

RESPONSE TO COMMENTS

Belleville Shoe South, Inc.
PERMIT #2079-A
AFIN: 01-00022

On January 13, 2009, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, one interested person submitted written comments, data, views, or arguments on the draft permitting decision. The Department's response to these issues follows.

Comment #1:

Section II: Summary of Permit Activity

The facility would like to increase the usages of 3393 Leather Softener, 20-13 Contact Adhesive, and 3213 chlorination.

Response to Comment #1:

The emission increases are below forty (40) tpy of VOC, twenty-five (25) tpy of PM, and fifteen (15) tpy of PM₁₀ (de minimis limit) so the usage increases qualify as de minimis. The Department will make the change as requested.

Comment #2:

Section II: Summary of Permit Activity

Page 15, Section V: INSIGNIFICANT ACTIVITIES, the facility would like to include the following as Insignificant Activities.

Description	Category
Leather Cutting/Sewing	A-13
Leather polishing	A-13
Rubber Press Roller	A-13
Cutting/Molding Sole	A-13
Press Machines	A-13
Rolled Glue Sticks Machine	A-13

Response to Comment #2:

The Department will make the change as requested.

Comment #3:

Section II: Summary of Permit Activity

Page 7, Total Allowable Emissions Table. The facility would like to increase the total allowable emissions because of usage increases in Comment #1.

Response to Comment #3:

The emission increases of Comment #1 are below forty (40) tpy of VOC, twenty-five (25) tpy of PM, and fifteen (15) tpy of PM₁₀ (de minimis limit) so the usage increases qualify as de minimis. The Department will make the change as requested.

Comment #4:

Section IV: Emission Unit Information

Page 9, Specific Condition #1 and #2 should be changed to reflect the emission increases for PM/PM₁₀, VOC, Toluene, and Acetone.

Response to Comment #4:

The emission increases are below forty (40) tpy of VOC, twenty-five (25) tpy of PM, and fifteen (15) tpy of PM₁₀ (de minimis limit) so the usage increases qualify as de minimis. The Department will make the change as requested.

Comment #5:

Section IV: Emission Unit Information

Page 10, Specific Condition #5 contains a typo and should be corrected to contain the correct maximum acetone content of 7.13 lb/gal.

Response to Comment #5:

The Department will make the change as requested.

Comment #6:

Section IV: Emission Unit Information

Page 10, Specific Condition #6 should be corrected to reflect the increase in acetone maximum Plantwide usage to 37,250 gal/yr.

Response to Comment #6:

The emission increases are below forty (40) tpy of VOC, twenty-five (25) tpy of PM, and fifteen (15) tpy of PM₁₀ (de minimis limit) so the usage increases qualify as de minimis. The Department will make the change as requested.

Comment #7:

Section IV: Emission Unit Information

Page 10, Specific Condition #8 should be corrected to reflect the increase of Cleaning Solution #5 used Plantwide to 2,200 gal/yr.

Response to Comment #7:

The emission increases are below forty (40) tpy of VOC, twenty-five (25) tpy of PM, and fifteen (15) tpy of PM₁₀ (de minimis limit) so the usage increases qualify as de minimis. The Department will make the change as requested.

Comment #8:

Section IV: Emission Unit Information

Page 10, Specific Condition #9 contains a typo and should be corrected to:

... The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions #5 through #8 ...

Response to Comment #8:

The Department will make the change as requested.

Comment #9:

Section IV: Emission Unit Information

The facility would like to make the following changes of maximum usage in gal/yr.

Page #	Specific Condition #	Description	Max. Usage (gal/yr)
11	13	17-30-2 Thread Lubricator	100
11	16	40-09 Rubber Adhesive	800
11	19	3393 Leather Softener	750
12	22	20-13 Contact Adhesive	10,600
13	29	Tan A Cement	4,500
13	31	Tan B Cement	4,500
13	36	VX-793	250
14	39	SP Urethane	10,400

Response to Comment #9:

The emission increases are below forty (40) tpy of VOC, twenty-five (25) tpy of PM, and fifteen (15) tpy of PM₁₀ (de minimis limit) so the usage increases qualify as de minimis. The Department will make the change as requested.

