used in calculating VOC emissions to demonstrate compliance with the VOC NSR avoidance limit. These new emission factors must be verified by the Division but are not expected to exceed the current summer or winter emission factors demonstrated under the previous RACT determination; they will use the old factors in the mean time, as found below. If the new factors are found to be greater than the old factors, the Division reserves the right to reopen the VOC RACT determination.

Old Emission Factors

$$\text{Summer (May - October)} = \frac{2.48\text{lb(VOC)}}{\text{ton of dry feed produced}}$$

$$\text{Winter (November - April)} = \frac{1.50\text{lb(VOC)}}{\text{ton of dry feed produced}}$$

C. Compliance Status

The applications submitted by this facility contain compliance certifications, which were signed by the company's responsible official, certifying "this facility is in compliance with all applicable requirements effective as of the date of the certification and will continue to comply with such requirements." The Title V permit application contained no Section F Facility Compliance forms, which must be submitted if there is any non-compliance known by the company. The Division has no evidence to the contrary and therefore accepts the compliance certification.

D. Operational Flexibility

Not Applicable.

E. Permit Conditions

The Gold Kist-Ball Ground facility must operate under a VOC limit, which was established in the VOC NSR avoidance review and RACT determination. The facility is required, by Condition 2.1.1, to limit emissions of VOC below 72.3 tons of VOCs during any twelve consecutive months. The VOC RACT requires this facility, as specified in Condition 2.3.1, to operate the wet scrubbers in a manner so as to minimize emissions of VOCs and odorous compounds and to monitor these control devices in accordance with the associated conditions in Section 5.2.

IV. Regulated Equipment Requirements

A. Brief Process Description

Chicken feathers and blood are currently processed through eight feather hydrolyzers (part of Group No. SS2B). This modification authorizes Gold Kist to construct and operate four new semi-continuous hydrolyzers to replace the eight existing batch hydrolyzers. The eight existing hydrolyzers will be decommissioned with the four new hydrolyzers replacing them in Group No. SS2B. Each new hydrolyzer will be heated using steam generated from the existing boilers. The vapors from the feather and blood hydrolyzation will still be treated by ducting through water cooled condensers and the two separate packed tower scrubbers (ID Nos. SS2 and SS2A), in series, before being emitted into the atmosphere. These four new semi-continuous hydrolyzers will be housed in a new building which will contain an additional building ventilation scrubber (SS3) to provide odor control for the building.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
SS2B	Four Semi-continuous Hydrolyzers and four Continuous Cookers	391-3-1-.02(2)(b), 391-3-1-.02(2)(tt), 391-3-1-.02(2)(e)	2.1.1, 2.3.1, 3.4.1, 3.4.3, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 6.1.7, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7	SS2, SS3, SS2A	Millpoint Packed Tower Scrubbers

C. Equipment & Rule Applicability

Applicable Rules and Regulations -

Georgia Rule (b) limits opacity to 40% and applies to sources that are not subject to another more stringent opacity limit. The four new feather hydrolyzers and four existing continuous cookers with Group No. SS2B are specifically subject to Rule (b).

Georgia Rule (e) applies to processes and limits particulate emissions according to the formula: $E = 4.1P^{0.67}$, where E equals the allowable emission rate in pounds per hour and P equals the process input weight rate in tons per hour. The four new feather hydrolyzers and four existing continuous cookers in Group No. SS2B are subject to this limit.

D. Compliance Status

Refer to Section III C. of this Narrative.

E. Operational Flexibility

None Applicable.

F. Permit Conditions

Condition 3.4.1 has been modified to limit visible emissions from the four new feather hydrolizers and four existing continuous cookers (all part of Equipment Group SS2B) to the Rule (b) opacity limit, which is 40 percent or less opacity.

Condition 3.4.3 has been modified, and now requires the rendering process equipment, consisting of four new feather hydrolizers and four existing continuous cookers (Group No. SS2B), to comply with Rule (e) for PM.

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

A. Individual Equipment:

This permit specifies that a performance test is required to determine compliance with the VOC emission limit in Part 3.0, and the test methods to be used to determine compliance are listed in Condition 4.1.3. A general condition to require notification of any test and for the submission of a test plan is included in Condition 4.1.2.

Emissions from scrubbers SS2, SS2A and SS3 are required by Conditions 4.2.1, 4.2.2, and 4.2.3 to be tested to establish and verify four worst-case emission factors, based on two scrubbant operating scenarios, for both the summer and winter seasons, and to establish scrubber parameters appropriate for assuring compliance with these VOC emission factors. By adding the VOC testing results from each Scrubber (SS2A and SS3), the Permittee shall obtain the overall emission factors. Summer and winter performance tests must be conducted following the issuance of this Title V permit. The summer tests must be performed during the first June, July, or August and the winter tests must be carried out during the first December, January, or February after issuance of this permit. The results of the VOC performance tests must be used to establish emission factors in the form of pounds of VOC per ton of dry product produced for the summer season (May 1 through October 31) and for the winter season (November 1 through April 30) for each of the two scrubbant scenarios. These seasonal emission factors will assure compliance with the VOC emission limit.

