

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0559-AOP-R10 AFIN: 33-00013

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Beasley Flooring Products, Inc.
485 Highway 9 Spur
Melbourne, Arkansas 72556

3. PERMIT WRITER:

Derrick Brown

4. NAICS DESCRIPTION AND CODE:

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

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
7/17/2020	Modification	Removal of lumber kilns (SN-17) and Wood fired boilers (SN-05 and SN-06). This modification permits this facility as a minor source.
7/14/2020	Administrative Amendment	Addition of two natural gas fired heaters to the insignificant activities list.

6. REVIEWER'S NOTES:

Beasley Flooring Products, Inc., owns and operates a hardwood flooring manufacturing facility in Melbourne, Izard county, Arkansas. This permit modification changes the name from Unilin North America, LLC to Beasley Flooring Products, Inc., also this modification removes sources SN-17 (lumber drying kilns), SN-05 and SN-06 (wood

fired boilers). This modification decreases facility emissions by 154.8 tpy of PM, 154 tpy of PM₁₀, 4.4 tpy of SO₂, 2.4 tpy of VOC, 244.2 tpy of CO, 102.3 tpy of NO_x, and 0.89 tpy of HAPs and permits this facility as a minor source.

7. COMPLIANCE STATUS:

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

The facility was inspected on August 22, 2019. The Inspection Report did not cite any areas of concern.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N/A

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 for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
N/A		

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY: (N/A, minor source permit)

Did the facility request a permit shield in this application? N/A

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A
If not, explain why.

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:
N/A

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H₂S Modeling: N/A

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
SN-01	Test results	0.01 gr/dscf	Baghouse		20,500 dscfm
SN-02	Test results	0.01 gr/dscf			20,100 dscfm
SN-03	Test results	0.01 gr/dscf			31,227 dscfm
SN-22	Manufacturer	0.0001153 gr/dscf			55,659 dscfm
SN-23	Manufacturer	0.0001153 gr/dscf			66,750 dscfm
SN-07	Mass Balance	6.59 lbs Acetone/gal			
SN-08, SN-09, SN-10, SN-21, SN-24	Mass Balance	VOC/HAP lb/gal			
SN-11	AP-42 Tables 1.4-1 & 2	(lbs/MMscf) 7.6 lbs PM/PM ₁₀ 0.6 lbs SO ₂ 5.5 lbs VOC 84.0 lbs CO	None	N/A	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
		100.0 lbs NO _x Various lbs HAPs			
SN-20	Division Memo dated August 22, 2003, dried shavings factor.	0.0022 lbs PM/ton 0.00018 lbs PM ₁₀ /ton			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

17. MONITORING OR CEMS:

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

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
N/A				

18. 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)
SN-07	Acetone	3,120 gal/yr	Monthly	N
SN-08	VOC/HAP lb/gal	7.0 lbs/gal	Monthly	N
SN-09		2.0 lbs/gal		
SN-10		2.0 lbs/gal		
SN-21		2.0 lbs/gal		
SN-24		2.0 lbs/gal		
SN-20	Wood waste	15,000 pounds	Monthly	N

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19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-01, SN-02, SN-03, SN-07, SN-08, SN-09, SN-10, SN-11, SN-20, SN-21, SN-22, SN-23, SN-24	20%	Reg.19.503 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspector Observation
SN-11	5%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspector Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
#6 through #20	Sources SN-05 and SN-06 were removed.
#29 through #32	Source SN-17 was removed.

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Cat.	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Natural Gas Heaters (2 @ 1.0 MMBtu/hr each)	A-1	0.062	0.005	0.045	0.684	0.815		0.045
Diesel Fuel Storage Tank (10,000 gallons)	A-3			0.003				0.003
Eight Electric UV Curing Units (Lights)	A-13							
Three Wood Storage Silos	A-13	0.36						

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0559-AOP-R9

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source Changing to Minor Source

Revised 03-11-16

Facility Name: Beasely Flooring
 Products, Inc.
 Permit Number: 0559-AR-3
 AFIN: 33-00013

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	95.1
Minimum Fee \$	400	Permit Fee \$	400

Title V Permit Chargeable Emissions (tpy) 387.5

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 condensable PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Title V Permit Annual Chargeable Emissions
PM		182.6	27.8	-154.8	182.6
PM ₁₀		181.8	27.8	-154	
PM _{2.5}		0	0	0	
SO ₂		4.5	0.1	-4.4	4.5
VOC		97.5	95.1	-2.4	97.5
CO		244.7	0.5	-244.2	
NO _x		102.9	0.6	-102.3	102.9
HAP Single	<input type="checkbox"/>	9.9	9.01	-0.89	
HAP Total	<input type="checkbox"/>	24.9	24.01	-0.89	
Acetone	<input type="checkbox"/>	10.28	10.28	0	
	<input type="checkbox"/>	0	0	0	
	<input type="checkbox"/>	0	0	0	
	<input type="checkbox"/>	0	0	0	