

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1876-AOP-R0 AFIN: 60-00617

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Dassault Falcon  
3801 East 10th Street  
Little Rock, Arkansas 72202

3. PERMIT WRITER:

Charles Hurt, P.E.

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Aircraft Manufacturing and Rework Facility  
NAICS Code: 336411

5. SUBMITTALS:

7/31/2008

6. REVIEWER'S NOTES:

Dassault Falcon (AFIN: 60-00617) owns and operates an aerospace manufacturing and rework facility located at 10th & Leonard Streets, Little Rock, Arkansas 72202. Dassault submitted an initial Title V application in order to increase production by increasing the annual VOC emission limit from 95.0 tpy to 165.0 tpy. Although Dassault did not propose to install new equipment, the following modifications were made:

- Emissions from existing unpermitted natural gas fired process equipment, now permitted as SN-78, were quantified;
- SN-03 was removed;
- SN-26 was corrected to show there are two booths (SN-26 A and SN-26) with a stack for each;
- SN-69 and SN-70 (Hangar 3 Paint and Primer Work Rooms) were revised to show there are four sources by adding SN-76 and SN-77 (Hangar 2 Paint and Primer Work Rooms);

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- SN-52 was renamed to Clean Room Exhaust;
- SN-55 and SN-56 were renamed to UV Flash Off;
- SN-58 was renamed to Touch-Up Booth;
- The plantwide HAP emission limit from sources which do not qualify as insignificant activities was reduced to 22.00 tpy; and
- A plantwide emission limit of 70.00 tpy of acetone was added.

#### Specific Condition #2

Review of the application resulted in the discovery that the permittee failed to consider HAP emissions from insignificant activities when requesting a plantwide emission limit of 24.5 tpy for HAP. The total amount of HAP emitted from the insignificant activities is approximately 1.42 tpy. The plantwide limit did not include insignificant activities. When both are summed, the result exceeds 25 tpy. The permittee requested the HAP emission limit in Specific Condition #2 to be lowered to 22.00 tpy.

#### Specific Condition #12

The application proposed to remove Specific Condition #12 citing the condition was too general and open to interpretation. Specific Condition #12 was originally placed in a previous permit because the permittee requested to increase emission limits for VOC, single HAP, and combination HAPs, to rates which require a demonstration that accuracy of the recordkeeping of emissions including insignificant activities is sufficient to ensure the facility does not exceed major source thresholds. This condition is necessary because the permittee intends to avoid being subject to potential MACTs by remaining an area source for HAPs. Specific Condition #12 was updated to clarify that HAP emission from insignificant activities must also be included in the accuracy demonstration.

#### Area Source MACTs

Based on information provided in the application, Dassault appears to conduct activities and emit pollutants that are regulated by 40 CFR Part 63, Subpart HHHHHH (compliance date: January 10, 2011) and WWWW (compliance date: July 1, 2010). Some activities which are listed as insignificant may no longer be considered insignificant upon the effective dates of these subparts.

#### Chapter 10 of Regulation No. 19 Applicability

Dassault is an existing affected source of Regulation No. 19, Chapter 10, "Regulations for the Control of Volatile Organic Compounds in Pulaski County". However, there are no source specific requirements because the facility is not classified as a surface coating of metal parts and products facility or any of the other facilities listed in Regulation No. 19 §19.1005. The facility conducts aerospace manufacturing and rework.

7. COMPLIANCE STATUS:

Dassault was last inspected in December 2005 and determined to be operating in accordance the terms of the existing permit. There are currently no enforcement issues or actions against the facility.

8. PSD APPLICABILITY:

- a. Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? 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?*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

There are no source and/or pollutant specific regulations that are applicable for the current operations at the facility.

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

Non-Criteria Pollutants:

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

TLV greater than or equal to (mg/m <sup>3</sup> )	Maximum Single HAP Allowable Weight Content (wt %)**
78.7	100%
70.8	90%
63.0	80%
55.1	70%
47.3	60%
39.4	50%

TLV greater than or equal to (mg/m <sup>3</sup> )	Maximum Single HAP Allowable Weight Content (wt %)**
31.5	40%
23.6	30%
15.8	20%
7.9	10%
4.0	5%
3.2	4%
2.4	3%
1.6	2%
0.8	1%
*	<1%

Other Modeling:

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
01	Mass Balance	VOC 3.5 lb/hr HAP 2.67 lb/hr Acetone 1.40 lb/hr			
08A	Mass Balance	VOC 4.8 lb/hr HAP 1.12 lb/hr			
08B	Mass Balance	VOC 4.8 lb/hr HAP 1.12 lb/hr			
08C	Mass Balance	VOC 4.8 lb/hr HAP 1.12 lb/hr			

