

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 1676-AOP-R2

IS ISSUED TO:

Robbins Hardwood Flooring, Inc. Sykes Plant
501 Pennington Road
Warren, AR 71671
Bradley County
CSN: 06-0001

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

February 3, 1999 and February 2, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Amended

SECTION I: FACILITY INFORMATION

PERMITTEE: Robbins Hardwood Flooring, Inc.
Sykes Plant

CSN: 06-0001

PERMIT NUMBER: 1676-AOP-R2

FACILITY ADDRESS: 501 Pennington Road
Warren, AR 71671

COUNTY: Bradley

CONTACT POSITION: Judy Shipp

TELEPHONE NUMBER:

REVIEWING ENGINEER: Melisha Griffin

UTM North-South (Y): Zone 15 [3719.9]

UTM East-West (X): Zone 15 [588.0]

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SECTION II: INTRODUCTION

Summary

Robbins Hardwood Flooring, Inc. operates two facilities in Warren, Arkansas. The Sykes Plant and the Witt Plant both manufacture finished hardwood flooring (SIC Code 2426). This permit modification concerns the Sykes Plant located at 501 Pennington Road.

An audit revealed that exhaust vents on two of the baghouses were not permitted and the hammer mill that is currently in use is not permitted. In addition, the facility uses several chemicals on the conventional and UV finish lines that are not included in the existing permit. This application also requests the authority for new construction to install a new hammer mill and connect it to a cyclone which is in place but not operating. In addition, the facility is removing the equipment from the old process line, including the kiln, the log debarker, the veneer dryer, and the waste shaker/chip loader (SN-02, SN-05, SN-06, and SN-09). The permit modification includes a new process description which incorporates the proposed equipment and reflects the removal of old equipment.

Process Description

Two types of flooring, solid wood and laminated or veneer, are manufactured at the Sykes facility. Display samples for advertising purposes are also assembled in this facility.

Solid wood or plank flooring originates from hardwood planks approximately 12"x1"x10' long which are delivered to the site. The planks are presently milled into strip flooring at the Witt plant. The edge trim pieces measuring 1½ to 2" wide are returned to the Sykes Plant for the production of parquet flooring. The trim pieces are cut to length, planed, trimmed, and arranged into "tiles" with wire back assemblies. Residual wood waste is conveyed to a hammer mill (SN-24) and then to the Peerless bin (SN-14). The wood chips and wood residue from the Peerless bin are shipped off-site as fuel. The dust from the parquet mill operation is controlled by two baghouses (SN-10 and SN-11).

Veneer flooring is manufactured from veneer sheets 1/6" thick delivered to the facility. The sheets are cut into four-foot lengths and graded for use as backs, cores, or face material. Three sheets, back, core, and face, are glued together at the glue roll coater (SN-07) and placed in a steam-heated hydraulic press. The press uses 2,000 psi pressure for 5.5 minutes to bond the veneer. The veneer sheets are stored for two weeks for the moisture content to normalize before milling. The veneer is milled for strip flooring or used as a medallion in the parquet tile. Dust from this operation is controlled by baghouses SN-10 and SN-11 which discharge air back into the building. During hot weather, the baghouses also have the ability to vent to the atmosphere

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(SN-20 and SN-21). Waste wood is conveyed to the hammer mill or hog (SN-24) where it is crushed and conveyed to the Peerless bin (SN-14). Dust from the hammer mill is sent to the north cyclone prior to being conveyed to the Peerless bin. Air from this cyclone is routed back to baghouses SN-10 and SN-11. All collected dust from the baghouses is conveyed to the Peerless bin.

The conventional finish line (SN-15) includes sanding and buffing units used prior to the application of stain, sealer, and topcoat. Particulate matter is emitted to a baghouse (SN-10). Emissions from the stain, sealer, and topcoat applications, including those volatilized in curing ovens, are vented to the atmosphere.