Comment #10:

Section II: Summary of Permit Activity

The facility would like to change the name of chemical VX-793 to V-4092. The chemical VX-793 was named for testing purposes. The chemical was approved for facility usage and the name changed to V-4092.

Response to Comment #10:

The Department will make the change as requested.

ADEQ

ARKANSAS
Department of Environmental Quality

April 20, 2009

Johnnie Carr
Plant Manager
Belleville Shoe South, Inc.
P.O. Box 111
Dewitt, AR 72042

Dear Mr. Carr:

The enclosed Permit No. 2079-A is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 9/11/2008.

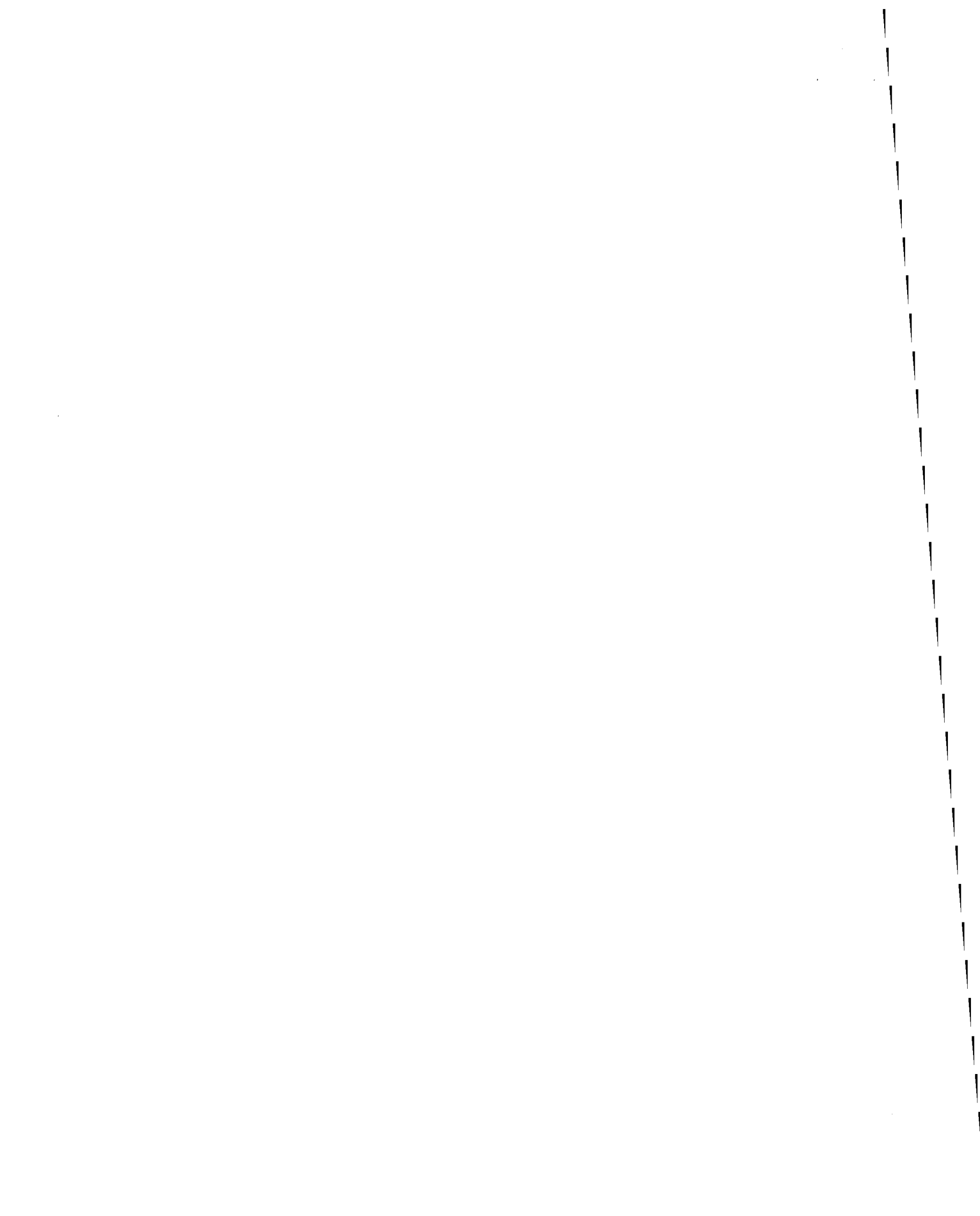
After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 2079-A for the construction, operation and maintenance of an air pollution control system for Belleville Shoe South, Inc. to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under §2.1.14 of Regulation No. 8, Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, within thirty (30) days after service of this decision.

