### STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1876-AOP-R10 AFIN: 60-00617

### 1. PERMITTING AUTHORITY:

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

### 2. APPLICANT:

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

3. PERMIT WRITER:

John Mazurkiewicz

4. NAICS DESCRIPTION AND CODE:

NAICS Description:Aircraft ManufacturingNAICS Code:336411

5. SUBMITTALS:

Date of	Type of Application	Short Description of Any Changes
Application	(New, Renewal, Modification,	That Would Be Considered New or
	Deminimis/Minor Mod, or	Modified Emissions
	Administrative Amendment)	
7/17/2015	Minor Modification	Install two spray booths (SN-97 and
		SN-98)
		Install a paint cure booth (SN-99)
		Add two vent stacks for the paint
		mixing room
		(SN-100A and SN-100B)
		Remove the Plating Shop - Laquer
		Room (SN-28) from the permit
		Install vent hoods over alodine tanks,
		and include them as a permitted
		source
		Remove the flocking booth (SN-13)
		from the permit

Permit #: 1876-AOP-R10 AFIN: 60-00617 Page 2 of 17

#### 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, and has submitted an application for Minor Modification to the existing permit. The following changes have been requested in this application:

- Convert the existing Plating Shop to the Small Parts Painting Shop;
- Install two spray booths (proposed as sources SN-97 and SN-98);
- Install a paint cure booth (proposed as SN-99);
- Add two vent stacks for the paint mixing room (proposed as SN-100A and SN-100B);
- Remove the Plating Shop Laquer Room (SN-28) from the permit;
- Install vent hoods over the existing alodine tanks, and add the tanks as an individual source in the permit (SN-101A and SN-101B); and,
- Remove the flocking booth (SN-13) from the permit.

Changes to annual emission rates associated with this Modification include an increase of 0.1 tpy PM, and 0.1 tpy  $PM_{10}$ .

#### 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 active or pending air enforcement actions or issues at this time.

#### 8. PSD APPLICABILITY:

- a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N/A
- b) Is the facility categorized as a major source for PSD?
- Single pollutant  $\geq$  100 tpy and on the list of 28 or single pollutant  $\geq$  250 tpy and not on list N/A

If yes, explain why this permit modification is not PSD.

#### 9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-80	PM <sub>10</sub> , VOC, CO, NO <sub>X</sub> , HAPs	NSPS IIII, NESHAP ZZZZ
SN-81	HAPs	NESHAP ZZZZ

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	HAPs	NESHAP CCCCCC
Facility	HAPs	NESHAP HHHHHH
Facility	HAPs	NESHAP WWWWWW

### 10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

#### 11. AMBIENT AIR EVALUATIONS:

- a) Reserved.
- b) Non-Criteria Pollutants:

The facility emits HAPs common to paint stripping, surface coatings, electroplating, metal polishing, and gasoline dispensing activities. Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

Other Modeling:

Odor:

H<sub>2</sub>S Modeling:

This facility is not a significant source of hydrogen sulfide.

### 12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		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			
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			
12	Mass Balance	VOC 14.4 lb/hr HAP 3.64 lb/hr Acetone 2.90 lb/hr			
17	Mass Balance	VOC 4.6 lb/hr HAP 2.08 lb/hr Acetone 6.60 lb/hr			

Permit #: 1876-AOP-R10 AFIN: 60-00617 Page 5 of 17

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
18	Mass Balance	VOC 4.6 lb/hr HAP 2.08 lb/hr Acetone 6.60 lb/hr			
19	Mass Balance	VOC 4.6 lb/hr HAP 2.08 lb/hr Acetone 6.60 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			
30	Mass Balance	VOC 42.6 lb/hr HAP 1.3 lb/hr Acetone 266.00 lb/hr			
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			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		Acetone 266 lb/hr			
		VOC			
22		0.6 lb/hr			
33	Mass Balance	HAP			
		0.01 lb/hr			
		VOC			
34	Mass Balance	0.6 lb/hr			
		HAP			
		0.01 lb/hr VOC			
		0.3 lb/hr			
35	Mass Balance	HAP			
		0.01 lb/hr			
		VOC			
37	Mass Balance	17.9 lb/hr			
57	Mass Datalice	HAP			
		17.85 lb/hr			
		VOC			
		64.0 lb/hr			
39	Mass Balance	HAP 1.89 lb/hr			
		Acetone			
		399.00 lb/hr			
		VOC			
		64.0 lb/hr			
40	Mass Balance	HAP			
40	Mass Datatice	1.89 lb/hr			
		Acetone			
		399.00 lb/hr			
		VOC 9.9 lb/hr			
		HAP			
42	Mass Balance	3.01 lb/hr			
		Acetone			
		96.00 lb/hr			
		VOC			
		9.9 lb/hr			
43	Mass Balance	HAP			
_		3.01 lb/hr			
		Acetone 96.00 lb/hr			
		VOC			
45	Mass Balance	9.9 lb/hr			
	Diruss Duranov	HAP			

