

ADEQ OPERATING AIR PERMIT

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

Permit #: 427-AOP-R1

IS ISSUED TO:

Robbins Hardwood Flooring Inc.-Witt Plant
Hwy 15 S. at Hwy 4 Bypass
Warren, AR 71671
Bradley County
CSN: 06-0014

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:

July 31, 1998

and

July 30, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Robbins Hardwood Flooring Inc.-Witt Plant
CSN: 06-0014
PERMIT NUMBER: 427-AOP-R1

FACILITY ADDRESS: Hwy 15 S. at Hwy 4 Bypass
Warren, AR 71671

COUNTY: Bradley

CONTACT POSITION: Gary Raven
TELEPHONE NUMBER: 800-526-0308 x2592

REVIEWING ENGINEER: Wesley Crouch

UTM North-South (X): Zone 15: 3716
UTM East-West (Y): Zone 15: 585.5

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SECTION II: INTRODUCTION

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.

The new boiler would be subject to 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* and will operate with fly ash re-injection and an electrostatic precipitator.

Process Description

Rough lumber is brought to the site and air-dried for approximately 90 days during summer months and up to 150 days during winter months. The lumber is then dried in one of twenty-five (25) kilns (SN-15 through SN-35 and SN-39 through SN-42). The length of time in the kilns depends on the moisture content of the lumber, but typically takes about 8 days. The steam used to dry the lumber in the pre-dryer and drying kilns is provided by one of two (2) boilers (SN-13 and SN-36), which are fired by wood waste generated at the site.

Lumber from the drying kilns is taken to the milling section of the facility where it is ripped to 2 9/16" and 2 5/8" width. Rough cut boards are run through knotsaws, sidematcher, and endmatcher. Sawdust emissions from the milling section are picked up by suction fans and routed to the dust collection system. Wood waste is routed to one of two hammer mills (hogs).

Wood from the milling section is sent to the Finish Line or to a packaging area. The flooring banded in pallets is sent to the front of the Finishing Line. At the Finishing Line, the flooring pallets go through a number of processes; sanding, stain roll coating (SN-01), high mass oven (SN-02), UV reactor (SN-03), sealer spray booth (SN-04), first coat sealer (SN-05), UV reactor (SN-06), second coat sealer (SN-07), IR oven and UV reactor (SN-08), first coat/top coat roll coating (SN-09), UV reactor (SN-10), 2nd and 3rd top coat roll coating (SN-11), and IR oven and UV reactor (SN-12). Wood waste generated at the rework station is conveyed to the hog located on the west side of the plant. All particulate matter emissions generated at the Finish Line are collected and routed through the dust collection system. VOC emissions are combined and

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routed to the atmosphere. All VOC emissions from the Finish Line are bubbled under one source number. The facility uses different chemicals at the Finishing Line which may contain toxic components. HAPs emitted from the Finishing Line are also bubbled as one source number.

Wood waste generated at the milling section or the finishing line is conveyed to the two hogs. The smaller hog located on the east side of the facility receives waste from the milling section only. Dust from both units is collected and sent to a cyclone. From the cyclone, the dust is combined with baghouse dust and routed to a second cyclone located above the dust collection silo #1. From this cyclone, dust is separated from the air and sent either to the dust collection silo #1 or the truck bin. The sawdust in the truck bin is shipped off site. The facility has installed doors on the truck bin to eliminate particulate matter emissions during loading operations.

The dust collection system consists of three baghouses and three cyclones. Particulate matter collected from the milling section and the finishing line is exhausted to the baghouses. The clean air from the baghouses is routed back to the milling section. During periods of hot weather, the facility has the ability to vent the baghouses to the atmosphere (SN-37).

Dust from the baghouses is pneumatically conveyed to one of the three dust collection cyclones. Prior to entering the silos, the dirty air is sent through a cyclone. One cyclone is located on top of dust collection silo #1 and the second cyclone is located on dust collection silo #2. The second cyclone can feed either silo #2 or silo #3. Clean air from all three cyclones is routed back to the baghouses. Wood waste from the dust collection silos is used to feed the boilers.

Particulate emissions from boiler SN-13 are controlled by a cyclone with flyash reinjection. Clean air is emitted to the atmosphere. There is no control equipment on boiler SN-36.

All operations and equipment at the facility are permitted to be operated 8,760 hours per year.

