

TITLE V APPLICATION REVIEW

Facility Name: Shaw Industries, Inc. - Plant 20

City: Dalton

County: Whitfield

AIRS #: 04-13-313-00079

Application #: TV- 9236

Date Application Received: October 22, 1996

Date Application Deemed

Administratively Complete: December 9, 1996

Date of Draft Permit: December 9, 1999

Permit No: 2273-313-0079-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Mansour Alaeddini	James Capp
SSCP/ASU	Deirdre Edwards	James Eason
ISMP	DeAnna Garrison	Larry Webber
TOXICS	NA	NA

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V operating permit. 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 proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Shaw Industries, inc. **Plant 20** 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 public participation process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name

Shaw Industries, Inc. Plant 20

2. Parent/Holding Company Name

Shaw Industries, Inc.

3. Previous and/or Other Name(s)

E & B Carpet Mills, Inc.
Armstrong World Industries, Inc.

4. Facility Location

1020 Riverbend Drive, Dalton, Georgia

5. Attainment or Non-attainment Area Location

This site, located in Whitfield County, is in an attainment area for all criteria pollutants.

6. Class I Area Impacts

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

B. Site Determination

Yarn warehouse storage is located adjacent to Plant 20 on Riverbend Drive. There are a number of other Shaw operations that are contiguous or adjacent to Shaw Plant 20, including two sample plants, and offices for Corporate Engineering and Corporate Assets. The offices and sample plants not only have a **different SIC**, but also they do not directly support the operations of Plant 20. There is limited product flow from Plant 20 to the sample plants, and they have different operational management. According to the site determination procedure, the other plants are not part of this Title V site.

C. Existing Permits

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2272-155-6763-C.	02/07/1979	x	
2272-155-7769-0	11/05/1980	x	
2272-155-9508	02/24/1987	x	
2272-155-10453	3/08/90	x	

Table 2: Comments on Specific Permits

Permit Number	Comments
2272-155-6763-C	Issued to E & B Carpet Mills, Inc., for 126 ft. high boiler exhaust stack for compliance with sulfur dioxide emission regulations.
2272-155-7769-0	Issued to E & B Carpet Mills, Inc., for operation of Boiler No. 1 , 45 MMBtu/hr, capable of firing on natural gas and/ or residual fuel oil; Boiler No. 2 , 92 MMBtu/hr, capable of firing on natural gas and/or residual fuel oil; Boiler No. 3 , 92 MMBtu/hr, capable of firing on natural gas and/ or residual fuel oil; carpet dyeing and finishing facilities.
2272-155-9508	Issued to Armstrong World Industries, Inc., for operation of a carpet dyeing and finishing facility.
2272-155-10453	Issued to the Shaw Industries Inc., operation of a carpet finishing facility including three boilers capable of firing on natural gas and/or fuel oil.

D. Process Description

1. SIC Code(s)

2273

2. Description of Product(s)

The final product from Plant 20 is finished, broadloom residential carpet.

3. Overall Facility Process Description

Shaw Plant 20 is a typical carpet manufacturing site, with tufting, continuous dyeing (source code CD01), atmospheric batch (Beck) dyeing (sources BK01-08), pressure Beck dyeing, and SBR latex coating (source codes LC01-02). The final product from Plant 20 is finished, broadloom residential carpet. With the exception of the Beck dryers (Source codes DR01-02) which are indirect steam heated dryers to dry Beck dyed carpet, all in-line dryers and curing ovens are heated directly by burning natural gas at low fire conditions. Steam for all process equipment including the Beck dryers, Beck dyeing and continuous dyeing operations is provided by three large boilers- a 42 MMBtu/hr installed in 1963 (source code BL01), a 84 MMBtu/hr installed in 1968 (source code BL02), and a 98 MMBtu/hr installed in 1987 (source code BL03).

4. Overall Process Flow Diagram (optional)

There is one attached to the application.

