

DiGeronimo Aggregates, LLC
PTI # 13-04605
Summary of Comments and Responses
Public Hearing Held June 15, 2006 and
Comment Period Ending June 21, 2006
Facility ID: 13 18 27 0383

The following Ohio EPA responsiveness study was prepared to address comments and questions regarding a proposed air permit to install (PTI) action by Ohio EPA for DiGeronimo Aggregates, LLC (hereafter DGA), in Independence, Ohio. The project calls for the modification and operation of an existing rotary kiln, used for expanding raw shale, to use coal as a primary fuel. Ohio EPA issued the PTI in draft form and held a public hearing to gather public comments on the air permit.

After technical review, both the Cleveland Division of Air Quality (CDAQ) and the Ohio EPA, Division of Air Pollution Control, have determined that a final PTI should be issued to DiGeronimo for application number 13-04605.

This responsiveness summary is intended to address questions and comments presented at the hearing and submitted in writing during the comment period. For questions regarding this summary, please contact Mr. David Hearne of the Cleveland Division of Air Quality at 216-664-2178.

1. Comment from Councilman George Klepacz:

The commenter stated that the EPA needs to consider the questions that have been asked during the public information session and public hearing held on June 15, 2006. The commenter noted that residents want to be assured that their quality of life will not be diminished because of this proposed action but will actually be improved.

Response:

Currently, several techniques and technologies are being employed at the DGA facility to limit emissions of air pollutants from the emissions units. Additional technologies that satisfy the best available technology requirements for Ohio are being implemented as part of the action described in this Permit to Install/Modify. A new baghouse that controls emissions with a greater efficiency than presently achieved will be installed to collect particulate, lead, mercury, arsenic, cadmium and chromium emissions. A coal handling and pulverizing system will be employed that is designed with enclosed conveyors and transfer points and capture and collection system to minimize emissions. A low-NOx burner or equivalent technology will be required that will keep nitrogen oxide (NOx) emissions within allowable limits. A lime-slurry injection system will be employed to control sulfur dioxide, hydrogen fluoride and

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hydrogen chloride emissions. The DGA facility will also have limits on the annual amount of coal that can be used as well as an annual restriction on shale throughput to help minimize emissions. The terms and conditions included in this proposed permit were developed to satisfy the applicable Ohio air pollution control laws and regulations that assure protection of human health and the environment, a key component of any quality of life measurement.

2. Comment from Councilman George Klepacz:

The commenter noted that the facility will be inspected at least once every two years. The commenter questioned whether these inspections were announced or unannounced. The commenter also requested that the City of Independence receive a copy of each inspection report without having to request a copy of the report from EPA.

Response:

Major facilities such as DGA undergo a complete facility inspection at least once every two years. Such inspections are typically scheduled with the facility in advance for logistical reasons (e.g., to assure that key staff from the facility are on site and to assure that the facility is operating during the inspection). These inspections provide a comprehensive review of the facility for which one or more inspectors will review all of the files, records, reports, stack tests, and permits for the facility and then conduct an onsite inspection over one or more days. During the onsite inspection, the inspector(s) will examine each emissions unit and any related control equipment in depth. The inspector(s) will also review all records and logs required to be maintained by the terms and conditions of the permit(s). After this review and the subsequent analysis of all information collected and observed during the course of the inspection, the inspector(s) will formally determine the compliance status of the facility and write a comprehensive report documenting all results of each inspection.

In addition to these comprehensive inspections, interim partial inspections are conducted as part of our complaint response process or in cases where a new permit application for some new equipment has been received. These types of inspections are often unannounced.

The final reports of all inspections conducted by CDAQ are public documents. As such, they are available for review by anyone. CDAQ has established procedures that make all such public information available for review upon request at no charge.

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While public documents may be copied by the requestor, there is a charge for each photocopy made. The public records laws do not provide a mechanism for CDAQ to produce and deliver copies of these documents to a requestor on a continuous basis. As one possible suggestion that would accommodate the commenter's request, CDAQ recommends that the commenter request to review the resulting inspection report at the time of the facility inspection.

3. Comment from Councilman George Klepacz:

The commenter inquired if there were any plans to replace the kiln and noted that it appeared to be around 100 years old.

Response:

An error was made in the public information presentation listing the age of the kiln. The kiln was actually constructed in 1970. It is Ohio EPA/CDAQ's understanding that the current age of 36 years is well within the expected lifespan for such kilns.

4. Comment from Councilman George Klepacz:

The commenter questioned how the coal will be pulverized and expressed concern that DGA would utilize a giant coal pile that would need to be smashed up. The commenter requested an explanation of how the actual pulverization process is going to work.

