

RESPONSE TO COMMENTS

UNILIN FLOORING NC, LLC-COLUMBIA FLOORING DIVISION PERMIT #0559-AOP-R5 AFIN: 33-00013

On December 9, 2010, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted by Rebecca Bolden, Senior Environmental Engineer of Mohawk, owner of Unilin Flooring, on behalf of the facility. The Department's response to these issues follows.

Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.

Comment #1:

Section VII: Insignificant Activities (page 28) - There are five individual UV curing ovens, they are not combined into two UV curing ovens. To best represent these ovens, we would like to state in the permit 5 ovens which would still be insignificant activities.

Response to Comment #1:

"UV curing ovens" have been changed from two to five ovens in the Insignificant Activities List.

PC
01/26/2011

ADEQ

ARKANSAS
Department of Environmental Quality

March 1, 2011

Henry Ihnfeldt
Plant Engineer
Unilin Flooring NC, LLC-Columbia Flooring Division
P.O. Box 480
Melbourne, AR 72556-0480

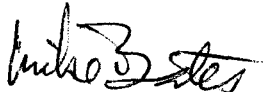
Dear Mr. Ihnfeldt:

The enclosed Permit No. 0559-AOP-R5 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 7/9/2010.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0559-AOP-R5 for the construction, operation and maintenance of an air pollution control system for Unilin Flooring NC, LLC-Columbia Flooring Division to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

ADEQ OPERATING AIR PERMIT

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

Permit No. : 0559-AOP-R5

IS ISSUED TO:

Unilin Flooring NC, LLC-Columbia Flooring Division
State Highway 9 Spur
Melbourne, AR 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:


March 1, 2011

AND

February 28, 2016

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

Signed:



Mike Bates
Chief, Air Division

March 1, 2011

Date

Unilin Flooring NC, LLC-Columbia Flooring Division
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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
BF	Board Feet [of Lumber]
CFR	Code of Federal Regulations
CO	Carbon Monoxide
dscf	dry standard cubic feet
gr	grains [7,000 gr = 1 lb]
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
mbf	million board feet
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
PTE	Potential-to-Emit
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
tpy	Tons Per Year
UTM	Universal Transverse Mercator
UV	ultraviolet
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Unilin Flooring NC, LLC-Columbia Flooring Division

AFIN: 33-00013

PERMIT NUMBER: 0559-AOP-R5

FACILITY ADDRESS: State Highway 9 Spur
Melbourne, AR 72556

MAILING ADDRESS: P.O. Box 480
Melbourne, AR 72556-0480

CORP. MAIL ADDRESS: P.O. Box 1006
Dalton, GA 30722

COUNTY: Izard County

CONTACT NAME: Henry Ihnfeldt

CONTACT POSITION: Plant Engineer

SITE PHONE NUMBER: 870-368-4005

CORPORATE CONTACT: Rebecca Bolden

CORP. CONTACT TITLE: Senior Environmental Engineer

CORP. PHONE NUMBER: 706-428-8080

REVIEWING ENGINEER: Patty Campbell, PE

UTM North South (Y): Zone 15: 3991119.28 m

UTM East West (X): Zone 15: 597184.24 m

SECTION II: INTRODUCTION

Summary of Permit Activity

Unilin Flooring NC, LLC (formerly Century Flooring Company) owns and operates a hardwood flooring mill, Columbia Flooring Division (Columbia Flooring), located at State Highway 9 Spur, Melbourne, Izard County, Arkansas 72556.

