

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1876-AR-4

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
10th and Leonard Streets
Little Rock, AR 72202

3. PERMIT WRITER: Charles Hurt

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Aircraft Manufacturing
NAICS Code: 336411

5. SUBMITTALS: 2/28/2005

6. REVIEWER'S NOTES:

Dassault Falcon Jet Corporation (DFJC) owns and operates an aerospace manufacturing and rework facility located in Little Rock, Pulaski County, Arkansas. DFJC requested to install a new glue booth (SN-49) at the Cabinet Shop, a new 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 will be installed. Both the glue booth and the hanger are sources of VOC emissions. The total increase in potential emissions from the modification is 18.4 tpy of VOC.

Although the new completion hanger is a new source of emissions, DFJC claims the original hourly VOC estimates do not need to be increased because actual solvent usage at the completion hangers is below the two gallon per hour estimate used. DFJC stated that solvent usage in the completion hanger is limited to wiping down small areas on the aircraft immediately before applying detailing and decals.

7. COMPLIANCE STATUS:

There are currently no enforcement issues or actions against the facility at this time.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera)? N

Has this facility undergone PSD review in the past? N Permit# N/A

Is this facility categorized as a major source for PSD?
 ≥ 100 tpy and on the list of 28 (100 tpy)? N
 ≥ 250 tpy all other N

PSD Netting

Was netting performed to avoid PSD review in this permit? N

Source and Pollutant Specific Regulatory Applicability

There are no applicable source and/or pollutant specific regulations for this facility.

9. EMISSION CHANGES:

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

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	Air Permit #1867-AR-3	Air Permit #1867-AR-4	Change
VOC	98.0	95.0	0.0
Single HAP	9.50	9.60	0.10
Total HAP	24.50	24.50	0.00

10. MODELING:

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.

Other Modeling

DFJC is not a source for hydrogen sulfide or styrene emissions.

Non-Criteria Pollutants

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLVs) that pass the PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

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TLV greater than or equal to (mg/m ³)	Maximum Single HAP Allowable Weight Content (Wt %)
122.77	100%
110.49	90%
98.22	80%
85.94	70%
73.66	60%
61.39	50%
49.11	40%
36.83	30%
24.55	20%
12.28	10%
6.14	5%
4.91	4%
3.68	3%
2.45	2%
1.23	1%
*	<1%

* 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 VOC concentration of 8.50 lb VOC per gallon of material.

11. 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		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

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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)
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
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		Filter	0	Filter only controls paint

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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)
	Balance				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		
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

12. TESTING REQUIREMENTS:

This permit does not require stack testing .

13. MONITORING OR CEMS

There are no required monitoring devices or CEMs at DFJC.

14. 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

15. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
facility wide	5	Department Guidance	Inspector's Observation

16. DELETED CONDITIONS:

No conditions were deleted.

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17. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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

Permit #
1867-AR-3

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Phillip Murphy, P.E.
Engineering Supervisor, Air Division