

## STATEMENT OF BASIS

*for the issuance of Draft Air Permit # 1876-AR-2*

**1. PERMITTING AUTHORITY:**

Arkansas Department of Environmental Quality  
8001 National Drive  
Post Office Box 8913  
Little Rock, Arkansas 72219-8913

**2. APPLICANT:**

Dassault Falcon Jet Corp.  
10<sup>th</sup> & Leonard Street  
Little Rock, Arkansas 72202

**3. PERMIT WRITER:**

Siew Low

**4. PROCESS DESCRIPTION AND SIC CODE:**

SIC Description: Aerospace Manufacturing and Rework Facility  
SIC Code: 3721

**5. SUBMITTALS:** August 16, 2001

**6. REVIEWER'S NOTES:**

This permit modification includes the installation of three new painting bays (SN-39, SN-40, SN-41, SN-42, SN-43, SN-44, SN-45, SN-46, and SN-47). 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 are no changes to the annual permitted emission limits with this modification. Although the hourly total HAPs emission rate increases from 224.6 lb/hr to 291.9 lb/hr, the HAP TLV table has a lower allowable TLV in this permit, because different meteorological data was used in the screening model. The new painting bays have a higher stack gas velocity. This also contributes to the lower allowable TLV in the HAP TLV table.

**7. COMPLIANCE STATUS:** The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues

There are currently no enforcement actions against this facility.

**8. APPLICABLE REGULATIONS:**

NSPS (Y/N)       N       If yes, subpart \_\_\_\_\_  
 NESHAP (Y/N)       N       If yes, subpart \_\_\_\_\_  
 PSD applicability (Y/N)       N        
     Is facility on 28 list (100 tpy)? (Y/N)       N        
     Was netting performed to avoid PSD review (Y/N)       N      

Subject to 112 (g) requirements (Y/N)       N        
 Subject to CAM requirements (Y/N)       N      

**9. EMISSION CHANGES:**

The following table summarizes plantwide emission changes associated with this permitting action.

<b>Plantwide Permitted Emissions (ton/yr)</b>			
<b>Pollutant</b>	<b>Air Permit 1876-A</b>	<b>Air Permit 1876-AR-1</b>	<b>Change</b>
PM/PM <sub>10</sub>	0.0	0.0	0
SO <sub>2</sub>	0.0	0.0	0
VOC	95.0	95.0	0
CO	0.0	0.0	0
NO <sub>x</sub>	0.0	0.0	0
Single HAP	9.5	9.5	0
Combined HAP	24.5	24.5	0

**10. MODELING:**

**A. Criteria Pollutants**

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

**11. Non-Criteria Pollutants**

A HAP table was prepared to establish Non-Criteria pollutant hourly emission rates in order to stay below 1/100 of the TLV. After receiving comments from the facility, this table was revised to a format of maximum allowable TLV vs. HAP content (by weight).

**12. CALCULATIONS:**

<b>SN</b>	<b>Emission Factor Source (AP-42, Testing, etc)</b>	<b>Emission Factor and units (lbs/ton, lbs/hr, etc)</b>	<b>Control Equipment Type (if any)</b>	<b>Control Equipment Efficiency</b>	<b>Comments (Emission factor controlled/uncontrolled, etc)</b>
01	Mass Balance		Filter	0	Filter only controls paint particulates
03	Mass Balance		Filter	0	Filter only controls paint particulates
05	Mass Balance		Filter	0	Filter only controls paint particulates
06	Mass Balance		Filter	0	Filter only controls paint particulates
07	Mass Balance		None		
08	Mass Balance		Filter	0	Filter only controls paint particulates
09	Mass Balance		Filter	0	Filter only controls paint particulates
10	Mass Balance		Filter	0	Filter only controls paint particulates
11	Mass Balance		Filter	0	Filter only controls paint particulates
12	Mass Balance		Filter	0	Filter only controls paint particulates

