

November 12, 2010

Peter R. Christiansen Manager Environmental Dassault Falcon P.O. Box 967 Little Rock, AR 72203-0967

Re: Notice of Administrative Amendment

AFIN: 60-00617, Permit No.: 1876-AOP-R2

Dear Mr. Christiansen:

Enclosed is Permit 1876-AOP-R2 completed in accordance with the provisions of Section 26.901 of Regulation No. 26, Regulations of the Arkansas Operating Air Permit Program.

Per your request the following modifications to the insignificant activity list were incorporated:

- Revise the heat input capacity of the mold machine shop curing oven to 0.7 MMBtu/hr,
- Add a second waste water evaporator (0.75 MMBtu/hr),
- Remove the service center small parts paint booth,
- Remove the paint vault sample spray booth,
- Remove one of the two listed gel coat booths,
- Rename the "Cabinet Shop Polish, Detail Polish, and Buffing Rooms" to "Cabinet Shop Polish and Buffing Rooms", and
- Remove the Paint Shop Sanding Area Enclosures

Please place the revised permit in your files.

Sincerely,

Mike Bates

Chief, Air Division

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Enclosure

# ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No.: 1876-AOP-R2

IS ISSUED TO:

Dassault Falcon
3801 East 10th Street
Little Rock, AR 72202
Pulaski County
AFIN: 60-00617

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

March 11, 2009 AND March 10, 2014

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates

Chief, Air Division

November 12, 2010

Date

Permit #: 1876-AOP-R2

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# List of Acronyms and Abbreviations

A.C.A. Arkansas Code Annotated

AFIN ADEQ Facility Identification Number

CFR Code of Federal Regulations

CO Carbon Monoxide

HAP Hazardous Air Pollutant

lb/hr Pound Per Hour

MVAC Motor Vehicle Air Conditioner

No. Number

NO<sub>x</sub> Nitrogen Oxide

PM Particulate Matter

PM<sub>10</sub> Particulate Matter Smaller Than Ten Microns

SNAP Significant New Alternatives Program (SNAP)

SO<sub>2</sub> Sulfur Dioxide

SSM Startup, Shutdown, and Malfunction Plan

Tpy Tons Per Year

UTM Universal Transverse Mercator

VOC Volatile Organic Compound

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# **SECTION I: FACILITY INFORMATION**

PERMITTEE:

Dassault Falcon

AFIN:

60-00617

PERMIT NUMBER:

1876-AOP-R2

**FACILITY ADDRESS:** 

3801 East 10th Street

Little Rock, AR 72202

MAILING ADDRESS:

P.O. Box 967

Little Rock, AR 72203-0967

COUNTY:

Pulaski County

CONTACT NAME:

Peter R. Christiansen

CONTACT POSITION:

Manager Environmental

TELEPHONE NUMBER:

501-210-0147

REVIEWING ENGINEER: Charles Hurt, P.E.

UTM North South (Y):

Zone 15: 3844105.48 m

UTM East West (X):

Zone 15: 570317.17 m

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#### **SECTION II: INTRODUCTION**

# **Summary of Permit Activity**

Dassault Falcon (AFIN: 60-00617) owns and operates an aerospace manufacturing and rework facility located at 10th & Leonard Streets, Little Rock, Arkansas 72202. Dassault requested an administrative amendment to make the following changes to the insignificant activity list:

- Revise the heat input capacity of the mold machine shop curing oven to 0.7 MMBtu/hr,
- Add a second waste water evaporator (0.75 MMBtu/hr),
- Remove the service center small parts paint booth,
- Remove the paint vault sample spray booth,
- Remove one of the two listed gel coat booths,
- Rename the "Cabinet Shop Polish, Detail Polish, and Buffing Rooms" to "Cabinet Shop Polish and Buffing Rooms", and
- Remove the Paint Shop Sanding Area Enclosures

# **Process Description**

New aircraft arrive at the Dassault Falcon facility with temporary instrumentation, crew seating, and a coating to protect the exterior aluminum frame from corrosion while in flight from France. The temporary instrumentation and seating are removed and returned to Dassault Aviation for reuse. The protective coating is washed off with a surfactant and water before completion activities begin. Aircraft are then completed to customer specifications. Completion activities include: painting, installing avionics, and interior fabrication. Previously purchased aircraft (also referred to as customer aircraft) are also brought to the facility for rework, repair, and inspection.

# Paint Shop

There are three prep bays at Dassault Falcon in which corrosion and sanding primer applications are performed. De-painting can also occur in these prep bays on customer aircraft that are returned to the facility as part of the service/re-work portion of facility operations. There are five paint bays in which topcoat applications are performed. All eight bays are equipped with three stage equivalent dry filtering system to control paint over spray.

Three small parts enclosures, used intermittently to paint or touch up smalls exterior parts of the aircraft, are located within Paint Bays 2 and 3. Interior parts of the aircraft are primed and painted in two small paint booths (also equipped with 3 stage equivalent filter) in the Small Parts Department.

# Cabinet Shop

Dassault Falcon builds and finishes cabinets for installation in the aircraft. Cabinet work involves sanding and buffing operations along with paint, stain, and adhesive application. The cabinet shop is equipped with a closet dust collection system, which collects stray particulate

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matter from cutting and sanding operations. Particulate is captured in one of eight diffuse particulate filters that remove particulate from the air and return the clean air back into the building, or it is captured by the two vacuum filters, which filter the air prior to exhausting to the atmosphere. Components are glued in Glue Booths No. 1, 2, 3, 4, and 5. Oil based stain is applied to the wood cabinet components in the Stain Room. A three part polyurethane is applied to all cabinets before a UV topcoat is applied. The UV topcoat is either applied by hand or by the Auto Finish Booth. If applied by hand, the UV topcoat is applied and cured in the UV spray, cure and flash-off area. The Auto Finish Booth is an automated UV application process (8 stacks are associated with the process).

