

## STATEMENT OF BASIS

*for the issuance of Draft Air Permit # 427-AOP-RI*

**1. PERMITTING AUTHORITY:**

Arkansas Department of Environmental Quality  
8001 National Drive  
Post Office Box 8913  
Little Rock, Arkansas 72219-8913

**2. APPLICANT:**

Robbins Hardwood Flooring-Witt  
Hwy 15 S. at Hwy 4 Bypass  
Warren, Arkansas 71671

**3. PERMIT WRITER:**

Wesley Crouch

**4. PROCESS DESCRIPTION AND SIC CODE:**

SIC Description: Hardwood Flooring Manufacturer  
SIC Code: 2426

**5. SUBMITTALS: 5-30-00**

**6. REVIEWER'S NOTES:**

Triangle Pacific Corp. owns and operates Robbins Hardwood Flooring, Inc. - Witt Plant (former Robbins, Inc.) located at Highway 15 South at Highway 4 Bypass, Warren, Arkansas. The facility manufactures finished hardwood flooring (SIC code 2426). Robbins proposes to install a larger (53.5 MMBtu/hr) boiler (SN-41) in place of a 28.08 MMBtu/hr boiler (SN-14) proposed in Permit #427-AOP-R0. The larger boiler will actually have lower CO emissions. This substitution will allow the facility to fall below the threshold for major stationary sources under PSD regulations. This modification also adds the chemicals used in the cleaning processes to the permit, permits emissions from the hammer mills, allows the installation of 16 new drying kilns and lists a diesel storage tank as an insignificant source.

**7. COMPLIANCE STATUS:** The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues

Facility is operating under a CAO. This permit meets the requirements of that CAO provided that they are maintaining the proper records.

**8. APPLICABLE REGULATIONS:**

**A. Applicability**

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera) (Y/N)  N   
 Has this facility underwent PSD review in the past (Y/N)  N  Permit # \_\_\_\_\_  
 Is this facility categorized as a major source for PSD? (Y/N)  N   
 \$ 100 tpy and on the list of 28 (100 tpy)? (Y/N) \_\_\_\_\_  
 \$ 250 tpy all other (Y/N) \_\_\_\_\_

**B. PSD Netting**

Was netting performed to avoid PSD review in this permit? (Y/N)  N

**C. Source and Pollutant Specific Regulatory Applicability**

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
13, 41	PM Opacity	<i>NSPS Subpart Dc</i>

**9. EMISSION CHANGES:**

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 427-AOP-R0	Air Permit 427-AOP-R1	Change
PM	108	103.0	-5
PM <sub>10</sub>	95.5	97.7	2.2
SO <sub>2</sub>	3.3	4.3	1

<b>Plantwide Permitted Emissions (ton/yr)</b>			
<b>Pollutant</b>	<b>Air Permit 427-AOP-R0</b>	<b>Air Permit 427-AOP-R1</b>	<b>Change</b>
VOC	193.4	195.0	1.6
CO	257.2	245.3	-11.9
NO <sub>x</sub>	29.0	56.5	27.5
Ethyl Benzene	3.73	3.73	0
EGMPE	3.24	3.24	0
Toluene	14.58	14.58	0
Xylene	18.14	18.14	0
MEK	0	29.2	29.2
MIBK	0	28.9	28.9

**10. MODELING:**

**A. Criteria Pollutants**

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

**11. Non-Criteria Pollutants**

**1st Tier Screening (PAER)**

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The PAER was deemed by the Department to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

<b>Pollutant</b>	<b>TLV (mg/m<sup>3</sup>)</b>	<b>PAER (lb/hr) = 0.11*TLV</b>	<b>Proposed lb/hr</b>	<b>Pass?</b>
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Ethylbenzene	434	47.74	2.21	Yes
EGMPE	16.0	1.76	1.92	No
Toluene	188.0	20.68	8.64	Yes
Xylene	434.0	47.74	10.75	Yes
MEK	590	64.9	29.2	Yes
MIBK	205	22.55	28.9	No

**2nd Tier Screening (PAIL).**

ISCST3 air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound was deemed by the Department to be one one-hundredth of the Threshold Limit Value, as listed by the ACGIH.

SN(s)	Pollutant	(PAIL, $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Pass?
01-12	Ethylene Glycol Monopropyl Ether	160.0	40.6	Yes
01-12	Methyl Isobutyl Ketone	2050	611	Yes

**12. CALCULATIONS:**

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
1-12		(gal/yr) x (lb/gal) x VOC content			
13	PM: manufacturer's emission factor SO <sub>2</sub> , VOC, CO, NO <sub>x</sub> : AP-42	various	cyclone with flyash reinjection	96.4	The boiler shall be tested for PM and CO emissions.
41	manufacturer's emission factor	various	ESP and flyash reinjection		The boiler shall be tested for PM and CO emissions.
15-35	PM, VOC: Arkansas recommended emission factors	various			1.0 lb VOC/ 10 <sup>6</sup> bdf
36	PM, SO <sub>2</sub> , VOC, CO, NO <sub>x</sub> : AP-42 emission factors	various			The boiler shall be tested for PM and CO emissions.

**13. TESTING REQUIREMENTS:**

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
13 & 41	PM and CO	1, 5 and 10	3 years	Verify manufacturer's emission rates.
36	PM, CO	1-5, 10	3 years	Verify emissions

**14. MONITORING OR CEMS**

The following are parameters that must be monitored with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

No CEMS required

**15. RECORD KEEPING REQUIREMENTS**

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SC	SN	Recorded Item
4	01-12	VOC usage
10	01-12	HAPs usage
15	13, 41	Amount of wood combusted during each day.
18	13, 41	Annual usage of wood waste fuel.
20	13, 41	Daily opacity readings.
23	36	Annual usage of wood waste fuel.
25	36	Daily opacity readings.
30	15-35 and 39-42	Annual purchase of hardwood lumber.

SC	SN	Recorded Item
33	37	Weekly observations of the duct system and the silo.

- \* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)
- \*\* Indicates whether the item needs to be included in reports

**16. OPACITY**

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
19	13,41	20%	New wood waste fired boiler.
24	36	20%	Wood waste fired boiler. Installed in 1978.

**17. DELETED CONDITIONS:**

The following Specific Conditions were included in the previous permit, but deleted for the current permitting action.

Former SC	Justification for removal
27	Facility no longer major for PSD

**18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**

List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.

Permit #
427-AOP-R0

**19. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

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*Tom Rheaume, P.E.*