

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2079-AR-5 AFIN: 01-00022

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Belleville Shoe Manufacturing Company d/b/a Belleville Shoe South, Inc.  
1800 South Jackson Street  
DeWitt, Arkansas 72042

3. PERMIT WRITER:

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
3/19/2018	Modification	-Increase throughput to 1,200,000 pairs of boots/yr. -Permit worst case scenario concentration/usage for VOC, acetone, and HAP.

6. REVIEWER'S NOTES:

Belleville Shoe Manufacturing Company d/b/a Belleville Shoe South, Inc. (01-00022) operates a facility located at 1800 South Jackson Street, DeWitt, AR 72042. The modification is to:

1. Increase the throughput of boots per year from 1,000,000 pairs to 1,200,000.
2. Remove specific concentration/usage limits of all chemicals used at the facility, and permit the worst case scenario for VOC, acetone, and HAPs.
3. Change the visible emission limit in Specific Condition #3 from 20% to 5% because of the control equipment applied at SN-02 and SN-03.

The permitted emissions are increasing/decreasing by 1.9 tpy PM/PM<sub>10</sub>, and 14.9 tpy VOC, - 9.5 tpy Single HAP, -23.01 tpy Total HAP, and -11.1 tpy Acetone.

7. COMPLIANCE STATUS:

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

An inspection was conducted at the facility on January 26, 2018. The inspection noted multiple areas of concern. The permittee had exceeded concentration limits for V-4178X, and throughput limits for 3271Z and 3244-B. This permitting action is to correct the areas of concern found in the inspection.

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. 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 Regulation 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		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

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

13. 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	0.291 lb/hr PM/PM <sub>10</sub>	Torit Dust Collector	90%	Calculations based on 1,200,000 pairs of boots/year, and 1,936 hr/yr of operation
03	Facility Knowledge	7.75 lb/hr PM/PM <sub>10</sub>	Torit Dust Collector	90%	Calculations based on 1,200,000 pairs of boots/year, and 1,936 hr/yr of operation
01 02 03	MSDS	7.72 lb/gal VOC 0.116 lb/gal Chlorobenzene 5.192 lb/gal Acetone	-	-	Calculations based on maximum usage of 12,800 gal/yr and 1,936 hr/yr of

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

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

15. 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				

16. 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
	Usage	12,800 gallons/yr	Monthly	N
04	Maximum Acetone Content	6.59 lb/gal	Monthly	N
	Cleaning	2,200 gal/yr	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Solution #5 usage			
	Throughput of Boots	1,200,000 pairs of boots/yr	Monthly	N

17. OPACITY:

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

18. DELETED CONDITIONS:

Former SC	Justification for removal
6 through 21	These conditions pertained to specific concentration/usage limits for every substance used at the facility. These are no longer necessary as the facility is now permitted for a worst case scenario of VOC, acetone, and HAPs.

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

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20. 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-4

## 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-5  
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			<b>Old Permit</b>	<b>New Permit</b>
\$/ton factor	23.93	Permit Predominant Air Contaminant	51.7	49.4
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	-2.3	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	49.4	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	5.9	7.8	1.9
PM <sub>10</sub>	5.9	7.8	1.9
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0	0	0
VOC	34.5	49.4	14.9
CO	0	0	0
NO <sub>x</sub>	0	0	0
Single HAP	9.5	0	-9.5
Total HAP	23.75	0.74	-23.01
Acetone	51.7	40.6	-11.1