# Upholstery Shop

Dassault Falcon fabricates all aircraft seating in the Upholstery Shop. All interior seats are upholstered to customer specifications. Two components of the operation produce emissions. One is the hot wire booth where a spray adhesive is applied to the foam (to attach the template) prior to the foam being cut by the hot wire. The second is the adhesive application room where solvent based glues are applied to the upholstery pieces. Both booths exhaust via a single stack.

Depending on customer specifications, certain cabinets/wood pieces may be upholstered. These cabinets/wood pieces are upholstered at the Cabinet Shop in Glue Booth No.5.

# Headliner Shop

Dassault Falcon builds and installs the headliners for each aircraft. Headliners are constructed in the Manufacturing Department and completed in the Headliner Shop. Completion of the headliners requires the use of adhesives and solvents. The headliner shop is equipped with particulate filters.

#### **Plating Shop**

Metal plating tanks are used to electroplate fixtures and cabinet components according to the customer's choice (e.g., 24K gold, rose gold or nickel). These tanks are located inside a dedicated building. There are no stacks to the atmosphere. The plating shop is equipped with a lacquer spray booth to coat specific plated parts to enhance appearance and durability. The lacquer booth is equipped with a particulate filter.

As part of the plating process, parts are buffed in the buffing room. The buffing compound is removed from the air by a diffuse particulate filter located just outside the buffing room and clean air is exhausted back into the buffing room.

#### Fuel Storage

Dassault Falcon stores fuel on site for aircraft, company vehicles, and equipment. Jet fuel is stored in three underground storage tanks. Dassault Falcon also has an underground storage tank

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for automotive fuel used to service vehicles and equipment. The gasoline tank is equipped with a pressure vacuum vent.

#### Service Center

Previously purchased aircraft are brought to the Service Center for rework and inspection. The majority of the work completed by the Service Center includes inspections and mechanical/instrumentation repairs that generate little to no emissions. However, the Service Center may rework the interior of the aircraft to include repair and installation of new cabinets, headliners, upholstery, etc. Emissions from the rework activities are emitted through the designated stack in the specific work area at the Service Center.

#### Miscellaneous

Several miscellaneous emission sources are included in this section that do not fit any particular operation. Solvents and other chemicals are used at many locations throughout the facility, including the completion hangers. These facility wide fugitive emissions are emitted to the atmosphere through general building ventilation.

Dassault Falcon also produces decals for aircraft in the screen printing room. Emissions from the screen printing process are emitted to the atmosphere through a single stack in the screen printing room.

# Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control,
Regulation 19, effective July 18, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective
January 25, 2009

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# **Emission Summary**

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

	EMISSION SUMMA	RY		
Source	Description	Pollutant	Emissic	n Rates
Number	Description	Tollulani	lb/hr	tpy
		PM	0.6	0.6
		$PM_{10}$	0.6	0.6
	m . 1 . 11	$SO_2$	0.1	0.1
	Total Allowable Emissions	VOC	702.3	165.0
		СО	6.3	6.3
		NO <sub>X</sub>	7.5	7.5
······································	Single HAP*		130.66	9.60
	Combination HAP*		130.66	22.00
	Air Contaminants**	Acetone	3403.7	70.00
<u> </u>		VOC	3.5	
01	Upholstery Shop – Adhesive Application	HAP	2.67	_
	Room	Acetone	1.40	
	0.11	VOC	4.8	
08A	Cabinet Shop – UV Spray	HAP	1.12	-
700	0.11 .01 .777.0	VOC	4.8	
08B	Cabinet Shop – UV Cure	HAP	1.12	-
000	C.1. (C) INVEL 1 OCC	VOC	4.8	
08C	Cabinet Shop – UV Flash Off	HAP	1.12	-
08D	Cohinet Chan IDV Connec	VOC	4.8	
עאט	Cabinet Shop – UV Spray	HAP	1.12	-
08E	Cabinet Shop – UV Flash Off	VOC ·	4.8	
UOL	Cabinet Shop = 0 v Plash Off	HAP	1.12	
08F	Cabinet Shop – UV Cure	VOC	4.8	
	Cabinet Shop - 0 v Cure	HAP	1.12	
09	Cabinet Shop – Poly Spray & Hold	VOC	10.2	_
	——————————————————————————————————————	HAP	1.58	
		VOC	12.8	
10	Cabinet Shop – Glue Booth #1	HAP	3.64	-
		Acetone	2.90	
		VOC	12.3	
11	Cabinet Shop – Glue Booth #2	HAP	3.52	-
		Acetone	2.70	
		VOC	14.4	
12	Cabinet Shop – Glue Booth #3	HAP	3.64	-
		Acetone	2.90	

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	EMISSION SUMMAI	RY		
Source	Dogovintion	Dallutant	Emissio	n Rates
Number	Description	Pollutant	lb/hr	tpy
13	Electrica Death	VOC	8.5	
13	Flocking Booth	HAP	4.00	-
		VOC	6.8	
20	Headliner Shop Stack #1	HAP	3.14	-
		Acetone	10.00	
		VOC	6.8	
22	Headliner Shop Stack #2	HAP	3.14	-
		Acetone	10.00	
25	Miscellaneous Screen Printing Room	VOC	8.5	_
	Miscondineeds Selecti Timenig Rectifi	HAP	4.00	
26A	Paint Shop – Spray Booth	VOC	3.9	_
	Tume Shop Spray Boom	HAP	5.03	
26B	Paint Shop – Spray Booth	VOC	3.9	_
	Tamosnop Spray Seem	HAP	5.03	
27	Cabinet Shop – Spray Booth	VOC	1.7	-
	Shows Strop Spray 20011	HAP	0.27	
28	Plating Shop – Lacquer Room	VOC	0.7	_
		HAP	0.70	
20	D 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	VOC	42.6	
30	Paint Shop – Prep Bay #1 Stack #1	HAP	1.30	-
		Acetone	266.00	
21	Daint Cl Dura Dara #1 Ct #2	VOC	42.6	
31	Paint Shop – Prep Bay #1 Stack #2	HAP	1.30	-
		Acetone	266.00	
22	Doint Chan Dran Day #1 Ctaals #2	VOC HAP	42.6 1.30	
32	Paint Shop – Prep Bay #1 Stack #3		266.00	-
		Acetone VOC	0.6	
33	Fuel Storage – Jet Fuel (20,000 gal)	HAP	0.01	-
		VOC	0.6	
34	Fuel Storage – Jet Fuel (20,000 gal)	HAP	0.01	-
		VOC	0.3	
35	Fuel Storage – Jet Fuel (10,000 gal)	HAP	0.01	-
	Miscellaneous – Facility Wide Uncontrolled	VOC	17.9	
37	Emissions	HAP	17.85	· <del></del>
		VOC	64.0	
39	Paint Shop – Prep Bay #2 Stack #1	HAP	1.89	_
		Acetone	399.00	İ
		VOC	64.0	
40	Paint Shop – Prep Bay #2 Stack #2	HAP	1.89	-
10		Acetone	399.00	

