



ARKANSAS

ENERGY & ENVIRONMENT

February 17, 2021

Via email to: Larry.Sherrer@beasleygroup.com & First Class Mail

Larry Sherrer
Maintenance Manager III
Beasley Flooring Products, Inc.
485 State Highway 9 Spur
Melbourne, AR 72556

Re: Notice of Final Permitting Decision; Permit No. 0559-AR-3

Dear Mr. Sherrer,

After considering the application, any public comments, and other applicable materials as required by APC&EC Reg.8.211 and Ark. Code Ann. § 8-4-101 *et seq.*, this notice of final permitting decision is provided for:

Beasley Flooring Products, Inc.
State Highway 9 Spur
Melbourne, AR 72556

Permit Number: 0559-AR-3

Permitting Decision: approval with permit conditions as set forth in final Permit No. 0559-AR-3

Accessing the Permitting Decision and Response to Comments, if any:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0559-AR-3.pdf>.

Accessing the Statement of Basis:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0559-AR-3-SOB.pdf>.

The permitting decision is effective on the date stated in the attached Certificate of Service unless a Commission review has been properly requested under Arkansas Pollution Control & Ecology Commission's Administrative Procedures, Regulation No. 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. Such a request shall be in the form and manner

required by Reg.8.603, including filing a written Request for Hearing with the Commission secretary at 3800 Richards Rd, North Little Rock, Arkansas 72117. If you have any questions about filing the request, please call the Commission at 501-682-7890.

This permit is your authority to construct, operate, and maintain the equipment and control apparatus as set forth in your application initially received on 8/21/2020.

Sincerely,



William K. Montgomery
Associate Director, Office of Air Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure: Certificate of Service
cc: jhale@trinityconsultants.com

CERTIFICATE OF SERVICE

I, Cynthia Hook, hereby certify that the final permit decision notice has been mailed by first class mail to Beasley Flooring Products, Inc., 485 State Highway 9 Spur, Melbourne, AR, 72556, on this 17th day of February, 2021.

A handwritten signature in black ink that reads "Cynthia Hook". The signature is written in a cursive style with a large initial "C" and a long, sweeping tail.

Cynthia Hook, AA, Office of Air Quality



DIVISION OF ENVIRONMENTAL QUALITY

MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 0559-AR-3

IS ISSUED TO:

Beasley Flooring Products, Inc.
State Highway 9 Spur
Melbourne, AR 72556
Izard County
AFIN: 33-00013

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DIVISION OF ENVIRONMENTAL QUALITY'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. § 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

A handwritten signature in black ink, appearing to read "William K. Montgomery", is written over a horizontal line.

William K. Montgomery
Associate Director, Office of Air Quality
Division of Environmental Quality

February 17, 2021

Date

Beasley Flooring Products, Inc.

Permit #: 0559-AR-3

AFIN: 33-00013

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Beasley Flooring Products, Inc.

Permit #: 0559-AR-3

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List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
No.	Number
NO _x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter Equal To Or Smaller Than Ten Microns
PM _{2.5}	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Beasley Flooring Products, Inc.

AFIN: 33-00013

PERMIT NUMBER: 0559-AR-3

FACILITY ADDRESS: State Highway 9 Spur
Melbourne, AR 72556

MAILING ADDRESS: 485 State Highway 9 Spur
Melbourne, AR 72556

COUNTY: Izard County

CONTACT NAME: Larry Sherrer

CONTACT POSITION: Maintenance Manager III

TELEPHONE NUMBER: (870) 368-4005

REVIEWING ENGINEER: Derrick Brown

UTM North South (Y): Zone 15: 3991067.99 m

UTM East West (X): Zone 15: 597239.66 m

Beasley Flooring Products, Inc.
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Section II: INTRODUCTION

Summary of Permit Activity

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.

Process Description

Beasley Flooring Products produces finished, engineered wood floor of various widths and thicknesses. It is manufactured from components brought in by truck to the warehouse and production facility.

The major components are...(1) Lamella (the face): Thin sliced or sawn veneers of mostly white oak with some hickory and occasionally other hardwood species; (2) Backs (the back): Red oak, rotary peeled veneer sheets; (3) Cores (the middle): High Density Fiberboard or Russian Birch Plywood (depending on the final product).

These major components are assembled utilizing an adhesive mixed with a catalyst (SN-24) and hot pressed for various times depending on the width into a solid panel. These panels are then sent to the milling line of the Engineered Mill. There they are cut to specific widths and lengths. They are milled on the long and short sides. They are graded and stacked in bundles in preparation for finishing. The wood waste for this mill is controlled by baghouse #4 (SN-22) and is transferred to either the Wood Waste Loadout (SN-20) or one of the storage silos (IA, A-13).

