ADEQ
OPERATING
AIR PERMIT

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

Permit #: 427-AOP-R4

Renewal #1

IS ISSUED TO:

Robbins Hardwood Flooring, Inc. – Witt Plant
Warren, AR 71671
Bradley County
AFIN: 06-00014

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:

November 10, 2003 AND November 9, 2008

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date Modified

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Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CSN	County Serial Number
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate matter
PM_{10}	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Robbins Hardwood Flooring, Inc. – Witt Plant
AFIN:	06-00014
PERMIT NUMBER:	427-AOP-R4
FACILITY ADDRESS:	688 Hwy. 278 Bypass Warren, AR 71671
MAILING ADDRESS	Same as Facility Address
COUNTY:	Bradley
CONTACT POSITION:	Marty Reep
TELEPHONE NUMBER:	(870) 226 7561
REVIEWING ENGINEER:	Paula Parker
UTM North - South (Y):	Zone 15 - 3716
UTM East - West (X):	Zone 15 - 585.5

Section II: INTRODUCTION

Summary of Permit Activity

Armstrong Wood Products, Inc., owns and operates Robbins Hardwood Flooring, Inc. - Witt Plant (formerly Robbins, Inc.) located at Highway 15 South at Highway 4 Bypass, Warren, Arkansas. The facility manufactures finished hardwood flooring. This minor modification incorporates a change to the CAM requirements for the ESP which controls particulate from a wood-fired boiler, SN-41. Information obtained through the manufacturer recommended the change in monitored parameters of the ESP. There is no emission change associated with this modification. The facility also submitted a minor modification in order to increase the allowable unloading limit at SN-43 from 173 trucks per month to 350. There was a 2.4 ton/yr emission increase of particulate from this change.

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, SN-40, and 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-41), 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) (SN-38).

Wood from the milling section is sent to the Finish Line (SN-01 through SN-12) 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), first coat sealer (SN-04), UV oven (SN-05), second coat sealer (SN-06), UV reactor with third coat sealer (SN-07), UV oven (SN-08), first coat top coat (SN-09), UV oven (SN-10), second & third coat top coat (SN-11), and final cure oven (SN-12, two stacks). 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 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 loaded into trucks (SN-43) and shipped offsite. The facility has installed a dust collection system inside the truck loading station to eliminate particulate matter emissions during loading operations.

The dust collection system consists of three baghouses and four 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 four 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 fourth cyclone with flyash reinjection. Clean air is emitted to the atmosphere. Particulate emissions from boiler SN-41 are controlled with an electrostatic precipitator (ESP).

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
All Sources	Arkansas Air Pollution Code (Regulation 18)
All Sources	Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19)
All Sources	Regulations of Arkansas Air Permit Operating Program (Regulation 26)
SN-01 through SN-12	40 CFR Part 63 Subpart QQQQ – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products*
13, 41	40 CFR Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 – Emission Summary

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
Total Allowable Emissions		PM PM_{10} SO_2 VOC CO NO_x	24.5 24.5 2.1 159.0 15.5 40.1	91.7 91.7 9.0 242.9 67.4 175.1	N/A

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
HAPs*		Acrolein Benzene Chlorine Ethyl benzene Ethylene Glycol Mono Propyl Ether Formaldehyde Manganese Methyl Ethyl Ketone Methyl Isobutyl Ketone Phenol Styrene Toluene Xylene	0.34 0.35 0.08 2.21 1.92 0.37 0.14 29.20 28.90 0.01 0.17 8.64 10.75	1.44 1.51 0.29 3.73 3.24 1.59 0.57 20.10 19.90 0.02 0.69 14.58 18.14	
01 thru 12	Finishing Lines	VOC Ethyl benzene Ethylene Glycol Mono Propyl Ether Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylene	149.9 2.21 1.92 29.20 28.90 8.64 10.75	189.9 3.73 3.24 20.10 19.90 14.58 18.14	13
13	Wood-fired Boiler (28.08 MMBTU/hr)	PM PM_{10} SO_2 VOC CO NO_x Acrolein Benzene Chlorine Formaldehyde Manganese Styrene	13.1 13.1 0.7 1.1 8.6 13.8 0.12 0.12 0.03 0.13 0.05 0.06	57.1 57.1 3.1 4.8 37.4 60.3 0.50 0.52 0.10 0.55 0.20 0.24	16
15 thru 35 and 39, 40, 42	Hardwood Lumber Drying Kilns	PM PM_{10} VOC	1.9 1.9 8.9	8.1 8.1 39.0	20
37	Milling Process Baghouse	PM PM_{10}	2.0 2.0	8.8 8.8	22