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	EMISSION SUMMARY					
Source	Degeriation	Dollytont	Emissio	n Rates		
Number	Description	Pollutant	lb/hr	tpy		
		VOC	9.9			
42	Paint Shop – Bay #1 Stack #1	HAP	3.01	-		
		Acetone	96.00			
		VOC	9.9			
43	Paint Shop – Bay #1 Stack #2	HAP	3.01	-		
		Acetone	96.00			
		VOC	9.9			
45	Paint Shop – Bay #2 Stack #1	HAP	3.01	_		
		Acetone	96.00			
		VOC	9.9			
46	Paint Shop – Bay #2 Stack #2	HAP	3.01	-		
		Acetone	96.00			
48	Paint Shop – Small Parts Enclosure	VOC	1.8	_		
40		HAP	0.29			
		VOC	12.3			
49	9 Cabinet Shop – Glue Booth #4	HAP	3.52	-		
		Acetone	2.70			
		VOC	21.4			
50	Cabinet Shop – Glue Booth #5	HAP	10.30	_		
		Acetone	6.30			
51	Auto Finish Cabinet Shop – UV Spray	VOC	1.7	_		
J1	* *	HAP	0.19			
52	Auto Finish Cabinet Shop – Clean Room	VOC	1.7	_		
	Booth Exhaust	HAP	0.19			
53	Auto Finish Cabinet Shop – UV Flash Off	VOC	1.7	_		
	Trate I man Casmer Shop C v I fash Off	HAP	0.19			
54	Auto Finish Cabinet Shop – UV Flash Off	VOC	1.7	_		
		HAP	0.19			
55	Auto Finish Cabinet Shop – UV Flash Off	VOC	1.7	_		
		HAP	0.19			
56	Auto Finish Cabinet Shop – UV Flash Off	VOC	1.7	_		
	r	HAP	0.19			
57	Auto Finish Cabinet Shop – UV Cure	VOC	1.7	_		
		HAP	0.19			
58	Auto Finish Cabinet Shop – Touch-up	VOC	1.7	_		
	Booth	HAP	0.19			
		VOC	9.9			
59	Paint Shop – Bay #3 Stack #1	HAP	3.01	· -		
		Acetone	96.00			

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	EMISSION SUMMA	RY		
Source	Description	Pollutant	Emissio	n Rates
Number	Description	Pollutant	lb/hr	tpy
		VOC	9.9	
60	Paint Shop – Bay #3 Stack #2	HAP	3.01	_
		Acetone	96.00	
		VOC	9.9	
61	Paint Shop – Bay #4 Stack #1	HAP	3.01	-
		Acetone	96.00	
		VOC	9.9	
62	Paint Shop – Bay #3 Stack #2	HAP	3.01	-
		Acetone	96.00	
		VOC	9.9	
63	Paint Shop – Bay #5 Stack #1	HAP	3.01	_
	-	Acetone	96.00	
		VOC	9.9	
64	Paint Shop – Bay #5 Stack #2	HAP	3.01	-
		Acetone	96.00	
		VOC	64.0	
65	Paint Shop – Prep Bay #3 Stack #1	HAP	1.89	-
		Acetone	399.00	
		VOC	64.0	
66	Paint Shop – Prep Bay #3 Stack #2	HAP	1.89	-
	- ·	Acetone	399.00	
67	Doint Chan Carell Dorte Fredering	VOC	1.8	
07	Paint Shop – Small Parts Enclosure	HAP	0.29	_
68	Doint Chan Conall Dorta Englagues	VOC	1.8	
. 00	Paint Shop – Small Parts Enclosure	HAP	0.29	-
69	Paint Shop – Primer Work Room (Hangar	VOC	1.3	
U <del>9</del>	3)	HAP	0.04	
70	Paint Shop – Paint Work Room (Hangar 3)	VOC	0.2	
/ 0	1 and 5110p – I and work Room (Hangar 3)	HAP	0.06	
71	Service Center – Spray UV	VOC	3.8	_
/ 1	Del vice Contol — Spray O v	HAP	1.41	<u>-</u>
72	Service Center – Cure UV	VOC	3.8	_
	Belvies Center Cure ov	HAP	1.41	
73	Service Center – UV Flash-off	VOC	3.8	_
13	Service Center – O v Prasir-On	HAP	1.41	
		VOC	2.9	
74	Service Center – Cabinet Glue Shop	HAP	0.83	-
		Acetone	0.80	
		VOC	6.8	
75	Service Center – Headliner Glue Area	HAP	2.67	-
		Acetone	10.00	

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EMISSION SUMMARY						
Source	Di-di	Pollutant	Emissio	n Rates		
Number	Description	Pollutant	lb/hr	tpy		
76	Paint Shop – Primer Work Room (Hanger	VOC	1.3			
/6	2)	HAP	0.04	-		
77	Paint Shop – Paint Work Room (Hanger 2)	VOC	0.2			
77		HAP	0.06	-		
		PM	0.6	0.6		
	Natural Gas Combustion Sources	$PM_{10}$	0.6	0.6		
78		$SO_2$	0.1	0.1		
76		VOC	0.5	0.5		
		CO	6.3	6.3		
		$NO_X$	7.5	7.5		

<sup>\*</sup>HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

\*\*Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

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#### **SECTION III: PERMIT HISTORY**

The first air permit, #1067-AR was issued to Dassault Falcon Jet Corp (DFJC) on August 21, 1990 under Regulation 18, the Arkansas Air Pollution Control Code.