This permitting action is necessary to modify the permit as follows:

1. Renew Title V permit;
2. Remove SN-04 baghouse from service;
3. Update emission factors for reportable HAPs for wood-fired Boilers SN-05/06;
4. Require a performance stack test for Deltak Boiler (SN-05) no later than December 31, 2010 and return to an every five-year from the date of the last successful test schedule thereafter, Specific Condition (SC) #10;
5. Add NO_x testing requirement for SN-05, SC #10;
6. Require continuous, proper use and maintenance of a multiple cyclone fly ash arrestor control device when operating either boiler (SN-05/06), SC #13;
7. Update content limits and remove TLV tables for coating materials SN-07, 08, 09, 10 and 21 used in the Finishing Department;
8. Correct math error for pounds per hour emissions of VOC, formaldehyde and methanol for Kilns (SN-17);
9. Update facility-wide opacity observation requirements;
10. Add non-resettable hour meter to Diesel Generator (SN-19), SC #29;
11. Correct math summary error for PM/PM₁₀ for Wood Waste (SN-20);
12. Add Insignificant Activities: five electric UV curing ovens and four wood storage silos, A-13; and
13. Add General Provisions #24 through #26.

Total permitted annual emission changes associated with these modifications and renewal are: 1.2 tpy PM, 0.4 tpy PM₁₀, -16.5 tpy VOC, 0.1 tpy NO_x, 10.28 tpy acetone, 0.88 tpy benzene, 0.01 tpy dioxins/furans, -0.07 tpy methanol, 0.40 tpy styrene, -0.19 tpy toluene, -0.20 tpy xylene and -7.89 tpy combined HAPs. Total permitted annual emission rates for this permit renewal are: 134.1 tpy PM, 133.3 tpy PM₁₀, 6.3 tpy SO₂, 17.8 tpy VOC, 97.6 tpy CO, 91.2 tpy NO_x, 10.28 tpy acetone, 0.83 tpy acrolein, 0.01 tpy arsenic, 0.88 tpy benzene, 0.16 tpy chlorine, 0.01 tpy dioxins/furans, 0.99 tpy formaldehyde, 4.0 tpy hydrogen chloride, 0.01 tpy lead, 0.33 tpy manganese, 3.05 tpy methanol, 0.40 tpy styrene and 0.08 tpy combined HAPs.

Process Description

Pre-cut lumber, mostly red and white oak but occasionally with some other species, is brought into Columbia Flooring 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

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moisture content of the wood. Once sorted for quality, the lumber is stored in this area for approximately 120 days.

The lumber is then placed in one of twelve (12) steam-heated drying kilns (SN-17) to further reduce the moisture content. The kilns vary in size from 65,000 to 135,000 board feet (BF) per load. The twelve kilns combined can hold a maximum 1.148 million BF. The kiln dried lumber is moved to cooling sheds for approximately three days to reduce the temperature and stabilize the wood. From the cooling sheds, the lumber is then moved to the Flooring Plant for further 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 is transferred to the Finishing Goods Warehouse. The remaining unfinished, unpackaged 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 is collected by the Floor Sanding (Carter Day) Baghouse (SN-03). This Baghouse removes 99.9% of the wood fines. Sawdust, sander dust and shavings from the machine processes along with pulverized wood scrap from the hog are pneumatically conveyed to four fuel storage silos (IA, A-13). Particulate matter emitted is routed to the Cyclone Return Baghouse (SN-02) for control.

Selected unfinished flooring is sent to the Finishing Department where the material is sanded, stained (SN-08), covered with two seal coats (SN-09), and three topcoats (SN-10) before being boxed and removed to the Finished Goods Warehouse. The equipment used throughout the Finishing Department is periodically cleaned (SN-07). Columbia Flooring uses all ultraviolet (UV) products in the Finishing Department. Electric UV ovens (IA, A-13) are used to cure the finishes. Natural gas is not utilized at this source.

Most but not all of the wood waste collected in the silos is fed as fuel to the boilers, Deltak (SN-05) or Keeler (SN-06). Some of the waste 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 multi-clone fly-ash arrestors for control of particulate matter (ash). The boilers are not used simultaneously, except during a 1-hour start-up/shutdown cycle. SN-06 is the back-up boiler.

