

# ADEQ

ARKANSAS  
Department of Environmental Quality

March 26, 2009

Marty Reep  
Plant EH&S Manager  
Armstrong Hardwood Flooring Company - Witt Facility  
P.O. Box 950  
Warren, AR 71671

Re: Notice of Administrative Amendment  
AFIN: 06-00014, Permit No.: 0427-AOP-R7

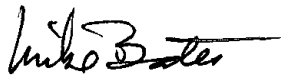
Dear Mr. Reep:

Enclosed is revised Permit 0427-AOP-R7 completed in accordance with the provisions of Section 26.901 of Regulation No. 26, *Regulations of the Arkansas Operating Air Permit Program*.

Section VII, Insignificant Activities has been revised to include the Green Planer. The process description was also updated to include the Green Planer.

Please place the revised permit in your files.

Sincerely,



Mike Bates  
Chief, Air Division

*jlb*  
Enclosure



# ADEQ OPERATING AIR PERMIT

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

Renewal # 2  
Permit No. : 0427-AOP-R7

IS ISSUED TO:

Armstrong Hardwood Flooring Company - Witt Facility  
688 Hwy 278 Bypass  
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:

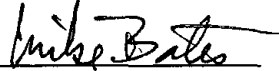
December 17, 2008

AND

December 16, 2013

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

  
Mike Bates  
Chief, Air Division

March 26, 2009  
Date

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Appendix A: 40 CFR Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

Armstrong Hardwood Flooring Company - Witt Facility  
Permit #: 0427-AOP-R7  
AFIN: 06-00014

List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Armstrong Hardwood Flooring Company - Witt Facility  
Permit #: 0427-AOP-R7  
AFIN: 06-00014

**SECTION I: FACILITY INFORMATION**

PERMITTEE: Armstrong Hardwood Flooring Company - Witt Facility

AFIN: 06-00014

PERMIT NUMBER: 0427-AOP-R7

FACILITY ADDRESS: 688 Hwy 278 Bypass  
Warren, AR 71671

MAILING ADDRESS: P.O. Box 950  
Warren, AR 71671

COUNTY: Bradley County

CONTACT NAME: Marty Reep

CONTACT POSITION: Plant EH&S Manager

TELEPHONE NUMBER: 870-226-7561

REVIEWING ENGINEER: Jennifer Boyette

UTM North South (Y): Zone 15: 3716849.85 m

UTM East West (X): Zone 15: 585525.97 m

Armstrong Hardwood Flooring Company - Witt Facility  
Permit #: 0427-AOP-R7  
AFIN: 06-00014

## SECTION II: INTRODUCTION

### Summary of Permit Activity

Armstrong Hardwood Flooring Company, formerly Robbins Hardwood Flooring, Inc., is located at 688 Highway 278 Bypass, Warren, Arkansas. The facility manufactures finished hardwood flooring. This permit action is to add a green lumber planer to the insignificant activities list. The process description was updated and no other changes were made to the permit.

### Process Description

The green lumber planer (listed in the insignificant activities list) will make all lumber a uniform dimension and thus easier to dry, stack and process through the plant. The planer will have an air driven collection system (a small air compressor will be installed) which will take the wood chips created by the unit and blow them into a truck load-out bin (peerless bin).

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 sixteen (16) kilns (SN-15 through SN-29). 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 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 allowed to cool before it is taken to the milling section (SN-37). In the milling section, lumber is ripped to 2 9/16" and 3 9/16" widths. 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 (2) hammer mills (hogs) (SN-38).

Wood from the milling section is sent to the Finishing 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 goes through a number of processes: sanders (which are vented to a dust collector), stain roll coater (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).

VOC emissions are combined and routed to the atmosphere. Emissions from sources 1-12 are bubbled and permitted as the Finishing Line (SN-1 through SN-12). A small (11 gallon) solvent distillation unit is used to recover solvent from coating and cleanup solvent wastes (insignificant activity). All particulate matter emissions generated at the Finish Line are collected and routed through the dust collection system.

