

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Shaw Industries Group, Inc. Plant D6**

City: Calhoun

County: Gordon

AIRS #: 04-13-129-00049

Application #: 14993

Date SIP Application Received: January 22, 2004

Date Title V Application Received: January 22, 2004

Permit No: 2273-129-0049-V-02-1

Program	Review Engineers	Review Managers
SSPP	James Capp	Susan Jenkins
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
2273-129-0049-V-01-0	May 10, 2001	X	
2273-129-0049-V-02-0	Pending	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2273-129-0049-V-01-0	Initial Title V permit issued to Carriage Industries.
2273-129-0049-V-02-0	Change of ownership from Carriage Industries to Shaw Industries Group, Inc.

B. Regulatory Status

1. PSD/NSR/RACT

This facility was potentially a “major” source under PSD/NSR regulations, but has taken limits to remain as a “minor” source.

Conditions 3.2.4 (limits No. 6 fuel oil to 1,250,000 gallons per year) and 3.4.3 (limits sulfur of fuel oil to 2.5%, by weight) effectively limit the facility potential SO₂ emissions below 250 tpy.

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	X			X
PM ₁₀	X			X
SO ₂	X	X		
VOC	X			X
NO _x	X	X		

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
CO	X			X
TRS	N/A			
H ₂ S	N/A			
Individual	X			X
Total HAPs	X			X

II. Proposed Modification

A. Description of Modification

Shaw Industries Group, Inc. (Shaw) purchased this facility from Carriage Industries on November 15, 2003. During a review of the facility after acquiring it, Shaw learned that there was a propane system used to provide a backup fuel source for the process dryers (source codes DR1 and DR2) in the event of natural gas curtailment. This propane system had not been included in any previous applications and therefore, propane was not listed as an allowable fuel in their current Title V permit. Shaw is now asking that propane be added to the permit for the two process dryers.

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	X	0	0
PM ₁₀	X	0	0
SO ₂	X	0	0
VOC	X	0	0
NO _x	X	0	0
CO	X	0	0
TRS	N/A		
H ₂ S	N/A		
Individual HAP	X	0	0
Total HAPs	X	0	0

Emissions from the combustion of propane differ slightly from that of natural gas. However, no change in the

emissions is indicated because the facility is already using propane as a backup fuel.

C. PSD/NSR Applicability

This changes does not involve a physical change or change in the method of operation. Therefore, PSD/NSR applicability is not an issue for this amendment.

III. Facility Wide Requirements

A. Emission and Operating Caps

Not applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility indicated that they are in compliance.

D. Operational Flexibility

Not applicable.

E. Permit Conditions

Not applicable.

IV. Regulated Equipment Requirements

A. Brief Process Description

Tufted greige goods are dyed on a continuous dye range and then dried in a direct-fired, natural gas and propane fueled dryer. After drying, the dyed greige goods are rolled and shipped to other facilities for latex backcoating.

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
DR1	Line 1 dryer	Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii) Rule 391-3-1-.02(2)(g)2	3.2.2, 3.4.3, 3.4.4, 3.4.5	None	None
DR2	Line 2 dryer	Rule 391-3-1-.02(2)(b)1	3.2.2, 3.4.3, 3.4.4, 3.4.5	None	None

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		Rule 391-3-1-.02(2)(e)1(ii) Rule 391-3-1-.02(2)(g)2			
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C. Equipment & Rule Applicability

- Emission and Operating Caps – Condition 3.2.2 of the permit currently restricts the fuel that can be burned in the process dryers (source codes DR1 and DR2) to only natural gas. This restriction is based on the original Title V application for this source (Title V application No. 10797 from Carriage Industries, Inc.), which listed only natural gas as fuels that the dryers were capable of burning. However, at that time, the units were equipped to burn propane and did so as a backup measure whenever there was a natural gas curtailment. It was an oversight by the facility that left propane out of the application. Had the facility included propane as a fuel for the dryers in the original Title V application, the permit would have allowed it.
- Applicable Rules and Regulations – No additional rules or regulations become applicable to this source due to the addition of propane to the permit. The dryers are already subject to Georgia Rules (b), (e), (g) and those requirements were already in the permit. No additional testing, monitoring, or record keeping requirements are necessary as a result of this amendment. The same basis for not needing any additional monitoring for the combustion of natural gas is also valid for propane since these fuels behave relatively similarly when they are combusted in this fashion.

D. Compliance Status

The facility indicated that they are in compliance.

E. Operational Flexibility

Not Applicable.

F. Permit Conditions

Condition 3.2.2 is being revised to allow the combustion of propane in the process dryers (source codes DR1 and DR2).

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

A. Individual Equipment:

Not applicable.

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

Not applicable.

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

A. Individual Equipment:

Not applicable.

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

Not applicable.

VII. Other Record Keeping and Reporting Requirements

Not applicable.

VIII. Specific Requirements

A. Operational Flexibility

Not applicable.

B. Alternative Requirements

Not applicable.

C. Insignificant Activities

Not applicable.

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. Prevention of Accidental Releases

Not applicable.

J. Stratospheric Ozone Protection Requirements

Not applicable.

K. Pollution Prevention

Not applicable.

L. Specific Conditions

Not applicable.

Addendum to Narrative

The 45-day EPA review started on June 3, 2004 and ended on July 18, 2004. No comments were received by the Division.