

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Shaw Industries Group, Inc., Plant No. 7**

City: Calhoun

County: Gordon

AIRS #: 04-13-129-0035

Application #: 14933

Date SIP Application Received: January 6, 2004

Date Title V Application Received: January 6, 2004

Permit No: 2281-129-0035-V-01-1

Program	Review Engineers	Review Managers
SSPP	James Capp	John Yntema
SSCP	N/A	N/A
ISMP	N/A	N/A
TOXICS	N/A	N/A

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed 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 proposed 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 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 and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2281-129-0035-V-01-0	January 8, 2001		✓

B. Regulatory Status

1. PSD/NSR/RACT

This facility is a minor source under PSD because it has potential to emit (PTE) of PSD regulated pollutants less than 250 tpy (it is not one of the 28 named source categories under PSD).

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

II. Proposed Modification

A. Description of Modification

Shaw Industries Group, Inc. (Shaw) acquired an adjacent facility owned and operated by The Dixie Group, Inc., that was operated under the name Carriage Industries, Inc. located at 185 S. Industrial Blvd. on November 18, 2003. The Carriage Industries facility had been assigned AIRS Number 129-00040. These two facilities are now part of the same Part 70 site. The only air pollution emitting equipment remaining in operation are two boilers rated at 8.4 mmBtu/hr firing natural gas or distillate fuel oil. This equipment is being added to Shaw’s Title V permit through this permit amendment.

B. Emissions Change

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

C. PSD/NSR Applicability

This permit amendment does not involve any activities that would be potentially subject to PSD review. This action only involves adding some existing emission units to the permit that were acquired when Shaw purchased the adjacent facility.

III. Facility Wide Requirements

None.

IV. Regulated Equipment Requirements

A. Brief Process Description

At this time, we are adding to the permit two boilers rated at 8.4 mmBtu/hr firing natural gas or distillate fuel oil.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
BL04	8.4 mmBtu/hr Cleaver boiler	391-3-1-.02(2)(d)2.i. 391-3-1-.02(2)(d)3. 391-3-1-.02(2)(g)2.	--	--
BL05	8.4 mmBtu/hr Eclipse boiler	391-3-1-.02(2)(d)2.i. 391-3-1-.02(2)(d)3. 391-3-1-.02(2)(g)2.	--	--

C. Equipment & Rule Applicability

- Emission and Operating Caps –

Similar to Boiler BL02 and BL03, which are included in the initial Title V permit, BL04 and BL05 are capable of firing on natural gas or No. 2 fuel oil with sulfur content of fuel oil not to exceed 0.5 weight percent.

- Applicable Rules and Regulations -

BL04 and BL05 are both rated at 8.4 mmBtu/hr and were constructed after January 1, 1972. Therefore the allowable PM emission rate from each boiler is specified by Georgia Rule 391-3-1-.02(2)(d)2(i), which limits PM to 0.5 lb/mmBtu. Visible emissions are regulated by Georgia Rule 391-3-1-.02(2)(d)3, which limits the opacity to 20 percent except for one six minute period per hour of not more than 27 percent opacity.

Since these boilers burn only natural gas or No. 2 fuel oil, compliance with the PM and visible emissions limits are easily expected. Therefore, no monitoring for these pollutants is proposed in this permit amendment.

Boilers BL04, and BL05 are capable of firing on natural gas, and or No. 2 fuel oil. Georgia Rule 391-3-1-.02(2)(g)2 limits the fuel sulfur content to 2.5 weight percent. The applicant has agreed to limit the fuel oil to a maximum sulfur content of 0.5 percent.

D. Compliance Status

None applicable

E. Operational Flexibility

None applicable

F. Permit Conditions

The permit conditions are described above in the Equipment & Rule Applicability section. There are no unusual conditions that need to be highlighted in this section.

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

None

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

None

VI. Other Record Keeping and Reporting Requirements

Existing condition 6.2.1 already requires Shaw to verify that each shipment of fuel oil meets the ASTM specifications for distillate fuel oil, including the requirement for the sulfur content to be below 0.5%. This condition should logically be extended to apply to any fuel received for usage in the BL04 and BL05 boilers.

Existing condition 6.1.7b has been modified to include the two additional boilers. It defines an exceedance as any time the boilers burn fuel oil that fails to meet the requirements of 6.2.1.

VII. Specific Requirements

None

Addendum to Narrative

The 45-day EPA review started on February 13, 2005 and ended on March 30, 2005. Comments were not received by the Division.