E. Regulatory Status

1. PSD/NSR

This facility is a major source under PSD because it has potential to emit (PTE) of PSD regulated pollutants greater than 250 tpy (it is not one of the 28 named source categories under PSD). The primary issue is whether this facility's permit should contain PSD avoidance limits for the installation of Boiler 3. Any available SO₂ emissions credits for BL03 should be based on the data placed in EPD files by the original permit engineer. On 11/21/86, Armstrong submitted a construction permit application for a 92 MMBtu/hr boiler with natural gas and No. 6 fuel oil capability, to replace a similar sized existing boiler (#3). Early in 1987, the permit engineer for this facility reviewed the application and determined that the facility was a PSD major source for SO₂ emissions and the actual emissions for SO₂ for 1986 was estimated to be 499 tons.

Since there were no fuel meters or existing permit requirements to track individual boiler fuel usage, the 499 tons SO₂ were rationed across the three existing boilers based on Btu input capacity. For boilers #2 and #3, this equated to approx. 200 tons each. PSD regulations required that this modification not result in a net emissions increase of 40 tons SO₂, or else go through full PSD permitting review. The final permit that was issued to Armstrong 3/24/87 was silent as to any SO₂ emissions or fuel oil restriction. Since this time, this facility has been acquired by Shaw, and on 3/8/90 the permit was amended to reflect the ownership change, however, the permit still contained no limitations on SO₂ emissions.

The facility has proposed to limit the SO₂ emissions from boilers #2 and #3 at Plant 20 to 440 tons. This figure is derived from the 200 tons SO₂ for each boiler + 40 tons PSD increment. For operational reasons, boiler #2 does not burn fuel oil except during periods of natural gas curtailment. Therefore, the 440¹ tons SO₂ are allocated in the following fashion:

Boiler #2 ° 20 tons SO₂

Boiler #3 ° 420 tons SO₂

Since boiler #1 has not changed its operations since it was installed, which was prior to PSD regulations, no restrictions on its operations are proposed. The facility requested that the permit condition language reflect flexibility to purchasing lower sulfur No. 6 fuel oil to allow consumption of a correspondingly higher number of gallons. The proposed conditions address the rolling twelve month tracking of each boilers SO₂ emissions limit, and how compliance shall be demonstrated on

¹Potential SO₂ emissions for No. 6 fuel oil:

Using AP-42, the uncontrolled SO₂ emission is 157S lb/1000gal and sulfur content for No. 6 fuel oil <= 2.5%, [Rule (g), maximum]. Maximum usage of No. 6 fuel oil in is 2,240,000 gal/yr.

Potential SO₂ emissions from Boiler No. BL03 = (157 * 2.5) * (2,240,000 / 2 * 10⁶) = 440 tpy.

an ongoing basis. Because of concerns of natural gas curtailment, the facility requested that 20 tons SO₂ be allocated to boiler No. 2 (BL02), with remaining 420 tons allocated to boiler No. 3 (BL03). Using No. 6 fuel oil with a maximum sulfur content of 2.5%, this equates to a twelve month consumption of fuel oil not to exceed 2,240,000 gallons.

Table 3: Title V Major Source Status

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's Title V status?		
		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		
CO	x			x
TRS	x			x
H ₂ S	x			x
Individual HAP	x			x
Total HAPs	x			x

3. MACT Standards

None- No pollution control equipment is operated to comply any state or federal emissions or production rate limits. The Fabric Printing, Dyeing, and Coating MACT (Textile MACT), when promulgated, may potentially regulate the types of equipment and processes located at Shaw Plant.

4. Program Applicability

Program Code	Applicable (Yes/No)
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

Not applicable.

B. Applicable Rules and Regulations

! Rules and Regulations Assessment.

Georgia Rule 391-3-1-.02(2)(a)1 applies to the entire facility.

! Emission and Operating Standards

None applicable.