Regulations

Robbins Hardwood Flooring, Inc. is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), the *Regulations of the Arkansas Air Permit Operating Program* (Regulation 26) and 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	25.2	110.2	
		PM ₁₀	24.0	104.9	
		SO ₂	1.0	4.3	
		VOC	157.2	235.0	
		CO	56.0	245.3	
		NO _x	12.9	56.5	
		Ethyl	2.21	3.73	
		benzene	1.92	3.24	
		EGMPE ¹	8.64	14.58	
		Toluene	10.75	18.14	
		Xylene	29.2	20.1	
		MEK	28.9	19.9	
		MIBK			
01-12	Finishing Line	VOC *	146.9	189.9	8
		Ethyl	2.21	3.73	
		benzene	1.92	3.24	
		EGMPE ¹	8.64	14.58	
		Toluene	10.75	18.14	
		Xylene	29.2	20.1	
		MEK ²	28.9	19.9	
		MIBK ³			
13	28.08 MMBtu/hr Wood Fired Boiler	PM	8.5	37.3	12
		PM ₁₀	7.8	34.2	
		SO ₂	0.3	1.4	
		VOC	0.4	1.8	
		CO	25.2	110.4	
		NO _x	2.8	12.3	
15-35 and 39-42	Hardwood Lumber Drying Kilns	PM	1.9	8.1	16
		PM ₁₀	1.9	8.1	
		VOC	8.9	39.0	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
36	9.36 MMBtu/hr Wood Fired Boiler	PM	5.4	23.7	12
		PM ₁₀	4.9	21.5	
		SO ₂	0.1	0.5	
		VOC	0.2	0.9	
		CO	8.3	36.4	
		NO _x	1.0	4.4	
37	Milling Process	PM	2.0	8.8	18
		PM ₁₀	2.0	8.8	
38	Hammer Mill	PM	2.0	8.8	20
		PM ₁₀	2.0	8.8	
41	53.5 MMBtu/hr Wood Fired Boiler	PM	5.4	23.5	12
		PM ₁₀	5.4	23.5	
		SO ₂	0.6	2.4	
		VOC	0.8	3.4	
		CO	22.5	98.5	
		NO _x	9.1	39.8	

- * VOC emissions include HAP emissions
1. Ethylene Glycol Monopropyl Ether
 2. Methyl Ethyl Ketone
 3. Methyl Isobutyl Ketone

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SECTION III: PERMIT HISTORY

Permit #427-A was issued to Branwood Corporation in September, 1977. The permit authorized the construction and operation of a new facility to produce unfinished wood furniture parts. The permit included nine drying kilns and two Wicks package boilers burning wood waste. Wood particulate emissions from manufacturing process were controlled by two fabric filters. Emissions from boilers and kilns were not quantified.

Permit #427-AR-1 was issued to Robbins, Inc. in November, 1988. The permit reflected the acquisition of the facility by Robbins, Inc. Visible emissions from boilers were limited to 20% opacity. No other emission limits were included in the permit.

Permit #427-AR-2 was issued in July, 1989. The permit modification allowed installation and operation of a finishing line. Only VOC emissions from the finishing line were quantified in the permit. Individual sources were combined into two groups.

Permit #427-AR-3 was issued in June, 1992. The permit modification allowed to increase VOC emissions from the finishing line. The permit contains estimations of VOC emissions from each individual source. The operation of the finishing line was limited to 8 hours per day, 5 days per week, and 2000 hours per year. Boilers and kilns were not included in the permit.

Permit #427-AR-3 was amended in June, 1997 to reflect the acquisition of the facility by Robbins Hardwood Flooring, Inc.

Permit #427-AOP-R0 was issued on July 31, 1998. This was the initial Title V permit for this facility. It allowed the construction of two (2) 28.08 MMBtu/hr wood waste fueled boilers, construction of twelve (12) drying kilns, removal of limit of hours of operation and increase of production rate at the finishing line, and permitting of the existing previously unpermitted sources. Carbon Monoxide emission rates listed in this permit exceeded the 250 tpy level of significance for PSD.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-01 through SN-12
Finishing Line

Source Description

The flooring banded in pallets is routed at the front of the Finishing Line. The Finishing Line consists of a number of sanding operations, spray application of wood stains and sealers, gas-fired oven drying, ultraviolet and infrared oven drying including stain roll coater (SN-01), high mass oven (SN-02), UV reactor (SN-03), sealer spray booth (SN-04), first coat sealer (SN-05), UV reactor (SN-06), second coat sealer (SN-07), IR oven and UV reactor (SN-08), first coat - top coat roll coater (SN-09), UV reactor (SN-10), 2nd and 3rd top coat roll coaters (SN-11), and IR oven & UV reactor (SN-12).