A 10,000-gallon above ground storage tank (AST) (formerly SN-18) is for storage of #2 diesel fuel (IA, A-3). The diesel fuel is 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.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
<i>Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010</i>
<i>Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009</i>
<i>Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009</i>

Emergency Generator SN-19 is not subject to 40 CFR 60, Subpart III – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* because it was purchased prior to July 11, 2005.

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	33.3	134.1
		PM ₁₀	31.9	133.3
		SO ₂	4.7	6.3
		VOC	300.9	17.8
		CO	26.8	97.6
		NO _x	40.2	91.2

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
	HAPs* (¹ HAP only, not a VOC; ² PM, not a VOC, not a HAP; & ³ Combined HAPs in Coating)	Acrolein*	0.20	0.83
		Arsenic ²	0.01	0.01
		Benzene*	0.21	0.88
		Chlorine ¹	0.04	0.16
		Dioxins/Furans*	0.01	0.01
		Formaldehyde*	3.43	0.99
		Hydrogen Chloride ¹	0.91	4.00
		Lead ²	0.01	0.01
		Manganese ²	0.08	0.33
		Methanol*	140.06	3.05
		Styrene*	0.10	0.40
		Combined HAPs* ³	0.13	0.08
	Air Contaminants	Acetone**	26.35	10.28
01, 02, 03	Flooring Production and Sanding Areas - Three Flooring Production Baghouses (each 99.9% efficient)	PM	5.4	22.9
		PM ₁₀	5.4	22.9
05/06	Deltak Wood-fired Boiler (47.64 MMBtu/hr) or Keeler Wood-fired Boiler (37.5 MMBtu/hr)	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*	0.20	0.83
		Arsenic ²	0.01	0.01
		Benzene*	0.21	0.88
		Chlorine ¹	0.04	0.16
		Dioxins/Furans*	0.01	0.01
		Formaldehyde*	0.21	0.92
		Hydrogen Chloride ¹	0.91	4.00
		Lead ²	0.01	0.01
		Manganese ²	0.08	0.33
		Styrene*	0.10	0.40

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
07, 08, 09, 10, 21	Finishing Department	VOC	5.6	7.9
		Combined HAPs ³	0.13	0.08
		Acetone**	26.35	10.28
17	Twelve Lumber Drying Kilns	VOCs	293.9	6.4
		Formaldehyde*	3.22	0.07
		Methanol*	140.06	3.05
19	Diesel Engine Emergency 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	11.0
20	Wood Waste Loadout	PM	2.2	1.3
		PM ₁₀	0.8	0.5
18	Changed to Insignificant Activity			
04 & 11-16	Removed from Service			

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

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

¹ HAP only, not a VOC.

² PM and HAP, not a VOC.

³ Combined HAPs in coating materials.

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SECTION III: PERMIT HISTORY

Permit #559-A was the initial permit for the facility issued on May 28, 1979. Color Tile proposed the installation of a facility to manufacture hardwood parquet flooring.

Permit #559-AR-1 was issued on September 29, 1988. In this modification, Color Tile installed a new finish line. The new coatings are polymerized with ultraviolet light.

Permit #559-AR-2 was issued on November 11, 1992. This permit action represents the change of ownership from Color Tile to Mannington Mills, Inc.

Permit #559-AOP-R0 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.

Permit #559-AOP-R1 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).

Permit #559-AOP-R2 was issued to Century Flooring Company 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.

Permit #0559-AOP-R3 Renewal #1 was issued to Century Flooring Company 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).

Permit #0559-AOP-R4 was issued to Century Flooring Company on June 19, 2006. This application added installation of a new Flat Line finishing process, which would apply UV wood filler (SN-21). The only emission increase permitted with this modification was the 0.7 tpy VOC associated with the UV filler.

