

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0559-AOP-R6 AFIN: 33-00013

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Unilin Flooring NC, LLC-Columbia Flooring Division
State Highway 9 Spur
Melbourne, Arkansas 72556

3. PERMIT WRITER:

Patty Campbell, PE

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Other Millwork (including Flooring)
NAICS Code: 321918

5. SUBMITTALS:

7/13/2011 and 8/25/11

6. REVIEWER'S NOTES:

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

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

1. Revise Process Description;
2. Require a one-time emission stack test of boiler SN-06, no later than 180 days after issuance of this permit, Specific Conditions (SC) #10;
3. SN-05 stack test was conducted on November 16, 2010 and so noted in the permit. The next SN-05 stack test is due no later than November 16, 2015;
4. Add applicable provisions of 40 CFR 63, Subpart JJJJJ for SN-05 and SN-06, SC #14 through #20;
5. Add a limit for any HAP containing compound with a TLV of 11.3 mg/m³ or higher at SN-10 and SN-21, SC #25 and #26;

- 6. Allow diesel fuel with a sulfur content no greater than 0.5% by weight, SC #38; and
- 7. Add applicable provisions of 40 CFR 63, Subpart ZZZZ for SN-19, SC #40 through #45.

There are no changes in emissions.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

Current CAO LIS 11-175 has been signed and issued on 9/28/2011.

8. PSD APPLICABILITY:

- a. Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
- b. Is the facility categorized as a major source for PSD? N
Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list?
If yes, explain why this permit modification is not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

| Source | Pollutant | Regulation (NSPS, NESHAP or PSD) |
|---------|-----------|----------------------------------|
| 05 & 06 | HAPs | NESHAP Subpart JJJJJ |
| 19 | HAPs | NESHAP Subpart ZZZZ |

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

Non-Criteria Pollutants:

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department

has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

| Pollutant | TLV (mg/m ³) | PAER (lb/hr) = 0.11 × TLV | Proposed lb/hr | Pass? |
|-------------------|--------------------------|---------------------------|----------------|-------|
| Acetone | 1187.1 | 130.58 | 26.35 | Yes |
| Acrolein | 0.2293 | 0.0252 | 0.34056 | No |
| Arsenic | 0.0033 | 0.000363 | 0.001874 | No |
| Benzene | 1.60 | 0.176 | 0.35759 | No |
| Chlorine | 1.45 | 0.1595 | 0.06301 | Yes |
| Dioxins/Furans | 0.001 | 0.00011 | 0.0001439 | No |
| Formaldehyde | 1.50 | 0.165 | 3.58902 | No |
| Hydrogen Chloride | 2.98 | 0.328 | 1.61766 | No |
| Manganese | 0.20 | 0.022 | 0.13622 | No |
| Methanol | 262.1 | 28.83 | 140.06 | No |
| Styrene | 85.2 | 9.372 | 0.161766 | Yes |
| Combined HAPs | 112.229 | 12.345 | 0.016 | Yes |

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

| Pollutant | PAIL (µg/m ³) = 1/100 of Threshold Limit Value | Modeled Concentration (µg/m ³) | Pass? |
|-----------|--|--|-------|
| Acrolein | 2.293 | 0.167 | Yes |
| Arsenic | 0.033 | 0.00092 | Yes |

| Pollutant | PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value | Modeled Concentration ($\mu\text{g}/\text{m}^3$) | Pass? |
|-------------------|--|--|-------|
| Benzene | 16.00 | 0.1748 | Yes |
| Dioxins/Furans | 0.01 | 0.00007 | Yes |
| Formaldehyde | 15.0 | 14.763 | Yes |
| Hydrogen Chloride | 29.9 | 0.791 | Yes |
| Manganese | 2.0 | 0.6659 | Yes |
| Methanol | 2620.9 | 644.795 | Yes |

Although the 2 boilers are used mutually exclusively, HAPs from both boilers were included in the modeling, a conservative, worst case scenario. Modeling was completed for Air Permit #0559-AOP-R5, issued March 29, 2011.

Table 11

Estimated PTE Annual HAP Emissions Summary

Unilin Flooring NC, LLC -- Columbia Division - Melbourne Facility

| HAP | Emission Factor lbs/MMBtu | Hourly (d) | | | | | | HAP Total |
|----------------------------|---------------------------|------------|-----------------------------|---|--------------------|------------------------|------------------------|-----------|
| | | | Wood-fired Boilers SN-05/06 | VOC/HAP Containing products SN-07/08/09/10/21 | Lumber Kilns SN-17 | Diesel Storage Tank IA | Diesel Generator SN-19 | |
| 1,1,1-trichloroethane | 3.10E-05 (1) | 1.5E-03 | 6.5E-03 | | | | | 6.5E-03 |
| 1,2-Dichloroethane | 2.90E-05 (1) | 1.4E-03 | 6.1E-03 | | | | | 6.1E-03 |
| 1,2-Dichloropropne | 3.30E-05 (1) | 1.6E-03 | 6.9E-03 | | | | | 6.9E-03 |
| 2,4-Dinitrophenol | 1.80E-07 (1) | 8.6E-06 | 3.8E-05 | | | | | 3.8E-05 |
| 4-Nitrophenol | 1.10E-07 (1) | 5.2E-06 | 2.3E-05 | | | | | 2.3E-05 |
| Acenaphthene | 9.70E-07 (1) | 4.6E-05 | 2.0E-04 | | | | 1.50E-05 | 2.2E-04 |
| Acenaphthylene | 5.00E-06 (1) | 2.4E-04 | 1.0E-03 | | | | 2.90E-05 | 1.1E-03 |
| Acetaldehyde | 8.30E-04 (1) | 4.0E-02 | 1.7E-01 | | | | 8.00E-05 | 1.7E-01 |
| Acetophenone | 3.20E-09 (1) | 1.5E-07 | 6.7E-07 | | | | | 6.7E-07 |
| Acrolein | 4.00E-03 (1) | 1.9E-01 | 8.3E-01 | | | | 2.50E-05 | 8.3E-01 |
| Anthracene | 3.00E-06 (1) | 1.4E-04 | 6.3E-04 | | | | 3.90E-06 | 6.3E-04 |
| Antimony | 7.90E-06 (2) | 3.8E-04 | 1.6E-03 | | | | | 1.6E-03 |
| Arsenic | 2.20E-05 (2) | 1.0E-03 | 4.6E-03 | | | | | 4.6E-03 |
| Benzene | 4.20E-03 (1) | 2.0E-01 | 8.8E-01 | | | 5.00E-06 | 2.50E-03 | 8.8E-01 |
| Benzo(a)anthracene | 6.50E-08 (1) | 3.1E-06 | 1.4E-05 | | | | 2.00E-06 | 1.6E-05 |
| Benzo(a)pyrene | 2.60E-06 (1) | 1.2E-04 | 5.4E-04 | | | | 8.20E-07 | 5.4E-04 |
| Benzo(b)fluoranthene | 1.00E-07 (1) | 4.8E-06 | 2.1E-05 | | | | 3.50E-06 | 2.4E-05 |
| Benzo(g,h,i)perylene | 9.30E-08 (1) | 4.4E-06 | 1.9E-05 | | | | 1.80E-06 | 2.1E-05 |
| Benzo(k)fluoranthene | 3.60E-08 (1) | 1.7E-06 | 7.5E-06 | | | | 7.00E-07 | 8.2E-06 |
| Beryllium | 1.10E-06 (2) | 5.2E-05 | 2.3E-04 | | | | | 2.3E-04 |
| bis(2-Ethylhexyl)phthalate | 4.70E-08 (1) | 2.2E-06 | 9.8E-06 | | | | | 9.8E-06 |

