

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2079-AR-2 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. NAICS DESCRIPTION AND CODE:

NAICS Description: Footwear Manufacturing  
NAICS Code: 316210

5. SUBMITTALS:

5/15/2013

6. REVIEWER'S NOTES:

This de minimis modification allows the facility to use two new chemicals, 3271-Z Nylon Primer and 3244-B Isocyanate Primer, in the sole laying department (SN-03). The 3271-Z Nylon Primer contains acetone. This facility's permitted annual emission is increasing by 1.2 tpy and 2.1 tpy for VOC and acetone respectively.

7. COMPLIANCE STATUS:

As of May 15, 2013, 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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list, or

Permit #: 2079-AR-2

AFIN: 01-00022

Page 2 of 6

- *CO<sub>2</sub>e potential to emit  $\geq 100,000$  tpy and  $\geq 100$  tpy/ $\geq 250$  tpy of combined GHGs?*

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

9. GHG MAJOR SOURCE (TITLE V):

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)
Facility	HAPs	40 CFR 63, Subpart OOOO

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:

This permitting action is for a Minor Source. Criteria pollutants were not evaluated for impacts on the NAAQS.

b) 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?
Toluene	75.36	8.29	1.40	Yes

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acetone	1187.2	130.6	79.5	Yes

13. 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

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	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		
02	VOC content of Leather Softener Leather Softener	7.3 lb/gal 750 gal/yr	Monthly	N
	VOC content of Contact Adhesive Acetone content of Contact Adhesive Contact Adhesive	3.6 lb/gal 1.88 lb/gal 10,600 gal/yr		
	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		
03	Acetone content of Tan A Cement Tan A Cement	5.14 lb/gal 4,500 gal/yr	Monthly	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	5.9 lb/gal			



Permit #: 2079-AR-2

AFIN: 01-00022

Page 6 of 6

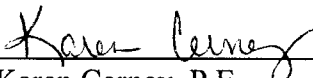
20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2079-AR-1

21. 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 08-20-12

Facility Name: Belleville Shoe South,  
Inc.

Permit Number: 2079-AR-2

AFIN: 01-00022

			Old Permit	New Permit
\$/ton factor	22.97	Permit Predominant Air Contaminant	74.7	76.8
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	2.1	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	76.8	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	5.9	5.9	0
PM <sub>10</sub>	5.9	5.9	0
SO <sub>2</sub>	0	0	0
VOC	54.2	55.4	1.2
CO	0	0	0
NO <sub>x</sub>	0	0	0
Acetone	74.7	76.8	2.1
Toluene	1.39	1.39	0