

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1876-AOP-R6 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:

Charles Hurt, P.E.

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Aircraft Manufacturing  
NAICS Code: 336411

5. SUBMITTALS:

9/10/2013, 1/13/2014

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 requested to relocate the upholstery shop (SN-01), construct a 14-bay hangar where completion activities included in SN-37 will occur, and add a 2,500 gallon gasoline tank as a permitted source, formerly an insignificant activity, with the applicable NESHAP CCCCCC requirement incorporated into the permit. The applicable requirements of NESHAP HHHHHH and NESHAP WWWWWW were incorporated. These changes did not require permitted emissions to be revised.

7. COMPLIANCE STATUS:

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

The facility was last inspected on November 15, 2012. The inspection report indicated the facility was complying with the permit in effect at that time.

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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list, or
- CO<sub>2</sub>e potential to emit  $\geq 100,000$  tpy and  $\geq 100$  tpy/ $\geq 250$  tpy of combined GHGs?

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

9. GHG MAJOR SOURCE (TITLE V):

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: \_\_\_\_\_

10. 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
Facility	HAPs	NESHAP CCCCCC
Facility	HAPs	NESHAP HHHHHH
Facility	HAPs	NESHAP WWWWWW

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

Pursuant to Act 1302 of the Regular Session of the 89th General Assembly of the State of Arkansas, no dispersion modeling was performed by ADEQ because it was not voluntarily proposed and agreed to by the facility. No other information was submitted by the applicant. Criteria pollutants were not evaluated for impacts on the NAAQS.

b) Non-Criteria Pollutants:

The facility emits HAPs common to paint stripping, surface coatings, electroplating, metal polishing, and gasoline dispensing activities. This modification involved no new construction or modification of any other kind that would require modeling of Non-Criteria Pollutants.

Other Modeling:

Odor:

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

This facility is not a significant source of hydrogen sulfide.

13. 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			
08D	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)
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			
17	Mass Balance	VOC 4.6 lb/hr HAP 2.08 lb/hr Acetone 6.60 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)
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			
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 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			
51	Mass Balance	VOC 1.7 lb/hr HAP 0.19 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)
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			
60	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)
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 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			

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)
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			
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			

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)
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			
79	Mass Balance	VOC 42.7 lb/hr HAP 1.26 lb/hr Acetone 265.90 lb/hr			
80	NSPS AP-42	PM/PM <sub>10</sub> 0.1 lb/hr SO <sub>2</sub> 0.4 lb/hr VOC 0.4 lb/hr CO 1.3 lb/hr NO <sub>x</sub> 1.1 lb/hr			158 hp 500 hr/yr operation
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			

14. TESTING REQUIREMENTS:

The permit does not require stack testing.

## 15. MONITORING OR CEMS:

This permit does not require monitoring devices or CEMS.

## 16. 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
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
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	N
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	N
80	Hours of Operation	500 hr/yr	monthly	Y

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
	Fuel Specification	Maximum 15 ppm wt% S and either a minimum centane 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 MACT 6C	1,000 gal/mo 12,000 gal/yr	monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
78	5%	§18.501	Inspector's Observation
80, 81	20%	§19.503 (B)	Daily observation for events lasting 24 hours or more otherwise annual observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
6	Per T. Rheume TLV table is no longer necessary
7,8,14, 15	Associated conditions for compliance with SC #6

19. 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	-	-
Group A-1 Totals		0.20	0.04	0.15	2.09	2.46	-	-
FAA Burn Test Room	A-13	0.1						

Source Name	Group A Category	Emissions (tpy)						HAPs	
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single	Total	
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	

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1876-AOP-R5

21. 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

Revised 11-06-13

Facility Name: Dassault Falcon Jet Corp.  
 Permit Number: 1876-AOP-R6  
 AFIN: 60-006017

\$/ton factor	23.42	Annual Chargeable Emissions (tpy)	178
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	0
Initial Title V Permit Fee Chargeable Emissions (tpy)	

*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		1	1	0		
PM <sub>10</sub>		1	1	0	0	1
SO <sub>2</sub>		0.4	0.4	0	0	0.4
VOC		165.9	165.9	0	0	165.9
CO		7.4	7.4	0		
NO <sub>x</sub>		10.7	10.7	0	0	10.7
Acetone	<input type="checkbox"/>	70	70	0		
HAP	<input type="checkbox"/>	22	22	0		