The unfinished engineered wood floor bundles are taken to the finishing line for finishing. There the engineered flooring planks are first sanded and wire brushed in preparation for coatings. Wood waste from these two processes is controlled by Baghouse #5 (SN-23) and is transferred to either the Wood Waste Loadout (SN-20) or one of the storage silos. The planks are then stained (SN-08) and heated in the curing oven (SN-11). Wood fillers, sealers and top coats are applied (SN-09, SN-10, SN-21). In this final coating process the planks are brushed and waste from this process travels through Baghouse #3 (SN-03) and ends in either the Wood Waste Loadout (SN-20) or one of the storage silos. The planks then undergo a final grading process if rework is necessary they are cut and re-milled. Waste from this process is controlled by Baghouse #3 (SN-03) and is transferred to either the Wood Waste Loadout (SN-20) or one of the storage silos (IA, A-13).

Baghouses #1 and #2 (SN-01 and SN-02) provide particulate control for additional processing lines of the engineered flooring planks. Wood waste generated from these lines is transferred to either the Wood Waste Loadout (SN-20) or one of the storage silos (IA, A-13).

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Wood waste is transported off site via truck. These trucks pull under the Wood Waste Loadout (SN-20) and the material is gravity loaded. Beasley has the option to convey the wood waste to one of three wood storage silos (IA, A-13), if needed. This option will be only used in an emergency situation.

A 10,000-gallon above ground storage tank is used for storage of No. 2 diesel fuel (IA, A-13). The diesel fuel is used to fuel facility equipment and vehicles.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective March 14, 2016
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective October 10, 2019

Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	6.7	27.8
PM ₁₀	6.7	27.8
SO ₂	0.1	0.1
VOC	180.1	95.1
CO	0.1	0.5
NO _x	0.2	0.6
Acetone	26.36	10.28
Total HAP	180.01	9.01/24.01~

~Single/Combination HAP.

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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-R0 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 Prefinished 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 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 tpy of VOC, and 137.5 tpy 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 fillers (SN-21). The emission increase permitted with this modification was the 0.7 tpy VOC associated with the UV wood fillers.

Permit #0559-AOP-R5 Renewal #2 was issued to Unilin Flooring NC, LLC-Columbia Flooring Division on March 1, 2011. 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;

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4. Require a performance stack test for SN-05, no later than December 31, 2010 and an every five-year stack test 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 boilers (SN-05/06), SC #13;
7. Update content limits and remove TLV tables for coatings SN-07, 08, 09, 10 and 21;
8. Correct math error for lbs/hr emissions, 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 IAs: 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 Total 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 Total HAPs.

Permit #0559-AOP-R6 was issued to Unilin Flooring NC, LLC - Columbia Flooring Division on February 2, 2012. This permitting action modified 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 were no changes in emissions.

Permit #0559-AOP-R7 was issued to Unilin Flooring NC, LLC - Columbia Flooring Division on November 26, 2012. This permitting action is necessary to modify the permit as follows:

1. HAPs in the Emission Summary table were changed from individual named HAPs to "Any Single HAP" and "Total HAPs";
2. Add recordkeeping requirement to calculate and maintain monthly Plantwide HAP emissions for affected sources SN-05, 06, 08, 09, 10, 11, 17, 19 and 21, which demonstrate that HAP emissions must be less than 10.00 tpy of any single HAP and 25.00 tpy of total combined HAPs emitted per rolling 12 month period, Plantwide Condition #7;

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3. Clarify operating hours recordkeeping for Boilers SN-05 and SN-06 and install non-resettable meters, if non-resettable meters are not already installed, SC #11;
4. Re-install a small natural gas-fired oven SN-11 for curing water based stains;
5. Revise hourly VOC and HAP emission limits to reflect a maximum allowable content limit lb/gal for SN-08, 09, 10 and 21, SC #28;
6. Revise VOC and HAP annualized emission rates for SN-08, 09, 10 and 21, SC #21 and #22;
7. Revise TLV Table and other TLV limits for SN-08, 09, 10 and 21; and
8. Revise maximum allowable *hourly* emissions for the lumber drying kilns (SN-17) to reflect the total emissions measured over the entire charge (full kiln) at a minimum 24-hour drying cycle. This revision does not change annual VOC or HAP emissions.

