

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2079-AR-6 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
3/21/2019	Modification	-Increase throughput at SN-01, 02 & 03. -Increase Plant-wide throughput of pairs boots/year.

6. REVIEWER'S NOTES:

This modification is to:

1. Increase the combined throughput limit (Specific Condition #9) at SN-01, SN-02 and SN-03 from 12,800 gal/yr to 20,725 gal/yr.
2. Increase Plant-wide throughput limit (Specific Condition #14) from 1,200,000 pairs of boots/yr to 1,400,000 pairs of boots/yr.

The permitted emissions are increasing by 1.4 tpy PM/PM₁₀, 30.6 tpy VOC, 0.47 tpy Total HAP and 20.6 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.

There are no pending or active 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. 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/A

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:

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 ADEQ 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.

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	0.4 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	-	-	Calculations based on maximum usage of 20,725 gal/yr
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	20,725 gallons/yr	Monthly	N
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

17. OPACITY:

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

18. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

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 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

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-5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Belleville Shoe South,
Inc.

Permit Number: 2079-AR-6

AFIN: 01-00022

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	49.4	80
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	30.6	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	<u>732.258</u>	
		Annual Chargeable Emissions (tpy)	<u>80</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	7.8	9.2	1.4
PM ₁₀	7.8	9.2	1.4
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	49.4	80	30.6
CO	0	0	0
NO _x	0	0	0
Total HAP	0.74	1.21	0.47
Acetone	40.6	61.2	20.6