

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2079-A AFIN: 01-00022

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Belleville Shoe South, Inc.
1800 South Jackson

DeWitt, Arkansas 72042

3. PERMIT WRITER:

Nelia Sandoval

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Other Footwear Manufacturing
NAICS Code: 316219

5. SUBMITTALS:

9/11/2008

6. REVIEWER'S NOTES:

Belleville Shoe South, Inc. (01-00022) operates a facility located at 1800 South Jackson, DeWitt, AR 72042. This facility manufactures military footwear (boots). Emissions from the facility are as a result of using sole cement and solvents in several departments to manufacture the boots. This minor permit modification will result in a permitted decrease of 43.4 tpy of VOC, 12.68 tpy of Toluene, and 35.09 tpy of Hexane and a permitted increase of 5.9 tpy of PM/PM₁₀, and 44.45 tpy of Acetone. This modification will allow Belleville Shoes to change from a Title V to a Minor Source permit.

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 in operation when the permit application for air permit 2079-AOP-R0 was filed in October 2004. The facility was already operating with air emissions qualifying the facility for a Title V Major Source permit.

On September 11, 2008, ADEQ sent the facility a proposed CAO written to address violations of the Arkansas Air Pollution Control Code.

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?

If yes, explain why this permit modification not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	HAPs	*40 CFR Part 63, Subpart OOOO - National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles

*A permit Modification to address compliance must be submitted no later than 6 months after the effective date of permit #2079-A.

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:

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Toluene	75.36	8.29	1.40	Yes
Acetone**	1187.2	130.6	67.50	Yes

** Emissions include Cleaning Solution #5 used Plantwide.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 02 and 03	MSDS	Mass Balance	None	N/A	None

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

14. 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				

15. RECORDKEEPING REQUIREMENTS:

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

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Plantwide	Acetone content	7.13 lb/gal 37,250 gal/yr	As needed Monthly	N
Plantwide	Acetone content of Cleaning Solution #5 used Plantwide	6.59 lb/gal 2,200 gal/yr	Monthly	N
01	VOC content of thread lubricator Thread Lubricator VOC content of Rubber Adhesive Acetone content of Rubber Adhesive Rubber Adhesive	3.4 lb/gal 100 gal/yr 4.8 lb/gal 0.93 lb/gal 800 gal/yr	Monthly	N
02	VOC content of Leather Softener Leather Softener VOC content of Contact Adhesive Acetone content of Contact Adhesive Contact Adhesive VOC content of Box Toe Solvent Acetone content of Box Toe Solvent Toluene content of Box Toe Solvent Box Toe Solvent	7.3 lb/gal 750 gal/yr 3.6 lb/gal 1.88 lb/gal 10,600 gal/yr 7.2 lb/gal 2.82 lb/gal 0.75 lb/gal 3,500 gal/yr	Monthly	N
03	Acetone content of Tan A Cement Tan A Cement Acetone content of Tan B Cement Tan B Cement Acetone content of B Black Cement B Black Cement VOC content of V4092 Toluene content of V4092 V4092 VOC content of SP Urethane Acetone content of SP Urethane SP Urethane VOC content of Chlorination Chlorination VOC content of Brown Pigment Brown Pigment VOC content of Black Pigment Black Pigment	5.14 lb/gal 4,500 gal/yr 5.15 lb/gal 4,500 gal/yr 5.28 lb/gal 750 gal/yr 6.1 lb/gal 0.76 lb/gal 250 gal/yr 0.6 lb/gal 5.22 lb/gal 10,400 gal/yr 7.5 lb/gal 2,400 gal/yr 3.4 lb/gal 10 gal/yr 3.5 lb/gal 5 gal/yr	Monthly	N

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16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
N/A			

17. DELETED CONDITIONS:

Former SC	Justification for removal
14	Cement no longer contains hexane
21	Last Slip no longer contains hexane

18. GROUP A INSIGNIFICANT ACTIVITIES

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Cutting/Molding	A-13							
Leather Cutting/Sewing	A-13							
Leather polishing	A-13							
Packaging	A-13							
Press Machines	A-13							
Rolled Glue Sticks Machine	A-13							
Rubber Press Roller	A-13							0.0008

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19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2079-AOP-R1

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.



Karen Cerney, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION



Fee Calculation for Major Source Changing to Minor Source

Facility Name: Belleville Shoe South, Inc.
 Permit Number: 2079-A
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\$/ton factor 22.07
 Minimum Fee \$ 400

Annual Chargeable Emission (tpy) 74.7
 Permit Fee \$ 400

Title V Permit Chargeable Emissions (tpy) ██████████

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Annual Chargeable Emissions
PM	<input checked="" type="checkbox"/>	0	5.9	5.9	
PM ₁₀	<input type="checkbox"/>	0	5.9	5.9	
SO ₂	<input checked="" type="checkbox"/>	0	0	0	
VOC	<input checked="" type="checkbox"/>	92.6	49.2	-43.4	
CO	<input type="checkbox"/>	0	0	0	
NO _x	<input checked="" type="checkbox"/>	0	0	0	
Acetone	<input checked="" type="checkbox"/>	30.25	74.7	44.45	
Hexane*	<input type="checkbox"/>	35.09	0	-35.09	
Toluene*	<input type="checkbox"/>	14.07	1.39	-12.68	