SECTION IV: SPECIFIC CONDITIONS

SN-01, 02 and 03 – Flooring Production Baghouses

Source Description

There are three baghouses in operation at Columbia Flooring to control particulate emissions from the manufacturing of hardwood flooring. Wood waste generated from the Flooring Production Area is collected by the Flooring Plant Baghouse (SN-01) and the Cyclone Return Baghouse (SN-02). The wood waste generated from the sanding of dried material is collected by the Flooring 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 Condition #5. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	Flooring Production Area - Flooring Plant Baghouse (99.9% efficient)	PM ₁₀	1.8	7.7
02	Flooring Production Area - Cyclone Return Baghouse (99.9% efficient)	PM ₁₀	1.8	7.6
03	Sanding Area - Floor Sanding Baghouse (99.9% efficient)	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 Condition #5. [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	Flooring Production Area - Flooring Plant Baghouse (99.9% efficient)	PM	1.8	7.7

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SN	Description	Pollutant	lb/hr	tpy
02	Flooring Production Area - Cyclone Return Baghouse (99.9% efficient)	PM	1.8	7.6
03	Sanding Area - Floor Sanding Baghouse (99.9% efficient)	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. Compliance with this opacity limit shall be demonstrated by compliance with Specific Condition #4.

SN	Limit	Regulatory Citation
01, 02, 03	5%	§18.501 and A.C.A.

4. The permittee shall conduct weekly opacity observations of SN-01, 02 and 03 by personnel familiar with the facility's opacity requirements and sources and keep a record of these observations. 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 to demonstrate compliance with this specific condition. If the source is not operating, a note shall be made in the records stating such. These records shall be updated on an as-performed basis, maintained on site, made available to Department personnel upon request and contain the following: [Regulation 19, §19.503, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- a. Indicate the date and time of any observation.
 - b. Show the results of the observation of the source.
 - c. Indicate the cause of any 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. Indicate the name of the person conducting the opacity observations.
5. The permittee shall operate each baghouse (SN-01, 02 and 03) at all times when the Flooring Production Area is in operation. The baghouses shall be kept in good working condition at all times. [Regulation 19, §19.303, 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].

SN-05/06 – Wood-fired Boilers

Source Description

The facility operates two wood-fired boilers, the Deltak Boiler (SN-05) and the Keeler Boiler (SN-06), to produce steam for the lumber drying kilns and electricity for the plant. The boilers are operated on a mutually exclusive basis with SN-05 operating 80% of the time and SN-06 operating 20% of the time, when SN-05 is down for maintenance. The Deltak Boiler (SN-05) has a heat rating of 47.64 MMBtu/hr. The Keeler Boiler (SN-06) has a heat rating of 37.5 MMBtu/hr. The facility assumes that the Deltak Boiler (SN-05) provides 100% of the facility's steam load. Both boilers are equipped with a Zurn flyash arrestor (mechanical control) to control particulate emissions. These arrestors are conservatively estimated to be 80-90% efficient in capturing particulates.

Specific Conditions

6. The permittee shall not exceed the emission rates set forth in the following table. Hourly and annual emissions are based on operating the Deltak Boiler (SN-05) at full load for continuous operation. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions #10 and #11. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
05	Deltak Wood-fired Boiler (47.64 MMBtu/hr, flyash arrestor, 85% efficient of PM, year installed 1979)	PM ₁₀	25.0	109.5
		SO ₂	1.0	4.4
		VOC	0.7	3.1
		CO	21.7	95.0
06	Keeler Wood-fired Back-up Boiler (37.5 MMBtu/hr, operates only when SN-05 is down, flyash arrestor, 85% efficient of PM, year installed 1979)	NO _x	18.3	80.2

