

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2079-AR-4 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:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Footwear Manufacturing
NAICS Code: 316210

5. ALL 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
12/6/2016	Modification	-Adjust the limit of V-4162 HAPs Free Adhesive listed in Specific Condition 12 from 3,500 gal/yr to 6,500 gal/yr. -Correct calculations for SN-02 emissions by applying correct weight percent of 1.2 lb/gal.

6. REVIEWER'S NOTES:

The facility submitted a de minimis application on December 5, 2016 and it was denied and processed as a modification. The modification is to:

1. Adjust the limit of V-4162 HAPs Free Adhesive listed in Specific Condition 12 from 3,500 gal/yr to 6,500 gal/yr.

2. Correct calculations for SN-02 emissions by applying correct weight percent of 1.2 lb/gal per the MSDS for 3393 Leather Softener, resulting in a decrease of VOC and Acetone emissions.

The permitted emissions are decreasing by 3.6 tpy VOC, and 22.5 tpy Acetone. The permit will now include a Single HAP limit of 9.5 tpy and a Total HAP limit of 23.75 tpy.

7. COMPLIANCE STATUS:

On October 6, 2016 the facility discovered the emission rates in Specific Condition 1 and 2 were exceeded as well as the total amount of V-4162 Adhesive listed in Specific Condition 12. This modification is to correct these upset conditions.

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 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. AMBIENT AIR EVALUATIONS:

- a) Reserved.
- b) 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/m^3), 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?
Chlorobenzene	46	5.06	0.0033	Yes
Acetone	1187.2	130.6	51.7	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 annual usage	3.4 lb/gal 100 gal/yr	Monthly	N
	VOC content of V-4162 Adhesive Acetone content of V-4162 Adhesive V-4162 Adhesive annual usage	3.82 lb/gal 1.76 lb/gal 6,500 gal/yr		
02	VOC content of Leather Softener Leather Softener annual usage	7.3 lb/gal 750 gal/yr	Monthly	N
	VOC content of V-4178X Adhesive Acetone content of V-4178X Adhesive V-4178X Adhesive annual usage	2.92 lb/gal 2.92 lb/gal 6,500 gal/yr		
03	Acetone content of Tan A Cement Tan A Cement annual usage	5.14 lb/gal 4,500 gal/yr	Monthly	N
	Acetone content of Tan B Cement Tan B Cement annual usage	5.15 lb/gal 4,500 gal/yr		
	Acetone content of B Black Cement B Black Cement annual usage	5.28 lb/gal 750 gal/yr		
	VOC content of V4092 Toluene content of V4092 V4092 annual usage	6.1 lb/gal 0.76 lb/gal 250 gal/yr		
	VOC content of SP Urethane Acetone content of SP Urethane SP Urethane annual usage	0.6 lb/gal 5.22 lb/gal 10,400 gal/yr		
	VOC content of Chlorination Chlorination annual usage	7.5 lb/gal 2,400 gal/yr		
	VOC content of Brown Pigment Brown Pigment annual usage	3.4 lb/gal 10 gal/yr		
	VOC content of Black Pigment Black Pigment annual usage	3.5 lb/gal 5 gal/yr		
VOC content of Urethane Primer Urethane Primer annual usage	5.9 lb/gal 1,680 gal/yr			
VOC content of 3271-Z Nylon Primer Acetone content of 3271-Z Nylon Primer 3271-Z Nylon Primer annual usage	2.0 lb/gal 4.1 lb/gal 1,000 gal/yr			

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	3244-B Isocyanate Primer annual usage	55 gal/yr		
	Boots per year	1,000,000 boots/yr		
	Single HAP	9.5 tpy		
	Total HAP	23.75 tpy		
04	Acetone content of Cleaning Solution #5 Cleaning Solution #5 plantwide annual usage	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	Inspector to verify compliance upon inspection.

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							
Rolled Glue Sticks Machine	A-13							
Eight (8) Natural Gas	A-1	-	-	-	0.0185	0.044	-	0.00043

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Source Name	Group A Category	Emissions (tpy)						
		PM/ PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Heaters								

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2079-AR-3

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Belleville Shoe South,
Inc.

Permit Number: 2079-AR-4

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			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	74.2	51.7
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	-22.5	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	51.7	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	5.9	5.9	0
PM ₁₀	5.9	5.9	0
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	38.1	34.5	-3.6
CO	0	0	0
NO _x	0	0	0
Acetone	74.2	51.7	-22.5