Wood waste generated at the milling section or the finishing line is conveyed to the two hogs. Wood waste generated at the rework station is conveyed to the larger hog located on the west

side of the plant. 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 cyclone #'s 1&4. The clean air from these two cyclones is routed to one of the baghouses. From these cyclones, the dust is combined with baghouse dust and routed to cyclone #2 located at the truck loading area or to cyclone #3 in the boiler house area. From cyclone #2, 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 off-site. The facility has installed a dust collection system inside the truck loading station to minimize particulate matter emissions during loading operations. From cyclone #3, dust is separated from air and fed into silo#2 or #3. These two silos then feed the dust to the boiler feed system.

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. Air from the baghouse is then exhausted to the atmosphere. Dust from the baghouses and cyclones #1 and #4 is pneumatically conveyed to one of three dust collection silos or the truck loading bin. Prior to entering the silos, dirty air is sent through a cyclone. Cyclone #2 is located on top of dust collection silo #1 and can feed this silo or the truck loading bin. Cyclone #3 is located on top of the dust collection silo #2 and can feed either silo #2 or silo #3. Clean air from these two cyclones (#2 and #3) is part of a closed system that is routed back to the baghouse area.

The facility plans to install a fourth baghouse at source SN-01 through SN-12 (Finishing Line) to provide additional emissions control. Particulate emissions from the dust collection system are permitted under SN-37 & 38 bubbled, with the exception of the fourth baghouse where the emissions are permitted under the finishing line.

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 re-injection. Clean air is emitted to the atmosphere. Particulate emissions from boiler SN-41 are controlled with an electrostatic precipitator (ESP). The boilers have rated heat inputs of 28.08 MMBtu/hr (SN-13) and 53.3 MMBtu/hr (SN-41) and both are subject to federal NSPS Subpart Dc standards.

### Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective January 25, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009
40 CFR Subpart Dc - <i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</i>



**Emission Summary**

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	Tpy
Total Allowable Emissions		PM	31.2	120.9
		PM <sub>10</sub>	31.2	120.9
		SO <sub>2</sub>	2.1	9.0
		VOC	145.1	242.8
		CO	23.1	101.2
		NO <sub>x</sub>	40.0	175.1
		Lead	0.02	0.03
HAPs		Acrolein*	0.34	**
		Benzene*	0.35	
		Beryllium	0.02	
		Cadmium	0.02	
		Chromium, IV	0.02	
		Chlorine	0.08	
		Ethyl benzene*	3.02	
		Ethylene Glycol Mono Propyl Ether*	3.00	
		Formaldehyde*	0.37	
		Hydrochloric Acid	1.56	
		Manganese	0.14	
		Mercury	0.10	
		Methyl Isobutyl Ketone*	3.00	
		Phenol*	0.02	
		Styrene*	0.17	
		Toluene*	3.08	
	Xylene*	3.02		
SN-01 – SN-12	Finishing Lines	VOC	133.0	189.9
		PM	2.0	8.5
		PM <sub>10</sub>	2.0	8.5
		Ethyl benzene*	3.00	**
		Ethylene Glycol Mono Propyl Ether*	3.00	
		Methyl Isobutyl Ketone*	3.00	
		Toluene*	3.00	
		Xylene*	3.00	

