

ADEQ OPERATING AIR PERMIT

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

Permit No. : 0559-AOP-R4
Renewal #1
IS ISSUED TO:
Century Flooring Company
State Highway 9 Spur
Melbourne, Arkansas 72556
Izard County
AFIN: 33-00013

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:

JANUARY 30, 2006 AND JANUARY 29, 2011

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

Signed:

Mike Bates
Chief, Air Division

Date Modified

Table of Contents

SECTION I: FACILITY INFORMATION	4
SECTION II: INTRODUCTION	5
Summary of Permit Activity	5
Process Description	5
Regulations	6
Emission Summary	7
SECTION III: PERMIT HISTORY	10
SECTION IV: SPECIFIC CONDITIONS	11
SN-01, 02 and 03	11
SN-05 and 06	13
SN-07, 08, 09, 10, and 21	16
SN-17	19
SN-19	21
SN-20	23
SECTION V: COMPLIANCE PLAN AND SCHEDULE	25
SECTION VI: PLANTWIDE CONDITIONS	26
SECTION VII: INSIGNIFICANT ACTIVITIES	27
SECTION VIII: GENERAL PROVISIONS	28

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 _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	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Century Flooring Co.
Permit #: 0559-AOP-R4
AFIN: 33-00013

SECTION I: FACILITY INFORMATION

PERMITTEE: Century Flooring Co.
AFIN: 33-00013
PERMIT NUMBER: 0559-AOP-R4
FACILITY ADDRESS: State Highway 9 Spur
Melbourne, AR 72556
MAILING ADDRESS: P.O. Box 480
Melbourne, Arkansas 72556
COUNTY: Izard
CONTACT POSITION: Henry Ihnfeldt
TELEPHONE NUMBER: (870) 368-4000
REVIEWING ENGINEER: Patty Campbell
UTM North South (Y): Zone 15: 3,990.94
UTM East West (X): Zone 15: 597.225

SECTION II: INTRODUCTION

Summary of Permit Activity

Century Flooring Company (Century) (AFIN: 33-00013) owns and operates a hardwood flooring mill located at State Highway 9 Spur, Melbourne, Izard County, Arkansas 72556. This application requests installation of a new Flat Line finishing process, which will apply a UV wood Filler. The potential to emit is calculated based on the maximum operating schedule of 8,760 hours per year. Volatile Organic Compounds (VOC) and Particulate Matter (PM) are the only emissions generated from the Flat Line process. VOC as constituents of UV Fillers (SN-21) will be released as emissions at the reverse roll coating system of the Flat Line process. PM/PM₁₀ emissions will be emitted at the two Flat Line scuffing stations and will be pneumatically conveyed to an existing baghouse (SN-03). The only emission increase permitted with this modification is the 0.7 tpy VOC associated with the UV Filler (SN-21).

Process Description

Pre-cut red/white oak, or other species of lumber, are brought to the facility by truck and unloaded at the yard office. The lumber is inspected and graded for quality and stacked in one of three lumberyards, where ambient conditions reduce the moisture content of the wood from 18 to 25 percent. The lumber is typically stored in this area for 120 days.

The lumber is then placed in one of twelve (12) steam-heated drying kilns to further reduce the moisture content of the lumber from 6 to 9 percent. The kilns vary in size from 65,000 board feet per load to 135,000 board feet per load. The kiln dried lumber is moved to cooling sheds for approximately three days to reduce the temperature and stabilize the wood. The lumber is eventually moved from the cooling sheds to the Flooring Plant for additional processing.

Once in the Flooring Production Area, the lumber is checked for moisture content and quality. All excessive crook and bow are removed from the lumber. The lumber is cut, shaped, and graded to specified widths and thicknesses. Rough flooring and other undesirable natural and machining defects are removed. The flooring is end-matched with a tongue-and-groove configuration and graded before finally being packaged. The packaged, unfinished flooring continues on for processing in the Finishing Department.

Wood residuals from the Flooring Production Area operations are collected by the Flooring Plant (Pneumafil) Baghouse (SN-01) or the Cyclone Return (Carter Day) Baghouse (SN-02), which removes 99.9% of the wood fines. Dust generated from sanding and scuffing operations are collected by the Floor Sanding (Carter Day) Baghouse (SN-03), which removes 99.9% of the wood fines.