All persons submitting written comments during this thirty (30) day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by §2.1.14 of Regulation No. 8.

Sincerely,



Mike Bates
Chief, Air Division



ADEQ MINOR SOURCE AIR PERMIT

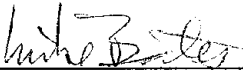
Permit No. : 2079-A

IS ISSUED TO:

Belleville Shoe South, Inc.
1800 South Jackson
DeWitt, AR 72042
Arkansas County
AFIN: 01-00022

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:


Mike Bates
Chief, Air Division

April 20, 2009

Date

Belleville Shoe South, Inc.

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Belleville Shoe South, Inc.

AFIN: 01-00022

PERMIT NUMBER: 2079-A

FACILITY ADDRESS: 1800 South Jackson
DeWitt, AR 72042

MAILING ADDRESS: PO Box 111
Dewitt, AR 72042

COUNTY: Arkansas County

CONTACT NAME: Johnnie Carr

CONTACT POSITION: Plant Manager

TELEPHONE NUMBER: 870-946-3526

REVIEWING ENGINEER: Nelia Sandoval

UTM North South (Y): Zone 15: 3793886.34 m

UTM East West (X): Zone 15: 652617.64 m

Belleville Shoe South, Inc.

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Section II: INTRODUCTION

Summary of Permit Activity

Belleville Shoe South, Inc. (01-00022) operates a facility located at 1800 South Jackson, DeWitt, AR 72042. This facility manufactures military footwear (boots). Emissions from the facility are a result of using sole cement and solvents in several departments to manufacture the boots. This minor permit modification will result in a permitted decrease of 43.4 tpy of VOC, 12.68 tpy of Toluene, and 35.09 tpy of Hexane and a permitted increase of 5.9 tpy of PM/PM₁₀, and 44.45 tpy of Acetone. This modification will allow Belleville Shoes to change from a Title V to a Minor Source permit.

Process Description

There are six (6) individual departments in which the boots are constructed. They are designated as: Cutting, Fitting, Lasting, Bottoming, Sole Lay, and Packing.

In the Cutting department, the unfinished leather and synthetic materials are cut into components that will be sewn together to form the boots. Components move from Cutting to the Fitting Department.

SN-01 Fitting Department

In the Fitting Department, the components are sewn together using computerized sewing machines. There is no exhaust point outside of the building in this area (SN-01); emissions are dispersed with oscillating fans inside the building. In this area 40-09 Rubber Adhesive (HAPs-Free) is used to stick components together prior to stitching so that they do not move while being stitched. A 3/4" adhesive transfer tape is also used to reduce the amount of the cement usage going to Lasting Department for Lasting Process.

SN-02 Last Department

The Lasting Department is set up in mods. Different styles run through these mods. "TLS" boots are processed through a mod by first cementing the counters by using 20-13 (HAPs-Free) Contact Adhesive. During assembly, box toes are inserted into the toe of the boot after being dipped into a box toe solvent. This is under a vented hood (SN-02). Box toes help to hold the shape of the toe of the boot. The heel counters are applied using 20-13 (HAPs-Free) Contact Adhesive. Emissions from the application of the 20-13 (HAPs-Free) Contact Adhesive are dispersed via oscillating fans inside the building. The next operation is toe last which forms the toe of the boot by using USM 600 glue rod cement. The boot then moves to heel mold which forms the heel of the boot using USM 778-0 glue rod cement. If the boot is a steel toe boot, the steel toe is sprayed with 22-266-hotmelt cement to hold the steel toe to the lining. If the boot is a black or brown leather boot, the boot is sprayed with 3393 Leather Softener to soften the leather. Thermo counter thermo box toe style boots are processed through a freeze mold operation. The

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rest of the boot is processed the same as the above process. Once the fitted upper is fully assembled and shaped on the last, it is scoured by sanding machines to remove excess leather. The excess leather is removed via downdraft vacuum machines and stored in collection bags located at the sanding machines, which are dumped in a commercial trash receptacle after filling. The vacuum removes 90% of the excess leather. The remaining 10% is dispersed inside the plant as particulate matter. The fitted upper then moves to the bottoming department to get the midsole put on.