The ultraviolet curing process (UV Finish Line, SN-19) uses a rollcoat of stain which is thermally cured. Applications of sealer and topcoat use ultraviolet irradiation to create cross-linking polymers with no emissions. The particulate emissions from the UV line are controlled by two baghouses (SN-12 and SN-13). The baghouses vent clean air to the atmosphere through exhaust vents SN-22 and SN-23. Dust collected in the baghouses is conveyed to the Peerless bin (SN-14). Wood waste from the UV Finish Line is conveyed to a hammer mill (SN-25). Dust from the hammer mill is collected and sent to the south cyclone prior to the Peerless bin. The air from this cyclone is routed back to baghouses SN-12 and SN-13 to complete a closed loop system.

Regulations

The facility is subject to the Arkansas Air Pollution Control Code (Regulation 18), Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and Regulations of the Arkansas Operating Air Permit Program (Regulation 26).

The following table is a summary of emissions from the facility. Specific conditions and

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emissions for each source can be found starting on the page cross referenced in the table.
This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY						
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page	
			lb/hr	tpy		
Total Allowable Emissions All HAPs are included in VOC		PM	26.5	87.0		
		PM ₁₀	26.5	87.0		
		SO ₂	0.2	0.2		
		VOC	116.9	169.9		
		CO	0.8	3.2		
		NO _x	3.4	15.0		
		<i>HAPs</i>				
		Formaldehyde	0.58	2.32		
		EGPE	2.4	3.6		
		Ethyl Benzene	2.9	4.2		
		Xylene	14.1	20.3		
		Toluene	10.1	15.5		
		Methanol	0.2	0.2		
		MEK	31.6	18.5		
		Methyl Isobutyl Ketone	0.1	0.1		
Propylene Glycol N-Butyl Ether	0.1	0.1				
01	150 HP Boiler (9 MM BTU/hr)	PM	0.2	0.5	10	
		PM ₁₀	0.2	0.5		
		SO ₂	0.1	0.1		
		VOC	0.1	0.2		
		CO	0.2	0.9		
		NO _x	0.9	4.0		

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
04	600 HP Boiler (25 MM BTU/hr) (Installed 1992)	PM	0.3	1.3	10
		PM ₁₀	0.3	1.3	
		SO ₂	0.1	0.1	
		VOC	0.1	0.3	
		CO	0.6	2.3	
		NO _x	2.5	11.0	
07	Glue Roll Coater & Plywood Press	VOC	1.0	2.3	16
		Formaldehyde	0.52	2.28	
10	Torit Day Baghouse Model 484	The exhaust is returned to building or vented to SN-20			12
20		PM	3.3	14.2	
		PM ₁₀	3.3	14.2	
11	Torit Day Baghouse Model 484	The exhaust returned to building or vented to SN-21			12
21		PM	3.3	14.2	
		PM ₁₀	3.3	14.2	
12 (internal exhaust)	Pneumafil Baghouse	No Emissions-Exhaust vented Cyclone on Peerless Bin or SN-22			12
22 (external exhaust)		PM	3.5	15.0	
		PM ₁₀	3.5	15.0	
13 (internal exhaust)	Pneumafil Baghouse	No Emissions-Exhaust vented Cyclone on Peerless Bin or SN-23			12
23 (external exhaust)		PM	3.5	15.0	
		PM ₁₀	3.5	15.0	
14	Peerless Bin	PM	7.5	7.2	12
		PM ₁₀	7.5	7.2	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
15	Pre-Edge Stainer, Roll-Coater Stain & Drying Oven #1, Sealer Application, and Topcoat Application	VOC	26.7	16.7	18
		Ethyl Benzene	0.5	0.3	
		Xylene	3.3	2.1	
		Toluene	1.4	0.9	
		EGPE	0.4	0.3	
		Methanol	0.1	0.1	
		Formaldehyde	0.06	0.04	
		MEK	10.4	0.1	
19	UV Finishing Line	VOC	88.8	149.9	18
		Ethyl Benzene	2.4	3.9	
		Xylene	10.8	18.2	
		Toluene	8.7	14.6	
		EGPE	2.0	3.3	
		MEK	21.2	12.4	
		Methanol	0.1	0.1	
		Methyl Isobutyl Ketone	0.1	0.1	
		Propylene Glycol N-Butyl Ether	0.1	0.1	
24	Hammer Mill	PM	2.0	8.8	22
		PM ₁₀			
25	Hammer Mill	PM	2.0	8.8	22
		PM ₁₀			
26	Vacuum Bed System	PM	0.9	2.0	24
		PM ₁₀			
27	Gasoline Tank	VOC	0.2	0.5	25

SECTION III: PERMIT HISTORY

The Robbins-Sykes Plant began operations approximately in 1951. The facility received its first

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air permit, 1676-A, on March 12, 1996. The permit listed sixty-one (61) sources whose primary emissions were 53.3 tpy of particulate and 15.8 tpy of VOCs.

