

Facility Name: **Shaw Industries, Inc., Plant 1 & 3**
 City: Dalton
 County: Whitfield
 AIRS #: 04-13-313-00081

Application #: TV-13876
 Date SIP Application Received: July 1, 2002
 Date Title V Application Received: July 1, 2002
 Date of Draft Permit:
 Permit No: 2273-313-0081-V-01-1

Program	Review Engineers	Review Managers
SSPP	Dan Abrams	James Capp
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 attached SIP permit to construct and/or draft/proposed operating permit amendment. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit amendment is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit amendment is to identify state and federal air requirements applicable to the modification/construction to be performed at Shaw Industries, Inc., Plant 1 & 3 and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit amendment and is presented in the same general order as the permit amendment. It initially describes the facility receiving the permit amendment, 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 amendment 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. Existing Permits**

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2273-313-0081-V-01-0	May 2, 2000	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2273-313-0081-V-01-0	Initial Title V Permit

B. 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).

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 HAP	✓			✓
Total HAPs	✓			✓

II. Proposed Modification

A. Description of Modification

Shaw Industries, Inc. agreed to Consent Order No. EPD-AQC-1877 for prior PSD violations at other Shaw Plants. In this Consent Order, Shaw agreed to lower the allowable sulfur content of the fuel oil burned in their boilers at several of Shaw's plants from 2.5% to 1.8%, including Plant 1&3.

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)
Particulate Matter	Yes	0	0
PM ₁₀	Yes	0	0
SO ₂	Yes	0	0
VOC	Yes	0	0
NO _x	Yes	0	0
CO	Yes	0	0
TRS	No	0	0
H ₂ S	No	0	0
Individual HAP	Yes	0	0
Total HAPs	Yes	0	0

C. PSD/NSR Applicability

This modification will not cause a PSD review to occur.

IV. Regulated Equipment Requirements

A. Brief Process Description

Plant 1: Synthetic carpet yarn fibers are tufted into greige goods and then dyed in a continuous process. Once the greige goods have been dyed, a secondary backing material is adhered with a latex emulsion coating to add stability to the fibers. After this process, the yarn fibers are sheared to create a uniform pile height and the finished carpet is inspected, rolled, and cut for shipping to the distribution centers.

Plant 3: There is no tufting machinery present. Dyed greige goods from other Shaw plants are coated with a urethane foam backing that adds stability. At the end of this process the finished carpet is inspected, rolled and cut for shipping to the distribution centers. Also, some undyed greige goods that have already been latex back coated are dyed in a continuous process. All process steam used by Plant 3 is generated by three boilers in Plant 1.

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
BL01 (Plant 1)	Boiler	GA Rule 391-3-1-.02(2)(d)3 GA Rule 391-3-1-.02(2)(d)2(ii) GA Rule 391-3-1-.02(2)(g)2	3.4.7	N/a	N/a
BL02 (Plant 1)	Boiler	GA Rule 391-3-1-.02(2)(b)1 GA Rule 391-3-1-.02(2)(d)1(ii) GA Rule 391-3-1-.02(2)(g)2	3.4.7	N/a	N/a
BL03 (Plant 1)	Boiler	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(d)1(ii) GA Rule 391-3-1-.02(2)(g)2	3.4.7	N/a	N/a

C. Equipment & Rule Applicability

Emission and Operating Caps –

Not applicable

Applicable Rules and Regulations -

Not applicable

D. Compliance Status

Not Applicable

E. Operational Flexibility

Not Applicable

F. Permit Condition

Condition 3.4.7 was modified to reflect the lower sulfur content of 1.8%, by weight.

Condition 5.2.3.b was modified to reflect the change in the reportable exceedances for the change in the sulfur content allowable.

Addendum to Narrative

The 45-day review period ended on October 14, 2002 and there were no comments received from the Company or from EPA. Therefore, no changes were made to the permit or narrative.