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<b>SN</b>	<b>Emission Factor Source (AP-42, Testing, etc)</b>	<b>Emission Factor and units (lbs/ton, lbs/hr, etc)</b>	<b>Control Equipment Type (if any)</b>	<b>Control Equipment Efficiency</b>	<b>Comments (Emission factor controlled/uncontrolled, etc)</b>
13	Mass Balance		Filter	0	Filter only controls paint particulates
14	Mass Balance		waterfall	0	Use waterfall to control the paint spray
15	Mass Balance		waterfall	0	Use waterfall to control the paint spray
16	Mass Balance		waterfall	0	Use waterfall to control the paint spray
17	Mass Balance		waterfall	0	Use waterfall to control the paint spray
18	Mass Balance		waterfall	0	Use waterfall to control the paint spray
19	Mass Balance		waterfall	0	Use waterfall to control the paint spray
20	Mass Balance		waterfall	0	Use waterfall to control the paint spray
21	Mass Balance		waterfall	0	Use waterfall to control the paint spray
22	Mass Balance		waterfall	0	Use waterfall to control the paint spray
25	Mass Balance		None		
26	Mass Balance		Filter	0	Filter only controls paint particulates
27	Mass Balance		Filter	0	Filter only controls paint particulates

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<b>SN</b>	<b>Emission Factor Source (AP-42, Testing, etc)</b>	<b>Emission Factor and units (lbs/ton, lbs/hr, etc)</b>	<b>Control Equipment Type (if any)</b>	<b>Control Equipment Efficiency</b>	<b>Comments (Emission factor controlled/uncontrolled, etc)</b>
28	Mass Balance		Filter	0	Filter only controls paint particulates
30	Mass Balance		Filter	0	Filter only controls paint particulates
31	Mass Balance		Filter	0	Filter only controls paint particulates
32	Mass Balance		Filter	0	Filter only controls paint particulates
33	Mass Balance		None		
34	Mass Balance		None		
35	Mass Balance		None		
37	Mass Balance		None		Facility Wide Uncontrolled emissions
39	Mass Balance		Filter	0	Filter only controls paint particulates
40	Mass Balance		Filter	0	Filter only controls paint particulates
41	Mass Balance		Filter	0	Filter only controls paint particulates
42	Mass Balance		Filter	0	Filter only controls paint particulates
43	Mass Balance		Filter	0	Filter only controls paint particulates

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)
44	Mass Balance		Filter	0	Filter only controls paint particulates
45	Mass Balance		Filter	0	Filter only controls paint particulates
46	Mass Balance		Filter	0	Filter only controls paint particulates
47	Mass Balance		Filter	0	Filter only controls paint particulates

**13. TESTING REQUIREMENTS:**

This permit requires stack testing of the following sources.

There are no testing requirements for this permit.

**14. MONITORING OR CEMS**

The following are parameters that must be monitored with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

There are no monitoring requirements for this permit.

**15. RECORD KEEPING REQUIREMENTS**

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency *	Report (Y/N)**
facility wide	VOC content and purchases of VOC containing materials	95.0 tpy of VOC emissions	monthly	N
facility wide	HAP content and purchases of HAP containing materials	9.6 tpy - single HAP 24.5 tpy - combined	monthly	N
facility wide	VOC and HAP credit, amount of VOC and HAP shipped off-site to a Hazardous Disposal Facility		quarterly	N
facility wide	VOC and HAP credit, amount of VOC and HAP contained in materials that have exceeded their shelf life		monthly	N

\* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

\*\* Indicates whether the item needs to be included in reports

**16. OPACITY**

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
facility wide	5	Department Guidance	EPA Method 9

**17. DELETED CONDITIONS:**

The following Specific Conditions were included in the previous permit, but deleted for the current permitting action.

None.

**18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**

List all active permits for this facility which are voided/superseded/subsumed by issuance

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of this permit.

Permit #
1876-AR-1

**19. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

\_\_\_\_\_  
*Lyndon Poole, P.E.*