Permit #: 1876-AOP-R10 AFIN: 60-00617 Page 7 of 17

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		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			
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			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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			
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			

Permit #: 1876-AOP-R10 AFIN: 60-00617 Page 9 of 17

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		3.01 lb/hr Acetone 96.00 lb/hr			
65	Mass Balance	VOC 42.7 lb/hr HAP 1.26 lb/hr Acetone 265.90 lb/hr			
66	Mass Balance	VOC 42.7 lb/hr HAP 1.26 lb/hr Acetone 265.90 lb/hr			
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			

## Permit #: 1876-AOP-R10 AFIN: 60-00617 Page 10 of 17

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		HAP 0.83 lb/hr Acetone			
75	Mass Balance	0.80 lb/hr VOC 6.8 lb/hr HAP 2.67 lb/hr Acetone 10.00 lb/hr			
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	$\begin{array}{c} PM/PM_{10}\\ 7.6\ lb/MMcf\\ SO_2\\ 0.6\ lb/MMcf\\ VOC\\ 5.5\ lb/MMcf\\ CO\\ 84\ lb/MMcf\\ NO_X\\ 100\ lb/MMcf \end{array}$			
79	Mass Balance	VOC 42.7 lb/hr HAP 1.26 lb/hr Acetone 265.90 lb/hr			
80	NSPS AP-42	$\begin{array}{c} {\rm PM/PM_{10}} \\ 0.1 \ {\rm lb/hr} \\ {\rm SO_2} \\ 0.4 \ {\rm lb/hr} \\ {\rm VOC} \\ 0.4 \ {\rm lb/hr} \\ {\rm CO} \\ 1.3 \ {\rm lb/hr} \\ {\rm NO_X} \\ 1.1 \ {\rm lb/hr} \end{array}$			158 hp 500 hr/yr operation

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
81	AP-42	PM/PM <sub>10</sub> 0.9 lb/hr SO <sub>2</sub> 0.8 lb/hr VOC 1.0 lb/hr CO 2.5 lb/hr NO <sub>X</sub> 11.4 lb/hr			Two Engines 183 hp, each 500 hr/yr operation
82	TANKS	VOC 11.9 lb/hr			
83A 83B	Mass Balance	1.4 lb/hr VOC 0.2 gal/hr max 7.01 lb/gal			
84A		1.0 lb/hr VOC			
84B	Mass Balance	0.2 gal/hr max 8.56 lb/gal			
85A	Mass Balance	12.2 lb/hr VOC			
85B	Mass Balance	2.4 gal/hr max 8.25 lb/gal			
86A 86B	Mass Balance	12.2 lb/hr VOC 2.4 gal/hr max 8.25 lb/gal			
87	Mass Balance	1.9 lb/hr VOC Clear UV Hi-Performance 1.1 gal/hr max 8.43 lb/gal Eastman isobutyl Acetate 0.5 gal/hr max 7.26 lb/gal			
88	Mass Balance	1.9 lb/hr VOC Clear UV Hi-Performance 1.1 gal/hr max 8.43 lb/gal Eastman isobutyl Acetate 0.5 gal/hr max 7.26 lb/gal			
89	Mass Balance	1.9 lb/hr VOC Clear UV Hi-Performance 1.1 gal/hr max 8.43 lb/gal Eastman isobutyl Acetate			

Permit #: 1876-AOP-R10 AFIN: 60-00617 Page 12 of 17

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		0.5 gal/hr max 7.26 lb/gal			
90	Mass Balance	1.9 lb/hr VOC Clear UV Hi-Performance 1.1 gal/hr max 8.43 lb/gal Eastman isobutyl Acetate 0.5 gal/hr max 7.26 lb/gal			
91	Mass Balance	10.3 lb/hr VOC			
92	Mass Balance	HAP 3.52 lb/hr Acetone 2.70 lb/hr			
93	Mass Balance	5.7 lb/hr VOC Clear UV Hi-Performance			
94	Mass Balance	1.1 gal/hr max 8.43 lb/gal Eastman isobutyl Acetate 0.5 gal/hr max			
95	Mass Balance	7.26 lb/gal			
96A	Mass Balance	3.0 lb/hr VOC			
96B	Mass Balance	Clear UV Hi-Performance 0.2 gal/hr max			
96C	Mass Balance	8.43 lb/gal Mid-Coat Adhesion			
96D	Mass Balance	Promoter 222S 0.2 gal/hr max			
96E	Mass Balance	7.09 lb/gal			
97	Mass Balance	4.9 lb/hr VOC 1.0 gal/hr max 4.84 lb/gal			
98	Mass Balance	4.9 lb/hr VOC 1.0 gal/hr max 4.84 lb/gal			
99	Mass Balance	1.0 lb/hr VOC			
100A	Mass Balance	1.0 lb/hr VOC			
100B	Mass Balance	1.0 lb/hr VOC			
101A	AP-42 Section 12,	4.2 gr PM/PM <sub>10</sub> /hr-ft <sup>2</sup>			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Table 12.20-2				
101B	AP-42 Section 12, Table 12.20-2	4.2 gr PM/PM <sub>10</sub> /hr-ft <sup>2</sup>			

### 13. TESTING REQUIREMENTS:

The permit does not require stack testing.