Air Permit #1067-AR-1 was issued to Dassault Falcon Jet Corp. on June 30, 1995 under Regulation 19, Regulations of the Arkansas Plan of Implementation for Air Pollution Control, at the request of Arkansas Department of Pollution Control and Ecology (ADPCE). DFJC identified specific emissions point sources and quantified emissions to obtain permit #1067-AR-1. In addition, DFJC became subject to 40 CFR 63, Subpart N - National Emission Standard for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

Air Permit #1067-AR-2 was issued to DFJC on December 20, 1995. The permit included the change of the test method for the decorative chrome plating operation from Method 306 or 306A to Method 306B. This modification allowed DFJC to utilize a test method which is significantly less expensive.

Air Permit #1067-AR-3 was issued to DFJC on August 6, 1996. The permit was issued to authorize the facility to build an additional paint bay and a second adhesive application room for the cabinet shop. This application also reflected the name change from Falcon Jet Corp. to Dassault Falcon Jet Corp. It was also submitted to notify ADPCE that DFJC has became subject to two more NESHAP standards: 40 CFR 63, Subpart GG - National Emission Standard for Aerospace Manufacturing and Rework Facilities and 40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations.

This facility operated under Air Pollution Prevention Plan #1067-AP3-R0 which was issued on March 27, 1998. Emissions were quantified as 0.9 tons per year (tpy) of PM/PM<sub>10</sub>, 94.0 tpy of Volatile Organic Compounds (VOC), and 23.8 tpy of Hazardous Air Pollutants (HAPs).

Permit 1876-A was issued on February 10, 2000. There were no physical changes made at this facility. This permit was issued to update the permit to permitting regulations introduced with the revisions to Regulations 18 and 19.

Permit 1876-AR-1 was issued on November 8, 2000. This permit was issued to remove Specific Conditions # 6 and # 7. These specific conditions limited the number of aircraft that the facility was allowed to produce and depaint during a consecutive twelve month period. However, the rolling 12-month VOC and HAP record keeping provisions of Specific Conditions #11, #12, #13, #14, and #15 are sufficient to show compliance with permitted emission rates.

Permit 1876-AR-2 was issued on April 26, 2002. This permit was issued to add three new painting bays, each bay having three stacks. One of the new bays is used for the depainting and primer application, while the remaining two new bays are used for topcoat application. There were no changes to the annual permitted limits with this modification.

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Permit 1876-AR-3 was issued on September 10, 2003. A stack was removed from each of three paint bays (SN-41, SN-44, and SN-47). Total emissions from the paint bays remained the same. A small parts paint booth was installed. No net increase in production resulted from this installation. However, to allow for flexibility in operations, the emission limits for the new paint booth was set equal to that for the existing. A Paint Vault Sample Spray Booth was added to the list of insignificant activities. There were no changes to the annual permitted emission limits.

Permit 1876-AR-4 was issued on June 28, 2005. DFJC requested to install a glue booth (SN-49) at the Cabinet Shop, a completion hanger (part of SN-37), and a second natural gas fired curing oven (Insignificant Activity). DFJC also requested to relocate the Mold Machine Shop curing oven to the new building where the new oven was installed. Both the glue booth and the hanger are sources of VOC emissions. DFJC did not request an increase for the permitted annual VOC emission rate.

Permit 1876-AR-5 was issued on June 13, 2006. Permit 1876-AR-5 allowed the following modifications:

- Expanded the Cabinet Shop and relocate Glue Booth No. 2 (SN-11),
- Relocated Headliner Operations (Remove stacks SN-05, SN-06, and SN-21 and SN-20 and SN-22),
- Relocated Printing Room (SN-25),
- Expanded the Upholstery Shop and relocate glue booth (SN-01),
- Replaced Paint Bays No. 1 and No. 2 waterfall particulate control system with dry filters,
- Constructed a new completion hanger and relocate existing completion operations (SN-37),
- Re-designated SN-08 as SN-08A through SN-08F since emissions are emitted through eight stacks instead of one,
- Removed SN-07 since the stack was never installed and emissions are accounted for in SN-08.
- Installed Glue Booth No. 5 (SN-20) in the Cabinet Shop,
- Constructed an Auto Finish Cabinet Shop (SN-51 through SN-58), and
- Updated Insignificant Activities Table

With the installation of the glue booth and construction of the Auto Finish Cabinet Shop, DFJC did not request an increase in the throughput of coatings and adhesives. Therefore, the annual emission limits were not increased.

Permit 1876-AR-6 was issued on August 14, 2007. This permit allowed the following modifications:

• Converted the existing paint bays (No. 1 and No. 2) into completion areas (SN-14 through SN-19); and

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• Constructed four new bays for depainting, primer application, and top coat application activities (SN-59 through SN-66), two enclosures for painting small parts (SN-67 and SN-68), a primer work room (SN-69), a paint work room (SN-70), a sanding area enclosure (insignificant activity), and a flightline hanger for storage of completed aircraft.

With the proposed construction, DFJC did not request an increase in the throughput of coatings and adhesives. Therefore, the annual VOC emission limits were not increased.

