

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1949-AR-9 AFIN: 21-00121

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Akin House, Incorporated
100 East Brookhaven
Dumas, Arkansas 71639

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Institutional Furniture Manufacturing
NAICS Code: 337127

5. SUBMITTALS:

3/6/2014

6. REVIEWER'S NOTES:

The facility submitted an administrative amendment to remove the usage of sealer coatings during operation and update source descriptions in the permit to reflect the change. Additionally, the facility is transferring ownership from Joernes Healthcare, Incorporated to Akin House, Incorporated.

7. COMPLIANCE STATUS:

As of March 6, 2014, there are no compliance issues with the facility.

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, or*

- CO_2e potential to emit $\geq 100,000$ tpy and ≥ 100 tpy/ ≥ 250 tpy of combined GHGs?

If yes, explain why this permit modification is not PSD.

9. GHG STATUS:

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: _____

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
None		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

Pursuant to Act 1302 of the Regular Session of the 89th General Assembly of the State of Arkansas, no dispersion modeling was performed by ADEQ because it was not voluntarily proposed and agreed to by the facility. No other information was submitted by the applicant. Criteria pollutants were not evaluated for impacts on the NAAQS.

b) 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 PAER or 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

Maximum Single HAP Concentration (lb/gal)	Minimum TLV (mg/m ³)
6.00	132.1
5.00	110.1
4.00	88.1
2.00	44.0
3.00	66.0
2.00	44.0
1.00	22.0
0.75	16.5
0.50	11.0
0.25	5.5
0.10	2.2

13. 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

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

15. 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)
None				

16. 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)]	9.5 tpy single HAP 23.7 tpy total HAP	Monthly	Y
16	Handheld Aerosol Spray Can Usage	300 gallons/yr (3,000 cans, 384 mL each)	Monthly	Y

17. OPACITY:

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

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18. DELETED CONDITIONS:

Former SC	Justification for removal
	None

19. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
There is no modification to the insignificant activities.								

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1949-AR-8

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION