

Facility Name: Shaw Industries, Inc. – Plant 4
City: Dalton
County: Whitfield
AIRS #: 04-13-313-00084

Application #: TV-17018
Date Application Received: October 23, 2006
Permit No: 2273-313-0084-V-02-0

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, Inc. – Plant 4** 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, Inc. – Plant 4

2. Parent/Holding Company Name

Shaw Industries Group, Inc.

3. Previous and/or Other Name(s)

Star Finishing Company, Division of Shaw Industries, Inc.

4. Facility Location

2225 South Hamilton Street Ext.
Dalton, Georgia 30720

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

This facility is located in Whitfield County, 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

Shaw Industries, Inc., has ten manufacturing plants in Whitfield County, Dalton, with eight of them classified as Title V major sources. Three Title V renewal applications are being submitted at the same time (Plant Nos. 2, 4 and 80) because the site determination as detailed in subsequent paragraphs has led the Division to conclude that these three facilities meet the definition of a Part 70 Single Site.

Shaw Plant #2 is located at 2207 South Hamilton Street Extension, Dalton, GA. This plant was purchased by Shaw Industries, Inc. in early 1987 from Unique Processing Co. On June 6, 1988, an Air Quality permit was issued to Shaw for the operation of Plant #2 and construction of two (2) 73.7 million Btu boilers. Shaw Plant #2 is located directly north of Plant #4, on contiguous property.

Shaw Plant #4 is located at 2225 South Hamilton Street Extension, on contiguous property with Plant #2; it is also adjacent to Shaw plant #80 which is separated by a public road (South Hamilton Extension). There is also a small chemical blending operation at Plant #4 that supplies auxiliary chemicals to other Shaw plants within and beyond Whitfield County. Shaw Plant #4 is

the oldest Shaw property at this site dating back to the early 1970's. On December 10, 1979 an Air Quality permit was issued to Shaw for the operation of Shaw Plant #4 and associated process equipment including boilers. In 1984, a second permit was issued for the construction and operation of three (3) coal fired boilers.

Shaw Plant #80 is located at 2230 South Hamilton Street Extension, adjacent to Plant #4. This plant was purchased by Shaw Industries, Inc. in late 1987 from West Point Pepperell, Inc. On April 27, 1988, an Air Quality permit was issued to Shaw for the operation of plant #80.

Plants 2, 4, and 80 are all one Part 70 source because they are under common control, located on contiguous and/or adjacent property, and have the same 2-digit SIC code.

For administrative purposes, Shaw requested separate Title V permits be issued for each facility. AIRS No. 313-00061 currently belongs to Plant #2, AIRS No. 313-00084 currently belongs to Plant #4, and AIRS No. 313-00003 currently belongs to Plant #80.

C. Existing Permits

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
2273-313-0084-V-01-0	March 18, 2002	Initial Title V
2273-313-0084-V-01-1	April 17, 2003	Revision to PSD Avoidance conditions for SO ₂ emissions from all boilers
2273-313-0084-V-01-2	April 17, 2003	Flexibility to burn propane as a backup fuel in process heaters and dryers
2273-313-0084-V-01-3	November 17, 2004	Construction and operation of three wet scrubbers to control emissions from the coal-fired boilers. This permit is superseded by Permit Amendment No. 2273-313-0084-V-01-4 due to comments received during the public comment period.
2273-313-0084-V-01-4	February 3, 2005	Construction and operation of three wet scrubbers to control emissions from the coal-fired boilers
2273-313-0084-V-01-5	November 29, 2005	Modification of an existing carpet dyeline and installation of a new water heater

D. Process Description

1. SIC Codes(s)

2273

2. Description of Product(s)

The final product of the facility is broadloom tufted carpet.

3. Overall Facility Process Description

Processed yarn is tufted into greige goods. These greige goods are then dyed in a continuous process. Once the greige goods have been dyed, they are then coated with an SBR latex adhesive backing that adds durability. During this process, the yarn fibers are sheared for consistent length. At the end of this process the finished carpet is inspected and cut to consumer specified lengths. The steam produced by five boilers (source codes BL04, BL05, BL06, BL07 and BL08) is mainly used to power the continuous dye operation and coating processes.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Plants 2, 4, and 80 are a major source under PSD because they have potential to emit (PTE) of PSD regulated pollutants over 100 tpy (they are one of the 28 named source categories under PSD because their combined site-wide boiler heat input is over 250 MMBtu/hr).