Permit 1876-AR-7 was issued on December 12, 2007. The modification expanded the Service Center, and added the following sources:

- Service Center Spray UV (SN-71)
- Service Center Cure UV (SN-72)
- Service Center UV Flash-off (SN-73)
- Service Center Cabinet Glue Booth (SN-74), and
- Service Center Headliner Glue (SN-75).

While the potential to emit from the proposed modification exceeded the VOC de minimis threshold, the resulting, combined VOC emissions from the sources listed above was limited to 20.0 tpy in order for the modifications to qualify as a de minimis modification. The plantwide VOC limit of 95.0 tpy did not increase.

Permit 1876-AOP-R0 was issued on March 11, 2009 and was the initial Title V permit issued to the facility. Dassault increased production but did not install new equipment. As a result, permitted VOC emissions increased from 95.0 tpy to 165.0 tpy. 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);
- 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.

Permit 1876-AOP-R1 was issued on June 10, 2010. The permit was amended to add a clear coat to plated parts at gel coat booths, an electric curing oven to cure the clear coated parts, and the Service Center Dust Collector/Filter to the insignificant activity list.

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# SECTION IV: SPECIFIC CONDITIONS

# SN-Facility Source Name

# Source Description

New aircraft arrive at the Dassault Falcon facility with temporary instrumentation, crew seating, and a coating to protect the exterior aluminum frame from corrosion while in flight from France. The temporary instrumentation and seating are removed and returned to Dassault Aviation for reuse. The protective coating is washed off with a surfactant and water before completion activities begin. Aircraft are then completed to customer specifications. Completion activities include: painting, installing avionics, and interior fabrication. Previously purchased aircraft (also referred to as customer aircraft) are also brought to the facility for rework, repair, and inspection.

# **Specific Conditions**

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition for all sources except SN-78 by complying with Specific Condition #4. In order to demonstrate compliance with this condition for SN-78 the permittee shall comply with Specific Conditions #16 and #18. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	Upholstery Shop – Adhesive Application Room	VOC	3.5	-
08A	Cabinet Shop – UV Spray	VOC	4.8	<u>-</u>
08B	Cabinet Shop – UV Cure	VOC	4.8	-
08C	Cabinet Shop – UV Flash Off	VOC	4.8	-
08D	Cabinet Shop – UV Spray	VOC	4.8	-
08E	Cabinet Shop – UV Flash Off	VOC	4.8	•
08F	Cabinet Shop – UV Cure	VOC	4.8	-
09	Cabinet Shop – Poly Spray & Hold	VOC	10.2	
10	Cabinet Shop – Glue Booth #1	VOC	12.8	-
11	Cabinet Shop – Glue Booth #2	VOC	12.3	1
12	Cabinet Shop – Glue Booth #3	VOC	14.4	-
13	Flocking Booth	VOC	8.5	-
20	Headliner Shop Stack #1	VOC	6.8	-
22	Headliner Shop Stack #2	VOC	6.8	_
25	Miscellaneous – Screen Printing Room	VOC	8.5	-
26A	Paint Shop – Spray Booth	VOC	3.9	_

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SN	Description	Pollutant	lb/hr	tpy
26B	Paint Shop – Spray Booth	VOC	3.9	-
27	Cabinet Shop – Spray Booth	VOC	1.7	-
28	Plating Shop – Lacquer Room	VOC	0.7	-
30	Paint Shop – Prep Bay #1 Stack #1	VOC	42.6	-
31	Paint Shop - Prep Bay #1 Stack #2	VOC	42.6	_
32	Paint Shop - Prep Bay #1 Stack #3	VOC	42.6	-
33	Fuel Storage – Jet Fuel (20,000 gal)	VOC	0.6	-
34	Fuel Storage – Jet Fuel (20,000 gal)	VOC	0.6	-
35	Fuel Storage – Jet Fuel (10,000 gal)	VOC	0.3	-
37	Miscellaneous – Facility Wide Uncontrolled Emissions	VOC	17.9	-
39	Paint Shop – Prep Bay #2 Stack #1	VOC	64.0	-
40	Paint Shop – Prep Bay #2 Stack #2	VOC	64.0	-
42	Paint Shop – Bay #1 Stack #1	VOC	9.9	-
43	Paint Shop – Bay #1 Stack #2	VOC	9.9	1
45	Paint Shop – Bay #2 Stack #1	VOC	9.9	-
46	Paint Shop – Bay #2 Stack #2	VOC	9.9	<del>-</del>
48	Paint Shop – Small Parts Enclosure	VOC	1.8	-
49	Cabinet Shop – Glue Booth #4	VOC	12.3	-
50	Cabinet Shop – Glue Booth #5	VOC	21.4	-
51	Auto Finish Cabinet Shop – UV Spray	VOC	1.7	-
52	Auto Finish Cabinet Shop – Clean Room Booth Exhaust	VOC	1.7	-
53	Auto Finish Cabinet Shop – UV Flash Off	VOC	1.7	-
54	Auto Finish Cabinet Shop – UV Flash Off	VOC	1.7	-
55	Auto Finish Cabinet Shop – UV Flash Off	VOC	1.7	<b>-</b>
56	Auto Finish Cabinet Shop – UV Flash Off	VOC	1.7	
57	Auto Finish Cabinet Shop – UV Cure	VOC	1.7	<u> </u>
58	Auto Finish Cabinet Shop – Touch-up Booth	VOC	1.7	-
59	Paint Shop – Bay #3 Stack #1	VOC	9.9	-
60	Paint Shop – Bay #3 Stack #2	VOC	9.9	-
61	Paint Shop – Bay #4 Stack #1	VOC	9.9	-
62	Paint Shop – Bay #3 Stack #2	VOC	9.9	-
63	Paint Shop – Bay #5 Stack #1	VOC	9.9	-