Century is planning for the installation and operation of a Flat Line finishing system. The Flat Line process will consist of two 2-lamp ultraviolet (UV) curing units, two 2-station scuffing units, and one reverse roll coating system. Selected unfinished flooring is sent to the existing Prefinishing Area, where the material is stained (SN-08). Stained product will enter the Flat Line at the first UV unit to ensure the stain (SN-08) is fully cured. The fully cured product then enters the first scuffing unit to remove any raised grain. Open grain on the product is filled in

with UV wood filler (SN-21) applied at the reverse roll coating system. The product then enters the second UV unit where the filler is cured prior to entering the second scuffing unit. After the second scuffing unit, the product is transferred to the Prefinishing Area where it is covered with two seal coats (SN-09), and three topcoats (SN-10) before being boxed and removed to the Finished Goods Warehouse. The stains, UV filler, and sealants are dried using Electric UV ovens. The cleaning of equipment in this area is also a source of VOC emissions. The equipment used throughout the Finishing Department is periodically cleaned (SN-07).

The Century Flooring facility has recently switched to using all ultraviolet (UV) products in the Finishing Department. Electric UV ovens are used to cure the finishes. The 1,200-standard cubic feet per hour (scf/h) natural gas-fired oven (SN-11) used to cure the solvent-based finishing products has been converted to a UV oven. Natural gas fuel is not utilized in this source.

Sawdust, sander dust, and shavings from the machine processes and pulverized wood scrap from the hog are pneumatically conveyed to four fuel storage silos. Particulate matter from the conveying system and the filling of the silos are collected by a Carter Day Heavy Duty High Efficiency Cyclone (SN-04). Particulate matter emitted by this cyclone is routed to the Cyclone Return Baghouse (SN-02) for control.

The wood residuals are collected in the silos before being fed to the Deltak (SN-05) or Keeler (SN-06) boilers. Not all of the wood waste collected in the silos is fed as fuel to the Deltak or Keeler Boilers; some of it is sold and loaded out onto trucks (SN-20) from the Peerless bin. The boilers have individual steam ratings of 35,000 pounds of steam per hour and are controlled by Zurn fly-ash arrestors.

A 10,000-gallon diesel above ground storage tank (ASTI) (SN-18) is also present at the Melbourne facility. The contents of this AST are used to fuel facility equipment and vehicles and to supply a diesel generator (SN-19). The generator, which is rated at 680 kilowatts, is used to provide power during outages and can be used during periods when boiler fuel inventories are low.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective May 28, 2006
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002

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

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	31.2	132.9
		PM ₁₀	31.2	132.9
		SO ₂	4.7	6.3
		VOC	36.8	34.3
		CO	26.8	97.6
		NO _x	40.2	91.1
HAPs		Acrolein*	0.19	0.83
		Arsenic	0.01	0.01
		Chlorine*	0.04	0.16
		Formaldehyde*	0.21	0.99
		Hydrogen Chloride	0.91	4.00
		Lead	0.01	0.01
		Manganese	0.08	0.33
		Toluene*	0.05	0.19
		Xylene*	0.10	0.20
		HAPs	29.15 ¹	7.97 ¹
Air Contaminants **		Methanol	2.46	3.12
SN	Description	Pollutant	lb/hr	tpy
01	Flooring Plant Baghouse	PM	1.8	7.7
		PM ₁₀	1.8	7.7
02	Cyclone Return Baghouse	PM	1.8	7.6
		PM ₁₀	1.8	7.6
03	Floor Sanding Baghouse	PM	1.8	7.6
		PM ₁₀	1.8	7.6