Please refer to the narrative for No. 2273-313-0084-V-01-0 for site history regarding PSD issues.

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

3. MACT Standards

HAP emissions are limited to 10/25 tpy to avoid 40 CFR 63 Subpart DDDDD and 40 CFR 63 Subpart OOOO.

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:

Shaw currently has a 10/25 tons per year limit for HAPs with Permit Amendment No. 2273-313-0084-V-01-4. Without limits, the facility is a major source of HAPs due to HCl emissions from the coal-fired boilers. The purpose of HAP emission limits is for the facility to not be subject to the Boiler MACT, 40 CFR 63 Subpart DDDDD and the Fabric Coating MACT, 40 CFR Subpart OOOO. Shaw claims that the only HAP emitted in significant quantities from the coal-fired boilers is HCl. Therefore, by limiting HCl emissions below 10 tpy, the entire facility will be a synthetic minor source for HAP emissions. The emission caps in this amendment are discussed in more detail in the narrative for this permit. Please refer to this narrative for more information.

B. Applicable Rules and Regulations

Applicable rules and regulations specified in Permit No. 2273-313-0084-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

C. Compliance Status

No noncompliance issues were identified in the application.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition 2.1.1 was added with Permit Amendment No. 2273-313-0084-V-01-4 to limit HAP emissions below the major source threshold on a facility-wide basis.

III. Regulated Equipment Requirements

A. Brief Process Description

Plant #4 manufactures tufted carpet by tufting nylon, polyester or polypropylene yarn through a polypropylene primary backing, dyeing the carpet, applying a coating to the primary backing, applying a secondary backing when called for and shearing the finished carpet. Yarn is not produced at Plant 4. It is delivered to the plant, stored in the plant and used when required. Plant 4 has 11 atmospheric dye becks which are used on a limited basis (listed in application as a insignificant sources based on emission levels), two Kuster continuous dye ranges (source codes CD03 and CD04) for polyester and nylon carpets and one continuous dye range for scouring polypropylene carpets. After the carpet is dyed, a stain blocker is applied, then a scotch guard is applied. Finally, a latex backing is applied to the carpet, the carpet is sheared, rolled up and marked for storage or delivery. The latex backing contains styrene and 1,3 butadiene. Lint from the shearing process is controlled by exhausting part of the lint laden air stream through a multiclone collector located outside and the other part of the line through a bag filter located inside the building. Steam required for the processes is provided by five boilers; two natural gas/No. 2 fuel oil fired boilers (source codes BL07 and BL08) each rated at 59 MMBtu/hr and installed in 1973 and three coal fired boilers (source codes BL04, BL05 and BL06) each rated at 37.5 MMBtu/hr and installed in 1984. The coal-fired boilers are equipped with multiclones for control of particulate matter (source codes PC01-03) and wet scrubber for control of HCl and SO₂.

Amendment No. 2273-313-0084-V-01-1 is for a revision to PSD avoidance conditions for SO₂ emissions from the boilers. The original permit limited sulfur content of the coal and coal usage for the purpose of limiting SO₂ emissions below 250 tpy. This amendment directly limits SO₂ emissions below 250 tpy from the boilers and prescribed a method for calculating those emissions.

Amendment No. 2273-313-0084-V-01-2 allows the flexibility to burn propane as a backup fuel in process heaters and dryers.

Amendment No. 2273-313-0084-V-01-3 is for the construction and operation of wet scrubbers on each of the three existing coal-fired boilers but is superseded by amendment No. 2273-313-0084-V-01-4 due to comments received during the public comment period.

Amendment No. 2273-313-0084-V-01-4 is for the construction and operation of wet scrubbers (source codes WS01, WS02, and WS03) on each of the three existing coal-fired boilers (source codes BL04, BL05 and BL06) to control HCl and SO₂. With this installation, the limit on sulfur content of coal was no longer warranted.