Condition Nos. 4.2.1, 4.2.2 and 4.2.3 were in the permit and have already been complied with. They are reinstated now, since new performance tests, as described above, are required to show compliance with the VOC limit while operating the new hydrolyzers.

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

A. Individual Equipment:

The Division has established several monitoring protocols for the proper operation and maintenance of the scrubber systems to ensure that the facility is maintaining VOC RACT requirements, and that the Permittee complies with Rule 391-3-1-.02(2)(a)10., which requires that control equipment be maintained and operated so as to minimize emissions of air pollutants. The values recorded must be compared to the range indicating good operation established for the particular scrubbant scenario during the current season of the year by the performance tests. The monitoring requirements of the emission control equipment are as follows:

a. Specific monitoring requirements

To assure compliance with Rule (tt) VOC RACT, Conditions 5.2.1 a., 5.2.1 b., 5.2.1 c., 5.2.1 f. and 5.2.1 l., which require the Permittee to continuously monitor and record the indicated parameters on Scrubbers SS2 and SS2A, will now require the same monitoring on new Scrubber SS3. This scrubber will most often use both ozone and chlorine dioxide to control VOCs and odor from the new process building.

Performance testing is required to demonstrate that keeping each scrubber operation within the acceptable range of each parameter will assure the efficient removal of odors and VOC emissions when using only chlorine dioxide as the scrubbant or both ozone and chlorine dioxide as the scrubbant.

The four new feather hydrolizers and four existing continuous cookers (Group No. SS2B) are subject to State Rules (b) and (e). However, the processes are predominately wet and therefore inherently low in PM emissions. Also, it is in the facility's self interest to maintain low PM levels in the emissions to prevent plugging of the condensers which are downstream from these processes. These units are also subject to State Rule (tt). As such, they are required to operate control equipment efficiently. Therefore, no monitoring requirements have been incorporated in the permit amendment with regard to Rule (b) or Rule (e).

To avoid a PSD/NSR review from this modification, the facility is required to calculate the monthly VOC emissions using the equation in Condition 6.2.7 which uses the production of products (dry basis) from the facility, and the summer or winter emission factor for a particular scrubbing scenario, to calculate the VOC emissions. The Permittee must calculate the 12-month rolling total quantities of VOC emitted from the facility for each calendar month and shall notify the Division in writing if VOC emissions from the entire plant exceed 72.3 tons during any twelve consecutive month period. Tracking VOCs from the process and submitting a VOC emission report semiannually will help ensure that this facility does not exceed the NSR VOC limit.

VII. Other Record Keeping and Reporting Requirements

6.1.7 b. i has been modified and now defines an exceedance as plant wide VOC emissions exceeding 72.3 tons per any twelve consecutive months.

Condition 6.1.7 c. iv has been modified to include Scrubber SS3 and requires ozone flow to be within the range of 30 to 50 percent for each scrubber. This range must be confirmed by the performance tests required in Section 4.2, or modified accordingly.

Condition 6.1.7 c. vi has been modified to include Scrubber SS3 and requires pH measurements of the scrubber water to be within the range of 4 to 9 inches for Scrubber SS2; 1 to 5 inches for Scrubber SS2A; and 5 to 9 inches for Scrubber SS3. These ranges must be confirmed by the performance tests required in Section 4.2, or modified accordingly.

Condition 6.1.7 c. vii has been modified to include Scrubber SS3 and requires a scrubbant recirculation rate range between 600 to 1400 gallons per minute for Scrubber SS2; a range of 175 to 500 gallons per minute for Scrubber SS2A; and 175 to 600 gallons per minute for Scrubber SS3. These ranges must be confirmed by the performance tests required in Section 4.2, or modified accordingly.

Condition 6.1.7 c. viii has been modified to include Scrubber SS3 and requires differential pressure measurements across Scrubber SS2 to be within the range of 3.5 to 8.5 inches of water; across Scrubber SS2A to be from 2.5 to 8.5 inches of water; and across Scrubber SS3 to be within the range of 2.0 to 9.0 inches of water. These ranges must be confirmed by the performance tests required in Section 4.2, or modified accordingly.

Condition 6.1.7 c. x has been modified to include Scrubber SS3 and requires the chlorine dioxide feed rate to be within the range of 3.7 to 13 pounds per hour in Scrubbers SS2, SS2A and SS3. This range must be confirmed by the performance tests required in Section 4.2, or modified accordingly.

Condition No. 6.2.4 has been modified to reflect that there will be new summer and winter emission factors developed while using chlorine dioxide as the scrubbant and while using both ozone and chlorine dioxide as the scrubbant while operating the new hydrolyzers. The current emission factors must be used until new emission factors are established in accordance with Section 4.2.

Condition No. 6.2.5 has been modified to reflect the reporting requirements if VOC emissions from the entire plant exceeds the new NSR avoidance limit of 72.3 tons during any twelve consecutive month period.

