Ray –
Problems with the Increment II permit. Come and see me.

J

1. A. Preliminary Determination:
Compliance Determination
"No compliance testing is required for HC, CO, or particulate matter".

not adequate

B. Permit
Compliance Demonstration
"No compliance testing is required for CO or PM."

What about HC? Is this a typo?

2. A. Preliminary Determination
Compliance Monitoring
"... a continuous monitoring system shall be installed to monitor either O_2 or CO for all gas fired heaters with a capacity greater than 43×10^6 BTU/hr.

B. Permit
"... (a) a continuous monitoring system shall be installed to monitor CO or O_2 for all gas fired process heaters."

What happened to 43×10^6 BTU/hr?

3. Must the source test for opacity?

5% heater 10% turbines
water vapor is hard to separate out for smoke reader
in line analyzer

USEPA REG
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