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
38	Hammer Mill	PM PM_{10}	2.0 2.0	8.8 8.8	24
41	Wood-fired Boiler (53.5 MMBTU/hr)	PM PM_{10} SO_2 VOC CO NO_x Acrolein Benzene Chlorine Formaldehyde Manganese Phenol Styrene	1.0 1.0 1.4 2.1 6.9 26.3 0.22 0.23 0.05 0.24 0.09 0.01 0.11	4.1 4.1 5.9 9.2 30.0 114.9 0.94 0.99 0.19 1.04 0.37 0.02 0.45	16
43	Truck Loadout Station	PM PM_{10}	4.5 4.5	4.8 4.8	25

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

Section III:PERMIT HISTORY

427-A 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.

427-AR-1 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.

427-AR-2 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.

427-AR-3 Issued in June, 1992. The permit modification allowed an increase in 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.

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

427-AOP-R0 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 un-permitted sources. Carbon Monoxide emission rates listed in this permit exceeded the 250 tpy level of significance for PSD.

427-AOP-R1 Issued on September 12, 2000. First, this modification permitted the installation of a larger (53.5 MMBtu/hr) boiler (SN-41) in place of the 28.08 MMBtu/hr boiler (SN-41). The larger boiler lowered CO emissions so that the facility fell below the threshold for a major stationary source under PSD regulations. Second, the modification also added the chemicals used in the cleaning processes to the permit and emissions from the hammer mills. Finally, it allowed the installation of 16 new drying kilns (SN-15 through SN-26 and SN-39, SN-40, and SN-42) and an insignificant diesel storage tank.

427-AOP-R2 Issued on April 25, 2002. Facility installed an emission control system for the truck loadout station associated with the milling process. The system will consist of new piping and a new material handling fan to collect the dust.

427-AOP-R3 Issued on November 10, 2003. The facility went through a renewal of their Title V air permit, which included the addition of CAM requirements for SN-37 (Milling Process baghouses) and SN-41 (wood-fired boiler). SN-36, a 28.08 MMBTU/hr wood-fired boiler, was removed from the permit. There were no changes to the method of operation associated with the renewal.

Section IV: EMISSION UNIT INFORMATION

SN- 01 through SN-12

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).

Particulate matter from the enclosed sanding machines is 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. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 4 – Maximum Criteria Emission Rates for SN-01 through SN-12

Pollutant	lb/hr	tpy
VOC	146.9	189.9

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Condition #3. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 – Maximum Non-Criteria Emission Rates for SN-01 through SN-12

Pollutant	lb/hr	tpy
Ethyl benzene	2.21	3.73
Ethylene Glycol Mono Propyl Ether	1.92	3.24
Toluene	8.64	14.58
Xylene	10.75	18.14
Methyl Ethyl Ketone	29.20	20.10

Pollutant	lb/hr	tpy
Methyl Isobutyl Ketone	28.90	19.90

3. The permittee shall maintain material safety data sheets (MSDS) for all coating compounds used at the finishing line (SN-01 through SN-12) and maintain the following lb/gallon limits:

Table 6 – Coating HAP Limits for the Finishing Line

Pollutant	lb/gal
Ethyl Benzene	0.18
Ethylene Glycol Mono Propyl Ether	0.15
Toluene	0.67
Xylene	0.83

[§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

4. The permittee shall maintain material safety data sheets (MSDS) for all compounds used in Cleanup Operations at the finishing line (SN-01 through SN-12) and maintain the following lb/gallon limits:

Table 7 – Cleanup Operations HAP Limits for the Finishing Line

Pollutant	lb/gal
Methyl Isobutyl Ketone	6.66
Methyl Ethyl Ketone	6.73

[§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

5. The permittee shall maintain monthly totals of VOC emissions, in tons, which demonstrate compliance with the limits of Specific Condition #1. The VOC usage records shall indicate the lb VOC per gallon of each compound. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation No.§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. The permittee shall maintain monthly totals of individual HAP emissions, in tons, to demonstrate compliance with Specific Condition #2. The HAP usage records shall indicate the lb HAP per

gallon of each compound. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records and associated MSDS data shall be kept on site, and shall be made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted in accordance with General Provision 7. [Regulation No.§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Wood Fired Boilers SN-13 and SN-41

Source Description

Steam generated by the boilers is used in the drying kilns.