Robbins submitted a title V permit application March 5, 1997. On May 7, 1997, the Department informed Robbins that the application was not technically complete and several issues needed to be addressed.

In April 1997 the Department was notified by Triangle Pacific Corp. of Dallas, Texas that they had purchased the facility and were requesting the permit be transferred. Permit 1676-A was transferred to Robbins Hardwood Flooring, Inc. on April 17, 1997. On June 6, 1997, Triangle Pacific Corp requested, by telephone, additional time to respond to the May 7, 1997 letter. The extension was necessary due to the change in ownership and reorganization of the facility.

Permit 1676-AOP-R0 was issued on February 3, 1999. Modifications in the permit included the following:

- install two additional baghouses (SN-12 and SN-13);
- consolidate and renumber sources (many of the previously listed sources had zero emissions) the number of sources reduced from 61 to 19;
- removed from service baghouses #1, #2, and #3;
- listing of three previously unlisted baghouses; and
- install a new UV finish line.

As a result of the proposed modifications, the facility became a major source subject to provisions of 40 CFR 70, State Operating Permit Programs.

Permit 1676-AOP-R1 was issued on March 28, 2000. This permit modification included:

- Addition of two stacks, SN-20 and SN-21, to vent two baghouses, SN-10 and SN-11, currently operating but venting internally. The external venting will be on an as-needed basis to control temperatures inside the facility;
- Removal of SN-03 and all associated equipment;
- Redirection of SN-12 and SN-13 to SN-10 and SN-11 instead of SN-14;
- Updating of regulatory citations and opacity observation requirements.

The new sources increased emissions by 28.4 tons per year of PM/PM₁₀.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-01, 150 HP Boiler
 SN-04, 600 HP Boiler

Source Description

Process heat at the Sykes Plant is supplied by two natural gas fired boilers. The 150 HP (9 MM BTU/hr) supplies heat to the three lumber drying kilns (SN-02). The 600 HP (25 MM BTU/hr) boiler supplies heat to the log heating vats that softens the logs before the veneer lath. This boiler also supplies heat to the veneer laminating press. The 600 HP boiler is subject to *New Source Performance Standard* (NSPS) Subpart Dc. The applicable parts are 40 CFR 60.48c(g) and §48c(i). As allowed by a letter from EPA to ADEQ, dated February 9, 1999, Robbins shall maintain monthly records of the quantity of natural gas consumed in the boiler and these records shall be maintained on site for a period of two years.

Specific Conditions

1. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour and tons per year (tpy) emission rates are based upon the maximum capacity of the equipment.

SN-#	Pollutant	lb/hr	tpy
01	PM ₁₀	0.2	0.5
	SO ₂	0.1	0.1
	VOC	0.1	0.2
	CO	0.2	0.9
	NO _x	0.9	4.0
04	PM ₁₀	0.3	1.3
	SO ₂	0.1	0.1
	VOC	0.1	0.3
	CO	0.6	2.3
	NO _x	2.5	11.0

2. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following

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table. The pounds per hour and tons per year (tpy) emission rates are based upon the maximum capacity of the equipment.

SN-#	Pollutant	lb/hr	tpy
01	PM	0.2	0.5
04	PM	0.3	1.3

3. Pursuant to §18.501 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Robbins shall not cause to be discharged to the atmosphere from the 150 HP boiler or the 600 HP boiler gases which exhibit an opacity greater than 5%. Compliance with this condition can be demonstrated by burning natural gas only.
4. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used in the permitted sources at this facility. The natural gas process equipment is permitted for their theoretical maximum or potential to emit. Therefore, no record keeping of natural gas usage is required for the 150 HP boiler (SN-01).
5. Pursuant to §19.304 of Regulation 19, and 40 CFR 60.48c(g) and §48c(i), NSPS Subpart Dc, Robbins shall maintain monthly records of the quantity of natural gas consumed in the 600 HP boiler (SN-04) and these records shall be maintained on site for a period of two years.

