

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

Application #: TV-203398
Date Application Received: November 21, 2017
Permit No: 2273-313-0084-V-04-0

Program	Review Engineers	Review Managers
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Toxics	N/A	N/A
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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The 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 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 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.

B. Site Determination

Shaw Industries, Inc. currently has two Title V manufacturing plants located in Whitfield County, Dalton. Other manufacturing plants have changed operating status from major sources. The two Title V facilities are Plant 4 and Plant 80 which are considered 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. 313-00084 currently belongs to Plant #4 and AIRS No. 313-00003 currently belongs to Plant #80.

Shaw Plant #4 is located at 2225 South Hamilton Street Extension and 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.

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.

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-03-0	July 8, 2013	Title V Renewal
Off-Permit	May 16, 2016	Installation of a new 2.5 MMBtu/hr burner in the extension of the coater
Off-Permit	August 9, 2013	Add three new burners to steamer on Multi-Tech Dye Line (CD04)

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

The facility produces broadloom carpet. 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 a latex adhesive backing that adds durability. The back coating consists of a combination of a mixture of water, base latex emulsion, calcium carbonate filler, and thickener applied as a thin layer between the tufted and greige goods and a secondary backing sheet. 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 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

Plant Nos. 4 and 80 (and previous Plant #2) 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. Plant Nos. 4 and 80 (and previous Plant #2) 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).

For administrative purposes, Shaw requested separate Title V permits be issued for each facility. AIRS No. 313-00084 currently belongs to Plant #4 and AIRS No. 313-00003 currently belongs to Plant #80. AIRS No. 313-00061 belonged to Plant #2, however, in March 2011, Shaw submitted a letter to revoke Plant #2's permit because it had ceased operations several years prior.

Shaw has an existing sulfur dioxide (SO₂) emissions limit from Boiler BL07 of 7,000,000 gallons of fuel oil per year to avoid PSD/NSR review. At the request of the facility, the fuel oil limit for Boiler BL07 will be reduced to 3,692,000 gallons per year which is the approximate maximum potential fuel oil that could be combusted in the boiler. This modification to the limit will remain in compliance with the PSD avoidance determination.

Shaw has an existing fuel sulfur content limit of 0.5 percent sulfur by weight to reduce sulfur emissions

Shaw has an existing sulfur dioxide (SO₂) emissions limit from Boiler BL09 of 1,000,000 gallons of fuel oil per year to avoid PSD/NSR review.

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	✓	✓		
PM _{2.5}	✓	✓		
SO ₂	✓	✓		
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓
Total GHGs	✓	✓		

3. MACT Standards

The facility previously had a HAP emission limit of 10/25 tpy for avoidance of 40 CFR 63 Subpart OOOO and 40 CFR 63 Subpart DDDDD. However, Plant 4 has removed the coal-fired boilers which resulted in significantly reduced HAP emissions. The facility provided an emission summary from both Plant 4 and Plant 80 since these two facilities are considered one Part 70 source. The summary shows the potential HAP emissions are below the major source threshold. The only source of HAP emissions are from natural gas combustion. As a result, the HAP emission limit was not included in the renewal permit.

As a minor source of HAP emissions, Boilers BL07, and BL09 are subject to 40 CFR 63, Subpart JJJJJ, “National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial Commercial, and Institutional Boilers”.

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	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no compliance issues noted with this application.