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	Tpy
SN-13	Wood-fired Boiler (28.08 MMBTU/hr)	PM	14.6	63.9
		PM <sub>10</sub>	14.6	63.9
		SO <sub>2</sub>	0.7	3.1
		VOC	1.1	4.8
		CO	9.3	40.7
		NO <sub>x</sub>	13.8	60.3
		Lead	0.01	0.01
		Acrolein*	0.12	0.50
		Benzene*	0.12	0.52
		Beryllium	0.01	0.01
		Cadmium	0.01	0.01
		Chromium, IV	0.01	0.01
		Chlorine	0.03	0.10
		Ethyl benzene*	0.01	0.01
		Formaldehyde*	0.13	0.55
		Hydrochloric Acid	0.54	2.34
		Manganese	0.05	0.20
		Mercury	0.01	0.01
		Phenol*	0.01	0.01
		Styrene*	0.06	0.24
Toluene*	0.03	0.12		
Xylene*	0.01	0.01		
SN-15 - SN-29	Hardwood Lumber Drying Kilns	PM	1.9	8.1
		PM <sub>10</sub>	1.9	8.1
		VOC	8.9	39.0
SN-30 to SN-35, 39,40, 42	Hardwood Lumber Drying Kilns	Permanently Retired		
37/38	Wood Processing	PM	6.3	27.3
		PM <sub>10</sub>	6.3	27.3
41	Wood-fired Boiler (53.5 MMBTU/hr)	PM	1.9	8.3
		PM <sub>10</sub>	1.9	8.3
		SO <sub>2</sub>	1.4	5.9
		VOC	2.1	9.1
		CO	13.8	60.5
		NO <sub>x</sub>	26.2	114.8
		Lead	0.01	0.02

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	Tpy
		Acrolein*	0.22	0.94
		Benzene*	0.23	0.99
		Beryllium	0.01	0.01
		Cadmium	0.01	0.01
		Chromium, IV	0.01	0.01
		Chlorine	0.05	0.19
		Ethyl benzene*	0.01	0.01
		Formaldehyde*	0.24	1.04
		Hydrochloric Acid	1.02	4.46
		Manganese	0.09	0.38
		Mercury	0.01	0.01
		Phenol*	0.01	0.02
		Styrene*	0.11	0.45
		Toluene*	0.05	0.22
		Xylene*	0.01	0.01
43	Truck Loadout Station	PM	4.5	4.8
		PM <sub>10</sub>	4.5	4.8

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

\*\*Subject to a Plantwide Limit of 9.5 tpy of a single HAP and 23.75 tpy of combined 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.

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- 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.
- 427-AOP-R4 Issued on June 24, 2004. This minor modification incorporated 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 was 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.
- 427-AOP-R5 Issued on July 6, 2006. This minor modification limited the facility's total plantwide HAP emissions to 9.5 ton/yr single HAP and 23.75 tpy of total HAPs. By lowering plantwide totals of HAP emissions, the facility is not subject to NESHAP QQQQ – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products*. In addition to a plantwide HAP limit, HAPs from SN-13 and SN-41 were reviewed and several additional HAPs were added to the permit. There were no actual criteria pollutant changes but because of the HAP review, 0.03 tpy of Pb were added to the permit.
- 427-AOP-R6 Issued on December 17, 2008. This permit action was a renewal of permit 0427-AOP-R5. The facility proposed to install a conveying system which feeds general plant wood waste directly into the hog system (SN-38) in order to improve plant wood recycling; modify the Finishing line rail system and sander to improve efficiency; and install a baghouse at the Finishing Line (SN-01 to SN-12) to provide additional emissions control. These modifications did not result in an increase of VOC or HAP emissions.

Nine kilns (SN-30 through SN-35, SN-39, SN-40, and SN-42) were permanently retired. One small (11 gallon) solvent distillation unit, drums and containers for coating and cleanup solvent storage, one diesel-fired fire pump, and one 150-kW natural gas fired emergency generator were added to the insignificant activities list.

The facility proposed to revise the CO emission limit for the large wood-fired boiler (SN-41) based on recently revised CO emission test data; adjust PM emissions to include the PM condensable fraction, use a uniform safety factor of 30%, and to apply a ratio of 1.3 to the average stack test data.

The permitted emissions changes were: 29.2 tpy increase in PM/PM<sub>10</sub>, 33.8 tpy increase in CO, and 0.1 tpy decrease in VOC.

**SECTION IV: SPECIFIC CONDITIONS**

SN-01 through SN-12

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), 2<sup>nd</sup> and 3<sup>rd</sup> top coat roll coaters (SN-11), and IR oven & UV reactor (SN-12).

