

## STATEMENT OF BASIS

For the issuance of Air Permit # 2079-AR-3 AFIN: 01-00022

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Belleville Shoe Manufacturing Company d/b/a 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:

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
11/5/2014	Deminimis	Replace adhesive used in SN-02 and remove boxtoe solvent usage.

6. REVIEWER'S NOTES:

This de minimis modification replaces the usage of 20-13 contact adhesive chemical with V-4178X (HAPs-free) adhesive. The new adhesive has a lower VOC content and lower maximum throughput limit. Additionally, the facility is removing the usage of Boxtoe Solvent from SN-02 and replacing the 40-09 Rubber Adhesive with V-4162 HAPs Free Adhesive in SN-01. The facility's permitted annual emissions are decreasing by 17.3 tpy VOC, 2.6 tpy acetone, and 1.3 tpy toluene.

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7. COMPLIANCE STATUS:

As of November 5, 2014, 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*

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. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) Reserved.

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 ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Toluene	75.36	8.29	0.10	Yes
Acetone	1187.2	130.6	74.0	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	3.4 lb/gal	Monthly	N
	Thread Lubricator annual usage	100 gal/yr		
	VOC content of V-4162 Adhesive	3.82 lb/gal		
02	Acetone content of V-4162 Adhesive	1.76 lb/gal	Monthly	N
	V-4162 Adhesive annual usage	3,500 gal/yr		
	VOC content of Leather Softener	7.3 lb/gal		
02	Leather Softener annual usage	750 gal/yr	Monthly	N
	VOC content of V-4178X Adhesive	2.92 lb/gal		

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Acetone content of V-4178X Adhesive V-4178X Adhesive annual usage	2.92 lb/gal 6,500 gal/yr		
03	Acetone content of Tan A Cement Tan A Cement annual usage Acetone content of Tan B Cement Tan B Cement annual usage  Acetone content of B Black Cement B Black Cement annual usage  VOC content of V4092 Toluene content of V4092 V4092 annual usage  VOC content of SP Urethane Acetone content of SP Urethane SP Urethane annual usage  VOC content of Chlorination Chlorination annual usage  VOC content of Brown Pigment Brown Pigment annual usage  VOC content of Black Pigment Black Pigment annual usage  VOC content of Urethane Primer Urethane Primer annual usage  VOC content of 3271-Z Nylon Primer Acetone content of 3271-Z Nylon Primer 3271-Z Nylon Primer annual usage  3244-B Isocyanate Primer annual usage	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  5.9 lb/gal 1,680 gal/yr  2.0 lb/gal 4.1 lb/gal 1,000 gal/yr  55 gal/yr	Monthly	N
04	Acetone content of Cleaning Solution #5 Cleaning Solution #5 plantwide annual usage	6.59 lb/gal 2,200 gal/yr	Monthly	N

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16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02 and 03	20%	§19.503 of Regulation 19	Inspector to verify compliance upon inspection.

17. DELETED CONDITIONS:

Former SC	Justification for removal
19-22	Boxtoe Solvent is no longer being used at the facility.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/ PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Cutting/Molding	A-13							
Leather Cutting/Sewing	A-13							
Leather polishing	A-13							
Packaging	A-13							
Rolled Glue Sticks Machine	A-13							
Eight (8) Natural Gas Heaters	A-1	-	-	-	0.0185	0.044	-	0.00043

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2079-AR-2

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