C. Compliance Status

According to the Title V applications, this Title V source is in compliance.

D. Operational Flexibility

None

E. Permit Conditions

None applicable

III. Regulated Equipment Requirements

A. Brief Process Description

Shaw Plant 20 is a typical carpet manufacturing site, with tufting, continuous dyeing (source code CD01), atmospheric batch (Beck) dyeing (sources BK01-08), pressure Beck dyeing, and SBR latex coating (source codes LC01-02). The final product from Plant 20 is finished, broadloom residential carpet. With the exception of the Beck dryers (Source codes DR01-02) which are indirect steam heated dryers to dry Beck dyed carpet, all in-line dryers and curing ovens are heated directly by burning natural gas at low fire conditions. Steam for all process equipment including the Beck dryers, Beck dyeing and continuous dyeing operations is provided by three large boilers- a 42 MMBtu/hr installed in 1963 (source code BL01), a 84 MMBtu/hr installed in 1968 (source code BL02), and a 98 MMBtu/hr installed in 1987 (source code BL03).

B. Equipment List for the Process

Emission Unit ID No.	Emission Unit Description	Applicable Permit Condition No.(s)	Applicable Requirement(s)/Standard(s)	APCD* ID No.(s)	APCD* Description
BL01	Boiler, 42 MMBtu/Hr	3.4.2, 3.4.4, 3.4.7, 5.2.1, 5.2.6	State Rules (b), (d) and (g)	none	-
BL02	Boiler, 84 MMBtu/Hr	3.2.1, 3.4.2, 3.4.4, 3.4.7, 5.2.1, 5.2.3, 5.2.4, 5.2.5, 5.2.6	State Rules (b), (d), and (g)	none	-
BL03	Boiler, 98 MMBtu/Hr	3.2.2, 3.4.1, 3.4.7, 3.4.8, 5.2.1, 5.2.3, 5.2.4, 5.2.5, 5.2.6	State Rules (d), (g)	none	-
DR01	Beck dryer	3.4.5, 3.4.6	State Rules (b) and (e)	none	-
DR02	Beck dryer	3.4.5, 3.4.6	State Rules (b) and (e)	none	-
LC01	Latex coater No. 1	3.4.3, 3.4.5, 3.4.6	State Rules (b) and (e)	none	-
LC02	Latex coater No. 2	3.4.3, 3.4.5, 3.4.6	State Rules (b) and (e)	none	-
BK01 through BK08	Dye beck	3.4.9,3.4.10	State Rules (b) and (e)	none	-
CD01	Dye range	3.4.3, 3.4.5, 3.4.6	State Rules (b) and (e)	none	-

C. Equipment & Rule Applicability

! Emission and Operating Cap

As described in the PSD status section of the narrative, sulfur dioxide emissions from the boiler No. 2 (source code BL02) are limited to 20 tons, and sulfur dioxide emissions from boiler No. 3 (source code BL03) are limited to 420 tpy.

! Applicable Rules and Regulations

Boilers BL01 (42 MMBtu/hr, constructed in 1963) & **BL02** (84 MMBtu/hr, constructed in 1968), capable of firing on natural gas as a primarily fuel, and No. 6 fuel as a backup fuel

Since BL01 and BL02 were constructed prior to January 1, 1972, the allowable PM emission rate from each boiler is specified by Georgia Rule 391-3-1-.02(2)(d)1(ii), which is stated as follows:

$$P = 0.7*(10/R)^{0.7}$$

Where P equals the allowable PM emission rate in pounds per million Btu and R equals the heat input in million Btu per hour.

Also, since these units were constructed prior to January 1, 1972, the opacity limit from each boiler is expressed by Georgia Rule 391-3-1-.02(2)(b)1. The Georgia Rule (b) opacity limit is 40 percent. The fuel sulfur content is limited to 2.5 weight percent, in accordance with Georgia Rule 391-3-1-.02(2)(g)2.