Response:

Based on information provided by DGA, the coal will be brought into the plant in lump form with these lumps ranging from 1/2" to 1" in size. The lumps of coal will be transferred directly from the trucks into a silo. There are no provisions for DGA to store any coal on the ground. The silo will have the capacity to store 3 days worth of lump coal. The coal will go from the storage silo to a smaller feed tank. From the feed tank it will go over a weigh-feeder (where the weight will be recorded hourly) to the coal mill (at about 2 tons per hour). The coal mill has a 45" table that spins at high speed, with three rollers that sit on top of it, the coal spins on top of the table and under the rolls which pulverizes it into a fine powder. Once the coal is pulverized fine enough, a whizzer fan picks it up and pulls it through the fan and up into the kiln through a pipe. The belt to the main storage tank will be covered. The transfer chute to the tank will be totally enclosed. The silo will have no openings. The belt conveyor

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to the small feed tank will be covered. The weigh feeder will be covered. The chute to the mill has a rotary feeder to seal the coal mill. The coal mill, ducts, and coal mill fan are totally enclosed. This system operates under negative pressure so that no coal blows outside.

To summarize, there are no provisions to have any coal (lump or pulverized) on the ground, it will be stored in a silo. The coal is pulverized as it is fed into the kiln. Coal mill systems such as this are used all over the nation in cement kilns, lime kilns, and lightweight aggregate kilns. Ohio EPA/CDAQ's analysis of this system based on the information provided by DGA in their permit application shows that maximum emissions from this system would be below the threshold for permitting (i.e., less than 10 pounds per day).

5. Comment from Councilman George Klepacz:

The commenter stated that he heard from several residents saying large clouds of dust were coming up over the Valley View bridge. The commenter inferred these emissions to be from DGA but did not specify a time when these emissions took place. The commenter does not want see clouds of black coal dust in addition to other accumulations of dust.

Response:

CDAQ has received 6 complaints related to the DGA facility during the last 7 years. All but one of these complaints were received prior to 2002. This most recent complaint was received on July 21, 2005 and reported a large cloud of smoke or dust. During CDAQ's investigation of this complaint it was reported that DGA had experienced a malfunction of their lime injection system. Following the repair of this system, emissions returned to normal levels.

The statements made by this commenter as well as others during the public hearing and public information session regarding other occasions when dust and/or smoke were emitted from the DGA facility cannot be verified by CDAQ because specific information regarding these incidents was not reported to us in a timely manner. CDAQ encourages anyone to report emissions of odors, smoke, open burning, or fumes as soon as they are observed from anywhere in Cuyahoga County to our 24-hour Air Quality Complaint Hotline by calling 216-441-7442. All complaints are investigated by CDAQ staff. When a complainant leaves their name and phone

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number, they will be contacted by the assigned investigator for additional information at the onset and conclusion of the investigation.

The complaint history of a facility can be reviewed when considering a permit application as needed. In the case of this permitting action, there have been a relatively low number of reported complaints in recent years.

6. Comment from Councilman George Klepacz:

The commenter questioned whether this permit would allow DGA to switch between coal and fuel oil and, if so, what the process would be to allow this. The commenter also questioned if DGA would be able to continue burning natural gas.

Response:

DGA currently has the ability to fuel their kiln using either natural gas or oil. At this time, DGA is burning natural gas. Information submitted by DGA indicates that if a final permit to burn coal is issued, they will burn coal as their primary fuel and utilize natural gas as their secondary fuel. The #4 re-refined oil will be used as a third fuel and will be the last option depending on fuel costs at any given time.

DGA uses a Peabody combination burner that allows them to switch back and forth from natural gas to oil, or use a combination of the two. The pulverized coal (primary fuel) burner pipe will be 12" or 14" diameter. A 2" or 4" pipe located at the center of the coal burner will be used as the natural gas (secondary fuel) burner. DGA is still designing how the oil burner will go into the kiln. Preliminary designs point to the possibility of opening the 4" pipe at the center of the coal pipe and pushing the oil firing gun into it to the end of the coal pipe or pull the coal pipe completely out and push an oil firing gun into the kiln.

7. Comment from Mr. Mike Guzi:

The commenter noted that forty years ago the DGA facility was burning coal to energize the kiln. The commenter offered the opinion that this was a dirty source then and that houses were covered with red and black smoke. The commenter stated that their health, safety, and quality of life was not very good from the mid '60s until the mid '70s when, in the interests of cost savings, the former owners of the DGA facility switched to natural gas and subsequently to re-refined used #4 fuel oil. The commenter added that this request to change back to coal does not represent a

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desire to use the cleanest fuel available. The commenter questioned if this fuel change request was consistent with applicable federal and state laws. The commenter offered the opinion that problems at the DGA facility are not being resolved but are becoming worse. The commenter urged EPA to place greater importance on the health impacts of proposed modifications to existing facilities and less importance on the cost impacts of changes at any facility. Regarding this proposed permit, the commenter requested an analysis of the health impacts of this project on the community.