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- SN-10, 20 Torit Day Baghouse
- SN-11, 21 Torit Day Baghouse
- SN-12, 22 Pneumafil Baghouse
- SN-13, 23 Pneumafil Baghouse
- SN-14, Peerless Bin

Source Description

Particulate emissions from the cutting, shaping, and sanding of wood are controlled by four baghouses (SN-10 through SN-13). Baggouses SN-10 and SN-11 have the ability to vent clean air back to the building. However, the exhaust may also vent to the atmosphere through baghouse vents SN-20 and SN-21. Baggouses SN-12 and SN-13 vent clean air to SN-22 and SN-23. The conventional finish line and the cut-up department vent discharge to baghouses SN-10 and SN-11. The UV finish line discharges to baghouses SN-12 and SN-13. All collected wood waste in the bagfilters is conveyed to a cyclone and then to the Peerless bin (SN-14) where it is loaded into trucks for shipment off-site. A vacuum system is used on the Peerless Bin to control emissions. The exhaust from the vacuum system is vented back into the cyclones; therefore, the vacuum system is not an emission source.

The following list of sources are connected to SN-10 baghouse.

Old SN	Description	Old SN	Description
SN-29	Back-Score, Multi-Score	SN-34	Two Knot Saws
SN-32	Diehl In-Line Rip Saws	SN-35	Two End Matchers
SN-33	Diehl Moulder	SN-36	Two End Matchers (Groove Cut)

The following list of sources along with new equipment have been connected to SN-11 baghouse.

Old SN	Description	Old SN	Description
SN-25	Waste Shaker Dust	SN-47	Two Brushes
SN-30	Rip Saw	SN-53	Three Brushes
SN-31	Sander - AEM	(New)	Double-End Tenorer
SN-46	Time Saver Sander	(New)	Moulder

The following list of sources have been removed from service.

Old SN	Description	Old SN	Description
SN-37	9X9 Rip Saws	SN-41	3X9 Square Machine

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SN-38	6X6/3X9 Cut Up Machine	SN-42	6X6 Squaring Machine
SN-39	Speciality Moulder	SN-43	Two 9X9 Squaring Machines
SN-40	Picket Machine	SN-61	Baghouse #4 - Williams Crusher
SN-03	Gang Rip Saw	SN-12	Schroeder Tongue and Groove Match
SN-04	Double Planner	SN-13	Sample Shop Band Saw
SN-05	Three Knot Saws	SN-14	Sample Shop Radial Arm Saw
SN-06	Chipper	SN-15	Two Radial Arm Saws
SN-07	Four Barrel Saws	SN-16	Sample Shop 10" Table Saw
SN-08	Two Schroeder Gang Rip Saws	SN-17	Sample Shop Router
SN-09	Three Schroeder Gang Rip Saws (New)		Dado Cutter - Small, Hand Held
SN-10	Three Schroeder Wire Backs (New)		Cross Cut Saw
SN-11	Sherrill Sander		

Old SN-61, Baghouse #4-Williams Crusher, has been replaced with a chipper. This unit blows chipped wood directly into the discharge duct of SN-10 and SN-11, which discharges into the Peerless bin.

All the collected wood waste in the bagfilters SN-10 and SN-11 is conveyed to the Peerless bin (SN-14) where it is loaded into trucks for shipment offsite.

Specific Conditions

6. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour and tons per year emission rates are the potential to emit for bagfilter vents SN-20, SN-21, SN-22, and SN-23. The emission rates for the Peerless bin are contingent upon compliance with Specific Condition 08.

SN-#	Pollutant	lb/hr	tpy
10	PM ₁₀	No Emissions- Exhaust Returned To Building or Vented Through SN-20, SN-21, SN-22, and SN-23	
11	PM ₁₀		
12	PM ₁₀		
13	PM ₁₀		
14	PM ₁₀	7.5	7.2

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SN-#	Pollutant	lb/hr	tpy
20	PM ₁₀	3.3	14.2
21	PM ₁₀	3.3	14.2
22	PM ₁₀	3.5	15.0
23	PM ₁₀	3.5	15.0

7. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour and tons per year emission rates are the potential to emit for bagfilter vents SN-20, SN-21, SN-22, and SN-23. The emission rates for the Peerless bin are contingent upon compliance with Specific Condition 08.