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-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

7. 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 #13, #14, and #15. [Regulation No. 19 §19.501 et seq. effective February 15, 1999 and 40 CFR Part 52, Subpart E]

Table 8 – Maximum Criteria Pollutant Emission Rates for SN-13 and SN-41

Source	Pollutant	lb/hr	tpy
13	PM_{10}	13.1	57.1
	SO_2	0.7	3.1
	VOC	1.1	4.8
	CO	8.6	37.4
	NO_x	13.8	60.3
41	PM_{10}	1.0	4.1
	SO_2	1.4	5.9
	VOC	2.1	9.2
	CO	6.9	30.0
	NO_x	26.3	114.9

8. 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 #13, #14, and #15. [Regulation No. §18.801 effective February 15, 1999, and A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 9 – Maximum Non-Criteria Pollutant Emission Rates for SN-13 and SN-41

Source	Pollutant	lb/hr	tpy

Source	Pollutant	lb/hr	tpy
13	PM	13.1	57.1
	Acrolein	0.12	0.50
	Benzene	0.12	0.52
	Chlorine	0.03	0.10
	Formaldehyde	0.13	0.55
	Manganese	0.05	0.20
	Styrene	0.06	0.24
41	PM	1.0	4.1
	Acrolein	0.22	0.94
	Benzene	0.23	0.99
	Chlorine	0.05	0.19
	Formaldehyde	0.24	1.04
	Phenol	0.01	0.02
	Styrene	0.11	0.45

40 CFR Part 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

9. The permittee shall record and maintain daily records of the amounts of wood combusted in each of the boilers, SN-13 and SN-41. [§19.304 of Regulation #19 and 40 CFR §60.48c(g)]

10. The permittee shall maintain records required under Specific Condition #9 for a period of two years following the date of such records. [§19.304 of Regulation #19 and 40 CFR §60.48c(i)]

11. The permittee shall not exceed 20% opacity from SN-13 and SN-41. [§19.304 of Regulation #19 and 40 CFR §60.43c(c)]

12. The permittee shall conduct daily 6-minute opacity readings required under Specific Condition #11 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. [§19.702 of Regulation 19 and 40 CFR 52, Subpart E]

13. The particulate emissions from SN-41 shall not exceed 0.1 lb/MMBtu. [§19.304 of Regulation #19 and 40 CFR §60.43c(b)(1)]

14. The permittee shall not use more than 15,600 tons of wood as a fuel at SN-13 for any consecutive twelve month period. [§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]

15. The permittee shall not use more than 31,300 tons of wood as a fuel at SN-41 for any consecutive twelve month period. [§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]

16. The permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions #14 and #15. These records shall be maintained on a monthly basis and updated by the 15th 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. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

17. The permittee shall perform stack testing of SN-13 and SN-41 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. Stack testing of SN-13 and SN-41 for these pollutants shall be repeated every three (3) years. [§19.702 of Regulation 19 and 40 CFR 52, Subpart E]

18. The permittee shall perform an initial stack test of SN-13 and SN-41 for NO_x emissions. Testing shall be performed in accordance with Plantwide Conditions 3 and 4 and Reference Method 10E. [§19.702 of Regulation 19 and 40 CFR 52, Subpart E]

CAM Requirements for the Electrostatic Precipitator at SN-41

19. For the ESP at SN-41, the permittee shall:

    A. Install, operate, calibrate, and maintain a device to monitor the secondary current. The secondary current shall be maintained at a minimum of 10 mADC. [40 CFR Part §64.6(c)(1)]

    B. Install, operate, calibrate, and maintain a device to monitor the secondary voltage. The secondary voltage shall be maintained at a minimum of 20 kV. [40 CFR Part §64.6(c)(1)]

    C. Monitor and record measurements for the secondary current and secondary voltage on a daily basis. These records shall be maintained on site and be made available to Department personnel upon request. [40 CFR Part §64.6(c)(3)]

    D. Confirm secondary current and secondary voltage is zero when the unit is not operating. [40 CFR Part §64.6(c)(1)]

    E. Maintain documentation of routine inspections and any maintenance activities performed. [40 CFR Part §64.9(b)]

20. For the ESP at SN-41, the permittee shall:

    A. Maintain records that summarize the number, duration, and cause of excursions or exceedances of limits as well as corrective action taken. [40 CFR §64.9(a)(2)(i) and §64.9(b)]

    B. Maintain records that summarize the number, duration, and cause of monitoring equipment downtime incidents, other than routine downtime for calibration checks. [40 CFR §64.9(a)(2)(ii) and §64.9(b)]

    C. Maintain a QIP (quality improvement plan) threshold of no more than nine excursions per six-month reporting period. Upon exceedance of this threshold, the permittee shall then develop a QIP. [40 CFR §64.9(a)(2)(iii) and §64.9(b)]