EMISSION SUMMARY					
Source Number	Description	Pollutant	Emission Rates		
			lb/hr	tpy	
05	Deltak Hogged-Fuel Boiler and Keeler Hogged-Fuel Boiler	PM	25.0	109.5	
		PM ₁₀	25.0	109.5	
		SO ₂	1.0	4.4	
		VOC	0.7	3.1	
		CO	21.7	95.0	
		NO _x	18.3	80.2	
		Acrolein	0.19	0.83	
		Arsenic	0.01	0.01	
		Chlorine	0.04	0.16	
		Formaldehyde	0.21	0.92	
		Hydrogen Chloride	0.91	4.0	
		Lead	0.01	0.01	
		Manganese	0.08	0.33	
		Toluene	0.05	0.19	
06	Keeler Hogged-Fuel Boiler	PM	25.0	***	
		PM ₁₀	25.0		
		SO ₂	1.0		
		VOC	0.7		
		CO	21.7		
		NO _x	18.3		
		Acrolein	0.19		
		Arsenic	0.01		
		Chlorine	0.04		
		Formaldehyde	0.21		
		Hydrogen Chloride	0.91		
		Lead	0.01		
		Manganese	0.08		
		Toluene	0.05		
07	Prefinishing Area (Cleaning Equipment)	VOC	19.3	24.3 ¹ 7.97 ¹	
		HAP			
08	Prefinishing Area (Stains)	VOC			2.3
		HAP			
09	Prefinishing Area (Seal Coats)	VOC			2.3
		HAP			
10	Prefinishing Area (Topcoats)	VOC	5.3		
		HAP			
21	Prefinishing Area & Flat Line (UV Filler)	VOC	0.2		
17	Lumber Drying Kilns (12 total)	VOC	5.3	6.5	
		Formaldehyde	0.06	0.07	
		Methanol	2.46	3.12	

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
19	Diesel Generator	PM	0.7	0.4
		PM ₁₀	0.7	0.4
		SO ₂	3.7	1.9
		VOC	0.7	0.4
		CO	5.1	2.6
		NO _x	21.9	10.9
20	Woodwaste Loadout	PM	0.1	0.1
		PM ₁₀	0.1	0.1

*HAPs are 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.

*** Annual emissions from SN-06 are included at SN-05.

¹Maximum emission rates from the Finishing Area (SN-07, 08, 09, 10, and 21).

SECTION III: PERMIT HISTORY

- 559-A This is the initial permit for the facility issued on May 28, 1979. Color Tile (what is now Century flooring) proposed the installation of a facility to manufacture hardwood parquet flooring.
- 559-AR-1 This permit was issued on September 29, 1988. In this modification, Color Tile installed a new finish line. The new coatings are polymerized with ultraviolet light.
- 559-AR-2 This permit was issued on November 11, 1992. This permit action represents the change of ownership from Color Tile to Mannington Mills, Inc.
- 559-AOP-R0 This permit was issued on March 26, 1998. This permit action represents the issuance of an initial Regulation #26 permit and the change of ownership from Mannington Mills, Inc to Century Flooring Company. In addition, some emissions from several sources were included that were not previously permitted.
- 559-AOP-R1 This was the first modification to permit 559-AOP-0 issued on February 9, 1999. This permit modification addressed the addition of two lumber drying kilns (SN22 and SN-23) to increase the hourly drying capacity of the facility. The allowable annual lumber drying rates for the entire facility did not change and there was no increase in annual emissions (annual lumber dried by SN-16 and SN-17 decreased).
- 559-AOP-R2 The permit was issued on June 29, 2000. This permitting action allowed the facility an opacity limit of 20% for the Deltak (SN-05) and Keeler (SN-06) Boilers. The facility also recalculated the Prefinish Line Curing Oven (SN-11) emissions due to revised EPA AP-42 factors for natural gas combustion.
- 0559-AOP-R3 The permit was issued on January 30, 2006. Along with a permit renewal the facility modified their permit to allow for the installation of four (4) new lumber kilns, the revision of emission factors used at the boiler from stack testing, and the removal of a natural gas fired curing oven. These changes to the permit resulted in the reduction of permitted emissions of 58.2 tons per year for particulate matter, 23.1 tons per year for sulfur dioxide, 139.9 tons per year of volatile organic compounds (VOC), and 137.5 tons per year of carbon monoxide (CO).

SECTION IV: SPECIFIC CONDITIONS

SN-01, 02 and 03 Flooring Production Area

Source Description

Lumber from the drying kilns is sent to the Flooring Production Area to produce flooring. The lumber is cut by two rip saws, shaped through a molder, and graded to specified widths and thicknesses. The resulting flooring is end matched with a tongue and groove configuration. Wood dust from the sawing and molding operations is collected by the flooring plant baghouse (SN-01) or the cyclone return baghouse (SN-02). Dust generated from sanding and scuffing operations, including the new Flat Line process system, is collected by the floor sanding baghouse (SN-03).