14. MONITORING OR CEMS:

This 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	Permit Limit	Frequency	Report (Y/N)
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	Ν
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	There is no applicable limit for this requirement	monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	have exceeded their shelf life			
Facility wide	Paint Stripping Operations	Less than 1 ton per year of methyl chloride	annually	N
Facility wide	Surface Coating Operation	Annual Notification of Changes Report	N/A	N
Facility wide	Surface Coating Operation	Training Certification for each employee Expires every 5 years	N/A	Ν
Facility wide	Electrolytic Operations	Maintain tank cover 95% of electrolytic process time	daily	N
Facility wide	Polishing Operations	Capture and control system manufacturer's specifications and instructions and inspections	N/A	N
Facility wide	Electrolytic Operations and Polishing Operations	Annual Compliance Certification Report	N/A	Ν
80	Hours of Operation	500 hr/yr	monthly	Y
	Fuel Specification	Maximum 15 ppm wt% S and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume	Per Fuel Shipment	N
81	Hours of Operation	500 hr/yr	monthly	Y
82	Monthly Throughput of Gasoline per	1,000 gal/mo 12,000 gal/yr	monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	MACT 6C			

### 16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
All Sources*	5%	§18.501	Inspector's Observation
80, 81	20%	§19.503 (B)	Daily observation for events lasting 24 hours or more otherwise annual observation

\*Excludes SN-80 and SN-81

## 17. DELETED CONDITIONS:

Former SC	Justification for removal
16.a,b,c	DFJC no longer operates any electroplating tanks.

### 18. GROUP A INSIGNIFICANT ACTIVITIES:

Source	G	roup A		Emissions (tpy)							
Name		ategory	P	PM/PM <sub>10</sub>		SO <sub>2</sub>	VOC	СО	NO <sub>x</sub>	HAPs	
		0.	1			302	VUC	CO	NO <sub>X</sub>	Single	Total
Mold Mach Shop Curir Oven 2.0 MMBTU/I	ng	A-1		0.07		0.01	0.05	0.73	0.86	-	-
Mold Mach Shop Curin Oven 1.2 MMBTU/I	ng	A-1		0.04		0.01	0.03	0.44	0.52	-	-
Machine Sh Oven <1 MMBTU/I		A-1		0.04		0.01	0.03	0.37	0.43	-	-
Wastewate Evaporator 1.5 MMBTU/I	r*	A-1		0.05		0.01	0.04	0.55	0.65	-	-

### Permit #: 1876-AOP-R10 AFIN: 60-00617 Page 16 of 17

Group A-1		0.20	0.04	0.15	2.09	2.46	_	-
Totals								
FAA Burn Test Room	A-13	0.1						
Cabinet Shop (Formerly SN- 29)	A-13	0.03						
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							
Cabinet Shop Dust Collector	A-13	0.15						
Manufacturing Area Dust Collector	A-13	0.04						
Headliner Shop Sanding Booths (2 Booths)	A-13	0.08						
Group A-13 Totals		0.85		2.14			0.62	1.09

# 19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #	
1876-AOP-R9	

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

#### Fee Calculation for Major Source

#### Facility Name: Dassault Falcon Jet Corp. Permit Number: 1876-AOP-R10 AFIN: 60-00617

\$/ton factor Permit Type	23.93 Minor Mod	Annual Chargeable Emissions (tpy) Permit Fee \$	<u>178.1</u> 500
Minor Modification Fee \$ Minimum Modification Fee \$ Renewal with Minor Modification \$	500 1000 500		
Check if Facility Holds an Active Minor Source or Mino Source General Permit If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ Total Permit Fee Chargeable Emissions (tpy) Initial Title V Permit Fee Chargeable Emissions (tpy)	or 0 0.1		

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.)

Revised 08-26-15

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		1	1.1	0.1		
$PM_{10}$		1	1.1	0.1	0.1	1.1
SO <sub>2</sub>		0.4	0.4	0	0	0.4
VOC		165.9	165.9	0	0	165.9
СО		7.4	7.4	0		
NO <sub>X</sub>		10.7	10.7	0	0	10.7
Total HAPs		22	22	0		
Acetone		70	70	0		