7. The permittee shall not exceed the emission rates set forth in the following table. Hourly and annual emissions are based on operating the Deltak Boiler (SN-05) at full load for continuous operation. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions #10 and #11. [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
05	Deltak Wood-fired Boiler (47.64 MMBtu/hr, flyash arrestor, 85% efficient of PM, year installed 1979)	PM	25.0	109.5
		Acrolein	0.20	0.83
		Arsenic	0.01	0.01
		Benzene	0.21	0.88
		Chlorine	0.04	0.16
		Dioxins/Furans	0.01	0.01
06	Keeler Wood-fired Back-up Boiler (37.5 MMBtu/hr, operates when SN- 05 is down, flyash arrestor, 85% efficient of PM, year installed 1979)	Formaldehyde	0.21	0.92
		Hydrogen Chloride	0.91	4.0
		Lead	0.01	0.01
		Manganese	0.08	0.33
		Styrene	0.10	0.40

8. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this opacity limit shall be demonstrated by compliance with Specific Condition #9.

SN	Limit	Regulatory Citation
05, 06	20%	§19.503 and A.C.A.

9. The permittee shall conduct daily opacity observations of SN-05 and SN-06 by personnel familiar with the facility's opacity requirements and sources and keep a record of these observations. 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 to demonstrate compliance with this specific condition. If the source is not operating, a note shall be made in the records stating such. These records shall be updated on an as-performed basis, maintained on site, made available to Department personnel upon request and contain the following: [Regulation 19, §19.503, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

- a. Indicate the date and time of any observation.
- b. Show the results of the observation of the source.
- c. Indicate the cause of any 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. Indicate the name of the person conducting the opacity observations.

10. The permittee shall conduct stack emission testing on the Deltak wood-fired Boiler (SN-05) every five years. The last stack test was conducted on February 16, 2005. ADEQ

Enforcement has extended the 5 year due date, one time only, to December 31, 2010 because the facility was temporarily shutdown. 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. The exhaust stack shall be tested for the following pollutants using the tabulated test methods:

Pollutant	EPA Reference Methods	Maximum Emissions
PM	5	25.0 lb/hr
PM ₁₀	201A	25.0 lb/hr*
CO	10	21.7 lb/hr
NO _x	7E	18.3 lb/hr

*Unilin chose to report PM₁₀ emissions as PM using Methods 5 and 202

All tests shall be conducted with the Deltak Boiler (SN-05) operating at 90% or greater of capacity. The permittee shall notify the Department of the scheduled date of testing at least fifteen (15) days in advance of such test, according to Plantwide Condition #3. Test results shall be submitted to the Department within thirty (30) days after the completed testing, according to Plantwide Condition #3, at the address in General Provision #7, maintained on-site and make available to Department personnel upon request. [Regulation 19, §19.702, and §19.901, and 40 CFR 52 Subpart E]

11. The permittee shall operate the Keeler Boiler (SN-06) as a back-up boiler only. The permittee shall not operate the two boilers (SN-05 and SN-06) simultaneously except that they may be in operation at the same time a maximum of 1-hour during periods of start-up/shutdown. [Regulation 19, §19.705, 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]
12. The permittee shall maintain records that demonstrate compliance with Specific Condition #11. These records shall indicate the date and time of start-up and shutdown for each boiler. These records shall be updated on an as-performed basis, maintained on site, and made available to Department personnel upon request. [Regulation 19, §19.705, and 40 CFR Part 52, Subpart E]
13. A multiple cyclone (multi-clone) fly ash arrestor (cyclone system) must be in use at all times that either boiler is operating. The cyclone system shall be operated and maintained in accordance with the manufacturer's specifications and good operating practices. [Regulation 19, §19.303, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SN-07, 08, 09, 10 and 21 – Finishing Department
 (VOC and HAP-containing Coating Materials and Acetone)

Source Description

The Finishing Department equipment is periodically cleaned with 100% Acetone, SN-07. Selected hardwood flooring is stained (SN-08), covered with sealers (SN-09) and topcoats (SN-10) and wood filler (SN-21). Unilin-Columbia uses a variety of ultraviolet (UV) coatings for the stains, sealers and topcoats. Electric UV ovens, IA, are used to cure the finishes.