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 complying with Specific Conditions 4 and 5. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
01	PM ₁₀	1.8	7.7
02	PM ₁₀	1.8	7.6
03	PM ₁₀	1.8	7.6

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 4 and 5. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
01	PM	1.8	7.7
02	PM	1.8	7.6
03	PM	1.8	7.6

3. 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
01	5%	§18.501
02	5%	§18.501
03	5%	§18.501

4. Weekly observations of the opacity from SN-01, SN-02, and SN-03 will be conducted by personnel familiar with the permittee's visible emissions. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. [Regulation No. 19 §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. The date and time of the observation.
 - b. If visible emissions which appeared to be above the permitted limit were detected.
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

5. The permittee shall operate each baghouse (SN-01, SN-02, and SN-03) at all times when the Flooring Production Area is in operation. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E].

SN-05 and 06
 Wood Fired Boilers

Source Description

Dust and shavings from all machine processes and pulverized wood scrap from the hog are pneumatically conveyed to fuel storage silos. The dust and shavings are collected in the silos before being fed to the boilers (SN-05 and SN-06) or loaded out (SN-20) to trucks. Both boilers, the Deltak (SN-05) and the Keeler (SN-06), are rated at 47.64 MMBtu per hour and are equipped with a Zurn flyash dry type arrestor to control particulate matter emissions. Neither boiler is subject to NSPS Subpart D_b because the installation dates precede the effective date of the NSPS Subpart D_b regulations.

Specific Conditions

6. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 9 and 10. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
05	PM ₁₀	25.0	109.5
	SO ₂	1.0	4.4
	VOC	0.7	3.1
	CO	21.7	95.0
	NO _x	18.3	80.2
06	PM ₁₀	25.0	*
	SO ₂	1.0	
	VOC	0.7	
	CO	21.7	
	NO _x	18.3	

*Annual emissions from SN-06 are included at SN-05.

7. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 9 and 10. [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	Pollutant	lb/hr	tpy
05	PM	25.0	109.5
	Acrolein	0.19	0.83
	Arsenic	0.01	0.01
	Chlorine	0.04	0.16
	Formaldehyde	0.21	0.92
	Hydrogen Chloride	0.91	4.0
	Lead	0.01	0.01

SN	Pollutant	lb/hr	tpy
	Manganese	0.08	0.33
	Toluene	0.05	0.19
06	PM	25.0	*
	Acrolein	0.19	
	Arsenic	0.01	
	Chlorine	0.04	
	Formaldehyde	0.21	
	Hydrogen Chloride	0.91	
	Lead	0.01	
	Manganese	0.08	
	Toluene	0.05	

*Annual emissions from SN-06 are included at SN-05.

8. 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
05	20%	§19.503
06	20%	§19.503

9. Daily observations of the opacity from SN-05 and SN-06 will be conducted by personnel familiar with the permittee's visible emissions. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. [Regulation No. 19 §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- a. The date and time of the observation.
 - b. If visible emissions which appeared to be above the permitted limit were detected.
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

10. The permittee shall conduct stack emissions testing on the Deltak wood fired boiler (SN-05) to measure the following pollutants by the indicated US EPA Reference Test Method as published in 40 CFR Part 60 Appendix A. [§19.702 of Regulation 19 and 40 CFR Part 52 Subpart E]

Pollutant	EPA Test Method
PM	5 and 202
CO	10

The facility shall perform this testing every 5 years from the date of the last successful test. If at any time the facility fails one of the 5-year tests, or the facility conducts additional modifications to either boiler, then the facility must conduct two successive annual tests. If both of these annual tests are successful, then the facility may return to the five-year testing schedule.

All tests shall be conducted with the boiler operating at 90% or greater of capacity. Failure to test at or above this level shall limit the permittee to operating within 10% above the tested rate. The ADEQ Air Division Compliance Inspector Supervisor shall be notified at least 15 days prior to the testing. Results of all testing shall be submitted to the address indicated in General Provision #7.

