

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 2079-AOP-R1
IS ISSUED TO:
Belleville Shoe South, Inc.
1800 South Jackson
DeWitt, AR 72042
Arkansas County
AFIN: 01-00022

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

November 16, 2005 AND November 15, 2010

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Porta
Interim Chief, Air Division

Date Modified

Belleville Shoe South, Inc.
Permit #: 2079-AOP-R1
AFIN: 01-00022

Table of Contents

SECTION I: FACILITY INFORMATION	4
SECTION II: INTRODUCTION	5
Summary of Permit Activity	5
Process Description	5
Regulations	6
Emission Summary	6
SECTION III: PERMIT HISTORY	8
SECTION IV: SPECIFIC CONDITIONS	9
SN-01	9
SN-02	11
SN-03	14
SECTION V: COMPLIANCE PLAN AND SCHEDULE	15
SECTION VI: PLANTWIDE CONDITIONS	16
SECTION VII: INSIGNIFICANT ACTIVITIES	18
SECTION VIII: GENERAL PROVISIONS	19

Belleville Shoe South, Inc.

Permit #: 2079-AOP-R1

AFIN: 01-00022

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
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Belleville Shoe South, Inc.
Permit #: 2079-AOP-R1
AFIN: 01-00022

SECTION I: FACILITY INFORMATION

PERMITTEE: Belleville Shoe South, Inc.

AFIN: 01-00022

PERMIT NUMBER: 2079-AOP-R1

FACILITY ADDRESS: 1800 South Jackson
DeWitt, AR 72042

MAILING ADDRESS: P.O. Box 111
DeWitt, Arkansas 72042

COUNTY: Arkansas

CONTACT POSITION: Earleen Ehlers

TELEPHONE NUMBER: (618) 233-5617

REVIEWING ENGINEER: John Bailey

UTM North South (Y): Zone 15: 3,794.0195

UTM East West (X): Zone 15: 652.883

SECTION II: INTRODUCTION

Summary of Permit Activity

Belleville Shoe South, Inc. located in Dewitt, Arkansas County, Arkansas manufactures military footwear (boots). Emissions from the facility are as a result of using sole cement and solvents in several departments to manufacture the boots. Belleville Shoe is modifying the current permit to allow for increases in leather softener (65 gallons), last slip (100 gallons), and satreat (1,020 gallons) usages. This minor permit modification will result in a permitted increase of 4.4 tons/year of VOC and 0.29 tons/year of Hexane.

Process Description

There are five departments that the boots go through for processing. They are: Cutting, Fitting, Lasting, Bottoming/Sole Lay, and Packing.

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

Fitting is where the components are sewn together using regular computerized sewing machines. There is an exhaust point in this area SN-01. It is in this area that 40-07 rubber cement is used to stick components together prior to stitching so that they do not move while being stitched. There is also 3393 Leather softener that is sprayed on the fitted uppers just prior to going to the Lasting Department for lasting.

SN-02 is over the Lasting Department. The Lasting Department consists of staplers which are used to anchor the fitted uppers onto the last, to assemble heel counters into the heels, as well as heel and toe last machines which have glue rolls that are melted and which stick the lasting allowance to the insole while the upper is on a last. During assembly, box toes are inserted into the toe of the boot after being dipped in box toe solvent. Box toes help keep the boot's shape. The box toes are then cemented using 20-01 and are inserted into the boot between the leather and the lining. This is done under a vented hood. 20-01 is also used to cement the vamp lining and counter cover in place; 20-03 cement is used on the insole so that it will stay in place. If an operator has trouble getting the fitted upper onto the last, they will spray the last with MM15 Last Slip which helps the upper slide onto the last. Once the fitted upper is fully assembled and shaped from the last it then moves to the Bottoming/Sole Lay Department to have the sole placed on it.

SN-03 is in the Bottoming/Sole Lay Area. Here the fitted uppers have Tan A and or Tan B or Black coating put on the bottom of the boots using a small brush. This is left to dry and then recoated before going to the presses for bottoming. The press is a hydraulic piston with a sized mold. The fitted upper is placed on a leg 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. Once the sole is put on it will

Belleville Shoe South, Inc.
 Permit #: 2079-AOP-R1
 AFIN: 01-00022

be sanded. Each layer is put together by sanding and using Satreat and 2406SP cement. The boots are then sent to the Packing Department for finishing.