All particulate matter emissions are collected and routed through a cyclone to the dust collection silo. VOC emissions are combined and routed to the atmosphere. All VOC emissions from the Finishing Line are bubbled.

The facility uses different chemicals at the Finishing Line which may contain toxic components. Hazardous air pollutants (HAP) emitted from the Finishing Line are also bubbled.

Specific Conditions

1. 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 the emission rates is based on maximum hourly usage of chemicals, 100% VOC content of chemicals, and compliance with Specific Condition 3.

SN-#	Pollutant	lb/hr	tpy
1-12	VOC ¹	146.9	189.9

1. VOC emissions include HAP emissions.

2. 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 the emission rates is based on maximum hourly usage of chemicals and compliance with Specific Conditions 3 and 5 through 9.

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SN-#	Pollutant	lb/hr	tpy
1-12	Ethyl benzene (CAS #100-41-4)	2.21	3.73
	Ethylene Glycol Mono Propyl Ether (CAS #2807-30-9)	1.92	3.24
	Toluene (CAS #108-88-3)	8.64	14.58
	Xylene (CAS #1330-20-7)	10.75	18.14
	Methyl Ethyl Ketone(CAS #78-93-3)	29.2	20.1
	Methyl Isobutyl Ketone (CAS #108-10-1)	19.9	19.9

3. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 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 exceed monthly usage of 32,000 pounds of chemicals¹ and usage of 149.9 tons of chemicals for any consecutive twelve month period at the Finishing Line (SN-01 through SN-12).
4. Pursuant to §19.705 of Regulation 19 and 40 CFR 52, Subpart E, the permittee shall maintain records of VOC usage which demonstrate compliance with the limits set in Specific Conditions 1 and 3 and may be used by the Department for enforcement purposes. The VOC usage records shall be maintained in the form of Attachment 1. These records shall be maintained on a monthly basis and updated by the 10th day of the month following the month to which the records pertain. These records shall be kept on site for five years in accordance with General Provision 6, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision 7.
5. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use chemicals containing more than 2.3 wt.% Ethyl benzene.
6. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use chemicals containing more than 2.0 wt.% ethylene glycol monopropyl ether.

¹ Chemicals include all stains, sealers, topcoats and other materials used at the Finishing Line.

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7. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use chemicals containing more than 9.0 wt.% toluene.
8. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use chemicals containing more than 11.2 wt.% xylene.
9. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use chemicals containing HAP not listed in Specific Condition 2.
10. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions 2 and 5 through 9. The HAP usage records shall be maintained in the form of Attachment 2. These records shall be maintained on a monthly basis and updated by the 10th day of the month following the month to which the records pertain. These records shall be kept on site for five years in accordance with General Provision 6, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision 7.
11. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall keep material safety data sheets (MSDS) for all chemicals used at the finishing line (SN-01 through SN-12). MSDS shall be kept on site for five years and shall be provided to Department personnel upon request.

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Wood Fired Boilers

SN-13: 28.08 MMBtu/hr Boiler, SN-36: 9.36 MMBtu/hr Boiler, SN-41: 53.5 MMBtu/hr boiler

Source Description

Steam generated by the boilers is used in the drying kilns (SN-15 through SN-35).

SN-13. The boiler has a maximum design heat input capacity of 28.08 MMBtu/hr. It is a wood waste fired boiler with a stocker firing configuration. The boiler was constructed in 1997. Particulate emissions from the boiler are controlled by a cyclone with flyash reinjection. The boiler is subject to the provisions of 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

SN-36. The boiler has a maximum design heat input capacity of 9.36 MMBtu/hr. It is a wood waste fired boiler with a dutch oven firing configuration. The construction of the boiler was authorized by air permit #427-A in 1977. The boiler was constructed in 1978. Emission rates of criteria pollutants have never been tested. There is no control equipment associated with this boiler.

SN-41. The boiler has a maximum design heat input capacity of 53.5 MMBtu/hr. It is a wood waste fired boiler with a stocker firing configuration. Particulate emissions from the boiler are controlled by flyash reinjection and an electrostatic precipitator. The boiler is subject to the provisions of 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Specific Conditions

12. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission limits is based on maximum design heat input capacities and compliance with Specific Conditions 16, 17, and 22.