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SN	Description	Pollutant	lb/hr	tpy
64	Paint Shop – Bay #5 Stack #2	VOC	9.9	-
65	Paint Shop – Prep Bay #3 Stack #1	VOC	64.0	•
66	Paint Shop – Prep Bay #3 Stack #2	VOC	64.0	
67	Paint Shop – Small Parts Enclosure	VOC	1.8	-
68	Paint Shop – Small Parts Enclosure	VOC	1.8	ı
69	Paint Shop – Primer Work Room (Hangar 3)	VOC	1.3	•
70	Paint Shop – Paint Work Room (Hangar 3)	VOC	0.2	-
71	Service Center – Spray UV	VOC	3.8	-
72	Service Center – Cure UV	VOC	3.8	-
73	Service Center – UV Flash-off	VOC	3.8	-
74	Service Center – Cabinet Glue Shop	VOC	2.9	-
75	Service Center – Headliner Glue Area	VOC	6.8	-
76	Paint Shop – Primer Work Room (Hanger 2)	VOC	1.3	-
77	Paint Shop – Paint Work Room (Hanger 2)	VOC	0.2	-
78	Natural Gas Combustion Sources	PM <sub>10</sub> SO <sub>2</sub> VOC CO NO <sub>X</sub>	0.6 0.1 0.5 6.3 7.5	0.6 0.1 0.5 6.3 7.5
	Plantwide Limit	VOC	702.30	165.0

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition #4. In order to demonstrate compliance with this condition for SN-78 the permittee shall comply with Specific Conditions #16 and #18. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Upholstery Shop – Adhesive Application Room	HAP Acetone	2.67 1.40	-
08A	Cabinet Shop – UV Spray, Flash Off, & Cure	HAP	1.12	-
08B	Cabinet Shop – UV Cure	НАР	1.12	-
08C	Cabinet Shop – UV Flash Off	НАР	1.12	_
08D	Cabinet Shop – UV Spray	HAP	1.12	-
08E	Cabinet Shop – UV Flash Off	HAP	1.12	-
08F	Cabinet Shop – UV Cure	HAP	1.12	-

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SN	Description	Pollutant	lb/hr	tpy
09	Cabinet Shop – Poly Spray & Hold	HAP	1.58	-
10	Cabinet Shop – Glue Booth #1	HAP Acetone	3.64 2.90	-
11	Cabinet Shop – Glue Booth #2	HAP Acetone	3.52 2.70	-
12	Cabinet Shop – Glue Booth #3	HAP Acetone	3.64 2.90	-
13	Flocking Booth	HAP	4.00	-
20	Headliner Shop – Stack #1	HAP Acetone	3.14 10.00	-
22	Headliner Shop Stack #2	HAP Acetone	3.14 10.00	-
25	Miscellaneous - Screen Printing Room	HAP	4.00	
26A	Paint Shop – Spray Booth	HAP	5.03	_
26B	Paint Shop - Spray Booth	HAP	5.03	
27	Cabinet Shop – Spray Booth	HAP	0.27	_
28	Plating Shop – Lacquer Room	HAP	0.70	-
30	Paint Shop – Prep Bay #1 Stack #1	HAP Acetone	1.30 266.00	<del>-</del>
31	Paint Shop - Prep Bay #1 Stack #2	HAP Acetone	1.30 266.00	-
32	Paint Shop - Prep Bay #1 Stack #3	HAP Acetone	1.30 266.00	_
33	Fuel Storage – Jet Fuel (20,000 gal)	HAP	0.01	-
34	Fuel Storage – Jet Fuel (20,000 gal)	HAP	0.01	-
35	Fuel Storage – Jet Fuel (10,000 gal)	HAP	0.01	-
37	Miscellaneous – Facility Wide Uncontrolled Emissions	НАР	17.85	-
39	Paint Shop – Prep Bay #2 Stack #1	HAP Acetone	1.89 399.00	_
40	Paint Shop – Prep Bay #2 Stack #2	HAP Acetone	1.89 399.00	-
42	Paint Shop – Bay #1 Stack #1	HAP Acetone	3.01 96.00	-
43	Paint Shop – Bay #1 Stack #2	HAP Acetone	3.01 96.00	-

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SN	Description	Pollutant	lb/hr	tpy
45	Paint Shop – Bay #2 Stack #1	HAP Acetone	3.01 96.00	_
46	Paint Shop – Bay #2 Stack #2	HAP Acetone	3.01 96.00	-
48	Paint Shop – Small Parts Enclosure	HAP	0.29	_
49	Cabinet Shop – Glue Booth #4	HAP Acetone	3.52 2.70	-
50	Cabinet Shop – Glue Booth #5	HAP Acetone	10.30 6.30	-
51	Auto Finish Cabinet Shop – UV Spray	HAP	0.19	<u>-</u>
52	Auto Finish Cabinet Shop – Clean Room Booth Exhaust	HAP	0.19	-
53	Auto Finish Cabinet Shop – UV Flash Off	HAP	0.19	-
54	Auto Finish Cabinet Shop – UV Flash Off	HAP	0.19	-
55	Auto Finish Cabinet Shop – UV Flash Off	HAP	0.19	-
56	Auto Finish Cabinet Shop – UV Flash Off	HAP	0.19	-
57	Auto Finish Cabinet Shop – UV Cure	HAP	0.19	_
58	Auto Finish Cabinet Shop – UV Touch-up Booth	НАР	0.19	-
59	Paint Shop – Bay #3 Stack #1	HAP Acetone	3.01 96.00	-
60	Paint Shop – Bay #3 Stack #2	HAP Acetone	3.01 96.00	-
61	Paint Shop – Bay #4 Stack #1	HAP Acetone	3.01 96.00	_
62	Paint Shop – Bay #3 Stack #2	HAP Acetone	3.01 96.00	-
63	Paint Shop – Bay #5 Stack #1	HAP Acetone	3.01 96.00	-
64	Paint Shop – Bay #5 Stack #2	HAP Acetone	3.01 96.00	-
65	Paint Shop – Prep Bay #3 Stack #1	HAP Acetone	1.89 399.0	-
66	Paint Shop – Prep Bay #3 Stack #2	HAP Acetone	1.89 399.0	-
67	Paint Shop – Small Parts Enclosure	HAP	0.29	_