| | | | | | | | | | |
|---------------------------------------|-----------|-----|-----------|---------|----------|----------|----------|----------|---------|
| Bromomethane | 1.50E-05 | (1) | 7.1E-04 | 3.1E-03 | | | | | 3.1E-03 |
| Cadmium | 4.10E-06 | (1) | 2.0E-04 | 8.6E-04 | | | | | 8.6E-04 |
| Carbon Tetrachloride | 4.50E-05 | (1) | 2.1E-03 | 9.4E-03 | | | | | 9.4E-03 |
| Chloroene | 7.90E-04 | (1) | 3.8E-02 | 1.6E-01 | | | | | 1.6E-01 |
| Chlorobenzene | 3.30E-05 | (1) | 1.6E-03 | 6.9E-03 | | | | | 6.9E-03 |
| Chloroform | 2.80E-05 | (1) | 1.3E-03 | 5.8E-03 | | | | | 5.8E-03 |
| Chloromethane | 2.30E-05 | (1) | 1.1E-03 | 4.8E-03 | | | | | 4.8E-03 |
| Chromium (total) | 2.10E-05 | (2) | 1.0E-03 | 4.4E-03 | | | | | 4.4E-03 |
| Chrysene | 3.80E-08 | (1) | 1.8E-06 | 7.9E-06 | | | 4.90E-06 | | 1.3E-05 |
| Cobalt | 6.50E-06 | (2) | 3.1E-04 | 1.4E-03 | | | | | 1.4E-03 |
| Cumene | | | | | 5.22E-03 | | | | 5.2E-03 |
| Dibenz(a,h)anthracene | 9.10E-09 | (1) | 4.3E-07 | 1.9E-06 | | | 1.10E-06 | | 3.0E-06 |
| Dichloromethane | 2.90E-04 | (1) | 1.4E-02 | 6.1E-02 | | | | | 6.1E-02 |
| Ehtylbenzene | 3.10E-05 | (1) | 1.5E-03 | 6.5E-03 | 9.50E-03 | | 1.00E-05 | | 1.6E-02 |
| Fluoranthene | 1.60E-06 | (1) | 7.6E-05 | 3.3E-04 | | | 1.30E-05 | | 3.5E-04 |
| Fluorene | 3.40E-06 | (1) | 1.6E-04 | 7.1E-04 | | | 4.10E-05 | | 7.5E-04 |
| Formaldehyde | 4.40E-03 | (1) | 2.1E-01 | 9.2E-01 | | 7.00E-02 | 2.50E-04 | | 9.9E-01 |
| Hydrogen Chloride | 1.90E-02 | (1) | 9.1E-01 | 4.0E+00 | | | | | 4.0E+00 |
| Ideno(1,2,3 c,d)pyrene | 8.70E-08 | (1) | 4.1E-06 | 1.8E-05 | | | 1.30E-06 | | 1.9E-05 |
| Lead | 4.80E-05 | (2) | 2.3E-03 | 1.0E-02 | | | | | 1.0E-02 |
| Manganese | 1.60E-03 | (2) | 7.6E-02 | 3.3E-01 | | | | | 3.3E-01 |
| Mercury | 3.50E-06 | (2) | 1.7E-04 | 7.3E-04 | | | | | 7.3E-04 |
| Methanol | | | | | | 3.05E+00 | | | 3.1E+00 |
| Naphthalene | 9.70E-05 | (1) | 4.6E-03 | 2.0E-02 | 3.10E-03 | | 4.10E-04 | | 2.4E-02 |
| Nickel | 3.30E-05 | (2) | 1.6E-03 | 6.9E-03 | | | | | 6.9E-03 |
| Pentachorophenol | 5.10E-08 | (1) | 2.4E-06 | 1.1E-05 | | | | | 1.1E-05 |
| Phenathrene | 7.00E-06 | (1) | 3.3E-04 | 1.5E-03 | | | 1.30E-04 | | 1.6E-03 |
| Phenol | 5.10E-05 | (1) | 2.4E-03 | 1.1E-02 | | | | | 1.1E-02 |
| Polychlorinated dibenzo-p-dioxins (a) | 1.67E-06 | (1) | 7.956E-05 | 3.5E-04 | | | | | 3.5E-04 |
| Polychlorinated Dibenzop-furans (b) | 1.87E-09 | (1) | 8.9E-08 | 3.9E-07 | | | | | 3.9E-07 |
| Polychlorinated biphenyls (c) | 8.14E-09 | (1) | 3.878E-07 | 1.7E-06 | | | | | 1.7E-06 |
| Propionaldehyde | 6.10E-05 | (1) | 2.9E-03 | 1.3E-02 | | | | | 1.3E-02 |
| Pyrene | 3.70E-06 | (1) | 1.8E-04 | 7.7E-04 | | | 1.20E-05 | | 7.8E-04 |
| Selenium | 2.80E-06 | (2) | 1.3E-04 | 5.8E-04 | | | | | 5.8E-04 |
| Styrene | 1.90E-03 | (1) | 9.1E-02 | 4.0E-01 | | | | | 4.0E-01 |
| Tetrachloroethene | 3.80E-05 | (1) | 1.8E-03 | 7.9E-03 | | | | | 7.9E-03 |
| Toluene | 9.20E-04 | (1) | 4.4E-02 | 1.9E-01 | 1.90E-03 | | 7.50E-05 | 9.00E-04 | 1.9E-01 |
| Trichloroethene | 3.00E-05 | (1) | 1.4E-03 | 6.3E-03 | | | | | 6.3E-03 |
| Vinyl Chloride | 1.80E-05 | (1) | 8.6E-04 | 3.8E-03 | | | | | 3.8E-03 |
| Xylene | 2.50E-05 | (1) | 1.2E-03 | 5.2E-03 | 5.02E-02 | | 1.90E-04 | 6.20E-04 | 5.6E-02 |
| HAP Total | HAP Total | | 1.1E+00 | 8.07 | 0.07 | 3.12 | 2.80E-04 | 0.005 | 11.27 |