Specific Conditions

14. The permittee shall not exceed the emission rates set forth in the following table. Hourly emissions are based on the highest VOC content for each category of material and maximum hourly usage, worst-case scenario. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions #17, #18 and #19. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
08	UV Stain	VOC	0.5	7.9
09	UV Sealer	VOC	3.4	
10	UV Topcoat	VOC	0.7	
21	UV Filler	VOC	1.0	

15. The permittee shall not exceed the emission rates set forth in the following table. Hourly emissions are based on the highest acetone and/or HAP content for each category of material and maximum hourly usage, worst-case scenario. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions #16, #18 and #19. [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
07	Cleaning Solvent	Acetone	26.35	10.28
10	UV Topcoat	Combined HAPs	0.03	0.08
21	UV Filler	Combined HAPs	0.10	

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16. Cleaning solvent (SN-07) shall not exceed 6.59 pounds per gallon (lbs/gal) acetone. Material Data Safety Sheets or other equivalent documents shall be maintained on-site and made available to Department personnel upon request. [Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. The content limit of any stain (SN-08) and sealer (SN- 09) shall not exceed 0.108 lbs/gal VOC and 0.339 lbs/gal VOC, respectively, or contain any HAP (HAP-free). Material Data Safety Sheets or other equivalent documents shall be maintained on-site and made available to Department personnel upon request. [Regulation 19, §19.705, Regulation 18, §18.1004, and 40 CFR Part 52, Subpart E]
18. The content limit of any topcoat (SN-10) shall not exceed 0.122 lbs/gal VOCs and 0.006 lbs/gal HAPs. Material Data Safety Sheets or other equivalent documents shall be maintained on-site and made available to Department personnel upon request. [Regulation 19, §19.705, Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
19. The content limit of any filler (SN-21) shall not exceed 0.09 lbs/gal VOCs and 0.01 lbs/gal HAPs. Material Data Safety Sheets or other equivalent documents shall be maintained on-site and made available upon request. [Regulation 19, §19.705, Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
20. The permittee shall maintain a twelve month rolling total and each individual month's data for acetone, VOC and HAP emissions which demonstrate compliance with Specific Conditions #14 and #15. The permittee shall complete a material balance spreadsheet, database, or other well-organized format each month based on actual usage (in gallons) and acetone, VOC and/or HAP content limits for each category of materials used in SN-07, 08, 09, 10 and 21. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee shall keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705, Regulation 18, §18.1004, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR Part 52, Subpart E]

SN-17 – Twelve Lumber Drying Kilns

Source Description

Hardwood lumber from the drying yard is placed in one of 12 steam-heated drying kilns. The twelve kilns vary in capacity from 65,000 to 135,000 board feet (BF) per load. Emissions from the hardwood are naturally occurring VOCs and HAPs in the wood. Emissions from the kilns are uncontrolled. The maximum combined kiln drying capacity is 1.148 million BF per hour. The total drying capacity of the facility is limited to 50 million BF per year.

Specific Conditions

21. The permittee shall not exceed the emission rates set forth in the following table. Hourly emissions have been calculated with all twelve kilns at maximum operating capacity (fully loaded) and at continuous operation, worst case scenario. The permittee shall demonstrate compliance with tons per year limits by complying with Specific Condition #23. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
17	Twelve Lumber Drying Kilns	VOC	293.9	6.4

22. The permittee shall not exceed the emission rates set forth in the following table. Hourly emissions have been calculated with all twelve kilns at maximum operating capacity (fully loaded) and at continuous operation, worst case scenario. The permittee shall demonstrate compliance with tons per year limits by complying with Specific Condition #23. [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
17	Twelve Lumber Drying Kilns	Formaldehyde	3.22	0.07
		Methanol	140.06	3.05

23. The permittee shall not exceed more than a total of 50 million board feet (MMBF) of kiln dried lumber in any consecutive twelve month period. [Regulation 19, §19.705, 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].
24. The permittee shall maintain a twelve month rolling total and each individual month's data to demonstrate compliance with Specific Condition #23. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee shall keep the records onsite, and make the records available to Department personnel upon request. A twelve month rolling total and each individual