11. The permittee shall operate the Keeler boiler (SN-06) as a back-up boiler only and may be in operation a maximum of 1 hr during periods of start-up/shutdown while the Deltak boiler (SN-05) is in operation. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]
12. The permittee shall maintain records that demonstrate compliance with Specific Condition 11 which may be used by the Department for enforcement purposes. These records shall indicate the date and time of the start-up and shutdown for each boiler. These records shall be updated daily, kept on site, and made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

SN-07, 08, 09, 10, and 21

Prefinishing Area and Flat Line

Source Description

Century is planning for the installation and operation of a Flat Line finishing system. The Flat Line process will consist of two 2-lamp ultraviolet (UV) curing units, two 2-station scuffing units, and one reverse roll coating system. Selected unfinished flooring is sent to the existing Prefinishing Area, where the material is stained (SN-08). Stained product will enter the Flat Line at the first UV unit to ensure the stain (SN-08) is fully cured. The fully cured product then enters the first scuffing unit to remove any raised grain. Open grain on the product is filled in with UV wood filler (SN-21) applied at the reverse roll coating system. The product then enters the second UV unit where the filler is cured prior to entering the second scuffing unit. After the second scuffing unit, the product is transferred to the Prefinishing Area where it is covered with two seal coats (SN-09), and three topcoats (SN-10) before being boxed and removed to the Finished Goods Warehouse. The stains, UV filler, and sealants are dried using Electric UV ovens. The cleaning of equipment in this area is also a source of VOC emissions. Emissions from the cleaning process are represented as SN-07.

Specific Conditions

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition complying with Specific Conditions 15, 16, 17, and 18. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
07	VOC	19.3	24.3
08	VOC	2.3	
09	VOC	2.3	
10	VOC	5.3	
21	VOC	0.2	

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 19 and 20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
07	HAPs	19.3	7.97
08	HAPs	2.3	
09	HAPs	2.3	
10	HAPs	5.25	

15. The VOC content of the cleaning solvents used at SN-07 shall not exceed 7.65 lb/gal without first obtaining a modification to this permit. Records of the VOC content shall be kept on site and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
16. The VOC content of the UV Stains, Sealers, and Topcoats used at SN-08, 09, and 10 shall not exceed 0.53 lb/gal. Records of the VOC content shall be kept on site and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. The VOC content of the UV Filler used at SN-21 shall not exceed 0.03 lb/gal without first obtaining a modification to this permit. The UV Fillers are non-HAP containing material. Records of the VOC content shall be kept on site and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee shall maintain records of VOC usage at SN-07, 08, 09, 10, and 21 on a monthly basis. VOC emissions shall be calculated from the usage records each month, and shall not exceed 24.3 tons per year, on a 12-month rolling total. The records and calculations shall be kept on site and made available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
19. The permittee shall maintain records of HAP usage at SN-07, 08, 09, and 10 on a monthly basis. HAP emissions shall be calculated from the usage records each month, and shall not exceed 7.97 tons per year, on a 12-month rolling total. The records and calculations shall be kept on site, made available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
20. HAP-containing materials are allowable for use at the facility within the parameters listed below. Any HAP, which is defined as a volatile organic compound (VOC), may be used within the maximum content limits described in the following table: [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Minimum HAPs TLV (mg/m³)	Maximum Content *
205	100%
184.5	90%
164	80%
143.5	70%
123	60%
102.5	50%

Minimum HAPs TLV (mg/m³)	Maximum Content *
82	40%
61.5	30%
41	20%
20.5	10%
10.25	5%
2.05	1%

Century Flooring Co.
Permit #: 0559-AOP-R4
AFIN: 33-00013

*The maximum content is the HAP content, as stated in the MSDS in lb/gal, divided by the VOC content limit stated in Specific Condition 15 or 16. This is not equivalent to wt% as stated on the MSDS.

Compliance will be determined using ACGIH TLV values as listed in the ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs). If no TLV is available from these sources, the facility may request the use of an alternate value from the Department. The permittee shall once-per-year, on or before the permit anniversary date, research and update, as necessary, TLV values for all HAPs in use. Additionally, the permittee will update specific TLV values on the subsequent monthly emissions record if notified in writing by the Department of such changed values. Proof of compliance with the TLV limits shall be kept on site and made available to Department personnel upon request. Sufficient proof of compliance shall be a collection of current coating and solvent MSDS sheets, along with an up-to-date summary sheet listing each HAP emitted, its TLV, and its maximum weight percent in any material used. A copy of the summary sheet shall be included in the semiannual report as required by General Provision 7.

