

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2079-AOP-R0 AFIN: 01-00022

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality  
8001 National Drive  
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Belleville Shoe South, Inc.  
1800 South Jackson  
Dewitt, Arkansas 72042

3. PERMIT WRITER:

John Bailey

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Boots Manufacturers  
NAICS Code: 314301

5. SUBMITTALS:

October 20, 2004

6. REVIEWER'S NOTES:

Belleville Shoe South, Inc. located in Dewitt, Arkansas County, Arkansas 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 is an initial Title V permit for the facility which will be permitted to emit 88.2 tons per year of Volatile Organic Compounds (VOC), 34.8 tons per year of Hexane, 9.82 tons per year of Methyl Ethyl Ketone (MEK), 14.07 tons per year of Toluene, and 30.25 tons per year of Acetone.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

There are currently no enforcement issues associated with this facility.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N  
 Has the facility undergone PSD review in the past? N  
 Is the facility categorized as a major source for PSD? N  
     ≥ 100 tpy and on the list of 28? N  
     ≥ 250 tpy all other? N

PSD Netting

Was netting performed to avoid PSD review in this permit? N

Source and Pollutant Specific Regulatory Applicability

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

\*The effective date of the subpart is on May 29, 2006.

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit #	Permit #2079-AOP-R0	Change
VOC	Initial Title V Permit	88.2	+88.2
Acetone		30.25	+30.25
Hexane		34.8	+34.8
MEK		9.82	+9.82
Toluene		14.07	+14.07

10. 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:

1<sup>st</sup> 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/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Hexane	176.24	19.4	27.25	No
MEK	589.77	64.9	6.41	Yes
Toulene	188.4	20.7	14.33	Yes
Acetone	1187.2	130.6	30.25	Yes

2<sup>nd</sup> Tier Screening (PAIL)

ISCST3 air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m <sup>3</sup> ) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m <sup>3</sup> )	Pass?
Hexane	1,762.4	1,040.95	Y

11. 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 Sheets	Mass Balance	None		

12. RECORD KEEPING 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)
01	Leather Softener Rubber Cement	145 gal/yr 7,650 gal/yr	Rolling 12-Month	Y
02	Box Toe Cement Insole Cement Box Toe Solvent Last Slip	11,055 gal/yr 6,495 gal/yr 2,970 gal/yr 150 gal/yr	Rolling 12-Month	Y
03	Urethane Satreat	13,120 gal/yr 1,950 gal/yr	Rolling 12-Month	Y

16. DELETED CONDITIONS:

This is an initial permit for the facility and therefore no conditions have been voided.

17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

This is an initial permit for the facility.

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

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David Triplett, P.E.