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. 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 (37.5 MMBtu/hr)	Rule 391-3-1-.02(2)(d) Rule 391-3-1-.02(2)(g) 40 CFR 63 Subpart JJJJJ	2.1.1, 3.2.4, 3.2.6, 3.3.4, , 3.3.5, 3.3.6, 3.4.1, 3.4.2, 3.4.5, 4.2.3, 4.2.4, 5.2.3, 5.2.4, 5.2.8, 5.2.9, 5.2.10, 6.2.4 through 6.2.9, 6.2.18 through 6.2.22	PC01 WS01	Multiclone Wet Scrubber
BL05	Coal Boiler #2 (37.5 MMBtu/hr)	Rule 391-3-1-.02(2)(d) Rule 391-3-1-.02(2)(g) 40 CFR 63 Subpart JJJJJ	2.1.1, 3.2.4, 3.2.6, 3.3.4, , 3.3.5, 3.3.6, 3.4.1, 3.4.2, 3.4.5, 4.2.3, 4.2.4, 5.2.3, 5.2.4, 5.2.8, 5.2.9, 5.2.10, 6.2.4 through 6.2.9, 6.2.18 through 6.2.22	PC02 WS02	Multiclone Wet Scrubber
BL06	Coal Boiler #3 (37.5 MMBtu/hr)	Rule 391-3-1-.02(2)(d) Rule 391-3-1-.02(2)(g) 40 CFR 63 Subpart JJJJJ	2.1.1, 3.2.4, 3.2.6, 3.3.4, , 3.3.5, 3.3.6, 3.4.1, 3.4.2, 3.4.5, 4.2.3, 4.2.4, 5.2.3, 5.2.4, 5.2.8, 5.2.9, 5.2.10, 6.2.4 through 6.2.9, 6.2.18 through 6.2.22	PC03 WS03	Multiclone Wet Scrubber
BL07	Natural Gas/Fuel Oil Boiler #1 (59 MMBtu/hr)	Rule 391-3-1-.02(2)(d) Rule 391-3-1-.02(2)(g) 40 CFR 63 Subpart JJJJJ	3.2.2, 3.2.4, 3.3.3, 3.4.1, 3.4.2, 5.2.4, 6.2.1, 6.2.3, 6.2.4, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.12	None	None
BL09	Natural Gas/Fuel Oil Boiler #2 (59 MMBtu/hr)	Rule 391-3-1-.02(2)(d) Rule 391-3-1-.02(2)(g) 40 CFR 60 Subpart Dc 40 CFR 63 Subpart JJJJJ	3.2.3, 3.2.4, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 5.2.1 through 5.2.4, 6.2.1, 6.2.3 through 6.2.12	None	None
CD03	Kuster continuous dye line	Rule 391-3-1-.02(2)(b) Rule 391-3-1-.02(2)(e) Rule 391-3-1-.02(2)(g)	3.2.5, 3.2.6, 3.4.3, 3.4.4, 6.2.3, 6.2.4	None	None
CD04	Multi-tech continuous dye line	Rule 391-3-1-.02(2)(b) Rule 391-3-1-.02(2)(e) Rule 391-3-1-.02(2)(g)	3.2.5, 3.2.6, 3.4.3, 3.4.4, 6.2.3, 6.2.4	None	None
DR01	Beck dryer	Rule 391-3-1-.02(2)(b) Rule 391-3-1-.02(2)(e) Rule 391-3-1-.02(2)(g)	3.2.5, 3.2.6, 3.4.3, 3.4.4, 6.2.3, 6.2.4	None	None
LC02	Latex coater	Rule 391-3-1-.02(2)(b) Rule 391-3-1-.02(2)(e) Rule 391-3-1-.02(2)(g)	3.2.5, 3.2.6, 3.4.3, 3.4.4, 6.2.3, 6.2.4	None	None
LC03	Latex coater	Rule 391-3-1-.02(2)(b) Rule 391-3-1-.02(2)(e) Rule 391-3-1-.02(2)(g)	3.2.1, 3.2.5, 3.2.6, 3.4.3, 3.4.4, 6.2.2, 6.2.3, 6.2.4	None	None
WH01	Water heater	Rule 391-3-1-.02(2)(b) Rule 391-3-1-.02(2)(d) Rule 391-3-1-.02(2)(g)	3.2.5, 3.2.6, 3.4.1, 3.4.2, 6.2.3, 6.2.4	None	None

*All three coal fired Boilers BL04, BL05 and BL06 have been removed as well as the ability of the facility to burn coal as a fuel source.