Once in the Packing Department the boots are cleaned up, inspected, laced, tagged and boxed in single pair boxes and then into six pair boxes. They are then ready for Final Inspection and testing by the Government QAR. Once they pass inspection/testing they are invoiced and shipped.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR 63 Subpart OOOO, National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing Fabrics and Other Textiles.*

*A permit Modification to address compliance must be submitted no later than 6 months prior to the effective date of May 29, 2006 (i.e. December 29, 2005).

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

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		VOC	67.3	92.6
		Acetone	30.25	30.25
HAPs		Hexane*	27.54	35.09
		Toluene*	14.33	14.07
SN	Description	Pollutant	lb/hr	tpy
01	Fitting Department	VOC	24.0	31.1
		Acetone**	30.25**	30.25**
		Hexane	23.32	29.57
02	Lasting Department	VOC	22.5	31.9
		Acetone**	30.25**	30.25**

Belleville Shoe South, Inc.

Permit #: 2079-AOP-R1

AFIN: 01-00022

		Hexane	4.22	5.52
		Toluene	14.33	14.07
03	Bottoming/Sole Lay	VOC	20.8	29.6
		Acetone**	30.25**	30.25**

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

** Emissions are based upon a Plantwide limit of 30.25 ton per year and an hourly rate of 30.25 lb/hr.

Belleville Shoe South, Inc.
Permit #: 2079-AOP-R1
AFIN: 01-00022

SECTION III: PERMIT HISTORY

2079-AOP-R0: This was an 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.

SECTION IV: SPECIFIC CONDITIONS

SN-01
Fitting Department

Source Description

Rubber cement is used to stick components together prior to stitching so that they do not move while being stitched. A leather softener is sprayed on the fitted uppers just prior to going to the Lasting Department for lasting.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 4 and 7. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	24.0	31.1

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 7. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Hexane	23.32	29.57

3. The VOC content of the leather softener used at SN-01 shall not exceed 7.29 lb/gal. Records of the VOC content shall be kept on site 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]
4. The permittee shall be limited to 200 gal/yr of leather softener at SN-01 on a rolling 12-month basis. Records of leather softener usage at SN-01 shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Belleville Shoe South, Inc.

Permit #: 2079-AOP-R1

AFIN: 01-00022

5. The VOC content of the rubber cement used at SN-01 shall not exceed 7.94 lb/gal. Records of the VOC content shall be kept on site 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]
6. The Hexane content of the rubber cement used at SN-01 shall not exceed 7.73 lb/gal. Records of the Hexane content shall be kept on site 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]
7. The permittee shall be limited to 7,650 gal/yr of rubber cement at SN-01 on a rolling 12-month basis. Records of rubber cement usage at SN-01 shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-02
Lasting Department

Source Description

The box toes are then cemented using 20-01 and are inserted into the boot between the leather and the lining. This is done under a vented hood. 20-01 is also used to cement the vamp lining and counter cover in place; 20-03 cement is used on the insole so that it will stay in place. If an operator has trouble getting the fitted upper onto the last, they will spray the last with MM15 Last Slip which helps the upper slide onto the last. Once the fitted upper is fully assembled and shaped from the last it then moves to the Bottoming/Sole Lay Department to have the sole placed on it.

Specific Conditions

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 12, 16, 19, and 22. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	22.5	31.9

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 12, 16, 19, and 22. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Hexane	4.22	5.52
Toluene	14.33	14.07

10. The VOC content of the cement used for the box toe, vamp linings, and counter cover at SN-02 shall not exceed 2.29 lb/gal. Records of the VOC content shall be kept on site 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 Toluene content of the cement used for the box toe, vamp linings, and counter cover at SN-02 shall not exceed 4.65 lb/gal. Records of the Toluene content shall be kept on site 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]