These sums are the totals of all HAPs emitted at the Unilin - Columbia Flooring - Melbourne Facility.

(1) Factors from AP42 Chapter 1.6 Table 1.6-3 Emission Factors for

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Speciated Organic Compounds from Wood Residue Combustion (September 2003)

(2) Factors from AP42 Chapter 1.6 Table 1.6-4 Emission Factors for Trace Elements from Wood Residue Combustion (September 2003)

(a) Includes Hepta, Hexa, Octa, Penta,(2,3,7,7) Tetra, and Tetrachlorodibenzo-p-dioxins

(b) Includes Hepta, Hexa, Octa, Penta,(2,3,7,7) Tetra, and Tetrachlorodibenzo-p-furans

(c) Includes Deca, Di, Hexa, Hepta, Octa, Mono, Penta, Tetra and Trichlorobiphenyl

(d) Estimated hourly emissions lb/hr = (MMBtu/hr max rating for boilers) x (emission factor [lb/MMBtu])

Maximum PTE hourly boiler fuel combustion (MMBtu/hr) = 47.64

(e) Estimated annual PTE in tons per year = (hourly emission) x (8760)/2000

Other Modeling: None.

Odor: None.

H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

Y/N

If exempt, explain: _____

| Pollutant | Threshold value | Modeled Concentration (ppb) | Pass? |
|------------------|--|-----------------------------|-------|
| H ₂ S | 20 parts per million (5-minute average*) | N/A | |
| | 80 parts per billion (8-hour average) residential area | N/A | |
| | 100 parts per billion (8-hour average) nonresidential area | N/A | |