SN-17
 Lumber Kilns

Source Description

Lumber from the drying yard is placed in one of 12 steam heated lumber kilns. The total drying capacity of the facility is limited to 50 million board feet per year.

Specific Conditions

21. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 23. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Name	Pollutant	lb/hr	tpy
Lumber Drying Kiln #1	VOC	0.5	6.5
Lumber Drying Kiln #2	VOC	0.5	
Lumber Drying Kiln #3	VOC	0.5	
Lumber Drying Kiln #4	VOC	0.5	
Lumber Drying Kiln #5	VOC	0.5	
Lumber Drying Kiln #6	VOC	0.5	
Lumber Drying Kiln #7	VOC	0.5	
Lumber Drying Kiln #8	VOC	0.5	
Lumber Drying Kiln #9	VOC	0.5	
Lumber Drying Kiln #10	VOC	0.5	
Lumber Drying Kiln #11	VOC	0.5	
Lumber Drying Kiln #12	VOC	0.5	

22. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 23. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Name	Pollutant	lb/hr	tpy
Lumber Drying Kiln #1	Formaldehyde Methanol	0.01 0.20	0.07 3.12
Lumber Drying Kiln #2	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #3	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #4	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #5	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #6	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #7	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #8	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #9	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #10	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #11	Formaldehyde Methanol	0.01 0.20	
Lumber Drying Kiln #12	Formaldehyde Methanol	0.01 0.20	

23. The facility shall not exceed more than a total of 50 million board feet (MMBF) of kiln dried lumber in any consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E].

24. The permittee shall maintain records that demonstrate compliance with Specific Condition 23 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth 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. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-19
 Diesel Generator

Source Description

One 680 kW diesel generator (SN-19) is located at the facility. This generator is used to provide power during outages and during periods in which boiler fuel (sawdust) inventories are low. This source will not operate in excess of 1,000 hours per year.

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 by complying with Specific Condition 29. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.7	0.4
SO ₂	3.7	1.9
VOC	0.7	0.4
CO	5.1	2.6
NO _x	21.9	10.9

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

Pollutant	lb/hr	tpy
PM	0.7	0.4

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
19	20%	§19.503

28. Daily observations of the opacity from SN-19 will be conducted by personnel familiar with the permittee's visible emissions. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document

that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. [Regulation No. 19 §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- a. The date and time of the observation.
 - b. If visible emissions which appeared to be above the permitted limit were detected.
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.
29. The facility shall not exceed more than a total of 1,000 hours of operation in any consecutive 12 month period at SN-19. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]
30. The permittee shall maintain records that demonstrate compliance with the limits set in Specific Condition 27 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth 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. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7.

SN-20
Woodwaste Loadout

Source Description

Woodwaste that is not used as fuel for the boiler is sent to the Woodwaste loadout to be shipped out and sold.

Specific Conditions

31. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 35. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.8	0.5

32. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 35. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	2.2	1.3

33. 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
20	10%	§18.501

34. Weekly observations of the opacity from SN-20 will be conducted by personnel familiar with the permittee's visible emissions. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. [Regulation No. 19 §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- a. The date and time of the observation.
- b. If visible emissions which appeared to be above the permitted limit were detected.

- c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.
35. The facility shall not exceed more than a total of 30,000 tons of woodwaste in any consecutive 12 month period at SN-20. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]
36. The permittee shall maintain records that demonstrate compliance with the limits set in Specific Condition 35 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth 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. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7.

Century Flooring Co.
Permit #: 0559-AOP-R4
AFIN: 33-00013

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Century Flooring Co. 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 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: [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]
 - 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.
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]

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. 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 March 8, 2006.

Description	Category
Diesel Storage Tank	A-3

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), effective September 26, 2002]
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. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 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 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: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

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

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
 - 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;
 - e. and 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]

Century Flooring Co.
Permit #: 0559-AOP-R4
AFIN: 33-00013