

# ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1949-AR-3

IS ISSUED TO:

Akin Industries, Incorporated  
100 East Brookhaven  
Dumas, AR 71639  
Desha County  
AFIN: 21-00121

THIS PERMIT IS Akin Industries, Incorporated's AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'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. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Mike Bates  
Chief, Air Division

August 14, 2006  
Date

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**Section I: FACILITY INFORMATION**

PERMITTEE: Akin Industries, Incorporated

AFIN: 21-00121

PERMIT NUMBER: 1949-AR-3

FACILITY ADDRESS: 100 East Brookhaven  
Dumas, AR 71639

COUNTY: Desha County

CONTACT PERSON: David Patrick

CONTACT POSITION: EH&S Coordinator

TELEPHONE NUMBER: 870-367-6263

REVIEWING ENGINEER: Charles Hurt

UTM Zone 15

UTM North-South (Y): 3752.1 km

UTM East-West (X): 640.5 km

## **Section II: INTRODUCTION**

### **Summary**

Akin Industries, Inc. manufactures wood and upholstered furniture for the health care industry at its location of 100 East Brookhaven, Dumas, Desha County, Arkansas. This modification will allow the facility to utilize unused production capacity resulting in increased raw material usage. Akin requested to increase the permitted VOC emission limit from 72.0 tpy to 91.0 tpy, a 19.0 tpy increase. Actual PM, PM<sub>10</sub>, and HAP emissions will also increase, but the existing permit limits are based on the maximum production capacity of the equipment. Therefore, permitted PM, PM<sub>10</sub>, and HAP limits were not increased.

### **Process Description**

The wood manufacturing process begins when the various types and grades of lumber are received into the wood products building. In this building the lumber is cut, sanded, milled, or otherwise processed through various woodworking operations to create the wood furniture components. All sawdust generated from these operations is exhausted through two cyclones (SN-02 and SN-03) and one baghouse (SN-01). Sawdust emissions captured by the cyclones and baghouse are collected in the sawdust loadout and hauled offsite. Fugitive emissions generated from sawdust handling are designated SN-04.

An adhesive that is applied through a hand operated rolling technique is used to glue the wood furniture pieces together. The Volatile Organic Compounds (VOC) and HAP emissions associated with the application of these adhesives are designated as SN-12.

The assembled furniture is transported from the wood products building to the finishing room, which houses the coatings operations. After entering the finishing room, the assembled furniture is placed onto a pan conveyor which routes each piece through a series of hand-operated coatings application booths and natural gas fired curing ovens. Depending upon need, each piece may or may not receive a coat at each booth. The sources in this area are the NGR/Toner/Washcoat Booth (SN-05), Wiping Stain Booth (SN-06), Wiping Stain Oven (insignificant activity), Sealer Booth (SN-07), Lacquer Oven (insignificant activity), Lacquer Booth (SN-10), Lacquer Booth #2 (SN-11) and Edge Fill/Touch-Up Booth (SN-14). The furniture is routed through the Lacquer Oven twice, once after the sealer booth, then again after the second lacquer booth. Both ovens are natural gas fired.

Following the coatings applications, the furniture is routed to the touch-up area (SN-13) within the finishing room. Should the piece require edge-fill due to imperfections or irregularities in the wood edges, it is moved by-hand to the Edge Fill/Touch-up Booth (SN-14) for repairs.

In addition to traditionally finished wood furniture, Akin's Dumas facility manufactures vinyl laminated wood furniture. This type of furniture is characterized by a wood substrate covered by a thin layer of vinyl film that is affixed by an adhesive. In order to prepare the wood substrate for the application of the vinyl, the wood is sprayed with an adhesive and allowed to cure in the Adhesives area (SN-15) located in the Southeast corner of the upholstery building.

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After final assembly of the furniture is completed, the pieces are packaged and stored prior to shipment.

**Regulations**

<i>Source No.</i>	<i>Regulation Citations</i>
Plantwide	Regulation No. 18, <i>Arkansas Air Pollution Code</i>
	Regulation No. 19, <i>Regulations of the Arkansas Plan of Implementation for Air Pollution Control</i>

The following table is a summary of the facility's total emissions.

