

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1949-AR-5 AFIN: 21-00121

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Joernes Healthcare, Inc., dba Akin Industries, Incorporated
100 East Brookhaven
Dumas, Arkansas 71639

3. PERMIT WRITER:

Charles Hurt, P.E.

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Institutional Furniture Manufacturing
NAICS Code: 337127

5. SUBMITTALS:

4/8/2009

6. REVIEWER'S NOTES:

Joernes Healthcare, Incorporated (AFIN: 21-00121) formerly known as Akin Industries, Incorporated manufactures wood and upholstered furniture for the healthcare industry at its location of 100 East Brookhaven, Dumas, Desha County, Arkansas. Joernes requested the permit be modified to include use of handheld aerosol spray cans (SN-16) for various touch up activities at the facility. The emissions associated with this modification is 0.13 tpy VOC, and the facility did not request an increase in the permitted plantwide limit of 99.8 tpy VOC.

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 last inspect in December 2008 and determined to be operating out of compliance with Permit No. 1949-AR-4. The inspection report cited inaccurate record keeping and failure to maintain sufficient records which demonstrate major source threshold were not exceed and failure to submit upset condition reports. A CAO is pending.

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?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

There are no applicable source or pollutant specific regulations.

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:

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

Maximum Single HAP Concentration (lb/gal)	Minimum TLV (mg/m ³)
8.00	176.1
7.00	154.1
6.00	132.1
5.00	110.1
4.00	88.1
2.00	44.0
3.00	66.0

Maximum Single HAP Concentration (lb/gal)	Minimum TLV (mg/m ³)
2.00	44.0
1.00	22.0
0.75	16.5
0.50	11.0
0.25	5.5
0.10	2.2

Other Modeling:

The facility has not reported any use of materials containing hydrogen sulfide or styrene. Therefore, odor modeling is not warranted at this time.

12. CALCULATIONS:

SN	Emission Factor Source	Emission Factor and units	Control Equipment Type	Control Equipment Efficiency	Comments
01	Manufacturer's Specifications	PM: 0.5 mg/m ³	baghouse	99%	Air flow rate: 35,000 cfm
02, 03	AP-42, 4 th Ed. table 10.4.1	PM: 0.03 gr/ft ³	cyclone		Air flow rate: 20,000 cfm
04	Mass Balance, AP-42	1 lb _{PM} / 1 T _{sawdust}	baghouse cyclone	99% 85%	
05-07, 10-14	Equipment Spec. & MSDS sheets	<i>maximum lb/gal</i> VOC: 8.0 HAPs: 8.0 Acetone: 6.7			Maximum Capacity: 26 gal/hr
15	Equipment Spec. & MSDS	<i>Max Content lb/gal</i> VOC: 8.0 HAPs: 8.0 Acetone: 6.7			Maximum Capacity: 3 gal/hr
16	Mass Balance, MSDS	<i>Max Content lb/gal</i> VOC: 8.0 HAPs: 5.0			Maximum Capacity: 0.11 gal/hr

13. TESTING REQUIREMENTS:

The permit does not require testing.

14. MONITORING OR CEMS

The permit does not require CEMS or monitoring devices.

15. RECORDKEEPING REQUIREMENTS:

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

SN	Recorded Item	Limit	Frequency	Report (Y/N)
05-07, 10-15, 16	Monthly VOC Emissions [material, MSDS, VOC content (lb/gal), & usage (gal/month)]	99.8 tpy 8.0 lb/gal	Monthly	Y
	Monthly HAP Emissions [material, MSDS, HAP content (lb/gal), & usage (gal/month)]	23.7 tpy	Monthly	Y
16	Handheld Aerosol Spray Can Usage	300 cans/yr	Monthly	Y

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-04	15%	Department Guidance	Inspector's Observation

17. DELETED CONDITIONS:

No conditions were deleted.

18. GROUP A INSIGNIFICANT ACTIVITIES

The permittee did not request any new modifications to the insignificant activity table.

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1949-AR-4

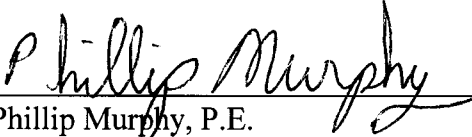
Permit #: 1949-AR-5

AFIN: 21-00121

Page 5 of 5

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

A handwritten signature in cursive script that reads "Phillip Murphy". The signature is written in black ink and is positioned above a horizontal line.

Phillip Murphy, P.E.

Engineering Supervisor, Air Division

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Facility Name: Joernes Healthcare,
 Inc., dba Akin Industries, Incorporated
 Permit Number: 1949-AR-5
 AFIN: 21-00121

\$/ton factor 22.07
 Minimum Fee \$ 400
 Minimum Initial Fee \$ 500
 Check if Administrative Amendment

Permit Predominant Air Contaminant
 Net Chargeable Emission Increase
 Permit Modification Fee \$
 Initial Permit Fee \$
 Annual Chargeable Emissions (tpy)

Old Permit	New Permit
99.8	99.8
0	
400	
0	
99.8	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	45.7	45.6	-0.1
PM ₁₀	45.7	45.6	-0.1
SO ₂	0	0	0
VOC	99.8	99.8	0
CO	0	0	0
NO _x	0	0	0
Acetone	20	20	0

