

Facility Name: **Geiger International, Inc.**
City: Atlanta
County: Fulton
AIRS #: 04-13-121-00558

Application #: TV-16124
Date Application Received: March 28, 2005
Permit No: 2521-121-0558-V-02-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Geiger International, 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, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name

Geiger International, Inc.

2. Parent/Holding Company Name

Herman Miller, Inc.

3. Previous and/or Other Name(s)

pka, Geiger Brickel – Fulton Facility

4. Facility Location

6095 Fulton Industrial Boulevard, SW
Atlanta, GA 30336-0068
Fulton County

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located within the non-attainment area for 8-hour ozone.

6. Class I Area Impacts

The facility is located within 200 miles of the Cohutta Wilderness Area, which is 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 Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the facility's "Permit" file(s) found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2521-121-0558-V-01-0	9-28-2000	Initial Title V Permit
Off Permit Change	12-27-2001	Existing electric Dryer Oven (PS08) replaced with a natural gas fired drying oven (<1 MMBtu/hr)
Off Permit Change	11-19-2002	Replaced existing Dust Collector (APC9) with newer, larger dust collector.
Off Permit Change	1-27-2004	Replaced existing Dust Collector (APC10) with a newer, larger dust collector
Off Permit Change	4-19-2004	Topcoat Booth (PS06) replaced with a new booth with a water filter, and Shade/Stain Booth No. 2 (PS02) replaced with new booth (water based paint booth with spray booth filters).
Off Permit Change	2-24-2005	Relocation of Edge Coater Line and Flat Line (ISN04)
Off Permit Change	4-4-2005	Construct and operate Edge Coater Line 3

D. Process Description

1. SIC Codes(s)

2521 – Wood Office Furniture

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

This facility produces high quality wood office furniture.

3. Overall Facility Process Description

The facility receives several shapes and sizes of particleboard, veneers, and natural wood. The facility first cuts, trims, and covers the wooden pieces (particle board) with veneer. The pieces are sanded and assembled as necessary. The facility utilizes three separate process lines: one for stained product, one line for natural products for cases and one line for natural products for flat parts. For stained products, case good components are stained via hand application techniques (stains emit toluene, xylenes, and other VOCs) Excess stain is wiped away with rags and the case goods are sent to the stain/shade sealer booth to add additional color. Sealers are the last material applied to the products. The sealed products are transferred to the topcoat line.

Natural wood products in case forms are sent to the shade/sealer booth where sealer is applied. Product is then transferred to the topcoat line. Natural wood products in flat form are sent to the edge coater and roll coater line (utilizes coating that are less than 0.1% VOC) where the sealer is applied and cured by UV lamps. Product is then transferred to the topcoat line.

The topcoat line is separated into three processes: one for case components (built cases); one for flat components; and one line for work surfaces.

The case components are dried by infrared lights, sanded and then enter the topcoat tunnel where a water based urethane clear coat is applied. The cases enter a drying tunnel for 20 minutes, are sanded and then pass through the topcoat tunnel where a second coat of water based urethane clear coat is applied. The cases reenter the drying tunnel for 20 minutes and are then transferred to final assembly.

Flat parts are transferred to the edge coater and roll coater line (utilizes coatings that are less than 0.1% VOC) where they are sanded, topcoat is applied and cured by UV lamps, and then transferred to final assembly.

Work surfaces are sanded and placed onto the topcoat line where they enter the topcoat booth and a urethane clear coat is applied. The work surfaces then enter a drying room where they stand for 24 hours before being transferred to the final assemble area.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a major source of VOC emissions under PSD and NSR regulations. The potential VOC emissions from the facility are 100 tons per year of VOCs. The major source threshold for the severe non-attainment area is 25 tons per year. The facility has had no major modifications in the last five years.

This is also discussed in the narrative for the Title V Permit No. 2521-121-0558-V-01-0. Please refer to this narrative.

2. Title V Major Source Status by Pollutant

Table 2: 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	N/A			
H ₂ S	N/A			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

The facility is subject to 40 CFR Part 63, Subpart JJ – *National Emission Standards for Wood Furniture Manufacturing Operations*.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	N
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

Regulatory Analysis**II. Facility Wide Requirements**

A. Emission and Operating Caps:

Emission and operating caps specified in Permit No. 2521-121-0558-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

B. Applicable Rules and Regulations

Applicable rules and regulations specified in Permit No. 2521-121-0558-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

C. Compliance Status

The facility applications indicate current compliance with all applicable rules and regulations.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition 2.1.1 limits the facility to less than 100 tons of VOC emissions during any 12 month period. This condition remains from the Initial Title V Permit.

III. Regulated Equipment Requirements**A. Brief Process Description**

A brief process description is specified in the narrative for Title V Permit No. 2521-121-0558-V-01-0. Please refer to this narrative.

The only process equipment addition in the last five years is the Edge Coater Line 3. This was requested in the Off Permit Letter dated April 4, 2005. This edge coating line is subject to the same regulations as Edge Coater Lines 1 and 2 and is treated in the same regard within Title V Permit No. 2521-121-0558-V-02-0.