Amendment No. 2273-313-0084-V-01-5 is to replace major components of the existing Kuster dyeline (source code CD03) and install a high efficiency water heater (source code WH01) for rinsing dyed carpet.

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
BL04	Coal boiler #1	Rule 391-3-1-.02(2)(d)2(ii) Rule 391-3-1-.02(2)(d)3 Rule 391-3-1-.02(2)(g)2	2.1.1, 3.2.4, 3.2.6, 3.4.1, 3.4.2, 3.4.5, 5.2.3, 5.2.4, 6.2.4 through 6.2.9	PC01 WS01	Multiclone Wet Scrubber
BL05	Coal boiler #2	Rule 391-3-1-.02(2)(d)2(ii) Rule 391-3-1-.02(2)(d)3 Rule 391-3-1-.02(2)(g)2	2.1.1, 3.2.4, 3.2.6, 3.4.1, 3.4.2, 3.4.5, 5.2.3, 5.2.4, 6.2.4 through 6.2.9	PC02 WS02	Multiclone Wet Scrubber
BL06	Coal boiler #3	Rule 391-3-1-.02(2)(d)2(ii) Rule 391-3-1-.02(2)(d)3 Rule 391-3-1-.02(2)(g)2	2.1.1, 3.2.4, 3.2.6, 3.4.1, 3.4.2, 3.4.5, 5.2.3, 5.2.4, 6.2.4 through 6.2.9	PC03 WS03	Multiclone Wet Scrubber
BL07	Gas boiler #1	Rule 391-3-1-.02(2)(d)2(ii) Rule 391-3-1-.02(2)(d)3 Rule 391-3-1-.02(2)(g)2	2.1.1, 3.2.2, 3.2.3, 3.4.1, 3.4.2, 6.2.1, 6.2.3, 6.2.4, 6.2.9	None	None
BL08	Gas boiler #2	Rule 391-3-1-.02(2)(d)2(ii) Rule 391-3-1-.02(2)(d)3 Rule 391-3-1-.02(2)(g)2	2.1.1, 3.2.2, 3.2.3, 3.4.1, 3.4.2, 6.2.1, 6.2.3, 6.2.4, 6.2.9	None	None
CD03	Kuster continuous dye line	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	2.1.1, 3.2.5, 3.2.7, 3.4.3, 3.4.4, 3.4.5, 6.2.3, 6.2.9	None	None
CD04	Multi-tech continuous dye line	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	2.1.1, 3.2.5, 3.2.7, 3.4.3, 3.4.4, 3.4.5, 6.2.3, 6.2.9	None	None
DR01	Beck 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	2.1.1, 3.2.5, 3.2.7, 3.4.3, 3.4.4, 3.4.5, 6.2.3, 6.2.9	None	None
LC02	Latex coater	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	2.1.1, 3.2.5, 3.2.7, 3.4.3, 3.4.4, 3.4.5, 6.2.3, 6.2.9	None	None
LC03	Latex coater	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	2.1.1, 3.2.1, 3.2.5, 3.2.7, 3.4.3, 3.4.4, 3.4.5, 6.2.2, 6.2.3, 6.2.4, 6.2.9	None	None
WH01	Water heater	Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(d)2(ii) Rule 391-3-1-.02(2)(d)3 Rule 391-3-1-.02(2)(g)2	2.1.1, 3.2.7, 3.2.8, 3.4.1, 3.4.2, 6.2.3, 6.2.9	None	None

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

C. Equipment & Rule Applicability

Emission and Operating Caps:

Emission and operating caps specified in Permit No. 2273-313-0084-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Permit No. 2273-313-0084-V-01-1 directly limits SO₂ emissions below 250 tpy from the boilers and prescribed a method for calculating those emissions. Fuel oil usage limit was revised to 7,000,000 gal/year in boilers BL07 and BL08 in lieu of the 450,000 gal/year limit. The sulfur content of coal was revised to 1% from 0.8% since SO₂ emissions will be limited directly for PSD avoidance purposes. Please refer to the narrative for this permit for more information.

Permit No. 2273-313-0084-V-01-2 limits propane usage to 4,000,000 gal/year in process groups CD03, CD04, DR01, LC02, and LC03. Please refer to the narrative for this permit for more information.

