

Facility Name: **Shaw Industries Group, Inc. – Plant D6**
City: Calhoun
County: Gordon
AIRS #: 04-13-129-00049

Application #: TV-16483
Date Application Received: November 14, 2006
Permit No: 2273-129-0049-V-03-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Shaw Industries Group, Inc. – Plant D6** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Shaw Industries Group, Inc. – Plant D6
2. Parent/Holding Company Name: Shaw Industries Group, Inc.
3. Previous and/or Other Name(s)

Carriage Industries, Inc., Carriage Industries, Inc. – Colorworks (Dyehouse)

4. Facility Location

341 Beamer Road
Calhoun, Georgia 30703, (Gordon County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in Gordon County, which is contributing county to the 8-hour ozone non-attainment area.

6. Class I Area Impacts

This facility is located within 100 km of the Cohutta Class I area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2273-129-0049-V-02-0	May 10, 2001	Initial Title V
2273-129-0049-V-02-1	August 25, 2004	Title V Amendment

D. Process Description

1. SIC Codes(s)

Major - 2273

Other - None

2. Description of Product(s)

The final product at Plant D6 is tufted, finished carpet.

3. Overall Facility Process Description

The facility produces dyed, greige goods for further processing into broadloom carpet. Tufted, greige goods are dyed using water-soluble dyes on a continuous dye range and then dried using natural gas/propane-fired dryers. A boiler is used to produce steam for dyeing greige goods.

Line 1 and Line 2 Dryers (DR1, DR2)

The finished carpet is placed in one of two dryers to complete the drying process. Line Dryer DR1 consists of one 5 MMBtu/hr natural gas-fired burner, and four 3 MMBtu/hr natural gas-fired burners. Line Dryer DR2 consists of one 2.5 MMBtu/hr natural gas-fired burner and six 3 MMBtu/hr natural gas-fired burners.

Boiler

A 97.6 MMBtu/hr natural gas-fired boiler (Source Code: BR01) produces steam needed for the process equipment. The boiler also burns No. 6 fuel oil. The boiler was manufactured in 1973 and installed in 1984.

Chemical Mixing

There are separate chemical mixing areas for the dye operations. Air emissions at each area are fugitive in nature. Quantity and type of emission varies with the type and quantity of chemicals used for the dye mix.

Process descriptions specified in Permit No. 2273-129-0049-V-03-0 are discussed in the initial Title V permit narrative. Please refer to this narrative.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a synthetic minor source under PSD because it has accepted practically enforceable restrictions such that the potential-to-emit (PTE) of PSD regulated pollutants less than 250 tpy. The facility is not one of the 28 named source categories under PSD.

2. Title V Major Source Status by Pollutant

Table 2: 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	Yes			✓
PM ₁₀	Yes			✓
SO ₂	Yes	✓		
VOC	Yes			✓
NO _x	Yes	✓		
CO	Yes			✓
TRS	Yes			✓
H ₂ S	Yes			✓
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

Shaw Industries, Inc. – Plant D6 is not a major source of HAP emissions.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None Applicable.

B. Applicable Rules and Regulations

None Applicable.

C. Compliance Status

The facility is currently in compliance with all applicable requirements.

D. Operational Flexibility

There is no request for operational flexibility associated with this application.

E. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility produces dyed, greige goods for further processing into broadloom carpet. Tufted, greige goods are dyed using water-soluble dyes on a continuous dye range and then dried using natural gas/propane-fired dryers. Boilers are used to combust fuel oil and natural gas to produce steam for dyeing greige goods.

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
BR01	Keeler Boiler	Rule 391-3-1-.02(2)(d)(ii) Rule 391-3-1-.02(2)(d)3 Rule 391-3-1-.02(2)(g)2	3.2.1, 3.4.1, 3.4.2, 3.4.3, 5.2.1, 6.1.7, 6.2.1 through 6.2.4	None	None
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 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

* Generally Applicable Requirements contained in this permit may apply also to emission units listed above.

C. Equipment & Rule Applicability

Choose the applicable option(s) below:

Equipment and Rule Applicability specified in Permit No. 2273-129-0049-V-03-0 is discussed in the initial Title V permit narrative. Please refer to this narrative.

D. Compliance Status

The facility is currently in compliance with all applicable requirements.

E. Operational Flexibility

There is no request for operational flexibility associated with this application.

F. Permit Conditions

Permit conditions specified in Permit No. 2273-129-0049-V-03-0 are discussed in the initial Title V permit narrative. Please refer to this narrative.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements**1. Individual Equipment**

None Applicable.

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

None Applicable.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Monitoring requirements specified in Permit No. 2273-129-0049-V-03-0 is discussed in the initial Title V permit narrative. Please refer to this narrative.

1. Individual Equipment:

None Applicable.

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

None Applicable.

C. Compliance Assurance Monitoring (CAM)

None Applicable.

VI. Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Record keeping and reporting requirements specified in Permit No. 2273-129-0049-V-03-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

VII. Specific Requirements**A. Operational Flexibility**

There is no request for operational flexibility associated with this application.

B. Alternative Requirements

There are no alternative requirements that need to be incorporated into this Title V Permit.

C. Insignificant Activities

Insignificant activities specified in Permit No. 2273-129-0049-V-03-0 are discussed in the initial Title V permit narrative. Please refer to this narrative.

D. Temporary Sources

Shaw Industries, Inc. – Plant D6 has not reported any temporary sources.

E. Short-Term Activities

Shaw Industries, Inc. – Plant D6 has not requested to operate any short-term activities.

F. Compliance Schedule/Progress Reports

The facility is currently in compliance with all applicable regulations and permit conditions.

G. Emissions Trading

The facility is not involved in any emissions trading programs.

H. Acid Rain Requirements

Shaw Industries, Inc. – Plant D6 is not subject to the Acid Rain Requirements in Title IV of the Clean Air Act.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit. The facility operates equipment that is subject to Title VI of the 1990 Clean Air Act Amendments.

J. Pollution Prevention

There are no pollution prevention provisions incorporated in this Title V Permit.

K. Specific Conditions

None Applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The public comment period began on May 27, 2006 and ended on June 26, 2006. Public comments were not received by the Division.