<b>Total Allowable Emissions</b>		
<b>Pollutant</b>	<b>Emissions Rates</b>	
	<b>lb/hr</b>	<b>tpy</b>
PM	10.6	45.7
PM <sub>10</sub>	10.6	45.7
VOC	232.0	91.0
Total HAP	---	23.7
Toluene*	185.7	7.88
2-Butoxyethanol*	67.6	1.23
Xylene*	208.0	4.00
Ethyl Benzene*	208.0	4.53
Methyl Isobutyl Ketone*	166.4	1.30
Methanol*	208.0	1.30
Naphthalene*	41.6	0.21
Dibutyl Phthalate*	4.64	1.75
Hexane*	162.4	4.90
Hexamethylene Diisocyanate*	0.3	0.10
Acetone**	208.0	20.00

\* HAPs included in the VOC total.

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

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### **Section III: PERMIT HISTORY**

Permit #**1949-A** was issued to Akin Industries, Inc. in Dumas on January 9, 2001. No previous permits were issued for this facility. This facility was acquired by Akin Industries in 2000. It was previously operated as a wood furniture manufacturing facility by Bassett Furniture Industries of North Carolina, Inc. The facility was inactive for an approximate twelve-month time period preceding Akin's acquisition of the plant.

Permit #**1949-AR-1** was a modification that allowed the facility to increase its emission of acetone to 20 tons per year. The facility requested increased acetone usage in order to reduce the usage of Hazardous Air Pollutants (HAP).

Permit #**1949-AR-2** was a modification which allowed the facility to construct and operate two spray application booths (SN-14 and SN-15) along with a coating testing process (Insignificant Activity). With the permit modification the annual permitted emissions of total HAP increased by 0.2 tpy to a total allowable combined HAP emission of 23.7 tpy.

**Section IV: EMISSION UNIT INFORMATION**

**Specific Conditions**

- The permittee shall not exceed the emission rates set forth in the following table. Compliance with the limits for woodworking operations shall be demonstrated by permitting these sources at maximum capacity. Compliance with the limits for the coatings operations shall be demonstrated by compliance with Specific Condition #6. [Regulation 19, §19.501 *et seq.*, effective December 19, 2004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
01	Woodworking	PM <sub>10</sub>	0.1	0.4
02	Woodworking	PM <sub>10</sub>	5.2	22.5
03	Woodworking	PM <sub>10</sub>	5.2	22.5
04	Woodworking	PM <sub>10</sub>	0.1	0.2
Coatings Operations				
05	NGR/Toner/Washcoat Booth	VOC	208.0	91.0*
06	Wiping Stain Booth			
07	Sealer Booth			
10	Lacquer Booth #1			
11	Lacquer Booth #2			
12	Glue Emissions			
13	Touch-Up Area			
14	Edge Fill/Touch-up Booth			
15	Adhesives	VOC	24.0	

\* VOC Annual Plantwide Limit

- The permittee will not exceed the emission rates set forth in the following table. [§18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
01	Woodworking	PM	0.1	0.4
02	Woodworking	PM	5.2	22.5
03	Woodworking	PM	5.2	22.5
04	Woodworking	PM	0.1	0.2

SN	Description	Pollutant	lb/hr	tpy
Coatings Operations		Acetone	208.0	20.00**
05	NGR/Toner/Washcoat Booth	Total HAP*	---	23.7*
06	Wiping Stain Booth	Toluene	166.4	7.88*
07	Sealer Booth	2-butoxyethanol	67.6	1.23*
10	Lacquer Booth #1	Xylene	208.0	4.00*
11	Lacquer Booth #2	Ethyl Benzene	208.0	4.53*
12	Glue Emissions	MIBK	166.4	1.30*
13	Touch-Up Area	Methanol	208.0	1.30*
14	Edge Fill/Touch-up Booth	Naphthalene	41.6	0.21*
		Dibutyl Phthalate	41.6	1.75*
		Hexane	145.6	4.90*
15	Adhesives	Toluene	19.3	*
		Hexamethylene Diisocyanate	0.30	*
		Dibutyl Phthalate	0.48	*
		Hexane	16.8	*
		Acetone	24.0	**

\* The facility may emit up to the permitted limit, for each individual HAP, but in no case shall the sum of the individual HAP emissions exceed that of the permitted limit for Total HAP.

\*\* Acetone is not a HAP and the annual emission of Acetone from all sources must not exceed 20.0 tpy.

