Facility Name: **Mount Vernon Mills, Inc.**
City: Trion
County: Chattooga
AIRS #: 04-13-055-00001

Application #: TV-515639
Date Application Received: October 7, 2020
Permit No: 2211-055-0001-V-05-0

| Program | Review Engineers | Review Managers |
|---|---|---|
| **SSPP** | Ginger Payment | Jeng-Hon Su / Hamid Yavari |
| **ISMU** | Josh Pittman | Dan McCain |
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| **Toxics** | N/A | N/A |
| **Permitting Program Manager** | | Stephen Damaske |

## 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: Mount Vernon Mills, Inc.

2. Parent/Holding Company Name

Mount Vernon Mills, Inc.

3. Previous and/or Other Name(s)

pka Riegel Textile Corporation

4. Facility Location

91 Fourth Street, One Plaza Circle, Trion, GA 30753-0007
Chattooga County

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

Mount Vernon Mills, Inc. (hereinafter "facility") is located in Chattooga County which is an attainment area for all pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

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 |
|---|---|---|
| Permit No. 2211-055-0001-V-04-0 | April 21, 2016 | Title V Renewal |
| Off Permit Change | January 24, 2017 | Installation of the bypass scrubber stack for Boiler # 1 and # 2. |
| Amendment No. 2211-055-0001-V-04-1 | July 30, 2018 | Modification of FR (Flame Retardant) Range 6 |

D. Process Description

1. SIC Codes(s)

2211

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not

intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility produces industrial and commercial clothing.

3. Overall Facility Process Description

The facility is comprised of the following: weaving mill, finishing plant, and steam plant.

The weaving mill includes warp yarn preparation/creeling, dyeing, slashing, weaving and fabric finishing. In warp yarn preparation/creeling, purchased yarn is either put up on a ball warp for denim dyeing or on a warp beam destined for greige (natural) fabrics to be further processed in the finishing plant. In dyeing, ball warp yarn is dyed with indigo and/or sulfur dyes for the warp yarn in denim fabric. The dyed warp yarn is then treated (sized) with corn starch in the slashing process to give it strength and woven together with purchased natural filling yarn to make denim fabric. Prepared warp yarn is also sized directly in slashing with corn starch and/or a blend of corn starch and polyvinyl alcohol and woven together with natural filling yarn into natural greige fabric destined for the finishing plant. Woven denim fabric is finished to set the width and hand (softness) and to control shrinkage (Sanforizing) prior to final inspection and shipping. Woven natural greige fabric is sent to the finishing plant to be further processed. Emissions include particulate matter, VOC and HAP.

The finishing plant processes either greige fabric from the weaving mill or purchased greige fabrics. Finishing plant processes include greige fabric preparation, dyeing, FR treatment and finishing. In greige fabric preparation, steps may include heat setting, singeing, desizing, scouring, mercerizing, and bleaching. In dyeing, prepared fabrics are dyed to impart color to them. In FR fabric treatment, certain fabrics are treated with a chemical that imparts flame resistant properties to the fabric. In finishing, dyed fabrics are finished on a tenter frame to set the width, to impart unique properties depending on the intended end-use (such as wrinkle-free, stain release, water repellency, etc.), and to control shrinkage (Sanforizing) prior to final inspection and shipping. Emissions include particulate matter, VOC and HAP.

In the steam plant, steam for textile processes is generated by combusting natural gas or coal in four boilers (source codes: EU01, EU02, EU03 and EU04). Boiler #1 (EU01) and Boiler #2 (EU02) are rated at 45 MMBtu/hr each and share a common stack, and Boiler #3 (EU03), rated at 70 MMBtu/hr, and Boiler #4 (EU04), rated at 154 MMBtu/hr, have separate stacks. Each boiler is controlled by a multiclone, and all three stacks are controlled by venturi scrubber systems while burning coal. Multiclones and venturi scrubbers control particulate matter, and venturi scrubbers also control acid gases (HCl and HF) while burning coal. Boilers #1, #2 and #4 have the option

of using bypass stacks (bypassing venturi scrubbers) while burning natural gas. The boilers are also capable of burning No. 2 fuel oil. Coal is stored in a pile adjacent to the steam plant. The facility is a synthetic minor for HAP (hydrochloric and hydrofluoric acid) by introducing caustic soda into the venturi scrubbers while burning coal. Emissions include PM, HAP (hydrochloric and hydrofluoric acid when burning coal), $SO_2$, $NO_x$ and CO.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

This facility is a major source under PSD. The total heat input of the boilers exceeds 250 MMBtu/hr; therefore, it is one of the 28 named source categories under PSD with a 100 tpy emission threshold for a major source classification. The facility was originally constructed before the PSD regulations were effective.