Total permitted annual emission changes associated with these modifications are: 0.1 tpy (tons per year) PM, 0.1 tpy PM₁₀, 0.1 tpy SO₂, 77.2 tpy VOC, 0.6 tpy NO_x, <10.00 tpy any Single HAP, and <25.00 tpy Total HAPs. Individual HAPs were changed to Total HAPs

Permit #0559-AOP-R8 was issued February 22, 2016. This permit included the following:

1. Renew Title V operating air permit;
2. Identify new facility name;
3. Allow any single HAP for materials in the Finishing Department (SN-08, 09, 10, and 21) with emissions equal or less than 10 tons per year or any HAP with a TLV greater than 1 mg/m³, regardless of emission rates;
4. Replace HAP TLV Table and associated conditions with PAER emission rate calculation for daily maximum usage or prior Department approval for any other HAP that does not meet the above limitations;
5. Update 40 C.F.R. § 63 Subpart ZZZZ, amended January 30, 2013, conditions for SN-19;
6. Add Engineered Hardwood Flooring Line (SN-22) with Baghouse #4;
7. Add Engineered Hardwood Flooring Line (SN-23) with Baghouse #5;
8. Add annual process limit for SN-22 and SN-23 combined for hardwood flooring;
9. Add Hot Melt Adhesive Application and Wood Press (SN-24);
10. Add annual usage limit for SN-24 hot melt adhesive; and
11. Add a content limit for hot melt adhesive.

Total annual emission changes associated with this modification are: +0.5 tpy PM/PM₁₀ and +2.9 tpy VOC.

Permit #0559-AOP-R9 was issued November 6, 2017. This modification revised PM, PM₁₀, CO, and NO_x emission limits for the wood fired boilers (SN-05 and SN-06) using AP-42 emission factors rather than past stack data. Also, the facility removed the Diesel Engine Emergency Generator SN-19. This modification increased PM, PM₁₀, and NO_x emissions by 47.9, 47.9, and 11.1 tons per year respectively.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-01	Baghouse #1	PM ₁₀	1.8	7.6
SN-02	Baghouse #2	PM ₁₀	1.8	7.6
SN-03	Baghouse #3	PM ₁₀	2.7	11.8
SN-08	Stains	VOC	49.0	95.0*
SN-09	Sealers	VOC	30.0	95.0*
SN-10	Topcoats	VOC	20.0	95.0*
SN-11	Curing Oven	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.5
		NO _x	0.2	0.6
SN-20	Wood Waste Loadout	PM ₁₀	0.1	0.1
SN-21	Fillers	VOC	21.0	95.0*
SN-22	Baghouse #4	PM ₁₀	0.1	0.3
SN-23	Baghouse #5	PM ₁₀	0.1	0.3
SN-24	Adhesives	VOC	60.0	95.0*

*VOC limit for sources SN-08, SN-09, SN-10, SN-21, and SN-24.

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-01	Baghouse #1	PM	1.8	7.6
SN-02	Baghouse #2	PM	1.8	7.6
SN-03	Baghouse #3	PM	2.7	11.8

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SN	Description	Pollutant	lb/hr	tpy
SN-07	Equipment Cleaning Solvent	Acetone	26.36	10.28
SN-08	Stains	HAPs	49.0	9.00/24.00**
SN-09	Sealers	HAPs	30.0	9.00/24.00**
SN-10	Topcoats	HAPs	20.0	9.0/24.00**
SN-11	Curing Oven	PM HAPs	0.1 0.01	0.1 0.01
SN-20	Wood Waste Loadout	PM	0.1	0.1
SN-21	Fillers	HAPs	21.0	9.00/24.00**
SN-22	Baghouse #4	PM	0.1	0.3
SN-23	Baghouse #5	PM	0.1	0.3
SN-24	Adhesives	HAPs	60.0	9.00/24.00**

**HAP limit for sources SN-08, SN-09, SN-10, SN-21, and SN-24.

- Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Limit	Regulatory Citation
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
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

- The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation 18, if the emission of the air contaminant constitutes air pollution within the meaning of Ark. Code Ann. § 8-4-303. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Reg.18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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SN-07 Conditions

6. The permittee shall not use more than 3,120 gallons of Acetone at SN-07 per rolling 12 month period. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
7. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #6. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Division of Environmental Quality personnel upon request. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-08, SN-09, SN-10, SN-21, SN-24 Conditions