Condition No. 6.2.6 has been modified to reflect the change in the emission statements submittal dates.

VIII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

The Insignificant Activities list was not changed as a result of this amendment.

D. Temporary Sources

Not Applicable.

E. Short-Term Activities

Not Applicable.

F. Compliance Schedule/Progress Reports

Not Applicable.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Prevention of Accidental Releases

Not Applicable.

J. Stratospheric Ozone Protection Requirements

This modification does not change the source's applicability.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

Not Applicable.

Addendum to Narrative

The Division issued draft Title V Permit Amendment 2077-057-0008-V-01-3 for Gold Kist, Inc. in Ball Ground, Georgia on September 8, 2005. The announced public comment deadline for the draft permit amendment was October 29, 2005. Written comments dated October 4, 2005 were received from Gold Kist, Inc. on October 6, 2005. No other comments were received.

Below are EPD's responses to comments made by Gold Kist, Inc.; the comments are reproduced below.

- (1) The following comment was made regarding Condition 1.3:

“It appears that the nomenclature for the existing 20,000 scfm packed tower scrubber and the existing 100,000 scfm packed tower scrubber have been reversed. The smaller scrubber should be referred to as SS2A and the larger scrubber should be referred to as SS2. Thus, the second paragraph needs to be modified to accurately reflect the appropriate scrubbers.”

EPD's Response:

The Title V permit will be changed to include the scrubber identification changes proposed by Gold Kist. The existing 20,000 scfm packed tower scrubber will be identified as ID No. SS2A and the existing 100,000 scfm packed tower scrubber will be identified as ID No. SS2.

- (2) The following comment was made regarding Condition 4.2.1:

The first sentence of Condition 4.2.1 should be revised to read "...at the outlet of Scrubbers Number SS2 and SS3." Further, the third sentence of Condition 4.2.1 should be revised to read "...(1) while operating with chlorine dioxide alone and (2) while operating with both the Ozone and Chlorine Dioxide in Scrubber Numbers SS2, SS3 and SS2A.”

EPD's Response:

Condition 4.2.1 in the Title V permit will be corrected, changing the scrubber identification number from SS2A to SS2, as suggested in comment No. 1. Condition 4.2.1 will also be modified to correct another mistake. The condition incorrectly specified that one of the scrubbants used in Scrubber SS2 is chlorine; it is actually chlorine dioxide.

- (3) The following comment was made regarding Condition 4.2.2:

The first sentence of Condition 4.2.2 should be revised to read "...record the following scrubber, chlorine dioxide and Ozone System parameters at least once every 15 minutes.”

EPD's Response:

As with Condition 4.2.1, Condition 4.2.2 incorrectly specified that one of the scrubbants used in Scrubber SS2 is chlorine; it is actually chlorine dioxide. Condition 4.2.2 is corrected as requested in the comment.

(4) The following comment was made regarding Condition 4.2.3:

The second sentence of Condition 4.2.3 should be revised to read "...from outlets SS2 and SS3 shall be added to obtain each seasonal emission factor."

EPD's Response:

Condition 4.2.3 in the Title V permit will be modified changing the scrubber identification number from SS2A to SS2, as suggested in comment No. 4. This condition now requires the Permittee to establish VOC testing results from outlets "SS2 and SS3" instead of "SS2A and SS3".

(6) The following comment was made regarding Condition 6.1.7(c)(vi):

The units of measure for pH should be changed from inches of water to standard units (s.u.). Further, it can be expected that the new building air scrubber (SS3) would operate in a similar range compared to the existing building air scrubber (SS2). Thus, Gold Kist requests that the pH range for SS3 be adjusted to 4.0 to 9.0 s.u.

EPD's Response:

The Division agrees to correct the units of measure for pH from inches of water to standard units (s.u.) and has changed Condition 6.1.7 c. vi. accordingly. The proposed permit allowed a pH range of 5 to 9 s.u. on new Scrubber SS3. The Division has determined that the proposed new range is acceptable since the method of operation for this scrubber will be similar to Scrubber SS2, which has a pH range of 4 to 9 s.u. This range must be verified in accordance to Condition 4.2.2. Therefore, Condition 6.1.7 c. vi. has been changed to allow a pH range from 4 to 9 s.u. on new Scrubber SS3.

(7) The following comment was made regarding Condition 6.1.7(c)(vii):

It can be expected that the new building air scrubber (SS3) would operate in a similar range as compared to the existing building air scrubber (SS2). Thus, Gold Kist requests that the scrubbant liquid recirculation rate be adjusted to 600 to 1400 gallons per minute.

EPD's Response:

Gold Kist requested an increase in the scrubbant liquid recirculation rate to allow a scrubbant liquid recirculation rate of 600 to 1400 gpm on Scrubber SS3. Since increasing the scrubbant liquid recirculation rate will likely provide better control, the Division has determined that this can be allowed and has changed the Condition 6.1.7 c. vii. in response to the comment.