

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1949-AR-10 AFIN: 21-00121

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Akin House, Inc.
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. 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
9/21/2018	De minimis	New coatings mixing system

6. REVIEWER'S NOTES:

With this deminimis modification, the facility is adding a coatings mixing system as SN-17. This source will be part of the coatings operations emissions bubble and no increase in permitted emissions is requested for the bubble. Additionally, this modification replaces the TLV condition for the coatings operations with a condition that limits the facility from emitting any single HAP with TLV less than 1 mg/m³. There are no changes to the facility's permitted annual emissions.

7. COMPLIANCE STATUS:

As of September 21, 2018, there are no compliance issues with the facility.

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?

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. PERMIT SHIELD – TITLE V PERMITS ONLY:

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?

If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

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

c) H₂S Modeling:

The facility does not have any H₂S emissions.

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, 17	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
N/A				

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)
N/A				

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, 17	VOC content of coating products	All coatings: 8.0 lb/gal Adhesives: 8.0 lb/gal	Monthly	Y
	TLV of any HAPs emitted	TLV < 1 mg/m ³	Monthly	Y
	Total and monthly VOC emissions	99.8 tons per consecutive 12 month period	Monthly	Y
	Total and monthly HAP emissions	Single HAP: 9.5 tons per consecutive 12 month period Total HAPs: 23.7 tons per consecutive 12 month period	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

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

19. GROUP A INSIGNIFICANT ACTIVITIES:

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

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:

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

Permit #
1949-AR-9

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