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 | yes | ✓ | | |
| $PM_{10}$ | yes | ✓ | | |
| $PM_{2.5}$ | yes | ✓ | | |
| $SO_2$ | yes | ✓ | | |
| VOC | yes | ✓ | | |
| $NO_x$ | yes | ✓ | | |
| CO | yes | ✓ | | |
| TRS | yes | | | ✓ |
| $H_2S$ | yes | | | ✓ |
| Individual HAP | yes | | ✓ | |
| Total HAPs | yes | | ✓ | |

3. MACT Standards

The facility avoided the requirements of 40 CFR 63 Subpart OOOO – NESHAP for Printing, Coating, and Dyeing of Fabrics and Other Textiles by limiting HAP emissions to 10 tpy for any individual HAP and 25 tpy for combined HAP emissions. The boilers are subject to 40CFR63 Subpart JJJJJJ – NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources.

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:

In order to avoid the requirements of 40 CFR 63 Subpart OOOO – NESHAP for Printing, Coating, and Dyeing of Fabrics and Other Textiles, the HAP emissions are limited to 10 tpy for any individual HAP and 25 tpy for combined HAP emissions.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no compliance issues noted in this application.

D. Permit Conditions

Condition 2.1.1 limits the HAP emissions to 10 tpy for any individual HAP and 25 tpy for combined HAP emissions in order to avoid MACT requirements.

## III. Regulated Equipment Requirements

A. Equipment List for the Process

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|---|---|---|---|---|
| ID No. | Description | | ID No. | Description |
| EU01 | Boiler #1<br>(45 MMBtu/hr, constructed in 1947) | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)<br>40CFR63 Subpart JJJJJJ | PC01,<br>PC05 | Multiclone,<br>Venturi Scrubber |
| EU02 | Boiler #2<br>(45 MMBtu/hr, constructed in 1947) | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)<br>40CFR63 Subpart JJJJJJ | PC02,<br>PC05 | Multiclone,<br>Venturi Scrubber |
| EU03 | Boiler #3<br>(70 MMBtu/hr, constructed<br>in 1951) | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)<br>40CFR63 Subpart JJJJJJ | PC03,<br>PC06 | Multiclone,<br>Venturi Scrubber |
| EU04 | Boiler #4<br>(154 MMBtu/hr, constructed in 1966) | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)<br>40CFR63 Subpart JJJJJJ | PC04,<br>PC07 | Multiclone,<br>Venturi Scrubber |
| EU05 | Dyeing | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(g) | None | None |
| EU06 | Finishing Range #3 | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(g) | None | None |
| EU6A | Finishing Range #4 | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(g) | None | None |
| EU6B | Finishing Range #5 | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(g) | None | None |
| EUFR6 | FR (Flame Retardant) Range #6 | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(g) | S1 | Scrubber |

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

The sulfur content of the coal is limited to 1.75%, by weight, in order to reduce emissions and to comply with Georgia Rule (g). The facility had requested the limit for the purpose of fee reduction.

The boilers are also required to use the Venturi scrubber systems while firing coal in order to comply with Georgia Rule (d).

In order to control ammonia emissions from FR Range #6, the associated scrubber is required to be operated at all times that the Ammoniator is being operated.

Rules and Regulations Assessment:

The boilers are subject to Georgia Rule (b) – *Visible Emissions*, Georgia Rule (d) - *Fuel-Burning Equipment*, Georgia Rule (g) – *Sulfur Dioxide* and 40 CFR 63 Subpart JJJJJJ - *NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources* (Boiler GACT). As subject to the Boiler GACT, the boilers will have emissions limits and will have work practice standards which include a one-time energy assessment that has already been completed.

Though the boilers have the capability of firing natural gas, No. 2 fuel oil and coal, the primary fuel used in these boilers is coal. These boilers are considered to be in the following subcategory of Table 2 of 40 CFR 63 Subpart JJJJJJ: Existing or new coal-fired, new biomass-fired or new oil-fired boilers (units with heat input capacity of 10 MMBtu/hr or greater). Therefore, these boilers are required to minimize the startup and shutdown periods and not required to have tune-ups.

Because Mount Vernon Mills has notified the Division of their intent to use performance testing to demonstrate compliance with the mercury limit, this permit does not include any references to fuel analysis. If the facility intends to change the compliance option, conditions concerning fuel analysis may be added later. In addition, conditions have been tailored to the operating conditions at the facility. Because there are no baghouses, any references to baghouses have not been included in the reporting requirements.

Because the boilers were constructed before the applicable dates, they are not subject to 40 CFR 60 Subpart Db or 40 CFR 60 Subpart Dc.