B. Equipment & Rule Applicability

Latex Coater #2 (source code LC03): To avoid PSD permitting and review, the facility agreed to limit the LC03 production rate to 123,000,000 square yards coated carpet which equates or less than 38 tons per year of VOC.

No. 2 fuel oil

BL07 is limited to 450,000 gallons of No. 2 fuel oil during any twelve consecutive months.

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 boiler BL07 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. At the request of the facility, the fuel oil limit for Boiler BL07 will be reduced to 3,692,000 gallons per year which is the approximate maximum potential fuel oil that could be combusted in the boiler.

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.

Limits the fuel oil usage from boiler BL09 to 1,000,000 gal/year and boiler BL07 to 3,692,000 gal/year. Both boilers will be limited to natural gas and fuel oil.

Rules and Regulations Assessment:

Applicable rules and regulations:

The two boilers in operation (source codes BL07 and BL09). Since these units were constructed after January 1, 1972, the allowable PM emission rate from each boiler is specified by Georgia Rule 391-3-1-.02(2)(d)2(ii).

Boilers BL07 and BL09 (59 MMBtu/hr each) are natural gas/No. 2 fuel oil fired boilers and were constructed prior to 1973 and installed in 1973. Since these units were constructed after January 1, 1972, the allowable PM emission rate from each boiler is specified by Georgia Rule 391-3-1-.02(2)(d)2(ii). Boiler BL07 are also subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(d)3 because they were constructed after January 1, 1972. Georgia Rule 391-3-1-.02(2)(d)3 limits the opacity to 20 percent except for one six minute period per hour of not more than 27 percent opacity. Since boiler BL07 is capable of firing on natural gas or No. 2 fuel oil, Georgia Rule 391-3-1-.02(2)(g)2 limited sulfur content to 2.5 weight percent. However, the facility agreed to limit the sulfur content of No. 2 fuel to 0.50%.

Because Boiler BL07 and Boiler BL09 fire both natural gas and fuel oil, both boilers are subject to 40CFR63 Subpart JJJJJ (Boiler GACT). The boilers are subject to the biennial tuneups and a one-time energy assessment. Because the one-time energy assessment was completed in February 2014, the condition concerning this was not included in the permit renewal.

Boiler BL09, 59 MMBtu/hr is capable of firing on natural gas and fuel oil and was installed after January 1, 1972, therefore the allowable PM emission rate from each boiler is specified by Georgia Rule 391-3-1-.02(2)(d)2(ii). Also since all the boiler was constructed after January 1, 1972, the opacity limit is expressed by Georgia Rule 391-3-1-.02(2)(d)3. The fuel sulfur content is limited to 2.5 weight percent, in accordance with Georgia Rule 391-3-1-.02(2)(g)2. However NSPS Dc subsumes Georgia Rule (g) and BL09 is limited to a sulfur content limit of 0.5%.

Boiler BL09 is subject to the requirements of 40 CFR 60 Subpart Dc because it was constructed after 1989 and has a heat input capacity greater than 10 MMBtu/hr. NSPS Dc limits opacity to 20% and all fuels to a sulfur content limit of 0.5%.

Because Boiler BL07 was constructed in 1972, it is not subject to the requirements of 40 CFR 60 Subpart Dc.

For the 16 MMBtu/hr natural gas fired Kuster continuous dye line CD03, constructed prior to 1970 and installed in 1970, 29 MMBtu/hr natural gas fired Multi-tech continuous dye line CD04, constructed prior to 1977 and installed in 1977, 14 MMBtu/hr natural gas fired Beck dryer DR01, constructed prior to 1981 and installed in 1981, 42.5 MMBtu/hr natural gas fired Latex coater LC02, constructed prior to 1978 and installed in 1978, and natural gas fired Latex coater LC03, constructed in 1999 and installed in 2000, the fuel sulfur content is limited to 2.5 weight percent, in accordance with Georgia Rule 391-3-1-.02(2)(g)2.