8. The permittee may not emit any HAP with a TLV less than 1 mg/m³ at sources SN-08, SN-09, SN-10, SN-21, and SN-24 unless it meets the exemption specified in Specific Condition 9. Compliance with this condition shall be shown by compliance with Specific Conditions 9 through 10. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
9. The permittee may use individual HAP-containing materials at SN-08, SN-09, SN-10, SN-21, and SN-24, which do not meet the TLV requirements of Specific Condition 8, provided that the daily maximum hourly emission rate for any individual HAP does not exceed the daily maximum hourly emission rate for any individual HAP does not exceed the daily maximum hourly emissions as determined by the Presumptively Acceptable Emission Rate (PAER) for each compound. The daily PAER is the product in pounds per hour of HAP emitted, of 0.11 and the TLV (m/m³), as listed in the most recent ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs), and 24 hours per day for each HAP-containing material used. The hourly emission rate shall be based on the maximum feed rate of the equipment and the highest weight percent HAP in the material as presented in the Material Safety data Sheet (MSDS) or equivalent technical document. Average feed rates and average weight percent cannot be used. The PAER value may be obtained by using the following formula:

Short Term (Daily) Individual HAP Limit Equation

$$\text{PAER (lb/day)} = 0.11 \times \text{TLV (mg/m}^3\text{)} \times 24 \text{ hours/day}$$

[Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

10. The permittee shall maintain TLV records which demonstrate compliance with Specific Condition 8 and daily records which demonstrate compliance with Specific Condition 9. The permittee shall maintain daily records of the ACGIH TLV values as listed in the

most recent ACGIH handbook of TLVs and BEIs or equivalent data for each HAP-containing material used at the facility. The weight percent of individual HAP in the material as applied and the corresponding TLV should be noted in these records. The permittee shall maintain daily, monthly, and annual records of material usage and associated HAP emissions to demonstrate compliance with this limit. Daily records shall be updated by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual day and month's data shall be maintained on-site and made available to Department personnel upon request. Legible MSDS or equivalent technical documents must be retained for a minimum of 24 months beyond the date of the materials' last use. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

11. The permittee shall not emit in excess of 95 tons of VOC at sources SN-08, SN-09, SN-10, SN-21, and SN-24 per consecutive 12 month period. Compliance with this condition will be demonstrated by compliance with Specific Condition #. [Reg.19.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
12. The permittee will maintain monthly records which track VOC usage and calculate total VOC emissions from sources SN-08, SN-09, SN-10, SN-21, and SN-24. The permittee will update the 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
13. The permittee will maintain monthly records which track HAP usage and calculate single and total HAP emissions from sources SN-08, SN-09, SN-10, SN-21, and SN-24. The permittee will update the 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-20 Conditions

14. The permittee shall not exceed a throughput of 15,000 tons of wood waste at SN-20 per rolling 12-month period. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
15. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #14. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Division of Environmental Quality personnel upon request. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and Regulation 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated August 21, 2021. [Reg.19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
Natural Gas Heaters (2 @ 1.0 MMBtu/hr each)	A-1
Diesel Fuel Storage Tank (10,000 gallons)	A-3
Eight Electric UV Curing Units (Lights)	A-13
Three Wood Storage Silos	A-13

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 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 (Ark. Code Ann. § 8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Division of Environmental Quality in writing within thirty (30) days after each of the following events: commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Reg.19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Reg.19.410(B) and/or Reg.18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must keep records for five years to enable the Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, to determine compliance with the conditions of the permit. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Division of Environmental Quality electronically using <https://portal.adeq.state.ar.us> or mail them to the address below. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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Office of Air Quality

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ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or 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) existing equipment already operating according to the time frames set forth by the Division of Environmental Quality. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Division of Environmental Quality within sixty (60) calendar days after the completion of testing. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Reg.19.303 and/or Reg.18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Division of Environmental Quality may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Reg.19.601 and/or Reg.18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Division of Environmental Quality that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, overnight delivery, or online at <https://portal.adeq.state.ar.us>) to the Division of Environmental Quality by the

- end of the next business day after the occurrence or the discovery of the occurrence.
- c. The permittee must submit to the Division of Environmental Quality, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
11. The permittee shall allow representatives of the Division of Environmental Quality upon the presentation of credentials: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
 12. The Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the permit application. The Division of Environmental Quality has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 13. The Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Reg.19.410(A) and/or Reg.18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Division of Environmental Quality and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the

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disclosure statement. The Division of Environmental Quality may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Reg.19.407(B) and/or Reg.18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Reg. 18 and/or Reg. 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [Ark. Code Ann. § 8-1-105(c)]
19. 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 Division of Environmental Quality approval. The Division of Environmental Quality 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.

[Reg.18.314(A) and/or Reg.19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

20. 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 Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality 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;

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- d. The request contains such information necessary for the Division of Environmental Quality 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.

[Reg.18.314(B) and/or Reg.19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

21. 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 Division of Environmental Quality approval. The Division of Environmental Quality 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.

[Reg.18.314(C) and/or Reg.19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Reg.18.1001, Reg.19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]