

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1876-AR-5

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: 11/08/05

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 the following modifications:

- Expand the Cabinet Shop and relocate Glue Booth No. 2 (SN-11),
- Relocate Headliner Operations (Remove stacks SN-05, SN-06, and SN-21 and SN-20 and SN-22),
- Relocate Printing Room (SN-25),
- Expand the Upholstery Shop and relocate glue booth (SN-01),
- Replace Paint Bays No. 1 and No. 2 waterfall particulate control system with dry filters,
- Construct a new completion hanger and relocate existing completion operations (SN-37),
- Re-designate SN-08 as SN-08A through SN-08F since emissions are emitted through eight stacks instead of one,
- Remove SN-07 since the stack was never installed and emissions are accounted for in SN-08.
- Install Glue Booth No. 5 (SN-20) in the Cabinet Shop,
- Construct an Auto Finish Cabinet Shop (SN-51 through SN-58), and
- Update Insignificant Activities Table

With the installation of the glue booth and construction of the Auto Finish Cabinet Shop, DFJC did not request an increase in the throughput of coatings and adhesives. Therefore, the annual emission limits were not increased.

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

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.

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.

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	8.5 lb/hr VOC 4.5 lb/hr	Filter	0	Filter only controls paint particulates

Permit #: 1867-AR-5

AFIN: 60-00617

Page 4 of 9

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)
		HAP			
03	Mass Balance	8.5 lb/hr VOC 4.5 lb/hr HAP	Filter	0	Filter only controls paint particulates
08A – 08F	Mass Balance	2.9 lb/hr VOC 1.34 lb/hr HAP	Filter	0	Filter only controls paint particulates
09	Mass Balance	42.5 lb/hr VOC 20 lb/hr HAP	Filter	0	Filter only controls paint particulates
10	Mass Balance	42.5 lb/hr VOC 20 lb/hr HAP	Filter	0	Filter only controls paint particulates
11	Mass Balance	42.5 lb/hr VOC 20 lb/hr HAP	Filter	0	Filter only controls paint particulates
12	Mass Balance	42.5 lb/hr VOC 20 lb/hr HAP	Filter	0	Filter only controls paint particulates
13	Mass Balance	8.5 lb/hr VOC 4.5 lb/hr HAP	Filter	0	Filter only controls paint particulates
14	Mass Balance	8.7 lb/hr VOC 3.1 lb/hr HAP	waterfall	0	Filter only controls paint particulates
15	Mass Balance	8.7 lb/hr VOC 3.1 lb/hr HAP	waterfall	0	Filter only controls paint particulates
16	Mass Balance	8.7 lb/hr VOC	waterfall	0	Filter only controls paint particulates

Permit #: 1867-AR-5

AFIN: 60-00617

Page 5 of 9

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		3.1 lb/hr HAP			
17	Mass Balance	8.7 lb/hr VOC 3.1 lb/hr HAP	waterfall	0	Filter only controls paint particulates
18	Mass Balance	8.7 lb/hr VOC 3.1 lb/hr HAP	waterfall	0	Filter only controls paint particulates
19	Mass Balance	8.7 lb/hr VOC 3.1 lb/hr HAP	waterfall	0	Filter only controls paint particulates
20	Mass Balance	8.5 lb/hr VOC 4.0 lb/hr HAP	Filter	0	Filter only controls paint particulates
22	Mass Balance	8.5 lb/hr VOC 4.0 lb/hr HAP	Filter	0	Filter only controls paint particulates
25	Mass Balance	8.5 lb/hr VOC 4.0 lb/hr HAP	None		
26	Mass Balance	8.5 lb/hr VOC 4.0 lb/hr HAP	Filter	0	Filter only controls paint particulates
27	Mass Balance	8.5 lb/hr VOC 4.0 lb/hr HAP	Filter	0	Filter only controls paint particulates
28	Mass Balance	8.5 lb/hr VOC 4.0 lb/hr HAP	Filter	0	Filter only controls paint particulates
30	Mass	33.9 lb/hr	Filter	0	Filter only controls paint

Permit #: 1867-AR-5

AFIN: 60-00617

Page 6 of 9

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	VOC 16.25 lb/hr HAP			particulates
31	Mass Balance	33.9 lb/hr VOC 16.25 lb/hr HAP	Filter	0	Filter only controls paint particulates
32	Mass Balance	33.9 lb/hr VOC 16.25 lb/hr HAP	Filter	0	Filter only controls paint particulates
33	Mass Balance	59.6 lb/hr VOC 3.22 lb/hr HAP	None		
34	Mass Balance	59.6 lb/hr VOC 3.22 lb/hr HAP	None		
35	Mass Balance	24.9 lb/hr VOC 1.34 lb/hr HAP	None		
37	Mass Balance	17.90 lb/hr VOC 17.85 lb/hr HAP	None		Facility Wide Uncontrolled emissions
39	Mass Balance	50.8 lb/hr VOC 24.39 lb/hr HAP	Filter	0	Filter only controls paint particulates
40	Mass Balance	50.8 lb/hr VOC 24.39 lb/hr HAP	Filter	0	Filter only controls paint particulates
42	Mass Balance	13.0 lb/hr VOC 4.65 lb/hr HAP	Filter	0	Filter only controls paint particulates

Permit #: 1867-AR-5

AFIN: 60-00617

Page 7 of 9

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)
43	Mass Balance	13.0 lb/hr VOC 4.65 lb/hr HAP	Filter	0	Filter only controls paint particulates
45	Mass Balance	13.0 lb/hr VOC 4.65 lb/hr HAP	Filter	0	Filter only controls paint particulates
46	Mass Balance	13.0 lb/hr VOC 4.65 lb/hr HAP	Filter	0	Filter only controls paint particulates
48	Mass Balance	8.5 lb/hr VOC 4.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
49	Mass Balance	42.5 lb/hr VOC 20.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
50	Mass Balance	8.5 lb/hr VOC 4.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
51	Mass Balance	4.3 lb/hr VOC 2.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
52	Mass Balance	4.3 lb/hr VOC 2.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
53	Mass Balance	4.3 lb/hr VOC 2.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
54	Mass Balance	4.3 lb/hr VOC 2.00 lb/hr	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)
		HAP			
55	Mass Balance	4.3 lb/hr VOC 2.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
56	Mass Balance	4.3 lb/hr VOC 2.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
57	Mass Balance	4.3 lb/hr VOC 2.00 lb/hr HAP	Filter	0	Filter only controls paint particulates
58	Mass Balance	4.3 lb/hr VOC 2.00 lb/hr HAP	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	VOC and HAP credit, amount		quarterly	N

Permit #: 1867-AR-5

AFIN: 60-00617

Page 9 of 9

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
wide	of VOC and HAP shipped off-site to a Hazardous Disposal Facility			
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.

17. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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

Permit #
1867-AR-4

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

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