SN-03 Bottoming and Sole Lay Department

Upon entering the Bottoming Department, a welt is applied to the fitted upper and is colored with one (1) of two (2) pigments, 3582 Brown or 3588 Black, depending on the color of the finished boot. The fitted uppers then have Tan A and Tan B or Black B coating applied to the bottom of the boots using a small brush, this is left to dry and then recoated before going to pressing for application of the bottoms. The press is a hydraulic piston with a sized mold. The fitted upper is placed on a foot form and the mold or frame closes around it. Pieces of rubber are then placed in the frame and the piston comes in and presses the rubber on to the boot. This is done at approximately 350 degrees for about ten minutes.

Following Bottoming operations, the unfinished boots are sent to the Sole Lay Department. In this department the boots enter the "box sanding" machines where the bottom of the rubber mid sole is sanded to prepare for bonding and chlorination. After drying, the out sole is compressed to make the unit sole.

The unfinished boot is then sent to the Soling Department where each sole layer is applied utilizing 3212 Halogenations and 2406SP Urethane cement followed by sanding. The boots are then sent to the Packing Department. Emissions for the Bottoming and Sole Laying Departments are accounted for in SN-03.

SN-03 Packaging Department

Once in the Packing Department the boots are cleaned up, inspected, laced, tagged and boxed in single pair boxes. In the Packing Department the boots enter a silpar operation to trim excess rubber and the rubber runs through a torret vacuum system to a hopper cart and dumped into the commercial dumpster. In this department the boots enter the second (2nd) scour process in which a fine sanding around the boot edge in which rubber and urethane are removed is performed via sanding machines. They are then ready for final inspection and testing by the Government QAR. Once they pass the inspection/testing, they are shipped and invoiced.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective January 25, 2009
*40 CFR Part 63, Subpart OOOO - National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles

*A permit Modification to address compliance must be submitted no later than 6 months after the effective date of permit #2079-A.

Total Allowable Emissions

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM/PM ₁₀	6.1	5.9
VOC	51.0	49.2
Toluene*	1.40	1.39
Acetone**	77.20	74.70

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

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Section III: PERMIT HISTORY

- 2079-AOP-R0: Initial Title V permit for the existing facility which was 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.
- 2079-AOP-R1: The facility modified the permit to allow for increases in leather softener (65 gallons), last slip (100 gallons), and satreat (1,020 gallons) usages. This minor permit modification resulted in a permitted increase of 4.4 tons/year of VOC and 0.29 tons/year of Hexane.

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.
[Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Fitting Department	VOC	2.2	2.1
02	Lasting Department	PM ₁₀	0.3	0.3
		VOC	35.6	34.4
03	Bottoming/ Sole Laying	PM ₁₀	5.8	5.6
		VOC	13.2	12.7

2. The permittee shall not exceed the emission rates set forth in the following table.
[Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Fitting Department	Acetone	0.40	0.40
02	Lasting Department	PM	0.3	0.3
		Toluene	1.30	1.30
		Acetone	15.4	14.80
03	Bottoming/Sole Laying	PM	5.8	5.6
		Toluene	0.10	0.09
		Acetone	53.90	52.30
04	Plantwide Cleaning Solution #5	Acetone	7.50	7.20

3. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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5. The permittee shall submit an application to address all applicable requirements of 40 CFR Part 63, Subpart OOOO, National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing Fabrics and Other Textiles, 6 months after the effective date of permit #2079-A. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOOO]
6. The permittee shall obtain a modification to this permit prior to the use of any product with a HAP/VOC content higher than current permit limits. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-01 Conditions