Belleville Shoe South, Inc.
Permit #: 2079-AOP-R1
AFIN: 01-00022

12. The permittee shall be limited to 11,055 gal/yr of cement used for the box toe, vamp linings, and counter cover at SN-02 on a rolling 12-month basis. Records of the cement usage at SN-02 shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The VOC content of the cement used for the insole at SN-02 shall not exceed 2.25 lb/gal. Records of the VOC content shall be kept on site 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 Hexane content of the cement used for the insole at SN-02 shall not exceed 3.62 lb/gal. Records of the Hexane content shall be kept on site 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]
15. The Toluene content of the cement used for the insole at SN-02 shall not exceed 4.82 lb/gal. Records of the Toluene content shall be kept on site 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]
16. The permittee shall be limited to 6,495 gal/yr of cement used for the insole at SN-02 on a rolling 12-month basis. Records of the cement usage at SN-02 shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. The VOC content of the box toe solvent at SN-02 shall not exceed 4.86 lb/gal. Records of the VOC content shall be kept on site 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]
18. The Toluene content of the box toe solvent at SN-02 shall not exceed 4.86 lb/gal. Records of the Toluene content shall be kept on site 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]
19. The permittee shall be limited to 2,970 gal/yr of box toe solvent at SN-02 on a rolling 12-month basis. Records of the box toe solvent usage at SN-02 shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted to the

Belleville Shoe South, Inc.

Permit #: 2079-AOP-R1

AFIN: 01-00022

Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

20. The VOC content of the last slip at SN-02 shall not exceed 5.61 lb/gal. Records of the VOC content shall be kept on site 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]
21. The Hexane content of the last slip at SN-02 shall not exceed 5.09 lb/gal. Records of the Hexane content shall be kept on site 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]
22. The permittee shall be limited to 250 gal/yr of last slip at SN-02 on a rolling 12-month basis. Records of last slip usage at SN-02 shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-03
Bottoming / Sole Lay

Source Description

SN-03 is in the Bottoming/Sole Lay Area. Here the fitted uppers have Tan A and or Tan B or Black coating put on the bottom of the boots using a small brush. This is left to dry and then recoated before going to the presses for bottoming. The bottom of the sole will be treated and is put on after the boot has been treated with the Satreat and the outer layers added. Each layer is put together by sanding and using Satreat and a cement.

Specific Conditions

23. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 25 and 27. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	20.8	29.6

24. The VOC content of the urethane used at SN-03 shall not exceed 2.78 lb/gal. Records of the VOC content shall be kept on site 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]
25. The permittee shall be limited to 13,120 gal/yr of urethane used at SN-03 on a rolling 12-month basis. Records of the urethane usage at SN-03 shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
26. The VOC content of the satreat used at SN-03 shall not exceed 7.45 lb/gal. Records of the VOC content shall be kept on site 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]
27. The permittee shall be limited to 2,970 gal/yr of satreat used at SN-03 on a rolling 12-month basis. Records of the satreat usage at SN-03 shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Belleville Shoe South, Inc.
Permit #: 2079-AOP-R1
AFIN: 01-00022

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Belleville Shoe South, Inc. will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must 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) new equipment or newly 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) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. 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 shall submit the compliance test results to the Department within thirty (30) days after completing the 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]
4. The permittee must 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.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. No material used at this facility shall exceed an acetone content of 6.55 lb/gal. Records of the acetone content shall be kept on site 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]

Belleville Shoe South, Inc.

Permit #: 2079-AOP-R1

AFIN: 01-00022

8. The permittee shall be limited to 9,236 gal/yr of acetone used at the facility on a rolling 12-month basis. Records of the plantwide usage of acetone shall be maintained on site, updated monthly, and made available to Department personnel upon request. A 12-month rolling total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
9. 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 prior to the effective date of May 29, 2006 (i.e. December 29, 2005). [Regulation No. 26 §26.1011 (A)(1)]
10. 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]

Belleville Shoe South, Inc.
Permit #: 2079-AOP-R1
AFIN: 01-00022

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated October 20, 2004.

Description	Category
Leather Cutting/Sewing	A-13
Leather polishing	A-13
Packaging	A-13

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which 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 which 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. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample,

Belleville Shoe South, Inc.
Permit #: 2079-AOP-R1
AFIN: 01-00022

measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location
 - ii. The process unit or emission source deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation,
 - vi. The average emissions during the deviation,
 - vii. The probable cause of such deviations,
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The

permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director

- along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
 16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
 17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
 18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
 19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
 20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also

Belleville Shoe South, Inc.
Permit #: 2079-AOP-R1
AFIN: 01-00022

submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]

- a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit;
 - e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
- a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