SN-#	Pollutant	lb/hr	tpy
10	PM	No Emissions- Exhaust Returned To Building or Vented Through SN-20, SN-21, SN-22, and SN-23	
11	PM		
12	PM		
13	PM		
14	PM	7.5	7.2
20	PM	3.3	14.2
21	PM	3.3	14.2
22	PM	3.5	15.0
23	PM	3.5	15.0

8. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not loadout more than 626 tons of wood waste per week nor more than 7,152 tons during any consecutive twelve month period from the Peerless bin (SN-14).
9. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, Robbins shall maintain weekly, monthly, and annual records of the tons of wood waste loaded from SN-

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14 which demonstrates compliance with the limit set in Specific Condition 12. By the 15th of each month a monthly report shall be prepared containing the individual records of each of the last twelve months and the total of the twelve months. The records shall be updated on a monthly basis, shall be kept on site for five years in accordance with General Provision 6, and shall be provided to Department personnel upon request. Annual total is defined as the summation of the most recent twelve monthly totals. There is a new annual total each month.

10. Pursuant to §18.501 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Robbins shall not cause to be discharged in to the atmosphere from Peerless bin (SN-14), Baghouse Vent (SN-20), Baghouse Vent (SN-21), SN-22, and SN-23 gases which exhibit an opacity greater than 5%.
11. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, weekly observations of the opacity from SN-14, SN-20, SN-21, SN-22 and SN-23 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.
 - a. The date and time of the observation.
 - b. If visible emissions which appeared to be above the permitted limit were detected.
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-07, Glue Roll Coater, Plywood Press

Source Description

Veneer sheets are sent to the facility where they are graded for use as backs, core, or face material. The three sheets of back, core, and face are glued together and placed in a steam heated hydraulic press. The press uses 2,000 psi pressure for 5.5 minutes to bond the veneer. The veneer sheets are stored for two weeks for the moisture content to normalize before milling.

The log debarker, veneer dryer, and waste shaker/chip loader are being removed from the plant. These units are no longer being used.

Specific Conditions

12. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour emission rates are the potential to emit of the equipment. The annual emission rates for this equipment are contingent upon compliance with Specific Condition 14.

SN-#	Pollutant	lb/hr	tpy
07	VOC	0.6	2.3

13. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour emission rates are the potential to emit of the equipment. The annual emission rates for this equipment are contingent upon compliance with Specific Condition 14.

SN-#	Pollutant	lb/hr	tpy
07	Formaldehyde	0.52	2.3

14. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Robbins shall not use any glue at the glue roll coater (SN-07) with formaldehyde percent by weight concentration higher than 0.3 percent by weight.
15. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, Robbins shall

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maintain monthly and rolling twelve month usage records of all the VOCs from any glue received in SN-07 which demonstrate compliance with the limits referenced in Specific Condition 12. These records shall list all materials by product name and number. The records shall list the pounds per gallon of the glue. The total VOC shall be recorded as percent by weight. The records shall also contain a monthly and annual summary of the total gallons of glue used and the total VOC emitted. The monthly and annual total usage of material shall be in gallons. The monthly total VOC emissions shall be listed in pounds. The annual total VOC emissions shall be listed in tons. Annual usage shall be the most recent twelve consecutive months of operation. These records shall be maintained on site and be made available to ADEQ personnel upon request. A new annual emission report shall be generated each month. These records shall be incorporated into the HAP report required in Specific Condition 16. The latest twelve consecutive month emission report shall be submitted to the Department in accordance with General Provision 7.

16. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Robbins shall maintain monthly and rolling twelve month usage records of the HAP (formaldehyde) from the glue received in SN-07 which demonstrate compliance with the limits referenced in Specific Condition 14. These records shall list all materials by product name and number. The records shall list the pounds per gallon of each material. The HAP shall be recorded as percent by weight. The records shall also contain a monthly and annual summary of the total gallons of glue used and the HAP emitted. The monthly and annual total usage of material shall be in gallons. The monthly emissions for the HAP shall be listed in pounds. The annual emissions for the HAP shall be listed in tons. Annual usage shall be the most recent twelve consecutive months of operation. These records shall be maintained onsite and be made available to ADEQ personnel upon request. A new annual emission report shall be generated each month. These records shall be incorporated into the VOC report required in Specific Condition 15. The latest twelve consecutive month emission report shall be submitted to the Department in accordance with General Provision 7.

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SN-15, Conventional Finish Line
(Pre-Edge Stainer, Roll Coaster Stain & Drying Oven #1, Sealer Application, Topcoat Application)
SN-19, UV Finishing Line

Source Description

The conventional finish line (SN-15) begins with the edge of each piece of flooring being stained and dried. Next, the strips are stain roll coated which rolls on an even layer of stain. The stain is followed by a clear sealer to lock in the stain and to fill the pores of the wood. Finally, the flooring is covered with a clear topcoat to the wood to its desired appearance. Each of these steps are followed by a drying operation. The conventional topcoat is cured by evaporation of the VOCs. The line speed, quantity of wood finished per hour, is limited by the drying and curing time of the finishes.

The UV Finish Line is similar to the conventional finish line except for the topcoat application. The topcoat is an epoxy cross-linking polymer which is cured or hardened by ultraviolet (UV) light. There are no emissions from the topcoat.

Specific Conditions

- 17. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour emission rates are limited by the quantity of wood that can be finished per hour. The annual emission rates are contingent upon compliance with Specific Condition 19.

SN-#	Pollutant	lb/hr	tpy
15	VOC	26.7	16.7
19	VOC	88.8	149.9

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18. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Robbins shall not exceed the total toxic emission rates at SN-15 and SN-19 set forth in the following table. These HAPs are listed individually and are included in the total VOCs in the above table. The pounds per hour permitted emission rates are based upon the worst case material and the potential to emit of the equipment. Compliance with the tons per year value will be demonstrated by Specific Condition 20.

SN-#	Pollutant	lb/hr	tpy
15	Ethyl Benzene	0.5	0.3
	Xylene	3.3	2.1
	Toluene	1.4	0.9
	EGPE	0.4	0.3
	Methanol	0.1	0.1
	Formaldehyde	0.06	0.04
	MEK	10.4	6.1
19	Ethyl Benzene	2.4	3.9
	Xylene	10.8	18.2
	Toluene	8.7	14.6
	EGPE	2.0	3.3
	MEK	21.2	12.4
	Methanol	0.1	0.1
	Methyl Isobutyl Ketone	0.1	0.1
	Propylene Glycol N-Butyl Ether	0.1	0.1

EGPE - Ethylene Glycol Mono Propyl Ether, CAS# 2807-30-9

19. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, Robbins shall maintain monthly and rolling twelve month usage records of all the VOCs from VOC containing materials (solvents, stains, thinners, coatings, etc.) which demonstrate

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compliance with the limits referenced in Specific Condition 17. These records shall list all materials by product name and number. The records shall list the pounds per gallon of each material. The total VOC shall be recorded as percent by weight. The records shall also contain a monthly and annual summary of the total gallons of each material used and the total VOC emitted. The monthly and annual total usage of material shall be in gallons. The monthly total VOC emissions shall be listed in pounds. The annual total VOC emissions shall be listed in tons. Annual usage shall be the most recent twelve consecutive months of operation. These records shall be maintained on site and be made available to ADEQ personnel upon request. A new annual emission report shall be generated each month. These records shall be incorporated into the HAP report required in Specific Condition 20. The latest twelve consecutive month emission report shall be submitted to the Department in accordance with General Provision 7.

20. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Robbins shall maintain monthly and rolling twelve month usage records of all the HAPs from VOC containing materials (solvents, stains, thinners, coatings, etc.) which demonstrate compliance with the limits referenced in Specific Condition 18. These records shall list all materials by product name and number. The records shall list the pounds per gallon of each material. Each HAP shall be recorded as percent by weight. The records shall also contain a monthly and annual summary of the total gallons of each material used and each HAP emitted. The monthly and annual total usage of material shall be in gallons. The monthly emissions for each HAP shall be listed in pounds. The annual emissions for each HAP shall be listed in tons. Annual usage shall be the most recent twelve consecutive months of operation. These records shall be maintained onsite and be made available to ADEQ personnel upon request. A new annual emission report shall be generated each month. These records shall be incorporated into the VOC report required in Specific Condition 19. The latest twelve consecutive month emission report shall be submitted to the Department in accordance with General Provision 7.

21. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Robbins shall not use any stain, sealer, or topcoat with a HAP percent by weight concentration higher than that listed in the following table.

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HAP	% by Weight
Formaldehyde	0.7
EGPE	4.0
Ethyl Benzene	1.5
Xylene	15.0
Toluene	15.0
Methanol	17.0

22. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Robbins may exchange HAPs from those listed in the permit to another HAP, provided the TLV value of the new compound is greater than 100 mg/m³ and the HAP exchange does not cause an increase in the mass emissions rate (pounds per hour) from the facility. All new materials must be added to the monthly and annual VOC emission report. Written approval from the Department must be received by Robbins prior to using any new material with a HAP whose TLV value is below 100 mg/m³.

SN-24 Hammer Mill
SN-25 Hammer Mill

Source Description

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Two hammer mills (SN-24 and SN-25) are in service at the Sykes facility. SN-24 is located east of baghouses SN-10 and SN-11. SN-25 is the hammer mill which is to be installed in the summer of 2000.

The hammer mills chop wood waste into small pieces to be used for fuel. Dust is collected from the hammer mills and sent into separate cyclones. In the cyclone, the dust is separated from the air and conveyed to the Peerless bin for removal. The air from the cyclones is routed back to the four baghouses.

Specific Conditions

23. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour and tons per year emission rates are the potential to emit for the hammer mills, SN-24 and SN-25.

Source	Pollutant	lb/hr	tpy
24	PM ₁₀	2.0	8.8
25	PM ₁₀	2.0	8.8

24. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour and tons per year emission rates are the potential to emit for the hammer mills, SN-24 and SN-25.

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Source	Pollutant	lb/hr	tpy
24	PM	2.0	8.8
25	PM	2.0	8.8

SN-26 Vacuum Bed System

Source Description

The vacuum bed system is used on the UV finish line to hold the wood to the belt as it passes through the sanding and finishing operations. The vacuum system fan and discharge point is located outside north of the UV line. The maximum air flow through the system is 2,900 cfm.

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Specific Conditions

25. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition 27.

Pollutant	lb/hr	tpy
PM ₁₀	0.9	2.0

26. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition 27.

Pollutant	lb/hr	tpy
PM	0.9	2.0

27. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not process more than 30,000,000 square feet of wood during any consecutive twelve-month period.
28. Pursuant to §19.705 of Regulation 19, and 40 CRF Part 52, Subpart E, Robbins shall maintain monthly and annual records of the square feet of wood processed through the UV finish line. These records shall be maintained on site and made available to Department personnel upon request. The monthly reports shall also be submitted to the Department per General Provision 7 by the last day of the month after the reported month.
SN-27 Gasoline Tank

Source Description

The Sykes facility has one 1,000-gallon gasoline tank. The tank is located outside.

Specific Conditions

29. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation

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for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pounds per hour and tons per year emission rates are the potential to emit for the gasoline tank, SN-27.

SN	Pollutant	lb/hr	tpy
27	VOC	0.2	0.5

30. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not receive more than 12,000 gallons of gasoline for any consecutive 12 month period. The gasoline will be stored in the one 1,000 gallon storage tank.
31. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, Robbins shall maintain monthly and annual records of the gasoline received into the 1,000 gallon storage tank. These records shall be maintained on site and made available to Department personnel upon request. The monthly reports shall also be submitted to the Department per General Provision 7 by the last day of the month after the reported month.

SECTION V: COMPLIANCE PLAN AND SCHEDULE

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SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

Acid Rain (Title IV)

7. Pursuant to §7(a) of Regulation #26 and 40 CFR 70.6(a)(4), the permittee is prohibited from causing any emissions which exceed any allowances that the source lawfully holds under Title IV of the Act or the regulations promulgated thereunder. No permit revision is required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement of this permit or the Act. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Act.