Particulate matter from the enclosed sanding machines is collected and routed to the baghouse at SN-12 and the older dust collection system. 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. HAPs 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 shall demonstrate compliance with this condition by Specific Conditions 3&4. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01-12	Finishing Line	VOC	133.0	189.9
01-12	Finishing Line	PM <sub>10</sub>	2.0	8.5

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions 5 & 6. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01-12	Finishing Line	PM	2.0	8.5
		Ethyl benzene	3.00	*
		Ethylene Glycol Mono Propyl Ether	3.00	

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SN	Description	Pollutant	lb/hr	tpy
		Toluene	3.00	
		Xylene	3.00	
		Methyl Isobutyl Ketone	3.00	

\*Subject to facility wide HAP limit of 9.5 tpy Single HAP or 23.75 total HAP.

Limits and Recordkeeping Requirements

3. The VOC content of all coating compounds used at the facility shall not exceed 7.0 lb/gal. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. The permittee shall maintain monthly totals of VOC emissions, in tons, which demonstrate compliance with the limits of Specific Conditions 1 & 3. 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 15<sup>th</sup> day of the month following the month to which the records pertain. These records and associated MSDS, a manufacturer's specification, or equivalent documentation 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]
5. The permittee shall not exceed the following HAP content limits in any coating, solvent, or adhesive material used at the facility. To demonstrate compliance with this condition: MSDS, a manufacturer's specification, or equivalent documentation shall be maintained on site for all coatings and solvent materials used at the facility which proves the HAP content is at or below the permitted limit. This documentation will be made available to Department personnel upon request. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Hazardous Pollutant	Maximum Allowable Content (lb/gal)
Ethyl benzene	0.16
Ethylene Glycol Mono Propyl Ether	0.16
Toluene	0.16
Xylene	0.16
Methyl Isobutyl Ketone	0.16

6. The permittee shall maintain monthly totals of individual HAP emissions, in tons, to demonstrate compliance with Specific Conditions 2. These records shall be maintained on a monthly basis and updated by the 15<sup>th</sup> day of the month following the month to which the records pertain. These records 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]
7. Visible emissions from the baghouse at SN-12 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 SN-01-12 Baghouse

8. For the baghouse at the Finishing Line, SN-10-12, the permittee shall:
  - A. Conduct daily visual inspections, when the plant is in operation, of the duct system and the silo for possible sawdust emissions. [40 CFR Part §64.6I(1)]
  - B. Record the presence of any visible emissions and the subsequent actions taken to reduce visible emissions. [40 CFR Part §64.6I(1)]
9. For the baghouse at SN-01-12, 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-13 and SN-41  
Wood Fired Boilers

Source Description

Steam generated by two boilers is used in the drying kilns. The boilers are subject to the provisions of 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

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 re-injection.

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.

Specific Conditions

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions 17&18. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
13	Wood-fired Boiler (28.08 MMBTU/hr)	PM <sub>10</sub>	14.6	63.9
		SO <sub>2</sub>	0.7	3.1
		VOC	1.1	4.8
		CO	9.3	40.7
		NO <sub>x</sub>	13.8	60.3
		Lead	0.01	0.01
41	Wood-fired Boiler (53.5 MMBTU/hr)	PM <sub>10</sub>	1.9	8.3
		SO <sub>2</sub>	1.3	5.9
		VOC	2.1	9.1
		CO	13.8	60.5
		NO <sub>x</sub>	26.2	114.8
		Lead	0.01	0.02

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11. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions 17 & 18. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
13	Wood-fired Boiler (28.08 MMBTU/hr)	PM	14.6	63.9
		Acrolein*	0.12	0.50
		Benzene*	0.12	0.52
		Beryllium	0.01	0.01
		Cadmium	0.01	0.01
		Chlorine	0.03	0.10
		Ethyl benzene*	0.01	0.01
		Formaldehyde*	0.13	0.55
		Hydrochloric Acid	0.54	2.34
		Manganese	0.05	0.20
		Mercury	0.01	0.01
		Phenol*	0.01	0.01
		Styrene*	0.06	0.24
		Toluene*	0.03	0.12
Xylene*	0.01	0.01		
41	Wood-fired Boiler (53.5 MMBTU/hr)	PM	1.9	8.3
		Acrolein*	0.22	0.94
		Benzene*	0.23	0.99
		Beryllium	0.01	0.01
		Cadmium	0.01	0.01
		Chlorine	0.05	0.19
		Ethyl benzene*	0.01	0.01
		Formaldehyde*	0.24	1.04
		Hydrochloric Acid	1.02	4.46