Response:

Response No. 5 above discussed the complaint history of this facility over the past six years. Beyond the complaints noted previously, Ohio EPA/CDAQ have not been made aware of specific incidents that would indicate a danger to human health or the environment from this facility. The proposed modification and fuel change coupled with the changes to emissions control equipment described in the draft permit is expected to reduce overall emissions.

As noted in the draft permit, Federal New Source Performance Standards found in 40 CFR part 60, subpart UUU restrict emissions of particulate matter from the kiln to no more than 0.040 grains per dry standard cubic foot and also impose a restriction on opacity of no more than 10% as a 6-minute average. Under this draft permit, DGA will be required to use low-NOx burner technology to minimize emissions of nitrogen oxides in order to satisfy Ohio's Best Available Technology requirements. These applicable state and federal air pollution control regulations and laws were developed to ensure protection of human health and the environment. In addition, the Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) regulations have been put in place to require areas to maintain or achieve compliance with the National Ambient Air Quality Standards (NAAQS) and to protect public health. DiGeronimo accepted federally enforceable restrictions in the Draft permit which significantly reduces emissions below maximum potential to emit in order to avoid the PSD and NNSR regulations. It is not anticipated that the proposed increase in nitrogen oxide emissions associated with the combustion of coal will result in a significant increase in the ambient concentrations of nitrogen oxides.

8. Comment from Mr. Mike Guzi:

The commenter noted that trucks hauling the Haydite material produced at the facility are a cause of fugitive dust, however these trucks are not owned by DGA but are

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controlled by clients, customers, or brokers. There is dust on the exterior of these trucks that is removed as they leave the plant going up Stone Road and it falls off on the berm of Stone Road. DGA's biggest seller is the very small No. 5 Haydite. As this falls off the truck, it becomes a powder. The commenter stated that the manager of the DGA facility has instituted a street sweeping and road watering program that has improved the situation tremendously. However, the commenter also noted that the onsite truck rinsing operation is not working very well and is not used by all trucks leaving the facility.

Response:

While this comment does not specifically address the proposal to burn coal in the kiln, Ohio EPA/CDAQ would like to note that DGA is required to minimize the deposition of mud and other particles on city streets through the employment of Reasonably Available Control Measures (RACM) in accordance with the following terms of their Title V permit:

The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means. Any material carried off of the permittee's property and deposited onto public streets by vehicular traffic or by erosion by water, etc., shall be promptly removed and disposed of properly to minimize or prevent resuspension.

Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

It is Ohio EPA/CDAQ's understanding that in addition to the above, DGA has entered into additional agreements with the City of Independence to restrict the speed limit of trucks on public roads, to perform extra street sweeping to keep the roads as clean as possible, and to install and operate a wheel wash mechanism. While this comment is outside the scope of the current permitting action, it appears that the commenter's statements about road dust may be best addressed through this separate agreement.

9. Comment from Mr. Mike Guzi:

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The commenter stated that they were concerned about the air quality and health impacts of this proposed action and were also concerned that there is no proven experience using the state of the art technology equipment that is included as part of this proposed installation.

Response:

As noted in the responses to Comments 1, 4, and 7, the terms and conditions found in the draft permit reflect the applicable air pollution control regulations that protect human health and the environment. The permit also specifies best available technology that must be operated and maintained in accordance with the terms of the permit recommendation. Also, a majority of cement plants, lime plants, and lightweight aggregate plants across the United States and worldwide use coal as a fuel and also employ air pollution control systems similar to those proposed in the draft permit.

10. Comment from Mr. Peter Panizzutti:

The commenter stated that ever since they instituted the lower speed limit on Stone Road, trucks have been doing relatively well going down the street, but unfortunately, going up the street they seem to always want to accelerate so that they can go up the hill, and that has resulted in a lot of dust and a lot of noise. The commenter stated that their front yard is covered in dust a lot of times and that if his vehicle is parked in the driveway for a couple of days, it gets covered by dust from the DGA trucks that go by. The noise is so bad at times when they go up the street that the commenter has to stop to talk and wait until the truck has passed by. The commenter feels that some of these problems with the dust could be alleviated if DGA trucks did obey the speed limit going up the street. The commenter noted DGA should be held responsible for trucks (i.e., customers) serving DGA that drive up and down the street too fast and create a lot of dust. The commenter stated that DGA has the ability to stop doing business with those customers unless they act appropriately and abide by the community standards.