*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

C_p = 5-minute average concentration

C_m = 1-hour average concentration

t_m = 60 minutes

t_p = 5 minutes

12. CALCULATIONS:

| SN | Emission Factor Source (AP-42, testing, etc.) | Emission Factor (lb/ton, lb/hr, etc.) | Control Equipment | Control Equipment Efficiency | Comments |
|--------------------|--|---|---|--------------------------------------|---|
| 01, 02, 03 | EF from informal testing event performed at SN-03 on 8/11/2003 & engineering judgment | 01/04 Test result = 0.0016 grains/dscf PM conservatively used <u>EF = 0.01 gr/dscf PM</u> | <u>SN-01</u> Pneumafil Baghouse model #135-448-10 Fabric Filter <u>SN-02, 03</u> Carter Day Baghouses model #RFJ-376 Fabric Filters | 99.9% each | Emissions calculated based on exhaust air flow of individual baghouses @8,760 hrs/yr Rated air flow SN-01 = 17.06 ft/sec – 20,500 scfm SN-02, 03 = 20.07 ft/sec – 20,100 scfm installed 1979 Unilin assumes 100% of PM is PM ₁₀ . |
| 05/06 | Criteria EF from test HAP EF from AP-42 Chapter 1.6 Tables 1.6-3 ¹ & 1.6-4 ² (9/03) | <u>lbs/hr</u> PM/PM ₁₀ = 25.0 SO ₂ = 1.0 VOC = 0.7 CO = 21.7 NO _x = 18.3 <u>lbs/MMBtu/hr</u> ¹ Acrolein – 4.00E-03 ² Arsenic – 2.20E-05 ¹ Benzene – 4.20E-03 ¹ Chlorine – 7.90E-04 ¹ Formaldehyde – 4.40E-03 ¹ HCl – 1.90E-02 ² Lead – 4.80E-05 ² Manganese – 1.60E-03 ¹ Dioxins – 1.70E-06 ¹ Furans – 1.90E-09 ¹ Styrene – 1.90E-03 | Zurn flyash arrester, multi-clone | 80-90% 85% for PM 63% for PM10 | Wood fired Boilers SN-05 – Deltak Boiler = <u>47.64 MMBtu/hr</u> SN-06 – Keeler Boiler = 37.5 MMBtu/hr Boilers operated mutually exclusive, 1 @ a time. SN-05 @ 8,760 hrs/yr SN-06 @ 1 hr/yr Actual is about 80/20 but conservatively estimated larger boiler SN-05 ops 100% SN-06 HAPs lb/hr |
| 07, 08, 09, 10, 21 | Mass Balance for Finishing Dept Materials | MSDS & actual usage Max 1. MMBF/hr w/12 kilns at capacity | None | N/A | <u>VOC & HAP-containing Materials in Finishing Dept.</u> Assumes 100% of VOCs & HAPs emitted |

| SN | Emission Factor Source (AP-42, testing, etc.) | Emission Factor (lb/ton, lb/hr, etc.) | Control Equipment | Control Equipment Efficiency | Comments |
|----|---|--|-------------------|------------------------------|---|
| 17 | VOC ¹ - Brian W. Beakler, et al "Quantification VOCs kin-drying Red Oak & White Oak Lumber" (11/07) Formaldehyde ² & Methanol ² – OR State Univ. "Small Scale Kiln Study Utilizing Ponderosa Pine, . . . White Fir . . ." (9/20/00) | Lumber Kiln Throughput = 50 MMBF of lumber / 12 consecutive mos. <u>Lb/mbf</u> VOC = 0.256 ¹ Formaldehyde = 0.0028 ² Methanol = 0.122 ² | None | N/A | @8,760 hrs/yr, 12 kilns, limited by throughput MBF x 1000 = MMBF 1 – worst case, red oak range 0.154 – 0.356 = 0.256 lb/mbf VOC (both white & red are dried) 2 – used white fir emission factor since oak not included |
| 19 | AP-42 Chap 3.4-1 (10/96) | <u>lbs/hp-hr</u> PM/PM ₁₀ = 0.0007 SO ₂ = 0.00405 ¹ VOC = 0.000705 CO = 0.0055 NO _x = 0.0240 | None | N/A | Emergency Diesel Generator Engine 981 hp [Large] @1000 hrs/yr max 100% of PM is PM ₁₀ . ¹ Sulfur content of diesel fuel is 0.5% x 0.00809 lbs/hp-hr = 0.00405 lbs/hp-hr EF |
| 20 | AP-42 Chap 9.9.1-1 (03/03) | <u>lbs/ton</u> PM = 0.086 PM10 = 0.029 Max 1 truck/hr @ max 25 tons/truck Max 100 trucks/mo = 2,500 tons/mo x 12 mos = 30,000 tons/yr | None | N/A | AP-42 is for Grain Truck Shipping as substitute for wood waste. The facility can only load one truck per hour. Historical data (last 5 yrs show max 96 loads/mo in 10/07. |

