

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2079-AR-1 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 Street
DeWitt, Arkansas 72042

3. PERMIT WRITER:

Alexander Sudibjo

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Other Footwear Manufacturing
NAICS Code: 316219

5. SUBMITTALS:

10/24/2011

6. REVIEWER'S NOTES:

This de minimis modification allows the facility to add a urethane primer to the boot sole process. The urethane primer contains methyl ethyl ketone and this modification will increase the plant's VOC emissions by 5.1 lb/hr and 5.0 tpy.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.
As of October 24, 2011, 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?
Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list?

N

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

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	HAPs	40 CFR 63, Subpart OOOO

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. MODELING:

Criteria Pollutants

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	77.2	Yes

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, 03, and 04	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
None				

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)
None				

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)
01	VOC content of thread lubricator Thread Lubricator	3.4 lb/gal 100 gal/yr	Monthly	N
	VOC content of Rubber Adhesive Acetone content of Rubber Adhesive Rubber Adhesive	4.8 lb/gal 0.93 lb/gal 800 gal/yr		
	VOC content of Leather Softener Leather Softener	7.3 lb/gal 750 gal/yr		
02	VOC content of Contact Adhesive Acetone content of Contact Adhesive Contact Adhesive	3.6 lb/gal 1.88 lb/gal 10,600 gal/yr	Monthly	N
	VOC content of Box Toe Solvent Acetone content of Box Toe Solvent Toluene content of Box Toe Solvent Box Toe Solvent	7.2 lb/gal 2.82 lb/gal 0.75 lb/gal 3,500 gal/yr		
	Acetone content of Tan A Cement Tan A Cement	5.14 lb/gal 4,500 gal/yr		
03	Acetone content of Tan A Cement Tan A Cement	5.14 lb/gal 4,500 gal/yr	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Acetone content of Tan B Cement Tan B Cement	5.15 lb/gal 4,500 gal/yr		
	Acetone content of B Black Cement B Black Cement	5.28 lb/gal 750 gal/yr		
	VOC content of V4092 Toluene content of V4092 V4092	6.1 lb/gal 0.76 lb/gal 250 gal/yr		
	VOC content of SP Urethane Acetone content of SP Urethane SP Urethane	0.6 lb/gal 5.22 lb/gal 10,400 gal/yr		
	VOC content of Chlorination Chlorination	7.5 lb/gal 2,400 gal/yr		
	VOC content of Brown Pigment Brown Pigment	3.4 lb/gal 10 gal/yr		
	VOC content of Black Pigment Black Pigment	3.5 lb/gal 5 gal/yr		
	VOC content of Urethane Primer Urethane Primer	5.9 lb/gal 1,680 gal/yr		
04	Acetone content of Cleaning Solution #5 used Plantwide	6.59 lb/gal 2,200 gal/yr	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02 and 03	20%	§19.503 of Regulation #19	

17. DELETED CONDITIONS:

Former SC	Justification for removal
	None

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

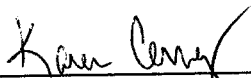
19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2079-A

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 Minor Source

Revised 08-30-11

Facility Name: Belleville Shoe South,
nc.

Permit Number: 2079-AR-1

AFIN: 01-00022

			Old Permit	New Permit
\$/ton factor	22.65	Permit Predominant Air Contaminant	74.7	74.7
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	74.7	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	5.9	5.9	0
PM ₁₀	5.9	5.9	0
SO ₂	0	0	0
VOC	49.2	54.2	5
CO	0	0	0
NO _x	0	0	0
Acetone	74.7	74.7	0
Toluene	1.39	1.39	0