Dyeing and the Finishing Ranges are subject to Georgia Rule (b) – *Visible Emissions*, Georgia Rule (e) – *Particulate Emission from Manufacturing Processes* and Georgia Rule (g) – *Sulfur Dioxide*. For purpose of determining compliance with this Condition, EU05 is a separate process under Rule (e). For purpose of determining compliance with this Condition, EU06, EU6A, EU6B and EUFR6 are separate processes under Rule (e).

FR (Flame Retardant) Range #6 was modified in Permit Amendment No. 2211-055-0001-V-04-1 which involved relocating gas predryer from Finish range 4 (EU6A) to FR Range #6, using the existing Ammoniator and adding new steam dry cans, two new chemical pads, a new set of timing rollers and two new wash boxes. A scrubber was added to control ammonia emissions from the Ammoniator. This modification allowed for complete fabric processing in one step on certain fabrics that otherwise requires two passes down the existing range

Previous Process Group PG01 had included the yarn spinning washers and the general exhaust. The facility has noted that they have closed the yarn spinning operations. As a result of the removal of the yarn operations, the remaining associated emission units (air washers) will be relocated to the generic emissions. Georgia Rule (fff) – *Particulate Matter Emissions from Yarn Spinning Operations* will <u>not</u> be included in this permit renewal.

C. Permit Conditions

Previous Condition 3.4.3 which concerned Georgia Rule (fff) for the yarn spinning was not included in this permit. As a result, the conditions were renumbered.

Conditions 3.4.7. and 3.4.8 of Permit Amendment No. 2211-055-0001-V-04-1 which concerns Georgia Rule (g) and Georgia Rule (e) for FR Range #6 will now be included in Conditions 3.4.3 and 3.4.4.

- Condition 3.2.1 limits the coal fired in the boilers to a sulfur content of 1.75%, by weight.
- Condition 3.2.2 requires the Venturi scrubber systems to be used while firing coal in the boilers.
- Condition 3.3.1 subjects the boilers to 40 CFR 63 Subpart JJJJJJ.
- Condition 3.3.2 details the work practices required by 40 CFR 63 Subpart JJJJJJ.
- Condition 3.3.3 requires the facility to meet the emission limits and states the options for meeting these limits.
- Condition 3.3.4 limits the carbon monoxide (CO) emissions from the boilers as required by 40 CFR 63 Subpart JJJJJJ.
- Condition 3.3.5 limits the mercury (Hg) emissions from the boilers as required by 40 CFR 63 Subpart JJJJJJ.
- Condition 3.4.1 subjects all equipment at the facility to Georgia Rule (b).
- Condition 3.4.2 subjects the boilers to Georgia Rule (d).
- Condition 3.4.3 limits the fuel fired in EU05, EU06, EU6A, EU6B and EUFR6 to 2.5 percent sulfur.
- Condition 3.4.4 limits Dyeing and the Finishing Ranges to Georgia Rule (e).
- Condition 3.4.5 limits the fuel in the boilers to comply with Georgia Rule (g).
- Condition 3.5.1 requires the use of the associated scrubber at all times that the Ammoniator is being operated on FR Range #6.

## 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

Requirements for performance tests on the scrubber for each coal-fired boiler are included in this permit. The tests are used to determine the controlled emissions rates for hydrogen chloride (HCl) and hydrogen fluoride (HF) emissions at maximum expected boiler operating rate. Particulate matter emissions testing are also required as a standard requirement. The results of the tests are also used to establish operating parameter limits for the scrubbers. Different parameter limits may be established for different boiler loadings that may be expected during routine operation. The tests are required to support the CAM plan.

- Condition 4.2.1 requires performance testing every 5 years on the boilers for particulate matter (PM), hydrogen chloride (HCl), and hydrogen fluoride (HF). The most recent test was conducted in May 2018; therefore, the next test needs to be conducted prior to June 2023.
- Condition 4.2.2 requires the facility to determine the emission factors for HCl and HF during performance testing and to verify the operating limits for the scrubbant nozzle pressure, scrubbant pH, pressure drop and the stack temperature for each Venturi scrubber.
- Condition 4.2.3 requires subsequent performance tests for CO and Hg for the boilers every 3 years as required by 40 CFR 63 Subpart JJJJJJ and allows for fuel analysis for Hg as an alternative.
- Condition 4.2.4 requires the facility to demonstrate compliance with the CO emission limit with either a performance test for an oxygen analyzer system or a CEMS for CO and oxygen.
- Condition 4.2.5 details the requirements for an oxygen analyzer system if the facility chooses this option.