7. The VOC content of the 17-30-2 Thread Lubricator used at SN-01 shall not exceed 3.4 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall be limited to 100 gal/yr of 17-30-2 Thread Lubricator at SN-01 on a rolling 12-month basis. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
9. The VOC content of the 40-09 Rubber Adhesive used at SN-01 shall not exceed 4.8 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The Acetone content of the 40-09 Rubber Adhesive used at SN-01 shall not exceed 0.93 lb/gal. Records of the Acetone content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The permittee shall be limited to 800 gal/yr of 40-09 Rubber Adhesive at SN-01 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
12. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #7 through #11. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SN-02 Conditions

13. The VOC content of the 3393 Leather Softener used at SN-02 shall not exceed 7.3 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. The permittee shall be limited to 750 gal/yr of 3393 Leather Softener used at SN-02 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The VOC content of the 20-13 Contact Adhesive used at SN-02 shall not exceed 3.6 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
16. The Acetone content of the 20-13 Contact Adhesive used at SN-02 shall not exceed 1.88 lb/gal. Records of the Acetone content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. The permittee shall be limited to 10,600 gal/yr of 20-13 Contact Adhesive used at SN-02 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The VOC content of the Boxtoe Solvent at SN-02 shall not exceed 7.2 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
19. The Acetone content of the Boxtoe Solvent at SN-02 shall not exceed 2.82 lb/gal. Records of the Acetone content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
20. The Toluene content of the cement used for the Boxtoe Solvent at SN-02 shall not exceed 0.75 lb/gal. Records of the Toluene content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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21. The permittee shall be limited to 3,500 gal/yr of the Boxtoe Solvent used at SN-02 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
22. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #13 through #21. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-03 Conditions

23. The Acetone content of the Tan A Cement at SN-03 shall not exceed 5.14 lb/gal. Records of the Acetone content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
24. The permittee shall be limited to 4,500 gal/yr of the Tan A Cement used at SN-03 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
25. The Acetone content of the Tan B Cement at SN-03 shall not exceed 5.15 lb/gal. Records of the Acetone content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
26. The permittee shall be limited to 4,500 gal/yr of the Tan B Cement used at SN-03 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
27. The Acetone content of the B Black Cement at SN-03 shall not exceed 5.28 lb/gal. Records of the Acetone content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
28. The permittee shall be limited to 750 gal/yr of the B Black Cement used at SN-03 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
29. The VOC content of V-4092 at SN-03 shall not exceed 6.1 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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30. The Toluene content of V-4092 at SN-03 shall not exceed 0.76 lb/gal. Records of the Toluene content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
31. The permittee shall be limited to 250 gal/yr of V-4092 used at SN-03 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
32. The VOC content of 2406 SP Urethane at SN-03 shall not exceed 0.6 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
33. The Acetone content of 2406 SP Urethane at SN-03 shall not exceed 5.22 lb/gal. Records of the Acetone content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
34. The permittee shall be limited to 10,400 gal/yr of SP Urethane used at SN-03 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
35. The VOC content of 3212 Chlorination at SN-03 shall not exceed 7.5 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
36. The permittee shall be limited to 2,400 gal/yr of 3212 Chlorination at SN-03 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
37. The VOC content of 3582 Brown Pigment at SN-03 shall not exceed 3.4 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
38. The permittee shall be limited to 10 gal/yr of 3582 Brown Pigment at SN-03 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
39. The VOC content of 3588 Black Pigment at SN-03 shall not exceed 3.5 lb/gal. Records of the VOC content shall be kept onsite and made available to Department personnel

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upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

40. The permittee shall be limited to 5 gal/yr of 3588 Black Pigment at SN-03 on a rolling 12-month basis. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
41. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #23 through #40. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-04 Conditions

42. The Acetone content of Cleaning Solution #5 used Plantwide shall not exceed 6.59 lb/gal. Records of the Acetone content shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
43. The permittee shall be limited to 2,200 gal/yr of Cleaning Solution #5 used Plantwide on a rolling 12-month basis. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
44. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions #42 through #43. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated **September 18, 2008**.

Description	Category
Cutting/Molding Sole	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

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Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor

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5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and

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nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

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21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
 - a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.102(C-D), Regulation 19, §19.103(D), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to
Belleville Shoe South, Inc., P.O. Box 111, Dewitt, AR, 72042, on this 20th day of
April, 2009.

Pam Owen

Pam Owen, AAI, Air Division