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SN	Description	Pollutant	lb/hr	tpy
68	Paint Shop – Small Parts Enclosure	HAP	0.29	_
69	Paint Shop – Primer Work Room (Hangar 3)	HAP	0.04	-
70	Paint Shop - Paint Work Room (Hangar 3)	HAP	0.06	-
71	Service Center – Spray UV	HAP	1.41	
72	Service Center – Cure UV	HAP	1.41	
73	Service Center – UV Flash-off	HAP	1.41	<u>-</u>
74	Service Center – Cabinet Glue Shop	HAP Acetone	0.83 0.80	-
75	Service Center – Headliner Glue Area	HAP Acetone	2.67 10.00	-
76	Paint Shop – Primer Work Room (Hangar 2)	HAP	0.04	<b>-</b>
77	Paint Shop – Paint Work Room (Hangar 2)	HAP	0.06	-
78	Natural Gas Combustion Sources	PM	0.6	0.6
Plantwide Limits		Total Combined HAP	136.96	22.00
		Any Single HAP	136.96	9.60
		Acetone	3,403.7	70.00

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition is demonstrated by combusting only natural gas. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
All Sources	5%	§18.501

- 4. The permittee will not emit in excess of 165.0 tons of VOC at the facility per consecutive 12 month period. Compliance with this condition will be demonstrated by compliance with Specific Condition #5. [§19.501 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 5. The permittee will maintain monthly records which track VOC usage and calculate total VOC emissions from all sources. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on-site, made available to Department personnel upon request and submitted in accordance with General

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Provision 7. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

6. The permittee will not exceed the facility-wide Hazardous Air Pollutant (HAP) content limits set forth in the following table. Materials which are not compliant with the requirements of this table may be exempted from this condition provided that they meet all of the requirements of Specific Condition #8. [§18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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%
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%

<sup>\*</sup> Several materials used at the facility contain trace amounts (<1% by wt.) of HAPs with low TLVs such as formaldehyde. Such HAPs in trace amounts are not limited by this table.

- \*\* This table is based on a maximum HAP concentration of 8.50 lb HAP per gallon of material, as applied.
- 7. The permittee will maintain records which demonstrate compliance with the limits set in Specific Condition #6 and which may be used by the Department for enforcement purposes. Compliance will be determined by inspecting the ACGIH TLV values as listed on current MSDS forms, or in the most recently published ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs) and properly noting on the monthly HAP records (required by Specific Condition #10) whether the material in question is compliant with the table contained in Specific Condition #6. These records will be maintained on site and will be provided to Department personnel upon request. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 8. Certain HAP containing materials that are unable to meet the requirements of Specific Condition #6 may be exempted provided that all of the following conditions are met.

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Any exemptions that are claimed must be noted on the HAP records required by Specific Condition #10. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- a. Emissions of the exempted pollutants will not exceed 200 lb of any single HAP during any one month.
- b. This exemption may only be claimed if the source material of the HAP is used for touch-up or other small quantity application. This exemption may not be claimed for any HAP emissions resulting from the usage of bulk process materials (such as paints) that are used in large quantities on a regular basis. The Department will reserve the right to determine whether a material qualifies under this condition.
- c. Total emissions of any single HAP that are claimed as an exemption may not exceed 1.00 tpy on a 12-month rolling total basis, and the combined HAP emissions that are claimed as an exemption may not exceed 2.50 tpy on a 12-moth rolling total basis.
- 9. The permittee will maintain records of the amount of VOC containing materials issued for use at the facility and their respective VOC contents. All VOCs contained in these materials will count as air emissions. Any VOCs that are properly shipped off-site according to the terms of Specific Condition #12 may be subtracted from the total emissions as a credit. A twelve month rolling total of materials issued for use and emissions will also be calculated. These records will be maintained in a spreadsheet, database, or other well-organized format. These records will be updated monthly, kept on-site, and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]
- 10. The permittee will maintain monthly records of the HAP emissions from the facility in order to demonstrate compliance with tons per year emission limits. All HAPs that are capable of being emitted as air emissions and are contained in materials issued for use at the facility shall be considered to be emitted. HAP emission credits may be subtracted from the total emissions provided they meet all of the requirements of Specific Condition #12. A 12-month rolling total and each individual month's data will be maintained on a facility-wide basis. These records will be maintained on site and will be made available to Department personnel upon request. [§18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 11. The permittee will demonstrate that the degree of accuracy of the calculations used to determine HAP emissions is sufficient to prove that neither limit of 10.00 tpy of single HAP nor 25.00 tpy combination HAP major source thresholds have been exceeded. The permittee shall account for all HAP emitted from the facility including activities which are considered insignificant. [§19.405(B) of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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12. The permittee may use all scrap VOCs and HAPs that are drummed and shipped offsite to a proper disposal site as a credit towards the facility's VOC and HAP emissions. Only the VOC and HAP portion of the shipment may be taken as a credit. Before a credit can be given the following conditions must be met. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- a. Testing will be performed quarterly in order to establish representative concentrations of VOCs and HAPs for the waste streams. This testing will be performed by an independent laboratory. Representative samples will be taken from 10% of the drums containing VOCs and HAPs. The samples will be tested for percentage of VOC and HAP content by weight and reported as such. The average of the samples will be applied to all the VOC and HAP containing drums disposed of for the next 3 month period.
- b. The ADEQ Air Division District Field Inspector will be notified no later than seven days prior to the date the samples are taken. The Air Division inspector will have the option of attending the sampling and selecting the drums to be sampled.
- c. The sampling reports will be maintained on site with the VOC and HAP emissions records required by this permit. These records will be made available to Department personnel upon request.
- d. The permittee will maintain a spreadsheet which will reflect the waste streams and the respective weight fractions of VOC and HAP shipped on a monthly basis. This spreadsheet will also contain monthly calculations for VOC and HAP emissions reductions. A copy of this spreadsheet will be made available to Department personnel upon request.
- 13. The VOC and HAP portions of unused materials that have either exceeded their shelf life or cannot be used for any reason may also be taken as an emission credit provided that these materials were first issued for use at the facility. These credits will be calculated based on the VOC and HAP concentrations reported on the MSDS sheet for each particular material. Monthly records will be maintained to demonstrate any credits claimed under this condition. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]
- 14. The permittee shall not apply any material that contains more than 8.50 lb HAP and/or VOC per gallon of material, as applied, unless it meets the exemption specified in Specific Condition #8 for HAPs and the exemption specified in Specific Condition #15 for VOC. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 15. Certain VOC containing materials that are unable to meet the requirements of Specific Condition #14 may be used provided that all of the following conditions are met. Usage of such materials shall be included in the VOC records required by Specific Condition