SN-#	Pollutant	lb/hr	tpy
13	PM	8.5	37.3
	PM ₁₀	7.8	34.0
	SO ₂	0.3	1.4
	VOC	0.4	1.8
	CO	25.2	110.4
	NO _x	2.8	12.3

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SN-#	Pollutant	lb/hr	tpy
36	PM	5.4	23.7
	PM ₁₀	4.9	21.5
	SO ₂	0.1	0.5
	VOC	0.2	0.9
	CO	8.3	36.4
	NO _x	1.0	4.4
41	PM	5.4	23.5
	PM ₁₀	5.4	23.5
	SO ₂	5.4	23.5
	VOC	0.8	3.4
	CO	22.5	98.5
	NO _x	9.1	39.8

13. Pursuant to §19.304 of Regulation 19 and 40 CFR 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, the boilers SN-13 and SN-41 are considered affected sources because their maximum design heat input capacity falls between 10 MMBtu/hr and 100 MMBtu/hr. A copy of Subpart Dc is provided in appendix C. Applicable provisions of Subpart Dc are listed in Table A (Appendix D).
14. Pursuant to §60.48c(g) of 40 CFR 60, Subpart Dc, the permittee shall record and maintain records of the amounts of wood combusted in each of the boilers (SN-13 and SN-41) during each day.
15. Pursuant to §60.48c(i) of 40 CFR 60, Subpart Dc, the permittee shall maintain records required under Specific Condition 14 for a period of two years following the date of such records.
16. 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 use more than 16,027 tons of wood as a fuel for the 28.08 MMBtu/hr boiler (SN-13) for any consecutive twelve month period.
17. Pursuant to 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 use more than 30,923 tons of wood as a fuel for the 53.5 MMBtu/hr boiler (SN-41) for any consecutive twelve month period.

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18. Pursuant to §19.705 of Regulation 19 and 40 CFR 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions 16 and 17. These records shall be maintained on a monthly basis and updated by the 10th day of the month following the month to which the records pertain. These records shall be kept on site for five years in accordance with General Provision 6, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision 7.
19. Pursuant to §19.503 of Regulation 19, 40 CFR Part 60, §60.43c(c) and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from SN-13 and SN-41.
20. Pursuant to §19.702 of Regulation 19 and 40 CFR 52, Subpart E, the permittee shall conduct daily 6-minute opacity readings required under Specific Condition 19 in accordance with EPA Reference Method 9. The results of these observations shall be kept on site and shall be provided to Department personnel upon request.
21. Pursuant to §19.702 of Regulation 19 and 40 CFR 52, Subpart E, the permittee shall perform stack testing of SN-13 and SN-41 for particulate matter (PM) and carbon monoxide (CO) emissions. Pursuant to §60.43c(b)(1), the particulate emission from SN-41 shall not exceed 0.1 lb/MMBtu. Testing shall be performed in accordance with Plantwide Conditions 3 and 4 and Referenced Methods 1 through 5 and 10, respectively, as found in 40 CFR Part 60, Appendix A. Stack testing of SN-13 and SN-41 for these pollutants shall be repeated every three (3) years.
22. 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 use more than 5343 tons of wood as a fuel in the 9.36 MMBtu/hr boiler (SN-36) for any consecutive twelve month period.
23. Pursuant to §19.705 of Regulation 19 and 40 CFR 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 22. These records shall be maintained on a monthly basis and updated by the 10th day of the month following the month to which the records pertain. These records shall be kept on site for five years in accordance with General Provision 6, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision 7.
24. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from SN-36.
25. Pursuant to §19.702 of Regulation 19 and 40 CFR 52, Subpart E, the permittee shall conduct daily 6-minute opacity reading required under Specific Condition 24 in

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accordance with EPA Reference Method 9. The results of these observations shall be kept on site and shall be made available to Department personnel upon request.

26. Pursuant to §19.702 of Regulation 19 and 40 CFR 52, Subpart E, the permittee shall perform stack testing of SN-36 for particulate matter (PM) and carbon monoxide (CO) emissions. Testing shall be performed in accordance with Plantwide Conditions 3 and 4 and Referenced Methods 1 through 5 and 10, respectively, as found in 40 CFR 60, Appendix A. Testing shall be performed no later than 180 days after the date this permit is issued.

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SN-15 through SN-35 and SN-39 through SN-42: Drying Kilns

Source Description

Drying Kilns (SN-15 through SN-35 and SN-39 through SN-42) are used to reduce the lumber's moisture content to 5-8%. The typical lumber is 1"x1" hardwood (oak) boards. The steam used in the Drying Kilns is supplied by the boilers (SN-13, SN-14, and SN-36).

There are nine (9) existing kilns at the facility (SN-27 through SN-35). The construction of additional twelve (16) drying kilns (SN-15 through SN-26 and SN-39 through SN-42) is authorized by this permit. The existing kilns were constructed in 1978 (air permit #427-A).

