

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1876-AOP-R9 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 Manufacturing
NAICS Code: 336411

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
3/31/2015	Minor Mod	No emission rate changes to the permit are associated with this modification

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 to increase the number of exhaust stacks to support expansion and improvements in Cabinet Shop operations. The following changes have been requested:

- Add a stack to the Stain Booth (SN-83B), where the stain is applied to components prior to placement in the Stain Booth Paternoster (SN-83A);
- Add a stack to the TAS Booth (SN-84B), where the TAS is applied to components prior to placement in the TAS Booth Paternoster (SN-84A);

- Construct an additional stack at UV Manual Booth #I (SN-85B); Construct an additional stack at UV Manual Booth #2 (SN-86B);
- Add three additional "pickup" points (stacks) for UV Cure to the Auto Bravo Robot system (SN-93, SN-94, and SN-95). From a mechanical standpoint, additional exhaust points are necessary to pull the preferred volume of air; and,
- Add five stacks for Touch-up Areas (SN-96A through SN-96E).

In addition to the changes above, Dassault proposes to correct a typographical error associated with the cabinet shop process description on page 5 of the current Title V Permit.

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 ≥ 100 tpy and on the list of 28 or single pollutant ≥ 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 ₁₀ , VOC, CO, NO _x , HAPs	NSPS IIII, NESHAP ZZZZ
SN-81	HAPs	NESHAP ZZZZ
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:

H₂S 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 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 (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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			
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			
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			

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

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

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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			
56	Mass Balance	VOC 1.7 lb/hr HAP			

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

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

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		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			
78	AP-42	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			
79	Mass Balance	VOC 42.7 lb/hr HAP 1.26 lb/hr Acetone 265.90 lb/hr			
80	NSPS AP-42	PM/PM ₁₀ 0.1 lb/hr SO ₂ 0.4 lb/hr VOC 0.4 lb/hr CO 1.3 lb/hr NO _x 1.1 lb/hr			158 hp 500 hr/yr operation
81	AP-42	PM/PM ₁₀ 0.9 lb/hr			Two Engines 183 hp, each

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		SO ₂ 0.8 lb/hr VOC 1.0 lb/hr CO 2.5 lb/hr NO _x 11.4 lb/hr			500 hr/yr operation
82	TANKS	VOC 11.9 lb/hr			
83A	Mass Balance	1.4 lb/hr VOC			
83B		0.2 gal/hr max 7.01 lb/gal			
84A	Mass Balance	1.0 lb/hr VOC			
84B		0.2 gal/hr max 8.56 lb/gal			
85A	Mass Balance	12.2 lb/hr VOC			
85B		2.4 gal/hr max 8.25 lb/gal			
86A	Mass Balance	12.2 lb/hr VOC			
86B		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 0.5 gal/hr max 7.26 lb/gal			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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 1.1 gal/hr max 8.43 lb/gal Eastman isobutyl Acetate 0.5 gal/hr max 7.26 lb/gal			
94	Mass Balance				
95	Mass Balance				
96A	Mass Balance	3.0 lb/hr VOC Clear UV Hi-Performance 0.2 gal/hr max 8.43 lb/gal Mid-Coat Adhesion Promoter 222S 0.2 gal/hr max 7.09 lb/gal			
96B	Mass Balance				
96C	Mass Balance				
96D	Mass Balance				
96E	Mass Balance				

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	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	N/A	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		and instructions and inspections		
Facility wide	Electrolytic Operations and Polishing Operations	Annual Compliance Certification Report	N/A	N
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 MACT 6C	1,000 gal/mo 12,000 gal/yr	monthly	N

16. 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

17. DELETED CONDITIONS:

This revision did not result in deleted conditions.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	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						
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	A-13			0.98				

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Booth								
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-R8

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-25-14

Facility Name: Dassault Falcon Jet Corp.
 Permit Number: 1876-AOP-R9
 AFIN: 60-00617

\$/ton factor	23.89	Annual Chargeable Emissions (tpy)	178
Permit Type	Minor Mod	Permit Fee \$	500

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 condensable 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 ₁₀		1	1	0	0	1
SO ₂		0.4	0.4	0	0	0.4
VOC		165.9	165.9	0	0	165.9
CO		7.4	7.4	0		
NO _x		10.7	10.7	0	0	10.7
Total HAPs	<input type="checkbox"/>	22	22	0		
Acetone	<input type="checkbox"/>	70	70	0		