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
08D	Mass Balance	VOC 4.8 lb/hr HAP 1.12 lb/hr			
08E	Mass Balance	VOC 4.8 lb/hr HAP 1.12 lb/hr			
08F	Mass Balance	VOC 4.8 lb/hr HAP 1.12 lb/hr			
09	Mass Balance	VOC 10.2 lb/hr HAP 1.58 lb/hr			
10	Mass Balance	VOC 12.8 lb/hr HAP 3.64 lb/hr Acetone 2.90 lb/hr			
11	Mass Balance	VOC 12.3 lb/hr HAP 3.52 lb/hr Acetone 2.70 lb/hr			
12	Mass Balance	VOC 14.4 lb/hr HAP 3.64 lb/hr Acetone 2.90 lb/hr			
13	Mass Balance	VOC 8.5 lb/hr HAP 4.00 lb/hr			

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
20	Mass Balance	VOC 6.8 lb/hr HAP 3.14 lb/hr Acetone 10.00 lb/hr			
22	Mass Balance	VOC 6.8 lb/hr HAP 3.14 lb/hr Acetone 10.00 lb/hr			
25	Mass Balance	VOC 8.5 lb/hr HAP 4.00 lb/hr			
26A	Mass Balance	VOC 3.9 lb/hr HAP 5.03 lb/hr			
26B	Mass Balance	VOC 3.9 lb/hr HAP 5.03 lb/hr			
27	Mass Balance	VOC 1.7 lb/hr HAP 0.27 lb/hr			
28	Mass Balance	VOC 0.7 lb/hr HAP 0.70 lb/hr			
30	Mass Balance	VOC 42.6 lb/hr HAP 1.3 lb/hr Acetone 266.00 lb/hr			

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
31	Mass Balance	VOC 42.6 lb/hr HAP 1.3 lb/hr Acetone 266.00 lb/hr			
32	Mass Balance	VOC 42.6 lb/hr HAP 1.3 lb/hr Acetone 266 lb/hr			
33	Mass Balance	VOC 0.6 lb/hr HAP 0.01 lb/hr			
34	Mass Balance	VOC 0.6 lb/hr HAP 0.01 lb/hr			
35	Mass Balance	VOC 0.3 lb/hr HAP 0.01 lb/hr			
37	Mass Balance	VOC 17.9 lb/hr HAP 17.85 lb/hr			
39	Mass Balance	VOC 64.0 lb/hr HAP 1.89 lb/hr Acetone 399.00 lb/hr			
40	Mass Balance	VOC 64.0 lb/hr HAP 1.89 lb/hr Acetone 399.00 lb/hr			

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
42	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
43	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
45	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
46	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
48	Mass Balance	VOC 1.8 lb/hr HAP 0.29 lb/hr			
49	Mass Balance	VOC 12.3 lb/hr HAP 3.52 lb/hr Acetone 2.70 lb/hr			
50	Mass Balance	VOC 21.4 lb/hr HAP 10.30 lb/hr Acetone 6.30 lb/hr			



SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
51	Mass Balance	VOC 1.7 lb/hr HAP 0.19 lb/hr			
52	Mass Balance	VOC 1.7 lb/hr HAP 0.19 lb/hr			
53	Mass Balance	VOC 1.7 lb/hr HAP 0.19 lb/hr			
54	Mass Balance	VOC 1.7 lb/hr HAP 0.19 lb/hr			
55	Mass Balance	VOC 1.7 lb/hr HAP 0.19 lb/hr			
56	Mass Balance	VOC 1.7 lb/hr HAP 0.19 lb/hr			
57	Mass Balance	VOC 1.7 lb/hr HAP 0.19 lb/hr			
58	Mass Balance	VOC 1.7 lb/hr HAP 0.19 lb/hr			
59	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
60	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
61	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
62	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
63	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
64	Mass Balance	VOC 9.9 lb/hr HAP 3.01 lb/hr Acetone 96.00 lb/hr			
65	Mass Balance	VOC 64.0 lb/hr HAP 1.89 lb/hr Acetone 399.00 lb/hr			
66	Mass Balance	VOC 64.0 lb/hr HAP 1.89 lb/hr Acetone 399.00 lb/hr			

SN	Emission Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
67	Mass Balance	VOC 1.8 lb/hr HAP 0.29 lb/hr			
68	Mass Balance	VOC 1.8 lb/hr HAP 0.29 lb/hr			
69	Mass Balance	VOC 1.3 lb/hr HAP 0.04 lb/hr			
70	Mass Balance	VOC 0.2 lb/hr HAP 0.06 lb/hr			
71	Mass Balance	VOC 3.8 lb/hr HAP 1.41 lb/hr			
72	Mass Balance	VOC 3.8 lb/hr HAP 1.41 lb/hr			
73	Mass Balance	VOC 3.8 lb/hr HAP 1.41 lb/hr			
74	Mass Balance	VOC 2.9 lb/hr HAP 0.83 lb/hr Acetone 0.80 lb/hr			
75	Mass Balance	VOC 6.8 lb/hr HAP 2.67 lb/hr Acetone 10.00 lb/hr			

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
76	Mass Balance	VOC 1.3 lb/hr HAP 0.04 lb/hr			
77	Mass Balance	VOC 0.2 lb/hr HAP 0.06 lb/hr			
78	AP-42	PM/PM <sub>10</sub> 7.6 lb/MMcf SO <sub>2</sub> 0.6 lb/MMcf VOC 5.5 lb/MMcf CO 84 lb/MMcf NO <sub>x</sub> 100 lb/MMcf			

13. TESTING REQUIREMENTS:

The permit does not require stack testing.