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
WW01	Woodworking	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.3, 5.2.2, 6.1.7, 6.2.15, 6.2.16	APC8, APC9, APC10	Dust Collection System
AD01	Adhesives	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.7, 3.3.8, 3.3.11, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.16		N/A
EC01	Edge Coater 1	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		N/A
EC02	Edge Coater 2	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		N/A
EC03	Edge Coater 3	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.4, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		N/A
F001	Stain Operations	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		N/A
FS01	Face Stain 1	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		N/A
FS02	Face Stain 2	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		N/A

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
MC01	Miscellaneous Coating Operations	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		N/A
PS01	Shade/Stain Booth	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.16		Fiberglass Filters
PS02	Water Based Paint Booth	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.16		Fiberglass Filters
PS03	Flash Off Area (Side Draft Booth)	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.16		Fiberglass Filters
PS04	Water Based Topcoat Tunnel / Water Line	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		Water Wash System
PS06	Topcoat Booth	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.12, 6.2.12, 6.2.13, 6.2.14, 6.2.16		Fiberglass Filters
UV01	UV Line	40 CFR Part 63, Subpart JJ, 391-3-1-.02(2)(hhh), 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.11, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.16		N/A

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 2521-121-0558-V-02-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

The only process equipment addition in the last five years is the Edge Coater Line 3. This was requested in the Off Permit Letter dated April 4, 2005. This edge coating line is subject to the same regulations as Edge Coater Lines 1 and 2 and is treated in the same regard within Title V Permit No. 2521-121-0558-V-02-0.

D. Compliance Status

The facility applications indicate current compliance with all applicable rules and regulations.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 3.5.2 has been modified from requiring the spray booth filters be changed once per day of operation to once per seven (7) days of operation. This is sufficient maintenance for the facility to reasonably assure compliance with Georgia Rule 391-3-1-.02(2)(b) and Georgia Rule 391-3-1-.02(2)(e).

Condition 3.5.4 has been added. This Condition applies to the Water Based Topcoat Tunnel / Water Line which is equipped with a water wash system to control particulate emissions. The efficiency of the water wash system is determined by the depth of the system at a specific location. This condition requires daily inspection of the depth of the water and that it be maintained between 12.5 to 15 inches of water depth. In the original Title V this Emission Unit had been incorrectly identified as having fabric filters, and therefore this Condition is being added to correct this.

No other condition's content has been modified; however the language has been updated and some conditions have been renumbered within the Permit. The following table compares the conditions as shown in Title V Permit 2521-121-0558-V-01-0 and how they are presented in Title V Permit 2521-121-0558-V-02-0. These conditions have been discussed previously in the narrative accompanying Title V Permit 2521-121-0588-V-01-0.

Conditions Comparison Table.

Title V Permit No. 2521-121-0588-V-02-0 Condition Is Now	Title V Permit No. 2521-121-0588-V-01-0 Condition Was Previously
3.5.4	N/A
5.2.1	3.3.11 (a) – (j)
5.2.2	5.2.1
5.2.3	N/A
6.1.7 (b) (ii), (v), (vi), (vii)	6.1.7 (a) (i) – (iv)
6.2.1	6.2.5
6.2.2	6.2.1
6.2.3	6.2.2
6.2.4	6.2.3
6.2.5 and 6.2.6	6.2.4
6.2.7	6.2.6
6.2.8	6.2.7
6.2.9	6.2.8
6.2.10	6.2.9
6.2.11	6.2.10
6.2.12	6.2.11
6.2.13	6.2.12
6.2.14	6.2.13
6.2.15	6.2.14
6.2.16	6.2.15

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

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements**1. Individual Equipment**

None applicable.

2. Equipment Groups (all subject to the same test requirements):

None applicable.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements**1. Individual Equipment:**

Monitoring requirements specified in Permit No. 2521-121-0558-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Condition 5.2.1 was added in Permit No. 2521-121-0588-V-02-0. This Condition was previously part of Condition 3.3.11, which outlined a Work Practice Implementation Plan to be followed in accordance with 40 CFR Part 63 Subpart JJ. This plan is now outlined in Condition 5.2.1 and is no longer a part of Condition 3.3.11. This is represented in the Condition Comparison Table in Section III, Part F of this narrative.

The previous Condition 5.2.1 is now Condition 5.2.2.

Condition 5.2.3 was added requiring a log to be kept of the daily water depth checks for the water wash system as required in Condition 3.5.4. This water wash system was incorrectly permitted as a fabric filter in the original Title V Permit and is now being corrected.

2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

C. Compliance Assurance Monitoring (CAM)

Not Applicable, since the facility does not use a control device to comply with the 100 tons per year VOC limit.

VI. Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the 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.

B. Specific Record Keeping and Reporting Requirements

Record keeping and reporting requirements specified in Permit No. 2521-121-0558-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Conditions have been rearranged in this section. Please see the Conditions Comparison Table in Section III, Part F of this Narrative.

VII. Specific Requirements

- A. Operational Flexibility
Not Applicable.
- B. Alternative Requirements
Not Applicable.
- C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

- 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. Stratospheric Ozone Protection Requirements
Not Applicable.
- J. Pollution Prevention
Not Applicable.
- K. Specific Conditions
Not Applicable.

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.

Addendum to Narrative

The 30-day public review started on September 21, 2005 and ended on October 21, 2005. Comments were not received by the Division.