

Mr. WINN. Thank you very much Mr. Chairman. I am completely confused now.

Mr. GUDE. Mr. Via, you are familiar with the legislation of the Ringelmann Smoke Test?

Mr. VIA. Yes.

Mr. GUDE. Wouldn't this require an operator to comply? He would then get the minimal stack emission we are seeking.

Mr. VIA. When a piece of equipment is adjusted and set up for proper firing one of the devices used to determine it's efficiency and proper firing is the Ringelmann Smoke Test along with a CO<sub>2</sub> analyzer to measure the efficiency or the CO<sub>2</sub> content or the fluid gases. These two tests are performed at all times when the burner is adjusted and the answer to your question is yes. It should be, and can be used to determine the amount of smoke being emitted at the stack.

Mr. GUDE. What we are really saying here is this: As far as the use of oil is concerned, it's not just the problem of getting low sulphur content but it's the problem of the operator of the apartment house to see to it that his equipment is burning properly so there is not this emission.

Mr. VIA. Yes.

Mr. GUDE. So it goes back to the individual, just as the one burning trash in the backyard.

Mr. VIA. Yes, the oil will burn clean if it's properly burned.

Mr. GUDE. So this legislation, with its standards, will provide the means of seeing to it that the owner of the apartment house is complying with the law.

Mr. WINN. Are there standards provided in this bill that would guide the apartment house owner?

Mr. GUDE. That's what's provided in this legislation. There is a standard set up, they would have to follow it.

Mr. WINN. Aren't they operating under any codes now?

Mr. GUDE. There are certain codes here now and I imagine there is some enforcement going on in this area.

Mr. WINN. Is there a lack of enforcement of the codes?

Mr. COUNTS. I couldn't say that. I'm not familiar enough. Our expert on that is on vacation and neither Mr. Via nor I are entire familiar with the Bill. We are only vaguely familiar with it. I don't know whether it's the code in itself or the enforcement, but there is a smoke control or emission control in the District.

Mr. VIA. This states the emission shall not exceed a Number two Ringelmann Smoke Test.

Mr. GUDE. There is some regulation going on, but also it gets into the question of sulphur. Then there is the question of proper ignition of fuels.

Mr. COUNTS. And combined with the fact that we don't think sulphur is the entire problem in pollution. We feel that the other polluting particulars being emitted play a role at least, in addition to sulphur.

Mr. GUDE. As far as the amount of fuel that is burnt here in the Metropolitan area, is there not a greater amount of oil burned than coal?

Mr. COUNTS. I'm sorry, but I couldn't give you a yes or no answer on that. You would have to confer to them to BTUs because of the difference of tonnage and gallons. I don't know the answer.