14. MONITORING OR CEMS

The permit does not require monitoring devices or CEMS.

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
facility wide	VOC content and purchases of VOC containing materials	165.0 tpy of VOC emissions	monthly	Y
facility wide	HAP content and purchases of HAP containing materials	9.6 tpy - single HAP 22.0 tpy - combined	monthly	N

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
facility wide	VOC and HAP credit, amount of VOC and HAP shipped off-site to a Hazardous Disposal Facility	There is no applicable limit for this requirement.	quarterly	N
facility wide	VOC and HAP credit, amount of VOC and HAP contained in materials that have exceeded their shelf life	There is no applicable limit for this requirement	monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
78	5%	§18.501	Inspector's Observation

17. DELETED CONDITIONS:

Former SC	Justification for removal
18, 19, 20, 21	Obsolete. These conditions were added to ensure the emission from the associated sources did not exceed <i>de minimis</i> thresholds. This requirement no longer applies because the facility is switching from minor source to major source for criteria pollutants.

18. GROUP A INSIGNIFICANT ACTIVITIES

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
Mold Machine Shop Curing Oven 2.0 MMBTU/hr	A-1	0.07	0.01	0.05	0.73	0.86	-	-
Mold Machine Shop Curing Oven 1.2 MMBTU/hr	A-1	0.04	0.01	0.03	0.44	0.52	-	-
Machine Shop Oven <1 MMBTU/hr	A-1	0.04	0.01	0.03	0.37	0.43	-	-
Wastewater Evaporator* 1.5 MMBTU/hr	A-1	0.05	0.01	0.04	0.55	0.65	-	-
<b>Group A-1 Totals</b>		<b>0.20</b>	<b>0.04</b>	<b>0.15</b>	<b>2.09</b>	<b>2.46</b>	-	-
Automotive Fuel Storage Tank 2,500 gallon	A-13						0.13	0.33
FAA Burn Test Room	A-13	0.1						
Cabinet Shop (Formerly SN-29)	A-13	0.03						

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
Cabinet Shop (Formerly SN-38)	A-13	0.03						
Production Warehouse	A-13	0.03						
Machine Shop Drilling and Cutting	A-13			0.05			0.05	0.05
Service Center Small Parts Paint Booth	A-13			0.12			0.02	0.046
Paint Vault Sample Spray Booth	A-13			0.24			0.24	0.24
Gel-Coat Booths (2 Booths)	A-13			0.75			0.62	0.75
Cabinet Shop – Polish, Detail Polish, and Buffing Rooms	A-13	0.18						
Weld Inspection Booth	A-13			0.98				
Paint Shop – Sanding Area Enclosure	A-13	0.21						
Wastewater Aeration*	A-13							
Machine Shop Welding **	A-13							
<b>Group A-13 Totals</b>		<b>0.58</b>		<b>2.14</b>			<b>0.62</b>	<b>1.42</b>

\* Although VOC and HAPs are present, the permitted sources assume all VOC's and HAPs are emitted.

\*\* Tungsten Inert Gas (TIG) welding uses non-consumable electrodes.

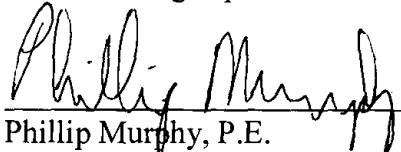
19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1876-AR-7

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

  
 Phillip Murphy, P.E.  
 Engineering Supervisor, Air Division

**APPENDIX A – EMISSION CHANGES AND FEE CALCULATION**





### Fee Calculation for Major Source

Facility Name: Dassault Falcon  
 Permit Number: 1876-AOP-R0  
 AFIN: 60-00617

\$/ton factor	22.07	Annual Chargeable Emission (tpy)	243.2
Permit Type	Initial Permit	Permit Fee \$	1185.424

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source Permit	<input checked="" type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	4182
Total Permit Fee Chargeable Emissions (tpy)	148.2

*HAPs not included in VOC or PM:*

*Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

*Air Contaminants:*

*All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM	<input checked="" type="checkbox"/>	0	0.6	0.6	0.6	0.6
PM <sub>10</sub>	<input type="checkbox"/>	0	0.6	0.6		
SO <sub>2</sub>	<input checked="" type="checkbox"/>	0	0.1	0.1	0.1	0.1
VOC	<input checked="" type="checkbox"/>	95	165	70	70	165
CO	<input type="checkbox"/>	0	6.3	6.3		
NO <sub>x</sub>	<input checked="" type="checkbox"/>	0	7.5	7.5	7.5	7.5
Acetone	<input checked="" type="checkbox"/>	0	70	70	70	70

