

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2079-AR-7 AFIN: 01-00022

1. PERMITTING AUTHORITY:

Division 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:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Footwear Manufacturing
NAICS Code: 316210

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

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
1/23/2023	Deminimis	-Add capability to use ammonia containing adhesive at SN-01 through SN-03

6. REVIEWER'S NOTES:

This permitting action is necessary to replace adhesive chemicals because the supplier no longer offers them. Belleville Shoe was granted interim authority to test new adhesives: VA-771 (replacing V-4178), VA-772 (replacing V-4162) and 13-2711 (new chemical). The new adhesives meet all of the current permit limits for VOC, acetone, and HAPs, however, 13-2711 has an ammonia component. With this application Belleville shoe is requesting the allowance to use the 13-271 adhesive, the other adhesives tested during the 90 day interim authority period, and add appropriate permit limits before using the new

adhesive chemicals in normal operation. Permitted emission rates are increasing by 0.07 tpy Ammonia as a result of this change.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was last inspected May 13, 2021; the inspection revealed no areas of concern. There are no active or pending enforcement actions.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? 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 for 8(b), 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 Part 63, Subpart OOOO

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N
 (Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N
 If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards Y
 If exempt, explain: No H₂S emissions

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H ₂ S	20 parts per million (5-minute average*)		
	80 parts per billion (8-hour average) residential area		
	100 parts per billion (8-hour average) nonresidential area		

*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

C_p = 5-minute average concentration

C_m = 1-hour average concentration

t_m = 60 minutes

t_p = 5 minutes

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02	Facility Knowledge	0.4 lb/hr PM/PM ₁₀	Torit Dust Collector	90%	Calculations based on 1,400,000 pairs of boots/year,
03	Facility Knowledge	PM Content: 2 oz/pair	Torit Dust Collector	90%	Calculations based on 1,400,000 pairs of boots/year
01 02 03	MSDS	7.72 lb/gal VOC 0.116 lb/gal Chlorobenzene 5.192 lb/gal Acetone 7.89 lb/gal Ammonia	-	-	Calculations based on maximum usage of 20,725 gal/yr, except the Ammonia adhesive

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					which is based on 1,635 gal/yr
04	MSDS	6.59 lb/gal Acetone	-	-	Calculations based on a maximum usage of 2,200 gal/yr

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

17. 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)
N/A				

18. 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, 02, 03	Maximum VOC Content	7.72 lb/gal	Monthly	N
	Maximum Acetone Content	5.192 lb/gal	Monthly	N
	Maximum HAP Content	0.116 lb/gal	Monthly	N
	Content Usage	20,725 gallons/yr	Monthly	N
	Ammonia	1,635 gallons/yr	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Adhesive Usage			
04	Maximum Acetone Content	6.59 lb/gal	Monthly	N
	Cleaning Solution #5 usage	2,200 gal/yr	Monthly	N
	Throughput of Boots	1,400,000 pairs of boots/yr	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02 & 03	5%	§18.501	Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

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 Heaters	A-1	-	-	-	0.0185	0.044	-	0.00043

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22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2079-AR-6

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Belleville Shoe
 Manufacturing Company d/b/a
 Belleville Shoe South, Inc.
 Permit Number: 2079-AR-7
 AFIN: 01-00022

			Old Permit	New Permit
\$/ton factor	27.27	Permit Predominant Air Contaminant	80	80
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	80	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	9.2	9.2	0
PM ₁₀	9.2	9.2	0
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	80	80	0
CO	0	0	0
NO _x	0	0	0
Total HAP	1.21	1.21	0
Acetone	61.2	61.2	0
Ammonia	0	0.07	0.07