The commenter also expressed concern about additional dust that may be arriving with the coal and hoped that the trucks coming down the street would be covered and would abide by the applicable speed limits. The commenter asserted that it is incumbent upon DGA as a good corporate citizen of the community to enforce the speed limit rule and make the speed limit rule a part of their contract with their

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customers. The commenter encouraged DGA to cancel the contracts of customers if their trucks speed along Stone Road.

Response:

Comments regarding speed limits on public roadways, truck traffic issues, and noise from offsite traffic are beyond Ohio EPA authority and the scope of the pending Draft permit. These issues should be discussed with officials from the City of Independence.

In regards to the comment about dust from offsite truck traffic, as noted in our response to Comment No. 8, the final Title V permit for this facility does contain provisions for the facility to reduce dust emissions from paved roadways at the facility and to take measures to prevent deposition of material onto offsite roadways.

Please note that DGA is required to keep the trucks carrying coal and other materials covered through the employment of Reasonably Available Control Measures (RACM) in accordance with the following term in their Title V permit:

Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

11. Comment from Mr. Peter Panizzutti:

The commenter acknowledged DGA's installation of state-of-the-art air pollution control equipment as part of this proposed modification, but expressed concern about the air quality in the surrounding area. The commenter noted that the Cuyahoga Valley National Park is adjacent to the DGA site, and questioned if it is appropriate to allow the burning coal in a kiln located at a facility right next to a national park.

Response:

Based on the information provided in the application and the requirements proposed in the pending Draft permit, this project will result in a reduction of the permitted amounts of particulate and sulfur dioxide emissions annually emitted into the air. While not the only pollutants of concern, these two pollutants comprise the main pollutants of concern for this type of facility. An analysis of the current actual emissions compared to the proposed allowable limits results in a reduction of

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approximately 65 tons/year of particulate emissions and approximately 133 tons/year of sulfur dioxide emissions. The federal requirements in place to protect national parks from damage due to air pollution have established the Cuyahoga Valley National Park, as well as the entire state of Ohio, as a Class II air quality area. The emissions that would be generated by the proposed permit do not exceed the levels that would be expected to impact such an area.

12. Comment from Ms. Deborah Nicastro:

The commenter noted their belief that the final issuance of this permit was decided before Ohio EPA/CDAQ walked into the public hearing. The commenter further stated their belief that Ohio EPA/CDAQ representatives must grant approval of proposed projects provided that the project appears to meet the applicable regulations on paper. The commenter stated that Ohio EPA/CDAQ representatives have no say in the permitting of a facility and must grant such permits.

Response:

The Ohio EPA is charged with issuing permits that impartially apply regulations that were put in place to protect air quality. Air permits that are issued in Ohio identify these applicable regulations and contain terms and conditions based on the regulations. This is done so that human health and the environment are uniformly protected based on federal and state law. In cases where a proposed project or modification cannot comply with one or more of the applicable air pollution regulations, the application cannot be approved. In such cases, a permit would not be issued unless the project is revised to comply with the applicable regulations. The review performed by CDAQ and Ohio EPA for the draft permit found that the proposed project meets the applicable regulations subject to the terms and conditions found in the permit.

The final decisions for permits are not made prior to the public hearing. An important part of the development of any air pollution permit is the public participation process. In several cases, comments offered by the public on a draft permit have resulted in changes to a final permit. As an example, in the case of the Title V permit for the DGA facility, some of the terms and conditions regarding offsite dust control are included because of the public's involvement during the development of the permit. In the case of this draft permit, we note that the final permit will contain a requirement for DGA to install, operate, and maintain a sulfur dioxide continuous emission monitor (SO₂ CEM) if they demonstrate marginal compliance with the allowable SO₂ permit

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limit based on the results of the stack test. This requirement was added as a direct result of public participation during the development of this permit. See comment No. 15 for further details.

13. Comment from Ms. Deborah Nicastro:

The commenter expressed frustration with the public hearings held by Ohio EPA and offered the opinion that this permit will not be denied no matter what is said. The commenter also noted that form letters sent by CDAQ/Ohio EPA will acknowledge public comments but that no changes to the permits will take place.

Response:

CDAQ and Ohio EPA value input from all members of the public whether in the form of testimony during a public hearing, written public comments, or informal comment offered during other meetings. As discussed in the response to the preceding comment (Comment No. 12), all comments are considered during the development of the final permit.