Boilers BL03 (98 MMBtu/hr, constructed in 1987), capable of firing on natural gas as a primarily fuel, and No. 6 fuel as a backup fuel

Since the BL03 was constructed after January 1, 1972, the allowable PM emission rate from the boiler is specified by Georgia Rule 391-3-1-.02(2)(d)2(ii), which is stated as follows:

$$P = 0.5*(10/R)^{0.5}$$

Where P equals the allowable PM emission rate in pounds per million Btu and R equals the heat input in million Btu per hour.

Since the **BL03** was constructed after January 1, 1972, the opacity limit from the boiler is expressed by Georgia Rule 391-3-1-.02(2)(d)3. The Georgia Rule (d) opacity limit is 20 percent except for one six minute period per hour of not more than 27 percent opacity. The fuel sulfur content is limited to 2.5 weight percent, in accordance with Georgia Rule 391-3-1-.02(2)(g)2.

DR01 and DR02 applies steam heat for drying beck dyed greige goods. They are non fuel burning equipments and were installed in 1969 and and 1986. Each of these unit is treated as a separate process, and the allowable PM emission rate from this range is expressed by Georgia Rule 391-3-1-.02(2)(e)1. which is stated as follows:

The allowable PM emission rate from this process is expressed by Georgia Rule 391-3-1-.02(2)(e)1. which is stated as follows:

For process weight input rates up to 30 tons per hour:

$$E = 4.1P^{0.67}$$

Where E equals the allowable PM emission rate in pounds per hour and P equals the maximum process input weight rate in tons per hour.

The opacity limit for DR01 & DR02 is specified by Georgia Rule 391-3-1-.02(2)(b) at forty percent and this is an applicable requirement since the range is subject to another Georgia Rule 391-3-1 emissions standard.

LC01, LC02 applies latex to the carpet back and then cure the latex. They are capable of firing on natural gas and were installed in 1969 and 1971. Each latex coater is treated as a separate process, and the allowable PM emission rate from this range is expressed by Georgia Rule 391-3-1-.02(2)(e)1. which is stated as follows:

The allowable PM emission rate from this process is expressed by Georgia Rule 391-3-1-.02(2)(e)1. which is stated as follows:

For process weight input rates up to 30 tons per hour:

$$E = 4.1P^{0.67}$$

Where E equals the allowable PM emission rate in pounds per hour and P equals the maximum process input weight rate in tons per hour.

The opacity limit for **LC01 and LC02** is specified by Georgia Rule 391-3-1-.02(2)(b) at forty percent and this is an applicable requirement since the range is subject to another Georgia Rule 391-3-1 emissions standard.

Kuster Dye Range (CD01) applies heat to the tufted greige goods. CD01 is capable of firing on natural gas and was installed in 1994. CD01 is treated as a separate process, and the allowable PM emission rate from this range is expressed by Georgia Rule 391-3-1-.02(2)(e)1. which is stated as follows:

The allowable PM emission rate from this process is expressed by Georgia Rule 391-3-1-.02(2)(e)1. which is stated as follows:

For process weight input rates up to 30 tons per hour:

$$E = 4.1P^{0.67}$$

Where E equals the allowable PM emission rate in pounds per hour and P equals the maximum process input weight rate in tons per hour.

The opacity limit for CD01 is specified by Georgia Rule 391-3-1-.02(2)(b) at forty percent and this is an applicable requirement since the range is subject to another Georgia Rule 391-3-1 emissions standard.

BK01, BK02, BK03, BK04, BK05, BK06, BK07 and BK08 apply dye to the tufted greige goods.

Each unit is treated as a separate process, and the allowable PM emission rate from this range is expressed by Georgia Rule 391-3-1-.02(2)(e)1. which is stated as follows:

The allowable PM emission rate from this process is expressed by Georgia Rule 391-3-1-.02(2)(e)1. which is stated as follows:

For process weight input rates up to 30 tons per hour:

$$E = 4.1P^{0.67}$$

Where E equals the allowable PM emission rate in pounds per hour and P equals the maximum process input weight rate in tons per hour.