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources:

| SN | Pollutants | Test Method | Test Interval | Justification |
|--------------|------------------|--------------|--|---------------------|
| 05 Boiler | PM | 5 and 202 | Once every 5 years or if test fails, two consecutive annual tests until boiler passes. Next test, no later than November 16, 2015. | §19.702 and §19.901 |
| | PM ₁₀ | 201A and 202 | | |
| | CO | 10 | | |
| | NO _x | 7E | | |
| 06 Boiler | PM | 5 and 202 | One-time Test due no later than 180 days after issue of Permit #0559-AOP-R6, unless emissions are greater than SN-05 emissions | §19.702 and §19.901 |
| | PM ₁₀ | 201A and 202 | | |
| | CO | 10 | | |
| | NO _x | 7E | | |

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

There are no CEMS or other monitoring equipment.

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

| SN | Recorded Item | Permit Limit | Frequency | Report (Y/N) |
|-------|--------------------------------------|--|---|--------------|
| 05 | Performance Tests | PM, PM ₁₀ , CO and NO _x limits | Every 5 years or if failed 2 consecutive successful tests | Y |
| 06 | Performance Test | PM, PM ₁₀ , CO and NO _x limits | One-time | Y |
| 05/06 | Boilers Manufacturer's Specification | Maintain for life of units | On-going | N |

| SN | Recorded Item | Permit Limit | Frequency | Report (Y/N) |
|-----------------|--|--|--|--------------|
| 05/06 | Hourly Operation of SN-05 & 06 | Maximum of 1-hour during periods of start-up/shutdown. Records shall indicate date & time of start-up and shutdown for each boiler | As –performed, no limit other than max 1-hr each occurrence | N |
| 05/06 | Multi-clone fly ash arrestors Manufacturer’s Specification | Maintain for life of units | On-going | N |
| 05/06 | Tune-ups | Must be completed as specified in §63.11223 (b)(1) through (7). | Biennially or no more than 25 months after previous tune-up. If unit not operating on the required date, tune-up must be conducted within 1 week of start-up | N |
| 05/06, Facility | Energy Assessment performed by a qualified Energy Assessor | Must be completed according to §63.11214(c.) and Table 2 to Subpart JJJJJ of Part 63, item #4, (1) through (7) and be performed by March 21, 2014. | One time | N |
| 05/06, Facility | Energy Assessment (above) | Maintain Report for life of Facility | On-going | N |
| 05/06 | Initial Notification of Compliance Status | Initial due by 9/17/2011. Include the §63.11225(a)(4) certifications. | Initial, one time | Y |
| 05/06 | Annual Notification of Compliance Status with NESHAP Subpart JJJJJ | Include the §63.11225(a)(4) certifications. Include completion of boiler tune-up, date, signed, as appropriate, per §63.11214(b) | Annually, prepare by 3/1 each year and received by ADEQ by 3/15 each year | Y |

| SN | Recorded Item | Permit Limit | Frequency | Report (Y/N) |
|-----------|---|--|-----------|--------------|
| 05/06 | Work practices, emission reduction measures, and management practices required by §63.11214 | <ul style="list-style-type: none"> • Identify Boiler, date of tune-up, tune-up procedures followed, manufacturer's specs • Document fuel type • Occurrence and duration of malfunction • Corrective action taken | Annually | N |
| 7-10 & 21 | VOC, HAP & acetone content | Various | Monthly | Y |
| 17 | Lumber Kiln-dried Throughput | 50 million (MM) board feet (BF) of Lumber per 12 month rolling totals | Monthly | Y |
| 19 | Operating Hours of Diesel Generator | 1,000 operating hours per 12 month rolling totals | Monthly | N |
| 19 | Diesel Fuel | Combust diesel fuel with a sulfur content no greater than 0.5% by weight | On-going | N |
| 20 | Wood Waste Truck Loadout | 2,500 tons of Wood Waste per month [equivalent to 100 trucks loaded per month] 30,000 tons of Wood Waste per 12 month rolling totals | Monthly | Y |

16. OPACITY:

| SN | Opacity | Justification for limit | Compliance Mechanism |
|------------|---------|-------------------------|----------------------|
| 01, 02, 03 | 5% | §18.501 and A.C.A. | Weekly Observation |
| 05, 06, 19 | 20% | §19.503 and A.C.A. | Daily Observation |
| 20 | 10% | §18.501 and A.C.A. | Weekly Observation |
| Off-site | 5% | §18.501 & A.C.A. | Observation |

17. DELETED CONDITIONS:

No conditions were deleted.