14. Comment submitted via e-mail from Mrs. Christine H. Guzi:

The commenter stated that during the past 40 years, the facility has moved from using coal to natural gas, to No. 4 used oil to fuel the kiln. The commenter noted that many meetings have been held over the years in an attempt to improve the air quality in the area. The commenter did not wish to go backwards in the quest for better air quality and noted that other pollutants would be emitted as a result of coal usage. The commenter stated that their health and lives were threatened by this proposed project and expressed their opposition to the modification.

Response:

Ohio EPA/CDAQ appreciate the continued involvement of members of the Independence Mining and Environmental Committee as well as the general public. Ohio EPA/CDAQ share the commenter's interest in not worsening the air quality and in reducing threats to human health and the environment wherever possible. Being mindful of these considerations, and others, Ohio EPA/CDAQ has therefore developed the draft permit that incorporates applicable state and federal regulations to protect human health and the environment. As noted previously, the modification

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proposed would reduce overall emissions from this facility and reflect an improvement to the air quality.

15. Comment submitted via letter from the National Park Service:

The commenter stated that the DGA facility is located on private property within the boundary of Cuyahoga Valley National Park (Park), a Class II air quality area managed by the National Park Service (NPS). The commenter noted that the natural resources and systems, cultural resources, human health, vegetation, visibility, water quality, wildlife, historic structures, cultural landscapes and threatened or endangered plant and animal species found in the Park are sensitive to air pollution and that any adjacent facilities should therefore be held to the highest standards of air quality and emissions monitoring. The commenter stated that the owner or operator of an emissions unit as large as the kiln described in the draft permit and located adjacent to the Park should be required to install and operate a Continuous Emission Monitor (CEM) for Sulfur Dioxide (SO₂). The commenter noted that the required use of a SO₂ CEM would ensure accurate measurement of SO₂ emissions and thus compliance with the permit conditions.

In response to CDAQ's request to the commenter for clarification of their comments, the commenter reiterated that an SO₂ CEM was necessary in order to adequately protect the three million visitors to the Park as well as the recreational and scenic values provided by the adjacent Ohio & Erie Canal Towpath Trail and Scenic Byway, the Cuyahoga Valley Scenic Railroad and the soon-to-be-constructed Independence Multi-Purpose Trail.

Response:

Ohio EPA/CDAQ agrees with the commenter that an SO₂ CEM would provide a more accurate measurement of SO₂ emissions and would therefore provide a more direct determination of compliance with SO₂ limits contained in the permit.

In addition to the factors cited by the commenter, Ohio EPA/CDAQ notes that during the development of the draft permit recommendation, it was discovered that the emissions factors employed by the previous owners of this facility to determine and report SO₂ emissions underestimated these emissions by a significant amount. When the revised emissions estimates are used to evaluate emissions for prior years, there appear to be occasions of marginal compliance.

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The first thing to be considered when looking at a source for possible CEM use is whether or not an applicable rule requires a CEM. In the case of DiGeronimo, no applicable rule requires an SO₂ CEM. Other factors are also important to consider when determining whether a situation warrants the need for a CEM. When the emissions level during performance testing is found to be close to the pollutant emissions limit (marginal compliance), Ohio EPA may use its discretionary authority to require a CEM. We currently do not have a prior stack test for SO₂ for the DiGeronimo kiln. However, based upon past and expected actual emissions levels, the determination has been made to require an SO₂ CEM if the results of future stack testing show marginal compliance with the permitted emissions limitation. In making this change, Ohio EPA/CDAQ carefully considered comments expressing resident's concerns about air emissions from the proposed project, as well as specific comments requesting that an SO₂ CEM be required given the close proximity of this facility to a national park.

Changes in the Final Permit:

In Section VI for the Miscellaneous Requirements of the permit, we have added the following requirement:

If DiGeronimo demonstrates marginal compliance with the allowable hourly SO₂ emission limitation, then DiGeronimo shall install, operate and maintain an SO₂ continuous emission monitor (CEM) within 180 days after completion of the stack test report. For purposes of this requirement, marginal compliance shall be defined as the actual emission rate determined from stack testing that is greater than 90% of the allowable mass rate of emission. Given the variability of the sulfur content of coal and shale, a demonstration of marginal compliance shall result in continuous emission monitoring that is necessary to ensure that the emissions unit is routinely operating in compliance with an applicable mass emission limitation.

Prior to the installation of the continuous SO₂ monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous SO₂ monitoring system meets the requirements of Performance Specifications 2 and 6. Once received,

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the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Cleveland Division of Air Quality upon request.

In the event that an SO₂ CEM is needed, the terms and conditions of this permit and the Title V permit, if needed, shall be modified to reflect the installation and operation of an SO₂ CEM.