Process Group (Atmospheric dye becks) BK01 through BK08 applies dye to the tufted greige goods. BK01 installed in 1987, BK02, BK03 and BK04 were installed in 1968. BK05, BK06, BK07 and BK08 were installed in 1968. The opacity limit for process group BK01- BK08 is specified by Georgia Rule 391-3-1-.02(2)(b).

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.

IV. Testing Requirements (with Associated Record keeping and Reporting)

General Testing Requirements:

A requirement for performance testing on any specified emissions unit, when directed by the Division, is included. Requirements for a 30 day notification of testing and the submission of a test plan are also included. Test methods and procedures to be used are specified.

V. Monitoring Requirements (with Associated Record keeping and Reporting)

Specific Monitoring Requirements:

The three boilers (BL01, BL02, and BL03) are subject to Georgia Rules 391-3-1-.02(2)(b), (d), and (g) for opacity, Particulate Matter (PM) and Sulfur Dioxide (fuel sulfur). The boilers are natural gas fired with number 6 fuel oil as the backup fuel. No monitoring is required when the boilers are fired with natural gas because it is very unlikely that emissions would exceed opacity and PM limitations. When the boilers are fired with number 6 fuel oil, daily readings of visible emissions (opacity) are required to ensure compliance with Rule (d) PM limitations. For boiler BL03, twenty percent opacity was chosen as the trigger level at which corrective action is required to be taken; thirty percent opacity was chosen for the older boilers BL01 and BL02. Occurrences of opacity greater than the trigger level are designated as excursions and are required to be reported. Compliance with the Rule (g) fuel sulfur limit is determined using fuel supplier certifications for residual oil.

Boilers BL02 and BL03 have an additional limitation on Sulfur Dioxide (SO₂) emissions. Each boiler is restricted to the number of tons of SO₂ which can be emitted over a 12-consecutive month period. To assure compliance with these limits, the permit specifies sufficient record keeping to calculate the SO₂ emissions. Each month, a 12-consecutive month total of the monthly SO₂ emissions is required to be calculated for Boiler BL02 and for BL03. Any 12-consecutive month total in which the SO₂ emissions are greater than the allowable is required to be reported as an excursion.

The Dye Dryer (CD01), the Beck Dryers (DR01 and DR02), the Latex Coaters (LC01 and LC02), and Dye becks (BK01 through BK08) are subject to Georgia Rules 391-3-1-.02(2)(b) for opacity and (e) for Particulate Matter (PM) emissions. No control equipment is present on any of the units; however, PM emissions from these units are very low and it is very unlikely that Particulate Matter and opacity limitations will be exceeded. Therefore, no monitoring is required.

Record Keeping and Reporting Requirements:

Records, including identification of excess emissions, exceedances, and excursions from applicable monitoring triggers, the cause of such occurrence, and the corrective action taken are required to be kept and reported semiannually.

The 12-consecutive month total for SO₂ emissions for Boiler BL02 and for BL03 is required to be submitted with the semiannual report. Also to be submitted are the fuel supplier certifications for each shipment of fuel oil received during the reporting period to assure compliance with the fuel sulfur limit.

VI. Other Record Keeping and Reporting Requirements

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 related information to deviations from applicable requirements.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

There is not any unusual equipment or process in this list.

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

The facility is not subject to the requirements of 40 CFR 68.

J. 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.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

Not 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.