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#6. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- a. Total VOC emissions of the materials unable to comply with the concentration limit may not exceed 2.5 ton/yr on a 12 month-rolling total basis. These emissions shall be quantified and included in the total annual VOC calculations.
- b. Only materials used for touch-up or other small quantity application may exceed the concentration limit. Any VOC emissions resulting from the usage of bulk process materials (such as paints) that are used in large quantities on a regular basis must result through the use of materials which comply with the concentration limit.
- 16. The permittee shall not combust more than 150 million standard cubic (MMscf) of natural gas per consecutive twelve (12) month period from all natural gas fired process equipment at the facility. In order to demonstrate compliance with this condition, the permittee shall install natural gas flow meters on each piece of natural gas fired equipment or at common location for equipment connected by manifold. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
  - a. In lieu of installing natural gas flow meters, the permittee may assume the amount natural gas combusted by process equipment is the total amount shown on the monthly statement that is provided by the natural gas supplier. The permittee may determine compliance by multiplying the twelve month rolling total by the ratio of heat input capacity from process equipment to the total heat input capacity of the facility. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
- 17. The permittee shall retain maintain monthly records to demonstrate compliance with Specific Condition #16. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on-site, made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]
- 18. In order to demonstrate compliance with the hourly emission limits for SN-78 in Specific Condition #1, the permittee shall perform a survey of all natural gas fired equipment at the facility within 90 days of issuance of this permit (1876-AOP-R0). The survey shall be kept onsite and be made available to Department personnel upon request.
- 19. The permittee shall record the location, maximum hourly heat input, and whether or not each source is used solely for comfort heating. The permittee shall sum the maximum hourly heat input for all equipment which is not solely used for comfort heating. The permittee shall then demonstrate compliance with the hourly limits by multiplying the

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maximum hourly heat input by the emission factors in the table below and dividing by a heating value of 1000 BTU/scf. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

Pollutant	Emission Factor (lb/MMscf)
PM/PM <sub>10</sub>	7.6
$SO_2$	0.6
VOC	5.5
CO	84
$NO_X$	100

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# SECTION V: COMPLIANCE PLAN AND SCHEDULE

Dassault Falcon will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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#### **SECTION VI: PLANTWIDE CONDITIONS**

- 1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
- 3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 4. The permittee must provide:
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

- 5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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#### Title VI Provisions

- 7. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
  - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 8. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC like appliance" as defined at §82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

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The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC 22 refrigerant.

11. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

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# SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated October 27, 2010.

Description	Category
Mold Machine Shop Curing Oven –0.7 MMBTU/hr	A-1
Mold Machine Shop Curing Oven – 1.2 MMBTU/hr	A-1
Machine Shop Oven – <1 MMBTU/hr	A-1
Wastewater Evaporator – 1.5 MMBTU/hr	A-1
Wastewater Evaporator – 0.75 MMBTU/hr	A-1
Automotive Fuel Storage Tank – 2,500 gallon	A-13
FAA Burn Test Room	A-13
Cabinet Shop (Formerly SN-29)	A-13
Cabinet Shop (Formerly SN-38)	A-13
Production Warehouse	A-13
Machine Shop Drilling and Cutting	A-13
Gel-Coat Booth	A-13
Cabinet Shop – Polish and Buffing Rooms	A-13
Weld Inspection Booth	A-13
Wastewater Aeration	A-13
Machine Shop Welding	A-13
Cabinet Shop – Vacuum Filter No. 1	A-13
Cabinet Shop – Vacuum Filter No. 2	A-13
Production Warehouse Vacuum Filter	A-13
Plating Shop Diffuse Particulate Filters	A-13
Service Center – Dust Collector/Filter	A-13

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#### SECTION VIII: GENERAL PROVISIONS

- 1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
- 2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26)]
- 3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
- 4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
- 5. The permittee must maintain the following records of monitoring information as required by this permit.
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

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6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality Air Division ATTN: Compliance Inspector Supervisor 5301 Northshore Drive North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

- 8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
    - i. The facility name and location;
    - ii. The process unit or emission source deviating from the permit limit;
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs:
    - iv. The date and time the deviation started;
    - v. The duration of the deviation;
    - vi. The average emissions during the deviation;
    - vii. The probable cause of such deviations;
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
    - ix. The name of the person submitting the report.

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The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

- 9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
- 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
- 12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
- 13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

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- 14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
- 15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
- 16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
- 17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
- 18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
- 19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
- 20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
- 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
- 22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
  - a. Such an extension does not violate a federal requirement;
  - b. The permittee demonstrates the need for the extension; and
  - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

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[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

- 25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
  - a. Such a request does not violate a federal requirement;
  - b. Such a request is temporary in nature;
  - c. Such a request will not result in a condition of air pollution;
  - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
  - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
  - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

- 26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
  - a. The request does not violate a federal requirement;
  - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
  - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]