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

**Table 4 - Visible Emissions**

SN	Limit	Regulatory Citation
01-04	15%	§18.501

- The permittee will 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 A.C.A. §8-4-303. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]
- The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- The permittee shall not exceed the VOC content (as applied) for any coating product used in the Coatings Operations (SN-05 through SN-07 and SN-10 through SN-14) or any glue used in the adhesives operations (SN-15) as outlined in the following table. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

<b>Product</b>	<b>VOC Content (lb/gal)</b>
All Coatings	8.0
Adhesives	8.0

7. The permittee shall not exceed the component content for any coating product used in the Coatings Operations (SN-05 through SN-07 and SN-10 through SN-14) or any glue used in the adhesives operations (SN-15) as outlined in the following table. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

<b>Product</b>	<b>HAP/Toxic Content (lb/gal)</b>
Acetone	8.0
Toluene	5.1
2-Butoxyethanol	2.6
Xylene	8.0
Ethyl Benzene	8.0
MIBK	5.5
Methanol	7.0
Naphthalene	1.4
Dibutyl Phthalate	0.13
Hexane	4.7

8. The records of the monthly VOC emissions shall be recorded in the format of the table in Appendix A or equivalent. The permittee shall track the raw material name, MSDS number, VOC content (lb/gal), and monthly usage (gal/month). [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
9. The records of the monthly HAP emissions shall be recorded in the format of the table in Appendix B or equivalent. The permittee shall track the raw material name, MSDS number, HAP content (lb/gal), and monthly usage (gal/month). [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions #6, #7, #8, and #9. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. A twelve month rolling average and each individual month's data shall be submitted in accordance with General Condition 6. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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11. The permittee shall not exceed the HAP or VOC content limits given in Specific Conditions #6 and #7. Use of a coating or solvent containing different components in amounts equal to or less than the HAP contents listed in Specific Condition #7 may be substituted provided that the ACGIH Threshold Limit Values, as listed on the current MSDS forms, or in the ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs), of the new components are equal to or higher than that given in Specific Condition #7. These substitution values shall be documented, maintained on site, and provided to Department personnel upon request and may be used by the Department for enforcement purposes. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
12. The permittee shall not emit in excess of 91.0 tons of VOC during any consecutive twelve month period. Compliance with this condition will be shown through compliance with Specific Condition #13. [Regulation 19, §19.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The permittee shall maintain records of the amount of VOC emissions each month. These records shall indicate the amount of each VOC-containing material used during that month as well as the corresponding VOC content for that material. The monthly emissions shall be calculated for each material by multiplying the usage by the corresponding VOC content. The total VOC emissions from all products shall also be indicated on these records. A copy of the MSDS sheet for each product used shall accompany these records. 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 average of total VOC emissions and each individual month's data shall be kept on-site and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. The permittee shall not emit in excess of 9.5 tons of any single hazardous air pollutant or 23.7 tons of any combination of hazardous air pollutants during any consecutive twelve month period. Compliance with this condition shall be shown by compliance with Specific Condition #15. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee shall maintain records of the amount of HAP emissions each month. These records shall indicate the amount of each HAP-containing material used during that month, as well as the corresponding HAP content for each HAP in that material. The monthly emissions shall be calculated for each material by multiplying the usage by the corresponding HAP content(s). The total HAP emissions from all products shall also be indicated on these records. A copy of the MSDS sheet for each product used shall accompany these records. 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 of HAP emissions and each individual month's data shall be kept on-site and shall be made available to Department personnel upon request. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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**Section V: INSIGNIFICANT ACTIVITIES**

The Department 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 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated **4/5/2006**.

<b>Description</b>	<b>Category</b>
Wiping Stain Oven – 1.0 MMBtu/hr	Group A, Item 1
Lacquer Oven – 1.5 MMBtu/hr	Group A, Item 1
Coatings Laboratory	Group A, Item 8

## **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 (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 that 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.
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. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after 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. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit; such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §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 Department at the address below. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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

7. The permittee will 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 Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms;
  - d. Utilities for sampling and testing equipment.
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §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 Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. The permittee demonstrates to the satisfaction of the Department 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.

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- b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
  - c. The permittee must submit to the Department, 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 will allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §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 Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, 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. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §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 Department 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

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transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department 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. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]

**APPENDIX A**

**Sample VOC Emissions Rate Calculation Format**

**APPENDIX B**

**Sample HAP Emissions Rate Calculation Format**

## APPENDIX C

## APPENDIX D