    D. Maintain records that describe the actions taken to implement a quality improvement plan (QIP), and upon completion of the QIP, documentation shall be maintained to confirm that the plan was completed and reduced the likelihood of similar excursions or exceedances. [40 CFR §64.9(a)(2)(iii) and §64.9(b)]

    E. Submit information pertaining to exceedances or excursions from permitted values in semi-annual reports in accordance with General Provision #7. [40 CFR§70.6(a)(3)(iii)(A)]

SN-15 through SN-35 and SN-39, SN-40, and SN-42: Drying Kilns

Source Description

Drying Kilns (SN-15 through SN-35 and SN-39, SN-40, and 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 and SN-41).

Specific Conditions

21. 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 #25. [Regulation No. 19 §19.501 et seq. effective February 15, 1999 and 40 CFR Part 52, Subpart E]

Table 10 – Maximum Criteria Pollutant Emission Rates for SN-15 through SN-35 and SN-39, SN-40, and SN-42

Source	Pollutant	lb/hr	tpy
SN-15 through SN-35 and SN-39, SN-40, SN-42	PM_{10} VOC	1.9 8.9	8.1 39.0

22. 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 #25. [Regulation No. §18.801 effective February 15, 1999, and A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 11 – Maximum Non-Criteria Pollutant Emission Rates for SN-15 through SN-35 and SN-39, SN-40, and SN-42

Source	Pollutant	lb/hr	tpy
SN-15 through SN-35 and SN-39, SN-40, SN-42	PM	1.9	8.1

23. The permittee shall not exceed 10% opacity from SN-15 through SN-35 and SN-39, SN-40, SN-42. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

24. The permittee shall conduct a weekly, 6-minute opacity reading 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. [§19.702 of Regulation 19 and 40 CFR 52, Subpart E]

25. The permittee shall not dry more than 76,470,000 board feet of hardwood lumber for any consecutive twelve month period. [§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]

26. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition #25. These records shall be maintained on a monthly basis and updated by the 15th 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. [§19.705 of Regulation 19 and 40 CFR 52, Subpart E]

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

27. 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. [Regulation No. 19 §19.501 et seq. effective February 15, 1999 and 40 CFR Part 52, Subpart E]

Table 12 – Maximum Criteria Pollutant Emission Rates for SN-37

Source	Pollutant	lb/hr	tpy
SN-37	PM_{10}	2.0	8.8

28. 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. [Regulation No. §18.801 effective February 15, 1999, and A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 13 – Maximum Non-Criteria Pollutant Emission Rates for SN-37

Source	Pollutant	lb/hr	tpy
SN-37	PM	2.0	8.8

29. Visible emissions from the baghouse at SN-37 shall not exceed 5% opacity. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

CAM Requirements for the Baghouse at SN-37

30. For the baghouse at the Milling Process, SN-37, the permittee shall:

    A. Conduct weekly visual inspections of the duct system and the silo for possible sawdust emissions. [40 CFR Part §64.6(c)(1)]

B. Record the presence of any visible emissions and the subsequent actions taken to eliminate visible emissions. [40 CFR Part §64.6(c)(1)]

31. For the baghouse at the Milling Process, SN-37, the permittee shall:

A. Maintain records that summarize the number, duration, and cause of excursions or exceedances of limits as well as corrective action taken. [40 CFR §64.9(a)(2)(i) and §64.9(b)]

B. Maintain a QIP (quality improvement plan) threshold of no more than one excursion per six-month reporting period. Upon exceedance of this threshold, the permittee shall then develop a QIP. [40 CFR §64.9(a)(2)(iii) and §64.9(b)]

C. Maintain records that describe the actions taken to implement a quality improvement plan (QIP), and upon completion of the QIP, documentation shall be maintained to confirm that the plan was completed and reduced the likelihood of similar excursions or exceedances. [40 CFR §64.9(a)(2)(iii) and §64.9(b)]

D. Submit information pertaining to exceedances or excursions from permitted values in semi-annual reports in accordance with General Provision #7. [40 CFR§70.6(a)(3)(iii)(A)]

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

32. 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. [Regulation No. 19 §19.501 et seq. effective February 15, 1999 and 40 CFR Part 52, Subpart E]

Table 14 – Maximum Criteria Pollutant Emission Rates for SN-38

Source	Pollutant	lb/hr	tpy
SN-38	PM_{10}	2.0	8.8

33. 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. [Regulation No. §18.801 effective February 15, 1999, and A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 15 – Maximum Non-Criteria Pollutant Emission Rates for SN-38