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SN	Description	Pollutant	lb/hr	tpy
		Manganese	0.09	0.38
		Mercury	0.01	0.01
		Phenol*	0.01	0.02
		Styrene*	0.11	0.45
		Toluene*	0.05	0.22
		Xylene*	0.01	0.01

\*HAPs are included in VOC totals.

12. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
13	20%	Regulation 19, §19.304
41		

13. The permittee shall conduct daily 6-minute opacity readings required under Specific Condition 12 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]

NSPS Conditions

14. The permittee shall record and maintain daily records of the amounts of wood combusted in each of the boilers, SN-13 and SN-41. [Regulation 19, §19.304 and 40 CFR §60.48c(g)]
15. The permittee shall maintain records required under Specific Condition 14 for a period of two years following the date of such records. [Regulation 19, §19.304 and 40 CFR §60.48c(i)]
16. The particulate emissions from SN-41 shall not exceed 0.1 lb/MMBtu. [Regulation 19, §19.304 and 40 CFR §60.43c(b)(1)]

### Throughput Limits

17. The permittee shall not use more than 15,600 tons of wood as a fuel at SN-13 for any consecutive twelve month period. [Regulation 19, §19.705 A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6]
18. The permittee shall not use more than 31,300 tons of wood as a fuel at SN-41 for any consecutive twelve month period. [Regulation 19, §19.705 A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6]
19. The permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions 17 and 18. These records shall be maintained on a monthly basis and updated by the 15<sup>th</sup> 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. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

### HAP Calculations

20. The permittee shall calculate and maintain a record of HAPs emitted from the wood boilers on a monthly basis. In lieu of actual testing, the permittee shall use AP-42 factors for wood waste combustion, Tables 1.6-3 and 1.6-4. The permittee shall base HAP calculations upon actual usage of wood. The permittee shall update these factors before the end of each calendar year. 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.

### Testing Requirements

21. 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 five (5) years. [Regulation 19, §19.702 and 40 CFR 52, Subpart E]
22. The permittee shall perform a one-time stack test of SN-13 and SN-41 for NO<sub>x</sub> emissions. Testing shall be performed in accordance with Plantwide Conditions 3 and 4 and Reference Method 10E. This test was conducted in April of 2004. [Regulation 19, §19.702 and 40 CFR 52, Subpart E]

CAM Requirements for SN-41 ESP

23. 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 §64.6I(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 §64.6I(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 §64.6I(3)]
- D. Confirm secondary current and secondary voltage is zero when the unit is not operating. [40 CFR Part §64.6I(1)]
- E. Maintain documentation of routine inspections and any maintenance activities performed. [40 CFR Part §64.9(b)]

24. 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-29  
 Drying Kilns

Source Description

Drying Kilns (SN-15 through SN-29) are used to reduce the lumber's moisture content to a typical range of 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

25. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Condition 29. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
SN-15 through SN-29	Drying Kilns	PM <sub>10</sub>	1.9	8.1
		VOC	8.9	39.0

26. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Condition 29. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-15 through SN-29	Drying Kilns	PM	1.9	8.1

27. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
SN-15 through SN-29	10%	Regulation 18, §18.501

28. 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. [Regulation 19, §19.702 and 40 CFR 52, Subpart E]

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29. The permittee shall not dry more than 76,470,000 board feet of hardwood lumber for any consecutive twelve month period. [Regulation 19, §19.705 A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6]
  
30. 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 15<sup>th</sup> 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. [Regulation 19, §19.705 and 40 CFR 52, Subpart E]

SN-37 & SN-38  
 Material Handling

Source Description

SN-37 Milling Process. 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.