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month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation 19, §19.705, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-19 – Diesel Engine Emergency 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 and by burning only diesel fuel in SN-19. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
19	Caterpillar 3412 Engine Emergency Generator (912 hp, diesel fuel, model date 1994)	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	11.0

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 and by burning only diesel fuel in SN-19. [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
19	Caterpillar 3412 Engine Emergency Generator (912 hp, diesel fuel, model date 1994)	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. Compliance with this opacity limit shall be demonstrated by compliance with Specific Condition #28.

SN	Limit	Regulatory Citation
19	20%	§19.503 and A.C.A.

28. The permittee shall conduct daily opacity observations of SN-19, when operating, by personnel familiar with the facility's opacity requirements and sources and keep a record of these observations. 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 to demonstrate compliance with this specific condition. If the source is not operating, a note shall be made in the records stating such. These records shall be updated on an as-performed basis, maintained on site, made available to Department personnel upon request and contain the following: [Regulation 19, §19.503, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- Indicate the date and time of any observation.
 - Show the results of the observation of the source.
 - Indicate the cause of any 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.
 - Indicate the name of the person conducting the opacity observations.
29. The permittee shall not operate the emergency generator (SN-19) more than 1,000 hours in any consecutive twelve month period. The generator shall have a non-resettable hour meter. [Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
30. The permittee shall maintain records to demonstrate compliance with Specific Condition #29. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on-site, made available to Department personnel upon request and submitted in accordance with General Provision #7. [Regulation 19, §19.705, and 40 CFR Part 52, Subpart E]

SN-20 – Wood Waste Loadout

Source Description

Wood waste that is not used as fuel for the boiler is sent to the Wood Waste Loadout to be shipped out by truck 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 #33. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
20	Wood Waste Loadout	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 #33. [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
20	Wood Waste Loadout	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. Compliance with this opacity limit shall be demonstrated by compliance with Specific Condition #34.

SN	Limit	Regulatory Citation
20	10%	§18.501 and A.C.A.

34. The permittee shall conduct weekly opacity observations of SN-20 by personnel familiar with the facility's opacity requirements and sources and keep a record of these observations. 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 to demonstrate compliance with this specific condition. If the source is not operating, a note shall be made in the records stating such. These

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records shall be updated weekly, maintained on site, made available to Department personnel upon request and contain the following: [Regulation 19, §19.503, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

- a. Indicate the date and time of any observation.
 - b. Show the results of the observation of the source.
 - c. Indicate the cause of any 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. Indicate the name of the person conducting the opacity observations.
35. The facility shall not exceed more than 30,000 tons of wood waste in any consecutive twelve month period as loadout (SN-20). [Regulation 19, §19.705, 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]
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. A twelve month rolling total and each individual month's data shall be maintained on-site, made available to Department personnel upon request and submitted in accordance with General Provision #7. [Regulation 19, §19.705, and 40 CFR Part 52, Subpart E]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Unilin Flooring NC, LLC-Columbia Flooring Division 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) business days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) calendar 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]

Title VI Provisions

7. 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.

8. 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.

9. 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.

10. 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.

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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.

11. 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. 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 July 7 and 21 and August 31, 2010.

Description	Category
One Diesel Fuel Storage Tank, 10,000 gallon capacity (formerly SN-18)	A-3
Five Electric UV Curing Ovens	A-13
Four Wood Storage Silos	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)]

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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)]

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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; 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.

Unilin Flooring NC, LLC-Columbia Flooring Division
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AFIN: 33-00013

[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 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, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 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, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to
Unilin Flooring NC, LLC-Columbia Flooring Division, P.O. Box 480, Melbourne, AR, 72556-
0480, on this 15th day of March, 2011.

Pam Owen
Pam Owen, AAI, Air Division