Permit No. 2273-313-0084-V-01-4 relaxes coal sulfur content from 1% back to 2.5% as a result of the installation of the scrubbers. Please refer to the narrative for this permit for more information.

Rules and Regulations Assessment:

Applicable rules and regulations specified in Permit No. 2273-313-0084-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Permit No. 2273-313-0084-V-01-5 is for the installation of a water heater. The water heater is subject to Georgia Rules (d) and (g). Please refer to the narrative for this permit for more information.

D. Compliance Status

The facility has not indicated that it is operating out of compliance with any applicable rules or regulations.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Permit Conditions specified in Permit No. 2273-313-0084-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative. Conditions 3.2.2 from this permit has been deleted. Condition 3.2.3 was modified from allowing the facility to burn no more than 450,000 gallons of fuel oil in boilers BL07 and BL08 to 7,000,000 as a result of Permit Amendment No. 2273-313-0084-V-01-1. All conditions have been renumbered for the current permit.

Conditions 3.2.3, 3.2.4, and 3.2.8 from Permit Amendment No. 2273-313-0084-V-01-1 have been renumbered for the current permit.

Conditions 3.2.8 and 3.2.10 from Permit Amendment No. 2273-313-0084-V-01-2 have been renumbered for the current permit.

Condition 3.4.6 from Permit Amendment No. 2273-313-0084-V-01-4 has been combined with Condition 3.4.5. Condition 3.5.1 has been deleted for the current permit because it has been fulfilled and all conditions referred in this condition has been implemented or removed from this permit.

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 (or sixty (60) days for tests required by 40 CFR Part 63) 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

Testing requirements specified in Permit No. 2273-313-0084-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Initial performance tests have been required for the wet scrubbers in Permit No. 2273-313-0084-V-01-4. Please refer to the narrative for this permit for more information.

According to the Department's records, these initial performance tests were conducted April 2005. See Table IV.1 below for results from the test.

Table IV.1 – Results from April 2005 Performance Test

Unit	SO ₂ Removal Efficiency (%)	HCl Removal Efficiency (%)	Average Scrubbant Liquid Flow Rate (GPH)	Average Scrubbant Liquid pH
WS01	79.2	92.5	188	6.12
WS02	79.2	92.5	184	6.21
WS03	79.2	92.5	230	6.57

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

1. Individual Equipment:

Monitoring requirements specified in Permit No. 2273-313-0084-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

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

Monitoring requirements specified in Permit No. 2273-313-0084-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Condition 5.2.1 from Permit No. 2273-313-0084-V-01-0 has been deleted by Permit Amendment No. 2273-313-0084-V-01-4 with the installation of the wet scrubbers.

From Permit Amendment No. 2273-313-0084-V-01-4, the facility is required to monitor the scrubbant flow rate and the scrubbant pH. Visible emissions checks were removed with this amendment because of the installation of wet scrubbers.

C. Compliance Assurance Monitoring (CAM)

The operations at Shaw Industries – Plant 4 include three coal-fired boilers (Source Codes BL04, BL05, and BL06), which emit HCl and SO₂ emissions that are controlled with a wet scrubber. The boilers are subject to the Compliance Assurance Monitoring provisions of 40 CFR 64 because Shaw Industries – Plant 4 is a major source facility with respect to Title V of the Clean Air Act. The facility has uncontrolled SO₂ potential emissions at least equal to or greater than the Part 70 major source threshold level of 100 tons per year. Shaw indicated that the coal-fired boilers are not Large Pollutant-Specific Emissions Units (LPSEU) because post controlled emissions of each unit is less than 100 tpy.

Condition No. 5.2.3 indicates the specific individual pieces of equipment that are subject to the provisions of 40 CFR 64, “Compliance Assurance Monitoring.”

Condition No. 5.2.4 indicates the operating parameters and criteria that the facility’s control equipment must meet in order to satisfy the requirements of 40 CFR 64, “Compliance Assurance Monitoring.”

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 semi-annual basis. The Division has decided that quarterly reporting is no longer necessary so it has been changed from quarterly to semi-annual.