SN-38 Hammer Mills. Wood waste generated at the milling section or the finishing line is conveyed to the hogs. The large hog on the west side of the building goes to cyclone #1. The smaller hog on the east side of the building goes to cyclone #4. The clean air from these two cyclones is routed to the baghouses. Particulate emissions from SN-37 and SN-38 are bubbled and based on the baghouse control.

Specific Conditions

31. The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
SN-37&38	Material Handling	PM <sub>10</sub>	6.3	27.3

32. The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-37&38	Material Handling	PM	6.3	27.3

33. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.



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SN	Limit	Regulatory Citation
37 & 38	5%	Regulation 18, §18.501

34. The permittee shall only process untreated wood-waste in the hogs of the Hammer Mill (SN-38). Untreated wood refers to wood which has had no coatings applied. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

CAM Requirements Baghouses

35. The permittee shall:
- A. Conduct daily visual inspections, when the plant is in operation, of the duct system and the silo for possible sawdust emissions. [40 CFR Part §64.6I(1)]
  - B. Record the presence of any visible emissions and the subsequent actions taken to reduce visible emissions. [40 CFR Part §64.6I(1)]
36. 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-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 material handling.

Specific Conditions

37. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Condition 41. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
SN-43	Truck Loadout Station	PM <sub>10</sub>	4.5	4.8

38. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Condition 41. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-43	Truck Loadout Station	PM	4.5	4.8

39. Visible emissions from the truck loadout station (SN-43) shall not exceed 10% opacity. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
40. 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. [Regulation 19, §19.702 and 40 CFR 52, Subpart E]
41. 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 15<sup>th</sup> 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. [Regulation 19, §19.705 A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]

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#### **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

Armstrong Hardwood Flooring Company - Witt Facility 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: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. 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 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise 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 shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide:
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

#### Plantwide HAP Limits

7. The permittee shall emit no more than 9.50 tons of a single hazardous air pollutant (HAPs) or 23.75 tpy of total hazardous air pollutants from The Finishing Line (SN-01 through SN-12) and from the Wood-Fired Boilers (SN-13 and SN-41) at the facility during any consecutive 12-month period. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall maintain monthly records which demonstrate compliance with Plantwide Condition 8. These records shall be maintained in a spreadsheet, database, or other well-organized format. These records shall indicate the total and individual HAPs emitted from The Finishing Line (SN-01 through SN-12) and from the permitted limits of Wood-Fired Boilers (SN-13 and SN-41). [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

#### Acid Rain (Title IV)

9. 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

10. 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.

11. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
  - 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.
12. 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.
13. 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.

14. 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.

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### SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. 0. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 9, 2008.

Description	Category
1,000 gallon diesel tank	A-3
Chemical storage room and exhaust fan	A-13
Small (11 gallon) Solvent Distillation Unit	A-10
Drums and small containers for coating and cleanup solvent storage and handling	A-2
Diesel-Fired Fire Pump (345 hp)	A-1
150-kW Natural Gas Fired Emergency Generator	A-1
Green Planer	A-13

### SECTION VIII: GENERAL PROVISIONS

1. 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. [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)]
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 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 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
  - 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.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]



6. The permittee must retain the records of all required monitoring data and support information for at least five (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 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (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 thirty (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:

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Regulation 19, § 19.601), 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:
    - i. The facility name and location;
    - ii. The process unit or emission source deviating from the permit limit;
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
    - iv. The date and time the deviation started;
    - v. The duration of the deviation;
    - vi. The average emissions during the deviation;
    - vii. The probable cause of such deviations;
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
    - ix. The name of the person submitting the report.

The permittee shall 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.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

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), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §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 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 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 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 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 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 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 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 26, §26.701(H)]
17. If the permit allows 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 operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 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 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 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 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 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

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- 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 shall 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 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 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 A.C.A. §8-4-304 and §8-4-311]
  24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
    - a. Such an extension does not violate a federal requirement;
    - b. The permittee demonstrates the need for the extension; and
    - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

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[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
  - b. Such a request is temporary in nature;
  - c. Such a request will not result in a condition of air pollution;
  - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
  - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
  - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
  - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
  - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]