DR01, CD03, CD04, LC02, and LC03 are used for latex adhesive to carpet and are capable of firing on natural gas only. 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.

CD03, CD04, DR01, LC02, and LC03 are subject to Georgia Rule 391-3-1-.02(2)(b)1. Georgia Rule 391-3-1-.02(2)(b)1 limits the opacity to forty percent.

Water Heater WH1 is subject to Georgia Rules (b), (d) and (g).

C. Permit Conditions

Renewal Condition	Existing Condition	Requirements
3.2.1	3.2.1	Limits Shaw to not process coated carpet in excess of 123,000,000 square yards during any twelve consecutive months in Latex Coater (LC03).
3.2.2	3.2.2	MODIFIED: Limits Shaw to not burn more than a total of 3,692,000 gallons of No. 2 fuel oil in Boiler BL07 during any twelve consecutive months. Fuel oil limit updated at request of facility.
3.2.3	3.2.9	Shaw must not burn more than a total of 1,000,000 gallons of No. 2 fuel oil in Boiler BL09 during any twelve consecutive months.
3.2.4	3.2.3	Shaw must not fire any fuel in Boilers BL07 and BL09 whose sulfur content exceeds 0.5 percent by weight.
---	3.2.4	<u>Condition removed.</u> *See below.

Renewal Condition	Existing Condition	Requirements
3.2.5	3.2.5	Shaw must not fire any fuel other than natural gas or propane in the Beck Dryer (DR01), Latex Coater #1 (LC02), Latex Coater #2 (LC03), Kuster Dye Range (CD03), Multi-tech Range (source code CD04) and Water Heater (Source Code WH01).
---	3.2.6	<u>Condition removed.</u> *See below.
3.2.6	3.2.7	Shaw must not burn more than 4,000,000 gallons of propane in Beck Dryer (DR01), Latex Coater #1 (LC02), Latex Coater #2 (LC03), Kuster Dye Range (CD03), Multi-tech Range (CD04), and the Water Heater (WH01) during any twelve consecutive months.
---	3.2.8	Shaw must not fire any fuel other than natural gas and propane in the Water Heater (WH01). Combined with Condition 3.2.5.
3.3.1	3.3.1	Shaw must comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units," for operation of the boiler BL09.
---	3.3.2	Shaw must not combust distillate fuel oil in Boiler BL09 that contains greater than 0.5 weight percent sulfur. Distillate fuel oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396, "Standard Specification for Fuel Oils." The fuel oil sulfur limit applies at all times, including periods of startup, shutdown, and malfunction. DUPLICATE CONDITION 3.2.3.
3.3.2	3.3.3	Shaw must not cause to be discharged into the atmosphere from Boiler BL09 any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times, except during periods of startup, shutdown, or malfunction.
3.3.3	3.3.4	Shaw must shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A- "General Provisions" and 40 CFR 63 Subpart JJJJJ- "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers" for operation of Boilers BL04, BL05, BL06 , BL07, and BL09.
---	3.3.5	<u>Condition removed.</u> *See below.
3.3.4	3.3.6	<u>Condition removed.</u> (concerned Boiler GACT one-time energy assessment)
3.4.1	3.4.1	MODIFIED: Condition No. 3.4.1 subjects boilers BL07 and BL09 to the requirements of Georgia Rule (d) for particulate matter. Removing BL04, BL05 and BL06
3.4.2	3.4.2	MODIFIED: Condition No. 3.4.2 subjects boiler BL07, and WH01 to the requirements of Georgia Rule (d) for opacity. Removing BL04, BL05 and BL06
3.4.3	3.4.3	Shaw must not discharge, or cause the discharge, into the atmosphere, from all process equipment, including DR01, CD03, CD04, LC02, and LC03, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent
3.4.4	3.4.4	Shaw must not cause, let, permit, suffer, or allow the rate of emissions from each manufacturing process, including DR01, CD03, CD04, LC02, and LC03, particulate matter in total quantities equal to or exceeding
---	3.4.5	MODIFIED: Shaw must not burn fuel containing more than 2.5 percent sulfur, by weight, in DR01, CD03, CD04, LC02, and LC03. NOT APPLICABLE See 3.2.5.