Title VI Provisions

8. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
9. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

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- c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
10. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
11. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

12. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 30, 2000.

Description	Category
Diesel Fuel Tank (1000 gallon tank)	A-3
Propane Tank	AP-42 7.1-24

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.

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7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.
9. Bathroom/toilet emissions.
10. Emergency (backup) electrical generators at residential locations.
11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.¹
15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.
16. Portable electrical generators that can be "moved by hand" from one location to another.²
17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
18. Brazing or soldering equipment related to manufacturing activities that do not result in

¹ Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

² "Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

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emission of HAPs.³

19. Air compressors and pneumatically operated equipment, including hand tools.
20. Batteries and battery charging stations, except at battery manufacturing plants.
21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.⁴
22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
24. Drop hammers or presses for forging or metalworking.
25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
26. Vents from continuous emissions monitors and other analyzers.
27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
29. Lasers used only on metals and other materials which do not emit HAPs in the process.
30. Consumer use of paper trimmers/binders.

³ Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

⁴ Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
33. Laser trimmers using dust collection to prevent fugitive emissions.
34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.
38. Environmental chambers not using hazardous air pollutant gases.
39. Shock chambers, humidity chambers, and solar simulators.
40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
41. Process water filtration systems and demineralizers.
42. Demineralized water tanks and demineralizer vents.
43. Boiler water treatment operations, not including cooling towers.
44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
45. Oxygen scavenging (de-aeration) of water.

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46. Ozone generators.
47. Fire suppression systems.
48. Emergency road flares.
49. Steam vents and safety relief valves.
50. Steam leaks.
51. Steam cleaning operations.
52. Steam and microwave sterilizers.
53. Site assessment work to characterize waste disposal or remediation sites.
54. Miscellaneous additions or upgrades of instrumentation.
55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.
56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).
57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
59. Residential wood heaters, cookstoves, or fireplaces.
60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.
61. Log wetting areas and log flumes.
62. Periodic use of pressurized air for cleanup.
63. Solid waste dumpsters.

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64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.
66. Emissions from engine crankcase vents.
67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.
68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
69. Mixers, blenders, roll mills, or calenders for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
70. The storage , handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).
71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
72. Tall oil soap storage, skimming, and loading.
73. Water heaters used strictly for domestic (non-process) purposes.
74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.
76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

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SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;

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- e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,
 - h. Any corrective actions or preventive measures taken or being taken to prevent

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such deviations in the future, and

- i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

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19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

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- a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

INVOICE REQUEST FORM

PDS- _____

Date October 8, 2001

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

CSN 06-0001

Facility Name Robbins Hardwood Flooring, Inc. Sykes Plant

Invoice Mailing Address P.O. Box 999

Warren, AR 71671

<input type="checkbox"/>	Initial
<input checked="" type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1676-AOP-R2

Permit Description Title 5

Permit Fee Code A

Amount Due \$ 1000

Engineer Melisha Griffin

Paid? GNo GYes Check # _____

Comments: **Air Permit Fee Calculation**

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Robbins Hardwood Flooring, Inc. operates two facilities in Warren, Arkansas. The Sykes Plant and the Witt Plant both manufacture finished hardwood flooring (SIC Code 2426). This permit modification concerns the Sykes Plant located at 501 Pennington Road.

An audit revealed that exhaust vents on two of the baghouses were not permitted and the hammer mill that is currently in use is not permitted. In addition, the facility uses several chemicals on the conventional and UV finish lines that are not included in the existing permit. This application also requests the authority for new construction to install a new hammer mill and connect it to a cyclone which is in place at but not operating. In addition, the facility is removing the equipment from the old process line, including the kiln, the log debarker, the veneer dryer, and the waste shaker/chip loader (SN-02, SN-05, SN-06, and SN-09). The permit modification includes a new process description which incorporates the proposed equipment and reflects the removal of old equipment.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Suzanne Carswell, Information Officer. Citizens desiring technical information concerning the application or permit should contact Melisha Griffin, Engineer. Both Suzanne Carswell and Melisha Griffin can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Southeast Arkansas Regional Library at 233 South Main Street in Monticello, AR 71655. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Suzanne Carswell. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis
Director