## 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

Coal is the primary fuel for these boilers with natural gas and number 2 fuel oil as backup fuels. Rule (g) limits the sulfur content of each fuel to 2.5% for EU01, EU02 and 3% for EU03, and EU04. However, the coal is limited by the permit to 1.75%, which is more stringent. Monitoring for these sulfur limits are through sampling and analysis.

Weekly inspections are required as periodic monitoring for the multiclones. The inspections ensure compliance with Georgia Rule (d) and to prevent fouling of the venturi scrubber spray nozzles by particulate matter.

Monitoring for the scrubbers ensures that these control devices are operating properly and include stack temperature, differential pressure across the scrubber, pH of scrubbant (scrubber liquid), scrubbant liquid pressure.

The weight of coal and the steam production are monitored to assist in calculating HCl and HF emissions from coal combustion.

- Condition 5.2.1 requires monitoring of the scrubbers with stack temperature, differential pressure, pH of the scrubber liquid and scrubbant nozzle pressure in order to ensure that the scrubbers are working properly.
- Conditions 5.2.2 through 5.2.4 summarize the CAM plan.
- Condition 5.2.5 requires a fuel oil certification statement in order to comply with the sulfur limits of Conditions 3.4.3 and 3.4.6.
- Condition 5.2.6 requires an analysis of the sulfur content in the coal in order to comply with the limit in Condition 3.2.1.
- Condition 5.2.7 requires inspections of the multiclones.
- Condition 5.2.8 requires the facility to record the weight of the coal shipments and to calibrate the coal scale yearly.
- Condition 5.2.9 requires records of steam production for each boiler to assist in calculating emissions.
- Condition 5.2.10 requires a CEMS or oxygen analyzer system as required by 40 CFR 63 Subpart JJJJJJ.
- Condition 5.2.11 requires the boilers to meet a 30-day rolling average oxygen level if they are using an oxygen analyzer system.
- Condition 5.2.12 limits the operating load to 110 percent if the facility is complying with performance stack tests.

- Condition 5.2.13 requires the facility to monitor the ammonia gas flow rate and the Scrubber discharge flow rate in order to verify operations concerning the scrubber and ammonia emission control.

C. Compliance Assurance Monitoring (CAM)

Because the potential precontrolled emissions of PM10 and HCl exceed the major source thresholds for each boiler and control devices are used to control these emissions, these pollutants are subject to CAM. The facility submitted a CAM plan with this application. Conditions 5.2.2, 5.2.3 and 5.2.4 summarize the CAM plan for PM10 and HCl. The monitoring plan for PM10 will use the stack temperature and the differential pressure of the Venturi scrubbers. The monitoring plan for HCl will use the differential pressure, stack temperature, scrubbant liquid pressure (scrubber nozzle pressure) and the scrubber liquid pH of the of the venturi scrubbers. These criteria will be monitored, and the data will be recorded every 15 seconds. A 3-hour average plot of the data will be generated and then compared to the set limits in order to determine compliance.

## 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

- Condition 6.2.1 requires the facility to submit a semiannual report of all coal shipments.
- Condition 6.2.2 requires operating records of the boilers including the hours operating in compliance and out of compliance.
- Condition 6.2.3 requires the calculation of monthly hydrogen chloride (HCl) emissions from the boilers and provides guidance on the emission calculations.
- Condition 6.2.4 requires the calculation of monthly hydrogen fluoride (HF) emissions from the boilers and provides guidance on the emission calculations.
- Condition 6.2.5 requires the facility to maintain records of all HAP-containing materials.
- Condition 6.2.6 requires the calculation of monthly HAP emissions from the boilers and also requires a notification if any monthly single HAP emission or combined HAP emissions exceed the stated limits.
- Condition 6.2.7 requires the calculation of 12 month rolling total HAP emissions from the boilers and also requires a notification if any 12 month rolling total of any single HAP emission or combined HAP emissions exceed the stated limits.
- Condition 6.2.8 requires the facility to keep heat capacity values of the coal combusted in the boilers.

**Record Keeping and Reporting for 40 CFR 63 Subpart JJJJJJ**

- Condition 6.2.9 requires notifications concerning 40 CFR 63 Subpart JJJJJJ requirements.
- Condition 6.2.10 lists the items to include in a compliance report.
- Condition 6.2.11 lists the records to be maintained as required by 40 CFR 63 Subpart JJJJJJ.
- Condition 6.2.12 provides guidance for submitting electronic information.
- Condition 6.2.13 requires the facility to submit a notification if fuels have switched or if there are other physical changes to the boilers.

## VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable

I. Stratospheric Ozone Protection Requirements

- Not applicable.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

## 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**

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//