*The facility has removed Boilers BL04, BL05 and BL06 and no longer uses coal as a fuel source.

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

Renewal Condition	Existing Condition	Requirements
4.1.1-4.1.4		Standard permit conditions. <u>Condition 4.1.3 modified</u> The facility has removed Boilers BL04, BL05 and BL06 and no longer uses coal as a fuel source.
---	4.2.1	<u>Condition removed.</u> Testing complete (Boiler BL04 – 4/14/2015), (Boiler BL05 – 4/13/2015) & (Boiler BL06 – 4/12/2015). *See below.
---	4.2.3	<u>Condition removed.</u> *See below.
---	4.2.4	<u>Condition removed.</u> *See below.
---	4.2.2	Removed. Testing complete.

*The facility has removed Boilers BL04, BL05 and BL06 and no longer uses coal as a fuel source.

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

Renewal Condition	Existing Condition	Notes
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.
---	5.2.1	Removed. See below.
---	5.2.2	Removed. See below.
---	5.2.3	Removed. See below.
---	5.2.4	Removed. See below.
5.2.1	5.2.5	Condition No. 5.2.5 lists the schedule for completing further performance test for Boiler BL09.
5.2.2	5.2.6	Condition No. 5.2.6 allows the facility to monitor opacity using Method 22 test in lieu of a Method 9 test and states the procedures for monitoring the opacity.
5.2.3	5.2.7	Condition No. 5.2.7 requires the facility to keep records of all excursions and the methods used to test for opacity.
---	5.2.8	Removed. See below.
5.2.4	5.2.9	Condition No. 5.2.9 was added as a part of this renewal and details if the facility chooses to use a CO CEMS for compliance with the CO limit in Permit Condition 3.3.5, then the facility must develop a site-specific monitoring plan as required by 40 CFR 63 Subpart JJJJJ.
---	5.2.10	Removed. See below.

*CAM will no longer apply to this facility. The facility no longer uses coal as a fuel source and has removed Boilers BL04, BL05 and BL06, Multi Cyclones PC01, PC02 & PC03 and West Scrubbers WS01, WS02 & WS03.

C. Compliance Assurance Monitoring (CAM)

CAM will no longer apply to this facility. The facility no longer uses coal as a fuel source and has removed Boilers BL04, BL05 and BL06, Multi Cyclones PC01, PC02 & PC03 and West Scrubbers WS01, WS02 & WS03.