18. GROUP A INSIGNIFICANT ACTIVITIES:

| Source Name | A | Emissions (tpy) | | | | | | |
|---|------|-------------------------|-----------------|-------|-----|-----------------|------|----------|
| | | PM/ PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs | |
| | | | | | | | S | Tot |
| One Diesel Fuel Storage Tank, 10,000 gallon capacity (formerly SN-18) | A-3 | 0.0 | 0.0 | 0.003 | 0.0 | 0.0 | - | 2.80E-04 |
| Five Electric UV Ovens | A-13 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Four Wood Storage Silos | A-13 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |


19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

| |
|-------------|
| Permit # |
| 0559-AOP-R5 |

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.



 Paula Parker, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-30-11

Facility Name: Unilin-Columbia Flooring
 Permit Number: 0559-AOP-R6
 AFIN: 33-00013

| | | | |
|---------------|--------------|-----------------------------------|--------|
| \$/ton factor | 22.65 | Annual Chargeable Emissions (tpy) | 263.84 |
| Permit Type | Modification | Permit Fee \$ | 1000 |

| | |
|---|--------------------------|
| Minor Modification Fee \$ | 500 |
| Minimum Modification Fee \$ | 1000 |
| Renewal with Minor Modification \$ | 500 |
| Check if Facility Holds an Active Minor Source or Minor Source General Permit | <input type="checkbox"/> |
| If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ | 0 |
| Total Permit Fee Chargeable Emissions (tpy) | 0 |
| Initial Title V Permit Fee Chargeable Emissions (tpy) | |

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

| Pollutant (tpy) | Check if Chargeable Emission | Old Permit | New Permit | Change in Emissions | Permit Fee Chargeable Emissions | Annual Chargeable Emissions |
|-------------------|-------------------------------------|------------|------------|---------------------|---------------------------------|-----------------------------|
| PM | <input checked="" type="checkbox"/> | 134.1 | 134.1 | 0 | 0 | 134.1 |
| PM ₁₀ | <input type="checkbox"/> | 133.3 | 133.3 | 0 | | |
| SO ₂ | <input checked="" type="checkbox"/> | 6.3 | 6.3 | 0 | 0 | 6.3 |
| VOC | <input checked="" type="checkbox"/> | 17.8 | 17.8 | 0 | 0 | 17.8 |
| CO | <input type="checkbox"/> | 97.6 | 97.6 | 0 | | |
| NO _x | <input checked="" type="checkbox"/> | 91.2 | 91.2 | 0 | 0 | 91.2 |
| Acrolein | <input type="checkbox"/> | 0.83 | 0.83 | 0 | | |
| Arsenic | <input type="checkbox"/> | 0.01 | 0.01 | 0 | | |
| Benzene | <input type="checkbox"/> | 0.88 | 0.88 | 0 | | |
| Chlorine | <input checked="" type="checkbox"/> | 0.16 | 0.16 | 0 | 0 | 0.16 |
| Dioxin/Furans | <input type="checkbox"/> | 0.01 | 0.01 | 0 | | |
| Formaldehyde | <input type="checkbox"/> | 0.99 | 0.99 | 0 | | |
| Hydrogen Chloride | <input checked="" type="checkbox"/> | 4 | 4 | 0 | 0 | 4 |
| Lead | <input type="checkbox"/> | 0.01 | 0.01 | 0 | | |
| Manganese | <input type="checkbox"/> | 0.33 | 0.33 | 0 | | |
| Methanol | <input type="checkbox"/> | 3.05 | 3.05 | 0 | | |
| Styrene | <input type="checkbox"/> | 0.4 | 0.4 | 0 | | |
| Combined HAPs | <input type="checkbox"/> | 0.08 | 0.08 | 0 | | |
| Acetone | <input checked="" type="checkbox"/> | 10.28 | 10.28 | 0 | 0 | 10.28 |