Specific Conditions

27. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates is based on type of lumber and compliance with Specific Condition 29.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
SN-15 through SN-35 and SN-39 through SN-42	PM ₁₀ VOC	1.9 8.9	8.1 39.0

28. Pursuant to §18.801 of 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 emission rates is based on type of lumber and compliance with Specific Condition 29.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
SN-15 through SN-35 and SN-39 through SN-42	PM	1.9	8.1

29. 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 dry more than 76,470,000 board feet of hardwood lumber for any consecutive twelve month period.

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30. Pursuant to §19.705 of Regulation 19 and 40 CFR 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 29. These records shall be maintained on a monthly basis and updated by the 10th day of the month following the month to which the records pertain. These records shall be kept on site for five years in accordance with General Provision 6, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision 7.

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SN-37
Milling Process

Source Description

The kiln dried lumber is routed to the milling section for unfinished hardwood flooring manufacturing. The sawdust emissions from the saws, side matchers, end matchers, and planers are picked up by suction fans and routed to the milling process dust collection baghouses. There are three (3) baghouses. The clean air from the baghouse is routed back to the milling section. The collected sawdust is fed pneumatically into the silo. There is a cyclone on the top of the silo. The exhaust air from the cyclone is routed back to the baghouses. The sawdust from the silo is fed pneumatically into the boilers. Some excess sawdust is loaded and shipped off site by trucks. There are some fugitive particulate matter emissions due to leaks from duct system and the silo.

Specific Conditions

31. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with emission rates is based on compliance with Specific Condition 33.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
SN-37	PM ₁₀	2.0	8.8

32. 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. Compliance with emission rates is based on compliance with Specific Condition 33.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
SN-37	PM	2.0	8.8

33. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall install doors at both openings of loading area at the bottom of the silo. The doors shall remain closed during unloading operations.
34. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall visually inspect the duct system and the silo for possible sawdust emissions. The inspections shall be conducted weekly. The results of the

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inspection shall be logged. If any visible emissions are detected, the permittee shall make a record in the logbook and take appropriate measures to eliminate such emissions as soon as practically possible. The records shall contain the date visible emissions were detected, measures taken, and the date the emissions were eliminated. The records shall be updated on a weekly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-38
Hammer Mill

Source Description

Wood waste generated at the milling section or the finishing line is conveyed to this hog. Dust from this unit is collected and sent to a cyclone.

Specific Conditions

35. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emissions rates are based on continuous usage and represent worst case.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
SN-38	PM ₁₀	2.0	8.8

36. 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. Emissions rates are based on continuous usage and represent worst case.

Source No.	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
SN-38	PM	2.0	8.8

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Robbins Hardwood Flooring Inc.-Witt Plant is in compliance with the applicable regulations cited in the permit application. Robbins Hardwood Flooring Inc.-Witt Plant will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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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 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.

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- 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.
 - 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 25, 2000.

Description	Category
1,000 gallon diesel tank	Group A, #3

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.
7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.

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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 emission of HAPs.³
19. Air compressors and pneumatically operated equipment, including hand tools.

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.

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.

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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.¹
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.
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.

¹ 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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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.
46. Ozone generators.
47. Fire suppression systems.
48. Emergency road flares.
49. Steam vents and safety relief valves.
50. Steam leaks.

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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.
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.

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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;
 - e. The results of such analyses; and

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- 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 such deviations in the future, and

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- 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.

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22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
 - 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.

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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 06-0014
Facility Name Robbins Hardwood Flooring Inc.-Witt Plant
Invoice Mailing Address Hwy 15 S. at Hwy 4 Bypass
Warren, Arkansas 71671

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

Permit Number 427-AOP-R1
Permit Description Title 5
Permit Fee Code A

Amount Due \$ 597

Engineer Wesley Crouch

Paid? GNo GYes Check # _____

Comments: Air Permit Fee Calculation

fee = \$18.47 x net increase in chargeable emissions or \$500 whichever is greater.

Robbins Hardwood Flooring Inc.-Witt Plant
Permit #: 427-AOP-R1
CSN #: 06-0014

$$18.47 \times (2.2+1+1.6+27.5) = 597.00$$

Robbins Hardwood Flooring Inc.-Witt Plant
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Public Notice

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

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 (CSN:06-0014). 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. This substitution will allow the facility to fall below the limit for a major stationary source under PSD regulations.

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 Wesley Crouch, Engineer. Both Suzanne Carswell and Wesley Crouch 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 Southwest Regional Library located at 233 South Main 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

Robbins Hardwood Flooring Inc.-Witt Plant
Permit #: 427-AOP-R1
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Randall Mathis
Director