

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1876-AR-6

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: 5/15/2007

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:

- to convert the existing paint bays (No. 1 and No. 2) into completion areas (SN-14 through SN-19); and
- to construct four new bays for depainting, primer application, and top coat application activities (SN-59 through SN-66), two enclosures for painting small parts (SN-67 and SN-68), a primer work room (SN-69), a paint work room (SN-70), a sanding area enclosure (insignificant activity), and a flightline hanger for storage of completed aircraft.

With the proposed construction, DFJC did not request an increase in the throughput of coatings and adhesives. Therefore, the annual VOC emission limits were not increased.

The flocking booth is basically a glue booth. It was named a "flocking" booth to describe the activity following the adhesive application. At the flocking booth, adhesive is sprayed to a specific custom ordered part for the aircraft. After the adhesive is sprayed, a fiber type material is sprayed onto the part and then it is baked in a dryer. The fiber type material is like a felt type material and an example of where it would be sprayed or added to a component would be the cabinet drawer that holds wine glasses or fine china.

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 #1876-AR-5 | Air Permit #1876-AR-6 | Change |
| VOC | 95.0 | 95.0 | 0.0 |
| Single HAP | 9.60 | 9.60 | 0.00 |
| 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/m³) | Maximum Single HAP Allowable Weight Content (wt %)** |
|--|---|
| 132.19 | 100% |
| 118.97 | 90% |
| 105.75 | 80% |
| 92.53 | 70% |
| 79.31 | 60% |
| 66.10 | 50% |
| 52.88 | 40% |
| 39.66 | 30% |
| 26.44 | 20% |
| 13.22 | 10% |
| 6.61 | 5% |
| 5.29 | 4% |
| 3.97 | 3% |
| 2.64 | 2% |
| 1.32 | 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.

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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 HAP | Filter | 0 | Filter only controls paint particulates |
| 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 4.00 lb/hr HAP | None | | Uncontrolled |
| 14 | Mass Balance | 8.7 lb/hr VOC 3.1 lb/hr HAP | waterfall | 0 | Filter only controls paint particulates |

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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) |
|----|--|--|---------------------------------|------------------------------|---|
| 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 3.1 lb/hr HAP | waterfall | 0 | Filter only controls paint particulates |
| 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 |

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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) |
|----|--|--|---------------------------------|------------------------------|---|
| 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 Balance | 33.9 lb/hr VOC 12.3 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 31 | Mass Balance | 33.9 lb/hr VOC 12.3 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 32 | Mass Balance | 33.9 lb/hr VOC 12.3 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 |

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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) |
|----|--|--|---------------------------------|------------------------------|---|
| 39 | Mass Balance | 50.8 lb/hr VOC 18.47 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 40 | Mass Balance | 50.8 lb/hr VOC 18.47 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 42 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 43 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 45 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 46 | Mass Balance | 13.0 lb/hr VOC 4.04 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 |

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|----|--|--|---------------------------------|------------------------------|---|
| 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 HAP | Filter | 0 | Filter only controls paint particulates |
| 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 |
| 59 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |

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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) |
|----|--|--|---------------------------------|------------------------------|---|
| 60 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 61 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 62 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 63 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 64 | Mass Balance | 13.0 lb/hr VOC 4.04 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 65 | Mass Balance | 50.8 lb/hr VOC 18.47 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 66 | Mass Balance | 50.8 lb/hr VOC 18.47 lb/hr HAP | Filter | 0 | Filter only controls paint particulates |
| 67 | Mass Balance | 8.5 lb/hr VOC 4.00 lb/hr HAP | None | | |
| 68 | Mass Balance | 8.5 lb/hr VOC 4.00 lb/hr HAP | None | | |

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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) |
|----|--|--|---------------------------------|------------------------------|---|
| 69 | Mass Balance | 1.9 lb/hr VOC 1.90 lb/hr HAP | None | | |
| 70 | Mass Balance | 1.3 lb/hr VOC 0.40 lb/hr HAP | None | | |

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 |

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| SN | Recorded Item | Limit (as established in permit) | Frequency* | Report (Y/N)** |
|--|---|----------------------------------|------------|----------------|
| 13, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70 | VOC content and purchases of VOC containing materials. The total annual VOC emission is not to exceed the limit. | 20.0 tpy | 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 # |
|-----------|
| 1876-AR-5 |

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

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