TITLE V APPLICATION REVIEW

Closing Block: We have reviewed and recommend issuance of draft Permit No. **2273-313-0074-V-01-0**

Program	Review Engineers	Dates	Review Managers	Dates
SSPP/ASU	Mansour Alaeddini		James capp	
SSCP/ASU	Deirdre Edwards		James Eason	
ISMP	DeAnna Garrison		Larry Webber	
TOXICS	NA		NA	

Stationary Source Permitting Program Manager

Date

Addendum to Narrative

The 30 day public comment period for the draft Title V permit for Shaw Industries Inc., Plant 20, Dalton, Georgia ended on March 19, 2000. On March 17, 2000, the Division received comments from the company which are outlined below, along with the Division's response:

3.4 Equipment SIP Rule Standards

Company comment

The facility requested that Condition **3.4.3** be amended to allow propane as a backup fuel in all process fuel burning equipment (**CD01, LC01, and LC02**).

Division Comment

Since this should not significantly change the PTE or actual emissions from the affected units, the final TV permit reflects this change.

Company comment

Condition **3.4.3**, the descriptive term **dryer** used for **CD01** is requested to be changed to dye range.

Division Comment

The final TV permit reflects this change.

5.2 Specific Monitoring Requirements

Company comment

Condition **5.2.1** requires a three minute period for determining opacity levels when residual fuel oil is burned in the boilers **BL01, BL02, and/or BL03**. Please clarify whether or not this means recording opacity levels every fifteen seconds for this three minute period, consistent with Method 9 protocols.

Division Comment

During the daily visible emissions check, opacity levels should be recorded every fifteen seconds as prescribed by Method 9 procedures. No changes were made as a result of company's comment.

Company comment

The company pointed out that the draft permit contained no Condition 5.2.2.

Division Comment

The company is correct; the draft permit does not contain a Condition 5.2.2. Condition 5.2.3 in the draft permit was renumbered Condition 5.2.2. The final TV permit reflects this change.

Company comment

The facility requested changes in the language of the condition No. 5.2.3.

Division Comment

Condition 5.2.3 is the condition that requires fuel supplier certification of the sulfur content of residual oil (residual oil is defined in Condition 5.2.1). No change should be made to this condition.

Company comment

The facility proposes that the Condition 5.2.4 be deleted “in its entirety, as Plant 20 will no longer be required to calculate the average sulfur content of the fuel oil in its storage tanks.”

Division Comment

Division believes that using the Rule (g) fuel sulfur allowable to calculate monthly Sulfur Dioxide emissions is acceptable. Therefore, this condition has been removed.

Company comment

For the calculation of Sulfur Dioxide emissions as required by Condition 5.2.6, the facility requested replacing the variable S_R , the weighted average sulfur content of the No. 6 fuel oil, with the applicable Rule (g) limit (2.5% S) for the fuel sulfur content.

Division Comment

Division believes, it is acceptable to use the Rule (g) allowable to calculate monthly emissions and the equation contained in this condition should be replaced with the following;

$$SO_2 \text{ (tons/month)} = (Q_R \times 2.5 \times W_R) / 1 \times 10^5$$

Where Q_R = Quantity of residual oil combusted in the boiler during the month, gallons.

W_R = Weight of one gallon of residual oil, pounds.

2.5= Allowable Sulfur content of No. 6 fuel oil, percent.

1×10^5 = conversion factor

The final TV permit reflects this change.

5.3 Record Keeping and Reporting Requirements

Company comment

Condition **5.3.1** requires Plant 20 to submit a semiannual report to EPD containing any excess emissions, exceedances, and/or excursions as described in the permit. To simplify compliance with this permit condition, Shaw requests a template report be provided, if such template exists.

Division Comment

The Division does not have a template for the submittal of the semiannual report required by this condition. However, the Division will work with the facility to develop an acceptable semiannual report format.

8.14 Compliance Requirements

Company comment

Condition **8.14.1** requires Plant 20 to provide EPD with written annual certification of compliance with permit conditions. Due the complexity of this requirement and to ensure compliance with this condition, Shaw requests that a template for this certification be provided by EPD, if such template exists.

Division Comment

The company has been sent a copy of the latest guidance from EPD on submitting the annual compliance certification report.