Source	Pollutant	lb/hr	tpy
SN-38	PM	2.0	8.8

34. Visible emissions from the Hammer Mill (SN-38) shall not exceed 20% opacity. egulation No.§19.503 and 40 CFR Part 52, Subpart E]

35. The permittee shall conduct daily, 6-minute opacity readings 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. [§19.702 of Regulation 19 and 40 CFR 52, Subpart E]

SN-43

Truck Loadout Station

Source Description

Emissions for a truck loadout station have not been accounted for in past permits. With the installation of a dust collection system, which will be operated during truck loading, this source has been quantified. The system consists of new piping and a new material handling fan to collect the dust. The collected material will be rerouted into the existing dust collection system from the milling process.

Specific Conditions

36. The permittee shall not exceed the emission rates set forth in the following table. Emission rates are based on compliance with Specific Condition #40. [Regulation No. 19 §19.501 et seq. effective February 15, 1999 and 40 CFR Part 52, Subpart E]

Table 16 – Maximum Criteria Pollutant Emission Rates for SN-43

Source	Pollutant	lb/hr	tpy
SN-43	PM_{10}	4.5	4.8

37. The permittee shall not exceed the emission rates set forth in the following table. Emission rates are based on compliance with Specific Condition #40. [Regulation No. §18.801 effective February 15, 1999, and A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 17 – Maximum Non-Criteria Pollutant Emission Rates for SN-43

Source	Pollutant	lb/hr	tpy
SN-43	PM	4.5	4.8

38. Visible emissions from the truck loadout station (SN-43) shall not exceed 10% opacity. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

39. The permittee shall conduct daily 6-minute opacity readings during truck loading operations at SN-43 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. [§19.702 of Regulation 19 and 40 CFR 52, Subpart E]

40. The permittee shall not load more than 350 trucks a month. The permittee shall maintain records of the number of trucks loaded at this source. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records shall be maintained on site and made available to Department personnel upon request. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]

Section V: COMPLIANCE PLAN AND SCHEDULE

Robbins Hardwood Flooring does not currently have an enforcement action. Robbins Hardwood Flooring 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.

Section VI: PLANT WIDE CONDITIONS

1. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No.19 §19.410(B) of and, 40 CFR Part 52, Subpart E]

2. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

3. The permittee must provide: [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

    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.

4. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No.19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

5. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

6. The permittee shall submit a permit modification application demonstrating how the permittee will comply with 40 CFR Part 63, Subpart QQQQ – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products. Alternatively, the permittee may submit a notification citing how the current permit demonstrates compliance with the subpart. The application or notification must be submitted no later than January 28, 2005 (18 months after promulgation date of May 28, 2003). [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart QQQQ, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Acid Rain (Title IV)

7. The Director prohibits the permittee to cause any emissions exceeding any allowances the source lawfully holds under Title IV of the Act or the regulations promulgated under the Act. No permit revision is required for increases in emissions allowed by allowances acquired pursuant to the acid rain program, if 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. However, the source may not use allowances as a defense for noncompliance with any other

applicable requirement of this permit or the Act. The permittee will account for any such allowance according to the procedures established in regulations promulgated under Title IV of the Act. [Regulation No. 26 §26.701 of and 40 CFR 70.6(a)(4)]

Title VI Provisions

8. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [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. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

    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.

    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 can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

Permit Shield

13. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in Table 18 - Applicable Regulations of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated February 3, 2003.

Table 18 - Applicable Regulations

Source No.	Regulation	Description
No Permit Shield Requested		

Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated February 3, 2003**.**

Table 19 - Insignificant Activities

Description	Category
1,000 gallon diesel tank	A-3
Chemical storage room and exhaust fan	A-13

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 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.[40 CFR 70.6(b)(2)]

2. 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. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [Regulation No. 26 §26.406]

4. 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, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]

    a. The date, place as defined in this permit, and time of sampling or measurements;

    b. The date(s) analyses performed;

    c. The company or entity performing the analyses;

    d. The analytical techniques or methods used;

    e. The results of such analyses; and

    f. The operating conditions existing at the time of sampling or measurement.

6. The permittee must retain the records of all required monitoring data and support information for 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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every 6 months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of

the initial Title V permit. The report is due within 30 days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

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

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of 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 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

    i. The name of the person submitting the report.

    The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee 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 the report will serve as both the initial report and full report. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will 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. [40 CFR 70.6(a)(5) and §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 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, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]

11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]

14. The permittee must 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 19. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]

17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]

    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 required 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 assuring compliance with this permit or applicable requirements.

21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]

    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. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]

    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. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]