

## STATEMENT OF BASIS

*for the issuance of Draft Air Permit # 1876-AR-3*

**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 Corporation  
10<sup>th</sup> & Leonard Street  
Little Rock, Arkansas 72202

**3. PERMIT WRITER:**

Karen Cerney

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

**NAICS Description:** Aircraft Manufacturing  
**NAICS Code:** 336411

**5. SUBMITTALS:** June 26, 2003

**6. REVIEWER'S NOTES:**

This De Minimis permit modification removes a stack from three separate paint shop bays: bay #5 (SN-41), bay #6 (SN-44), and bay #7 (SN-47). Total emissions from the paint bays will remain the same; however, the emissions from each bay are assumed to be equally distributed between the remaining two stacks. In addition, this modification adds a new small parts paint booth (SN-48) to facilitate localized logistical support of aircraft located in the shop area adjoining bay #5. The small parts painting accomplished in the new booth will be identical to that which occurs in the existing Paint Shop - Small Parts Enclosure (SN-13). No net increase in production will result from this installation, and it is estimated that each booth will address approximately 50% of the existing work. However, to allow for flexibility in operations, the emission limit for the new paint booth will be set equal to that for SN-13. This modification also adds a Paint Vault Sample Spray Booth to the list of insignificant activities. There are no changes to the annual permitted emission limits with this modification.

**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:**

This facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18) and the *Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19). This facility is not subject to 40 CFR Part 63, Subpart GG, *National Emissions Standards for Aerospace Manufacturing and Rework Facilities* because the facility is not a major source of HAPs.

**PSD Applicability**

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.

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1876-AR-2	Air Permit 1876-AR-3	Change
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

<b>Plantwide Permitted Emissions (ton/yr)</b>			
<b>Pollutant</b>	<b>Air Permit 1876-AR-2</b>	<b>Air Permit 1876-AR-3</b>	<b>Change</b>
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

<b>SN</b>	<b>Emission 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>
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
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

<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>
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
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		

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)
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
42	Mass Balance		Filter	0	Filter only controls paint particulates
43	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
48	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 of this permit.

Permit #
1876-AR-2

**19. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

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*Phillip Murphy, P.E.*