B. Specific Record Keeping and Reporting Requirements

Record keeping and reporting requirements specified in Permit No. 2273-313-0084-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Condition 6.2.2 from Permit No. 2273-313-0084-V-01-0 has been deleted because it has been replaced by current Conditions 6.2.5, 6.2.6, and 6.2.7 per Permit Amendment No. 2273-313-0084-V-01-1.

Conditions 6.2.4 from Permit Amendment No. 2273-313-0084-V-01-1 has been deleted because it is now covered by Condition 6.1.7.d.i. Conditions 6.2.8 through 6.2.10 from this amendment have been renumbered and added to the current permit.

Conditions 6.2.11 and 6.2.12 from Permit Amendment No. 2273-313-0084-V-01-2 have been combined with Conditions 6.2.6 and 6.2.7 of Permit No. 2273-313-0084-V-01-0 for the current permit.

Conditions 6.2.13 through 6.2.17 from Permit Amendment No. 2273-313-0084-V-01-4 have been renumbered and added to the current permit.

VII. Specific Requirements

A. Operational Flexibility

None Applicable.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

The Division's files indicate that the facility does not currently have any compliance issues.

G. Emissions Trading

None Applicable.

H. Acid Rain Requirements

None Applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they have air conditioners or refrigeration equipment that use CFC's, HFC's or other stratospheric ozone-depleting substances. The facility has indicated that they are subject to Title VI. The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit.

J. Pollution Prevention

None Applicable.

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 30-day public review ended on September 4, 2007. Comments were received by the Division from Troy Virgo of Shaw Industries.

Comments:

1. Condition 3.2.7 sets a site-wide propane limit for PSD avoidance for specified non-boiler fuel burning equipment. The facility indicates that Water Heater, WH01, should also be listed in this restriction.

Division Response:

The Division agrees with this comment. Water Heater WH01 was added by Permit Amendment 2273-313-0084-V-01-5, which is after the addition of the propane limit in Permit Amendment 2273-313-0084-V-01-2. Additionally, Permit Amendment 2273-313-0084-V-01-5 stated that Water Heater WH01 should only be fired with natural gas. However, the Division will allow the addition of propane use for Water Heater WH01 since emission changes will not be significant with the addition of this fuel flexibility for Water Heater WH01. The potential emissions increase from WHO01 firing only natural gas was 25 tpy; the increase from WHO01 firing propane is 37.5 tpy (less than the 40 tpy for PSD significance level).

2. Condition 3.4.5, which cites Georgia Rule (g), should include Water Heater WH01 to be subject to the 2.5% sulfur limit.

Division Response:

The Division disagrees with this comment. Condition 3.2.8, which states that Water Heater WH01 should only be fired with natural gas and propane, subsumes Georgia Rule (g).

3. Condition 6.1.7.b.vi, exceedance reporting for propane usage for specified non-boiler fuel burning equipment, should be revised to include Water Heater WH01.

Division Response:

The Division agrees with this comment. Please see Comment 1 for further explanation.

4. Condition 6.2.3.b, recordkeeping for propane usage for specified non-boiler fuel burning equipment, should be revised to include Water Heater WH01.

Division Response:

The Division agrees with this comment. Please see Comment 1 for further explanation.

5. Condition 6.2.9, which requires the facility to track “all HAP containing materials,” should be amended to specify that only process related HAPs must be tracked. The facility feels that the language in this condition is overly broad and site-wide HAP emissions remain well below 10/25 tpy. The facility contends that the only significant HAP emitted is HCl from the coal boilers and the installation of the wet scrubbers have reduced HCl emissions by 90%.

Upon further discussion with EPD, Shaw submitted a statement testifying that apart from HCl potential HAP emissions from the Title V site (consisting of Shaw Plants 2, 4, and 80) is less than 10 tpy of any single HAP and less than 15 tpy for any combination HAPs.

Division Response:

The Division agrees with this comment and will remove the HAP tracking requirement in Conditions 6.2.9, 6.2.10, and 6.2.11 and revise the permit to include only HCl tracking. Condition 2.1.1 will also be revised to limiting HCl emissions to 10 tpy.