

**TITLE V APPLICATION REVIEW**

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Facility Name: Shaw Industries, Inc., Plant No. 1 & 3

City: Dalton, Georgia

County: Whitfield

AIRS #: 04-13-313-00081

Application #: TV- 9234 & 9235

Date Application Received: October 22, 1996

Date Application Deemed

Administratively Complete: March 10, 1997

Date of Draft Permit: November 4, 1999

Permit No: 2273-313-0081-V-01-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
<b>SSPP/ASU</b>	Mansour Alaeddini	James Capp
<b>SSCP/ASU</b>	Deirdre Edwards	James Eason
<b>ISMP</b>	Daniel Abrams	Larry Webber
<b>TOXICS</b>	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 No. 1 and 3 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 No. 1 & 3  
Carpet printing & latex backing facility

2. Parent/Holding Company Name

Shaw Industries, Inc.

3. Previous and/or Other Name(s)

Plant 1: Shaw Industries, Inc. Star Division.  
Plant 3: Star Finishing Company, Division of Shaw Industries, Inc.

4. Facility Location

Plant 1 located at 501 East Franklin Street  
Plant 3 located at 500 East Franklin Street  
Dalton, Georgia

5. Attainment or Non-attainment Area Location

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

6. Class I Area Impacts

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

B. Site Determination

Plants 1&3 are located on adjacent sides of East Franklin Street, Dalton, Whitfield County, Georgia. Shaw Industries, Inc. has fifteen manufacturing plants in the Dalton area, with eight of them classified as Title V major sources and one classified as a synthetic minor source within 10 miles of Plant 1&3. Plant 3 is contiguous to Plant 1, is dependent on Plant 1 for its steam supply, and is under common daily management; therefore, these two plants are a single Title V site. Shaw Plant 63 is also under the same operational management, but is located 3 miles from Plants 1&3 and has been determined to be a separate site. The closest Shaw facility is Plant 20 which is approximately ½ mile away from Plants 1&3. Plant 20 is under separate operational management, there is minimal product or material flow between the two sites, and neither plants are dependent on each other in order to operate at full capacity. Therefore, Plant 20 has been determined to be a separate Title V site. Factors used to make this determination include:

- a. Plant 63 is located 3 miles away from Plants 1&3; there is no permanent flow of materials between these two sites and therefore, they can operate totally independent from each other.
- b. Plant 20 is located ½ miles away from Plants 1&3; there is no common operational management, minimal flow of materials between these two sites and therefore, they can operate totally independent from each other.
- c. Historically, all of these plants have been treated as separate plants by the Air Branch.

Similarly, all other Shaw plants are not part of this Title V site. There will be one Title V permit for Shaw Plant 1&3 and one AIRS number will be used. AIRS No. 313-00081, currently belongs to Plant 1 and will be used for the Title V site. AIRS No. 313-0083, currently belonging to Plant 3 will be retired.

**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
2272-155-7776-0 (plant 1)	11/05/1980, amended on 5/21/1986, and 8/4/1995		x
2272-155-6835-0 (plant 3)	04/06/1976, and amended on 09/26/1984		x

**Table 2: Comments on Specific Permits**

Permit Number	Comments
	None

**D. Process Description**

**1. SIC Code(s)**

Major - 2273

**2. Description of Product(s)**

The final product of Plant 1 & 3 finished, broadloom residential carpet.

**3. Overall Facility 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

4. Overall Process Flow Diagram (optional)

There is one attached to the application.

E. Regulatory Status

1. PSD/NSR

Since this is a PSD major source, PSD avoidance limits require net SO<sub>2</sub> emissions be less than the major modification threshold of forty (40) tons. Since the two boilers that were replaced with Boiler 1 only burned natural gas, there are no SO<sub>2</sub> credits available. Therefore, the facility proposed to accept a rolling twelve month limit of forty (40) tons of SO<sub>2</sub> for this boiler. 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 200,000 gallons.

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	T	T		
PM <sub>10</sub>	T	T		
SO <sub>2</sub>	T	T		
VOC	T			T
NO <sub>x</sub>	T	T		
CO	T			T
TRS	T			T
H <sub>2</sub> S	T			T
Individual HAP	T			T
Total HAPs	T			T

3. MACT Standards

None applicable

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

None 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 application, this facility is in compliance.

D. Operational Flexibility

None

E. Permit Conditions

None

**III. 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	Boiler #1	Rule 391-3-1-.02(2)(d)3 Rule 391-3-1-.02(2)(d)(ii) Rule 391-3-1-.02(2)(g)2	3.2.1, 3.4.1, 3.4.4, 3.4.7, 5.2.1, 5.2.2, 5.2.3	none	none
BL02	Boiler #2	Rule 391-3-1-.02(2)(d)2(ii) Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(g)2	3.4.2, 3.4.5, 3.4.7, 5.2.1, 5.2.2, 5.2.3	none	none
BL03	Boiler #3	Rule 391-3-1-.02(2)(d)2(ii) Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(g)2	3.4.2, 3.4.5, 3.4.7, 5.2.1, 5.2.2, 5.2.3	none	none
CD01 (plant 1)	rotary dye (range)	Rule 391-3-1-.02(2)(b) Rule 391-3-1-.02(2)(e)1(ii)	3.4.3, 3.4.5, 3.4.6	none	none
LC01 (plant 1)	Latex coater oven	Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii)	3.4.3, 3.4.5, 3.4.6	none	none
CD02 (plant 3)	printer dye range #2	Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii)	3.4.3, 3.4.5, 3.4.6	none	none
CD03 (plant 3)	printer dye range #1	Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii)	3.4.3, 3.4.5, 3.4.6	none	none
UC01 (plant 3)	Urethane coater oven	Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii)	3.4.3, 3.4.5, 3.4.6	none	none

**C. Equipment & Rule Applicability**

**! Emission and Operating Caps**

Because boiler no. 1 (BL01) was constructed after the PSD regulations were in effect, it is being limited 200,000 gallons of fuel oil so that the potential increase in SO2 is less than 40 tpy.

! Applicable Rules and Regulations

Boiler No. 2 (BL02, 74.1 MMBtu/hr constructed in 1965), Boiler No. 3 (BL03, 74.1 MMBtu/hr constructed in 1966) are capable of firing on natural gas as a primarily fuel, and No. 6 fuel oil as a back up fuel provides steam for process. These boilers are subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(d)1(ii) "Fuel Burning Equipment" based on the following equation:

$$E = 0.7 \left( \frac{Q}{R} \right)^{0.75}$$

where E is the allowable PM emission rate in pounds per hour & R = heat input rate in million Btu per hour for the boiler.

Boiler Nos. 2 and 3 (BL02 and BL03) are subject to forty ( 40) percent visible emissions opacity for particulate matter as outlined in Georgia Rule 391-3-1-.02(2)(b)1.

Boiler No. 1 (BL01, 61.75 MMBtu/hr constructed in 1984) is capable of firing on natural gas as a primarily fuel, and No. 6 fuel oil as a back up fuel provides steam for process and are subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(d)2(ii) "Fuel Burning Equipment" based on the following equation:

$$E = 0.5 \left( \frac{Q}{R} \right)^{0.75}$$

where E is the allowable PM emission rate in pounds per hour & R is heat input rate in million Btu per hour for the boiler.

Boiler No. 1 (BL01) is also subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(d)3 because it was constructed after January 1, 1972. Georgia Rule (d)3 limits the opacity to 20 percent except for one six minute period per hour of not more than 27 percent opacity.

Georgia Rules for Air Quality Control, Rule 391-3-1-.02(2)(e)1(ii) prohibits the facility to discharge, or cause the discharge, into the atmosphere, from Process Equipment, rotary dye range (CD01), latex coater oven (LC01), printer dye range #2 (CD02), printer dye range #1 (CD03) and urethane coater oven (UC01) in excess of the rate derived from the value calculated by the following equation:

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

where E is allowable emission rate in pounds per hour & P is process input weight rate in tons per hour.

For purpose of determining compliance with this Condition, rotary dye range (CD01), latex coater oven (LC01), printer dye range #2 (CD02), printer dye range #1 (CD03) and urethane coater oven (UC01) are separate processes under Rule (e).

Since the Boiler Nos. 1, 2, and 3 (BL01, BL02 and BL03) are capable of firing on No. 6 fuel, Georgia Rule for Air Quality Control Rule 391-3-1-.02(2)(g) prohibits firing any fuel oil that contains greater than 2.5 percent sulfur, by weight in boilers BL01, BL02, and BL03.

Process Equipment "rotary dye range (CD01)", "latex coater oven (LC01)", "printer dye range #2 (CD02)", "printer dye range #1 (CD03)" and "urethane coater oven (UC01)" are subject to forty (40) percent visible emissions opacity for particulate matter as outlined in Georgia Rule 391-3-1-.02(2)(b).

Shaw Industries, Inc. has not requested to change any existing permit conditions. Existing condition No. 5 of the permit No. 2272-155-7776-0 requires the plant to keep record of boilers operation, analysis of the fuel oil burned, and quantity of fuel oil burned during a year for two years which will remain as is except record keeping should be kept for five years.

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 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 BL01, 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 BL02 and BL03. 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 number 6 fuel oil.

The Rotary Dye Range (CD01) and Printer Dye Ranges #2 and #1 (CD02 and CD03, respectively) are subject to Georgia Rules 391-3-1-.02(2)(b) for Visible Emissions and (e) for Particulate Matter (PM) emissions. These units use water-based dyes and chemicals to dye the tufted carpet. The Urethane Coater (UC01) and the Latex Coater (LC01) are also subject to Georgia Rules 391-3-1-.02(2)(b) for opacity and (e) for Particulate Matter (PM) emissions. Latex is applied in these units to form a secondary backing to the tufted and dyed carpet. 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.

Boiler BL01 is required by this permit to keep records of the amount of fuel oil that is combusted in the boiler each month and submit the total usage on a 12-consecutive month basis 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

None applicable

B. Alternative Requirements

None applicable

C. Insignificant Activities

None applicable

D. Temporary Sources

None applicable

E. Short-Term Activities

None applicable

F. Compliance Schedule/Progress Reports

None applicable

G. Emissions Trading

None applicable

H. Acid Rain Requirements

None applicable

I. Prevention of Accidental Releases

This facility is not subject to 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

None applicable

L. Specific Conditions

None applicable

**VIII. General Provisions**

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 170 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Quality Control that apply to all stationary sources of air pollution.

**TITLE V APPLICATION REVIEW**

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**Closing Block:** We have reviewed and recommend issuance of Permit No. 2273-313-0081-V-01-0

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

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**Stationary Source Permitting Program Manager**

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Date

## **Addendum to Narrative**

The 30 day public comment period for the draft Title V permit for Shaw Industries Inc., Plants 1 & 3, Dalton, Georgia ended on February 21, 2000. On February 22, 2000, the Division received comments from the company which are outlined blow, along with the Division's response:

### **1.1 Site Determination**

#### Company comment

The first paragraph contains factual errors concerning the location of this site and the number of Shaw plants and Title V sites in Whitfield County. Replacement language is proposed as follows:

Plants 1&3 are located on adjacent sides of East Franklin Street, Dalton, Whitfield County, Georgia. Shaw Industries, Inc. has fifteen manufacturing plants in the Dalton area, with eight of them classified as Title V major sources and one classified as a synthetic minor source within 10 miles of Plant 1&3. Plant 3 is contiguous to Plant 1, is dependent on Plant 1 for its steam supply, and is under common daily management; therefore, these two plants are a single Title V site. Shaw Plant 63 is also under the same operational management, but is located 3 miles from Plants 1&3 and has been determined to be a separate site. The closest Shaw facility is Plant 20 which is approximately ½ mile away from Plants 1&3. Plant 20 is under separate operational management, there is minimal product or material flow between the two sites, and neither plants are dependent on each other in order to operate at full capacity. Therefore, Plant 20 has been determined to be a separate Title V site. Factors used to make this determination include:

- a. Plant 63 is located 3 miles away from Plants 1&3; there is no permanent flow of materials between these two sites and therefore, they can operate totally independent from each other.
- b. Plant 20 is located ½ miles away from Plants 1&3; there is no common operational management, minimal flow of materials between these two sites and therefore, they can operate totally independent from each other.
- c. Historically, all of these plants have been treated as separate plants by the Air Branch.

#### Division Comment

The final TV permit reflects this change.

### **1.3 Overall Facility Process Description**

#### Company comment

Shaw Industries proposed the following process descriptions for both Plant 1 and Plant 3: 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 for consistent length 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. Plant 3 does not have any boilers, but receives process steam generated by three boilers in Plant 1.

Division Comment

The final TV permit reflects this change.

**3.4 Equipment SIP Rule Standards**

Company comment

Condition 3.4.3, restricting fuel usage in all process fuel burning equipment (CD01, CD02, CD03, LC01, and UC01) to only natural gas, is proposed to be amended to allow for the use of propane as a backup fuel. This should not significantly change the PTE or actual emissions from the affected units.

The descriptive term oven used for processes CD01, CD02, CD03, LC01, and UC01 is requested to be changed to process equipment. (See also 3.4.5)

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

The daily visible emissions check on each boiler should be performed according to Method 9 procedures and therefore the observations should be recorded every fifteen second for the three minute period. Minor changes have been made to the permit as a result of this comment. The revised condition No. 5.2.1 reads as follow:

The Permittee shall, for each day or portion of a day that Boilers BL01, BL02, and/or BL03 are fired with residual oil, conduct a check of visible emissions from the boiler(s). For the purposes of this permit, residual oil means any fuel oil which does not comply with the specifications of fuel oils numbers 1 and 2, and all fuel oil numbers 4, 5, and 6 as defined by ASTM 396 (*Standard Specification for Fuel Oils*). The Permittee shall retain a record of the visible emissions check in a daily visible emissions (VE) log suitable for inspection or submittal to the Division. The check shall be conducted using the following procedure:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

The trained observer shall stand at a distance of at least 15 feet, which is sufficient to provide a clear view of the plume against a contrasting background, with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Make the determination at the point of greatest opacity in the portion of the plume where condensed water vapor is not present.

The person performing the determination shall have received training acceptable to the Division to recognize the appropriate opacity action level and the determination shall cover every fifteen seconds for period of three minutes. For Boiler BL01, the opacity action level shall be any occurrence of visible emissions that is equal to or greater than 20 percent and for Boilers BL02 and/or BL03, any occurrence of visible emissions that is equal to or greater than 30 percent. For any boiler that exhibits visible emissions equal to or greater than the applicable opacity action level, the Permittee shall record the occurrence as an excursion. The Permittee shall determine the cause of the excursion and correct the problem in the most expedient manner possible.

### **5.3 Record Keeping and Reporting Requirements**

#### Company comment

Condition 5.3.1 requires Plant 1&3 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 the semiannual report format within the next several months. No changes have been made to the permit as a result of this comment.

### **8.14 Compliance Requirements**

#### Company comment

Condition 8.14.1 requires Plant 1&3 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.

### **Attachment B Generic Emissions Groups**

#### Company comment

In the table titled Description of Fuel Burning Equipment, the number of units with a rated heat input capacity of less than 10 million Btu/hr burning only natural gas and/or LPG should be changed from zero (0) to one (1). This is a change from the original application dated October 18, 1996, and subsequent revisions.

#### Division Comment

The final TV permit reflects this change.

## **Narrative Changes**

### **I B. Site Determination**

#### Company comment

The following language is proposed to replace section IB in its entirety:

Plants 1&3 are located on adjacent sides of East Franklin Street, Dalton, Whitfield County, Georgia. Shaw Industries, Inc. has fifteen manufacturing plants in the Dalton area. Eight of them classified as Title V major sources and one classified as a synthetic minor source are located within 10 miles of Plant 1&3.

Plant 3 is contiguous to Plant 1, is dependent on Plant 1 for its steam supply, and is under common daily management. Therefore, these two plants are a single Title V site. Shaw Plant 63 is also under the same operational management as Plants 1&3, but is located 3 miles from Plants 1&3. There is no predetermined permanent flow of materials between these two sites. Based on the distance between the two sites and lack of total dependence, they will be treated as separate Title V sites. The closest Shaw facility is Plant 20 which is approximately ½ mile away from Plants 1&3. Plant 20 is under separate operational management, there is minimal product or material flow between the two sites, and neither plants are dependent on each other in order to operate. Therefore, these plants will be treated as separate Title V sites. Similarly, all other Shaw plants are not part of this Title V site.

There will be one Title V permit for Shaw Plant 1&3 and one AIRS number will be used. AIRS No. 313-00081, currently belongs to Plant 1 and will be used for the Title V site. AIRS No. 313-0083, currently belonging to Plant 3 will be retired.

#### Division Comment

The Division agrees with the company's comments regarding the site determination.

### **I E. Regulatory Status**

#### Company comment

Section 2. consists of Table 3: Title V Major Source Status, which lists the Major Source Status of each pollutant at Plant 1&3. This table incorrectly identifies Carbon Monoxide (CO) as being emitted at major source levels. CO should be listed as being non-major source status.

#### Division Comment

The Division agrees with the company's comment. The facility is a minor source for carbon monoxide (CO) emissions.

### **III A. Brief Process Description**

Company comment

This section is replaced in its entirety with the following language:

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.

Division Comment

The Division agrees with the company's comments regarding the process description.