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

Renewal Condition	Previous Condition	Requirements
6.1.1 – 6.1.6	6.1.1 – 6.1.6	Standard record keeping and reporting requirements. Updated and slightly modified.
6.1.7	6.1.7	<u>Excess Emissions:</u> None. <u>Exceedances:</u> Any time during which fuel combusted in Boilers BL07 or BL09 has sulfur content greater than 0.5 percent by weight. Any twelve-month rolling total of No. 2 fuel oil combusted in Boiler BL07 exceeding 7,000,000 gallons. Any twelve-month rolling total of coated carpet processed in Latex Coater (LC03) that is greater than 123,000,000 square yards. Any twelve-month rolling total of propane combusted in Process Equipment CD03, CD03, DR01, LC02, LC03, and WH01 exceeding 4,000,000 gallons. Any twelve-month rolling total of No. 2 fuel oil combusted in Boiler BL09 exceeding 1,000,000 gallons. <u>Excursions:</u> None.
6.2.1	6.2.1	Shaw must verify that each shipment of fuel oil received complies with the specifications of No. 2 fuel oil contained in ASTM D 396.
---	6.2.2	Removed. See below.
6.2.2	6.2.3	Shaw must keep records of the amount of coated carpet processed in Latex Coater (LC03) for each month of operation.
---	6.2.4	Removed. See below.
6.2.3	6.2.5	Shaw must keep records of the amount of fuel combusted in all fuel-burning equipment as listed below, for each month of operation.
---	6.2.6	Removed. See below.
6.2.4	6.2.7	Shaw must submit with the semi-annual reports required by Condition 6.1.4, a report prepared from records retained in Conditions 6.2.1, 6.2.2, 6.2.3, and 6.2.7, containing the 12-consecutive month totals listed below for each calendar month in the reporting period.
---	6.2.8	Shaw must submit a notification of the date of construction and actual startup of Boiler BL09. Requirement completed.
6.2.5	6.2.9	Shaw must submit excess emission reports for any excess emissions from Boiler BL09 that occur during the reporting period and maintain records according to the requirements.

Renewal Condition	Previous Condition	Requirements
---	6.2.10	Each shipment of fuel oil received, Shaw must obtain from the supplier a fuel supplier certification. Covered in Condition 6.2.1.
---	6.2.11	Shaw must record and maintain records of the amount of each fuel combusted in Boiler BL09 each operating day. Covered in Condition 6.2.3.
---	6.2.12	Records of all data, reports, and calculations shall be maintained in an order suitable for inspection by or submission to the Division upon request for a period five (2) years from the date of creation. Covered in Condition 6.2.15.
6.2.6	6.2.13	Shaw must submit fuel certifications and fuel usage records required by Conditions 6.2.12 as part of the report required by Permit Condition 6.1.4.
6.2.7	6.2.14	Along with the report required in Condition 6.1.7, Shaw must submit the results of any visible emissions observations conducted in accordance with Conditions 5.2.1 and/or 5.2.3 during the reporting period.
6.2.8	6.2.15	Modified since the facility has submitted the monitoring plan in October 2013. Condition now requires BL09 to be operated according to monitoring plan.
---	6.2.16	As specified in 40 CFR 63.11225(a)(2), The Permittee must submit an Initial Notification on or before January 20, 2014 to the Division for Boilers BL07 and BL09. Completed July 9, 2014.
6.2.9	6.2.17	Modified to reflect the current language of the rule. Shaw must prepare, maintain and “submit upon request”, an annual compliance certification report. The report does not need to be submitted automatically, only upon request.
6.2.10	6.2.18	Shaw must maintain the following records: a copy of each notification and report that the Permittee submitted to comply with 40 CFR 63 Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.
6.2.11	6.2.19	Shaw must maintain records in a form suitable and readily available for expeditious review. The facility must keep each record for 5 years following the date of each recorded action.
6.2.12	6.2.20	Shaw must keep a written record of each and all instances during which fuel oil or fuel other than natural gas was fired in each boiler, Boilers BL07 and BL09.
---	6.2.13 - 6.2.15	Removed. (previously HAP recordkeeping and emission calculations)

*The facility no longer uses coal as a fuel source and has removed Boilers BL04, BL05 and BL06, Multi Cyclones PC01, PC02 & PC03 and West Scrubbers WS01, WS02 & WS03.

VII. Specific Requirements

A. Operational Flexibility

- Not applicable.

B. Alternative Requirements

- Not applicable.

C. Insignificant Activities

Refer to <http://gatv.georgiaair.org/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

- 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. Stratospheric Ozone Protection Requirements

- Facility has indicated that they are subject to Title VI because the facility has air conditioners or refrigeration equipment that uses CFC's, HFC's or other stratospheric ozone-depleting substances listed in 40 CFR Part 82, Subpart A, Appendices A and B.

J. Pollution Prevention

- Not applicable.

K. 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.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative