



Statement of Basis

**Title V Air Quality Operating Permit
Modification**

Daktronics, Inc. –Brookings, South Dakota

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1.0 Operational Description

1.1 Background

Daktronics, Inc. manufactures and paints electronic visual information display systems at its facility in Brookings, South Dakota. The primary Standard Industrial Classification code is 3993 – Miscellaneous Manufacturing Industries, Signs and Advertising Specialties. Daktronics’ Title V air quality permit was renewed on May 2, 2011. Table 1-1 lists the units and processes that are covered under Daktronics’ existing Title V permit.

Table 1-1 – Description of Permitted Units, Operations, and Processes

Unit	Description	Control Device
#1	1999 JBI paint booth (Sports) coating operation, Model A-44-PDT-S ¹	Not applicable
#2	1994 JBI paint booth coating operation, model AT-40-SB-S ¹	Not applicable
#3	1985 Binks contract paint booth coating operation, model CA-544-T ¹	Not applicable
#5	1991 Nordson conformal coater, model SCIR2	Not applicable
#6	1999 Precision Valve and Automation (PVA) conformal coater, model PVA 2000	Not applicable
#12	JBI cross draft paint booth coating operation, model T-50-PDT-S ¹	Not applicable
#13	2006 Tekor Series 5000 paint booth, model no. 141650 ¹	Not applicable
#14	Tekor Series 5000 cross draft paint booth, model no. TTB-SE-14150-EI-ME ¹	Not applicable
#15	2005 Cefla Flacioni Kleenspray automatic paint sprayer, Model 12 ¹ . The sprayer uses an air assisted air mix method of spraying.	Not applicable
#22	Emergency Generator #1 with a heat output of 350 horsepower, fueled with diesel fuel	Not applicable
#23	Emergency Generator #2 with a heat output of 398 horsepower, fueled with diesel fuel	Not applicable

¹ – Coating operation includes the equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning); all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

1.2 Permit Modification

On January 17, 2013, Daktronics submitted an application for a construction permit to install an Optical Encapsulate coating process for electronics assembly parts. The Optical Encapsulate is a

2-part silicone material. Unit #24 is a full-scale production coating machine used for the automated application of the 2-part silicone. The machine also includes an automated cleaning process for purging/rinsing the silicone from the coating application heads. The solvent rinse material is stored in the machine and recycled/reused until manually changed out. Unit #25 is a lab-scale coating machine used for the manual application of the 2-part silicone material to the parts. The applicator heads are cleaned manually using a parts washer.

On June 5, 2013, Daktronics submitted an application for a construction permit to install new equipment for a primer application process for electronic assembly parts (Unit #26) prior to silicon application in Unit #24. Construction permit #28.9905-06-01C was issued on August 19, 2013, which incorporated both permit applications. On April 1, 2014, Daktronics submitted an application for a modification to Title V air quality operating permit #28.9905-06 to add the constructed units to the operating permit. The following units and processes will be reviewed for coverage under the Title V air quality operating permit:

- Unit #24** – Rampf Vacuum Dispense Machine
- Unit #25** – Bartech Vacuum Dispense Machine; and
- Unit #26** – Primer PVA Machine

2.0 New Source Performance Standards

DENR reviewed the new source performance standards under 40 CFR Part 60 and determined there are no New Source Performance Standards applicable to the proposed units.

3.0 New Source Review

ARSD 74:36:10:01 states New Source Review regulations apply to areas of the state which are designated as nonattainment pursuant to the Clean Air Act for any pollutant regulated under the Clean Air Act. Daktronics' facility is located in Brookings, South Dakota, which is in attainment or unclassifiable for all the pollutants regulated under the Clean Air Act. Therefore, Daktronics is not subject to New Source Review.

4.0 Prevention of Significant Deterioration

A prevention of significant deterioration (PSD) review applies to new major stationary sources and major modifications to existing major stationary sources in areas designated as attainment under Section 107 of the Clean Air Act for any regulated air pollutant. The following is a list of regulated air pollutants under the PSD program:

1. Total suspended particulate (PM);
2. Particulate with a diameter less than or equal to 10 microns (PM10);
3. Particulate with a diameter less than or equal to 2.5 microns (PM2.5);
4. Sulfur dioxide (SO₂);

5. Nitrogen oxides (NO_x);
6. Carbon monoxide (CO);
7. Ozone – measured as volatile organic compounds (VOCs);
8. Lead;
9. Fluorides
10. Sulfuric acid mist;
11. Hydrogen sulfide;
12. Reduced sulfur compounds;
13. Total reduced sulfur; and
14. Greenhouse gases (carbon dioxide, methane, nitrous oxide, etc.).

If the source is considered one of the 28 named PSD source categories listed in Section 169 of the federal Clean Air Act, the major source threshold is 100 tons per year of any regulated pollutant, except for greenhouse gases. The major source threshold for all other sources is 250 tons per year of any regulated pollutant, except for greenhouse gases.

The major source threshold for greenhouse gases is listed below:

1. New PSD source because of a criteria air pollutant, the major source threshold for greenhouse gases is 75,000 tons per year of carbon dioxide equivalent or more;
2. New PSD source if greenhouse gas emissions are 100,000 tons per year of carbon dioxide equivalent or more;
3. For an existing PSD source because of a criteria air pollutant, a major modification for greenhouse gases is an increase of 75,000 tons per year of carbon dioxide equivalent or more;
4. For an existing non-PSD source that has the potential to emit 100,000 tons per year of carbon dioxide equivalent emissions or more, a major modification for greenhouse gases is an increase of 75,000 tons per year of carbon dioxide equivalent or more; and
5. In addition to subsection (2) and (4), a specific greenhouse gas, without calculating the carbon dioxide equivalent, also needs to emit greater than 100 or 250 tons per year, whichever is applicable, to be regulated.

The US Supreme Court heard challenges to EPA's "Tailoring Rule". On June 24, 2014, the Supreme Court ruled greenhouse gases may not be regulated under the PSD program unless the facility requires a PSD permit for the other regulated air pollutants.

4.1 Background

Daktronics requested enforceable operating limits in the permit to restrict the VOC emissions to less than 250 tons per year. Therefore, Daktronics was considered a minor source under the PSD program and not subject to a PSD review.

4.2 Potential emission calculations

DENR uses stack test results to determine air emissions whenever stack test data are available from the source or a similar source. When stack test results are not available, the department

relies on manufacturing data, material balance, EPA's Air Pollutant Emission Factors AP-42 document, or other methods to determine potential air emissions. Potential emissions for each applicable pollutant are calculated by assuming the unit operates every day of the year at the maximum design capacity.

Unit #24 – Rampf Vacuum Dispense Machine

The emission factors were derived from the material safety data sheets for the products used in the optical encapsulate process. The potential emission rate will be estimated from the amount of material used and the amount of time the machine is operated. Daktronics estimated that the Rampf vacuum dispense machine will operate for 20 hours per day, 4 days per week, 52 weeks per year (4,160 hours per year). Potential emissions are calculated assuming that the facility operates 24 hours per day 365 days per year (8,760 hours per year). Therefore, the potential emissions for Unit #24 will be calculated by multiplying the calculated emissions by the following ratio:

$$\frac{8,760 \text{ potentialoperatinghours / year}}{4,160 \text{ actualoperatinghours / year}} = 2.11$$

Daktronics estimates that 220,106 pounds of silicone elastomer and 150 gallons of Rampf RAKU cleaner will be used per year based on the estimated number of hours of operation. The silicone elastomer is a 50/50 mixture of SE-1127 Dow Corning EE-1184 Part A and SE-1128 Dow Corning EE1184 Part B. The composition of the elastomer as applied is 0.67 percent VOC. The Rampf RAKU cleaner is 100 percent VOCs and weighs 9.01 pounds per gallon. The potential emissions from Unit #24 are calculated as follows:

Silicone Elastomer:

$$\text{VOCs} = \frac{220,106 \text{ pounds}}{\text{year}} \times \frac{0.0067 \text{ poundsVOC}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.11 = 1.56 \text{ tons/yr}$$

Rampf RAKU Cleaner:

$$\text{VOCs} = \frac{150 \text{ gallons}}{\text{year}} \times \frac{9.01 \text{ poundsVOC}}{\text{gallon}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.11 = 1.42 \text{ tons/yr}$$

Unit #25 – Bartech Vacuum Dispense Machine

The emission factors were derived from the material safety data sheets for the products used in the optical encapsulate process. The potential emission rate will be estimated from the amount of material used and the amount of time the machine is operated. Daktronics estimated that the Bartech vacuum dispense machine will operate for 8 hours per day, 5 days per week, 52 weeks per year (2,080 hours per year). Potential emissions are calculated assuming that the facility operates 24 hours per day 365 days per year (8,760 hours per year). Therefore, the potential

emissions for Unit #25 will be calculated by multiplying the calculated emissions by the following ratio:

$$\frac{8,760 \text{ potentialoperatinghours / year}}{2,080 \text{ actualoperatinghours / year}} = 4.21$$

Daktronics estimates that approximately 44,021 pounds of silicone elastomer will be used in the batch operation of the Bartech vacuum dispenser. The silicone elastomer is a 50/50 mixture of SE-1127 Dow Corning EE-1184 Part A and SE-1128 Dow Corning EE1184 Part B. The composition of the elastomer as applied is 0.67 percent VOC. The potential emissions from Unit #25 are calculated as follows:

Silicone Elastomer:

$$\text{VOCs} = \frac{44,021 \text{ pounds}}{\text{year}} \times \frac{0.0067 \text{ pounds VOC}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 4.21 = 0.62 \text{ tons/yr}$$

Unit #26 – Primer PVA Machine

The emission factors were derived from the material safety data sheet for the primer used in the PVA machine. Daktronics estimates that the primer will be applied at a rate of 0.079 gallons per hour. The primer weighs 5.92 pounds per gallon. Potential emissions are calculated assuming the unit operates 24 hours per day 365 days per year (8,760 hours per year). The primer is 100 percent VOCs.

Primer:

$$\text{VOCs} = \frac{0.079 \text{ gallons}}{\text{hour}} \times \frac{5.92 \text{ pounds}}{\text{gallon}} \times \frac{8,760 \text{ hours}}{\text{year}} \times \frac{\text{ton}}{2,000 \text{ pounds}} = 2.05 \text{ tons/yr}$$

Potential VOC emissions from Daktronics’ operations are summarized in Table 4-1. As shown in Table 4-2, Daktronics is a major source for volatile organic compounds and hazardous air pollutants.

Table 4-1 – Potential Emissions Summary

Unit	VOC
#1	30.2
#2	30.2
#3	30.2
#5	9.9
#6	17.0
#12	30.2
#13	30.2

Unit	VOC
#14	25.6
#15	38.1
#22	0.2
#23	0.2
#24	3.0
#25	0.6
#26	2.1
TOTAL	247.7

With the enforceable limitations in the existing permit, Daktronics is considered a minor source and is not applicable to the PSD program. Based on the Supreme Court’s decision and because Daktronics is not applicable to the PSD program, a review for greenhouse gas emissions is not required.

5.0 National Emission Standards for Hazardous Air Pollutants

DENR reviewed the national emission standards for hazardous air pollutants under 40 CFR Part 61 and determined there are no applicable requirements associated with the proposed units.

6.0 Maximum Achievable Control Technology Standard

The federal Maximum Achievable Control Technology Standards are applicable to both major and area sources of hazardous air pollutants. A major source of hazardous air pollutants is defined as having the potential to emit 10 tons or more per year of a single hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An area source is a source that is not a major source of hazardous air pollutants.

6.1 Potential HAP Emissions

Unit #24 – Rampf Vacuum Dispense Machine

The potential emissions for Unit #24 will be calculated by multiplying the calculated emissions by 2.11 as calculated in Section 4.2.

Daktronics estimates that 220,106 pounds of silicone elastomer and 150 gallons of Rampf RAKU cleaner will be used per year based on the estimated number of hours of operation. The silicone elastomer is a 50/50 mixture of SE-1127 Dow Corning EE-1184 Part A and SE-1128 Dow Corning EE1184 Part B. The composition of the elastomer as applied is 0.48 percent

xylene, and 0.19 percent ethylbenzene. The Rampf RAKU cleaner does not contain hazardous air pollutants. The potential emissions from Unit #24 are calculated as follows:

Silicone Elastomer:

$$\text{xylene} = \frac{220,106 \text{ pounds}}{\text{year}} \times \frac{0.0048 \text{ pounds xylene}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.11 = 0.53 \text{ tons/yr}$$

$$\text{ethylbenzene} = \frac{220,106 \text{ pounds}}{\text{year}} \times \frac{0.0019 \text{ pounds ethylbenzene}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.11 = 0.44 \text{ tons/yr}$$

Unit #25 – Bartech Vacuum Dispense Machine

The potential emissions for Unit #25 will be calculated by multiplying the calculated emissions by 4.21 as calculated in Section 4.2.

Daktronics estimates that approximately 44,021 pounds of silicone elastomer will be used in the batch operation of the Bartech vacuum dispenser. The silicone elastomer is a 50/50 mixture of SE-1127 Dow Corning EE-1184 Part A and SE-1128 Dow Corning EE1184 Part B. The composition of the elastomer as applied is 0.48 percent xylene and 0.19 percent ethylbenzene. The potential emissions from Unit #25 are calculated as follows:

Silicone Elastomer:

$$\text{xylene} = \frac{44,021 \text{ pounds}}{\text{year}} \times \frac{0.0048 \text{ pounds xylene}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 4.21 = 0.44 \text{ tons/yr}$$

$$\text{ethylbenzene} = \frac{44,021 \text{ pounds}}{\text{year}} \times \frac{0.0019 \text{ pounds ethylbenzene}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 4.21 = 0.18 \text{ ton/yr}$$

Unit #26 – Primer PVA Machine

The emission factors were derived from the material safety data sheet for the primer used in the PVA machine. Daktronics estimates that the primer will be applied at a rate of 0.079 gallons per hour. The primer weighs 5.92 pounds per gallon. Potential emissions are calculated assuming the unit operates 24 hours per day 365 days per year (8,760 hours per year). The primer is 100 percent VOCs. The statement of basis for the construction permit incorrectly stated that the primer contains a hexane, which is a hazardous air pollutant. The primer does not contain any listed hazardous air pollutants.

Potential HAP emissions from Daktronics’ operations are summarized in Table 6-1.

Table 6-1 – Potential HAP Emissions Summary

Unit	HAPs
#1	14.5

Unit	HAPs
#2	14.5
#3	14.5
#5	--
#6	--
#12	14.5
#13	14.5
#14	5.7
#15	9.6
#22	0.0
#23	0.0
#24	1.0
#25	0.6
#26	--
TOTAL	89.4

Daktronics is considered a major source of hazardous air pollutants. DENR reviewed the maximum achievable control technology standards under 40 CFR Part 63 and determined that the following may be applicable to the proposed project.

6.2 40 CFR Part 63, Subpart Mmmm

The provisions of this subpart are applicable to new, reconstructed, or existing affected sources that use 946 liters (250 gallons) per year, or more, of coatings that contain hazardous air pollutants in the surface coating of miscellaneous metal parts and products and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. The affected source is the collection of the following items:

- (1) All coating operations. A coating operation means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning);
- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed,
- (3) All manual and automated equipment and containers used for conveying coatings, thinners, and/or other additives, and cleaning materials; and
- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

One of the three following compliance options must be used to demonstrate compliance with the applicable limit in 40 CFR §63.3890:

- (1) Compliant material option. Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit and that each thinner and/or other additive, and cleaning material used contains no organic HAP;
- (2) Emission rate without add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis;
- (3) Emission rate with add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis. If this compliance option is used, all emission capture systems and add-on controls devices for the coating operation(s) must meet the applicable operating limits and work practice standards.

All coatings, thinners and/or other additives, and cleaning materials used in the affected source must be included when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit.

Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes and numerous other industrial, household, and consumer products.

Daktronics manufactures and paints electronic visual information display systems and is a major source of hazardous air pollutants. The existing coating operations associated with Units #1, #2, #3, #12, #13, #14, and #15 are subject to the requirements of this subpart. Daktronics is an existing major source of hazardous air pollutants; therefore, units #24, and #25 are also subject to this subpart. Unit #26 is not applicable to this subpart because it does not emit any hazardous air pollutants. None of the units have add-on emission controls. Therefore, Daktronics must use compliance option (1) or (2) above.

In accordance with 40 CFR § 63.3882, an affected source is a new affected source if it commenced construction after August 13, 2002, and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed. An affected source is reconstructed if the replacement of components of an affected source to the extent that the fixed capital cost of the new component exceeds 50 percent of the fixed capital cost that would be

required to construct a comparable new source; and it is technologically and economically feasible for the reconstructed source to meet the relevant standards. An affected source is existing if it is not new or reconstructed. Daktronics is an existing miscellaneous parts and products surface coating facility. Therefore, Units #24 and #25 are coating operations at an existing affected source.

The emission limit for each existing general use coating affected source is 0.31 kilogram (2.6 pounds) organic HAP per liter (gallon) coating solids used during each 12-month compliance period.

7.0 State Emission Limits

Daktronics does not operate any processes that are subject to the state's particulate or sulfur dioxide emission limits. However, each permitted unit is required to meet the 20 percent opacity limit as required in ARSD 74:36:12:01.

7.1 Compliance Assurance Monitoring

Compliance assurance monitoring is applicable to permit applications received on or after April 20, 1998, from major sources applying for a Title V air quality permit. Compliance assurance monitoring is applicable to any unit that meets the following criteria:

1. The unit is subject to an emission limit or standard for the applicable regulated air pollutant;
2. The unit uses a control device to achieve compliance with any such emission limit or standard; and
3. The unit has potential uncontrolled emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Daktronics submitted its permit application after April 20, 1998. None of Daktronics' operations use a control device to achieve compliance with an emission limit or standard. Therefore, compliance assurance monitoring is not applicable.

7.2 Periodic Monitoring

Periodic monitoring is required for each emission unit that is subject to an applicable requirement at a source subject to Title V of the Federal Clean Air Act. Units that are subject to opacity limits are typically based on periodic visible emission readings. However, in the case of painting operations, historical opacity readings indicate that periodic visible emission readings are not required. Daktronics is required to meet Maximum Achievable Control Technology Standards. The monitoring requirements specified in the federal standards will be required and satisfy periodic monitoring requirements.

7.3 Air Fees

Title V sources are subject to an annual air quality fee. The fee consists of an administrative fee and a per ton fee based on the actual tons per year of pollutant emitted. The air pollutants that are currently being charged a fee include total suspended particulate matter, sulfur dioxides, nitrogen oxides, volatile organic compounds, and hazardous air pollutants. The actual emissions are calculated by the department and are based on information provided by the source.

7.4 Insignificant Activities

Daktronics stated in the application that the parts washer associated with the batch optical encapsulate process is an insignificant activity because the potential emissions of any criteria pollutant (except lead) are less than two tons per year. In accordance with the Administrative Rules of South Dakota (ARSD) 74:36:05:04.01(7), a unit that has the potential to emit two tons or less per year of any criteria pollutant before the application of control equipment is considered an insignificant activity and is exempt from permitting as long as the system is not applicable to a federal standard or a similar emission limitation. The potential volatile organic compound (VOC) emissions from the parts washer are less than two tons per year. The solvent material used in the parts washer does not contain any hazardous air pollutants. Also, the parts washer is not applicable to a federal standard or a similar emission limitation. Therefore, the parts washer is exempt from permitting.

7.5 Summary of Applicable Requirements

Any source operating in South Dakota that meets the requirements of the Administrative Rules of South Dakota (ARSD) 74:36:05:03 is required to obtain a Title V air quality permit. A major source is defined as having the potential to emit greater than 100 tons per year of a criteria pollutant or greater than or equal to 10 tons per year of a single hazardous air pollutant, or greater than or equal to 25 tons per year of a combination of hazardous air pollutants. A source that is required to comply with federal new source performance standards or national emission standards for hazardous air pollutants must obtain a Title V air quality permit.

Daktronics is a major source for VOCs and HAPs and is subject to national emission standards for hazardous air pollutants. Therefore, Daktronics will be required to operate within the requirements stipulated in the following regulations:

- ARSD 74:36:05 - Operating Permits for Part 70 Sources;
- ARSD 74:36:06 - Regulated Air Pollutant Emissions;
- ARSD 74:36:08 - National Emission Standards for Hazardous Air Pollutants;
- ARSD 74:36:11 - Performance Testing;
- ARSD 74:36:12 - Control of Visible Emissions; and
- ARSD 74:37:01 - Air Emission Fees.

8.0 Recommendation

Based on the information submitted in the air quality permit application, the department recommends conditional approval of a Title V air quality permit modification for Daktronics,

Inc. in Brookings, South Dakota. The modifications to the permit may be viewed in Appendix A. Questions regarding this review should be directed to Marlys Heidt, Engineer III.

Appendix A

Permit Modification

Bold and underline mean an addition and overstrikes mean a deletion to the existing permit. In the case where a permit condition is added or deleted, the permit conditions will automatically be renumbered when the permit is issued.

1.0 STANDARD CONDITIONS

1.1 Operation of source. In accordance with Administrative Rules of South Dakota (ARSD) 74:36:05:16.01(8), the owner or operator shall operate the units, controls, and processes as described in Table 1-1 in accordance with the statements, representations, and supporting data contained in the complete permit application submitted and dated December 10, 2010, April 16, 2013 ~~and~~ March 11, 2014, April 1, 2014, and May 1, 2014, unless modified by the conditions of this permit. Except as otherwise provided herein, the control equipment shall be operated in a manner that achieves compliance with the conditions of this permit at all times. The application consists of the application forms, supporting data, and supplementary correspondence. If the owner or operator becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in an application, such information shall be promptly submitted.

Table 1-1 – Description of Permitted Units, Operations, and Processes

Unit	Description	Control Device
#1	1999 JBI paint booth (Sports) coating operation, Model A-44-PDT-S ¹	Not Applicable
#2	1994 JBI paint booth coating operation, model AT-40-SB-S ¹	Not Applicable
#3	1985 Binks contract paint booth coating operation, model CA-544-T ¹	Not Applicable
#5	1991 Nordson conformal coater, model SCIR2	Not Applicable
#6	1999 Precision Valve and Automation (PVA) conformal coater, model PVA 2000	Not Applicable
#12	JBI cross draft paint booth coating operation, model T-50-PDT-S ¹	Not Applicable
#13	2006 Tekor Series 5000 paint booth, model no. 141650 ¹	Not Applicable
#14	Tekor Series 5000 cross draft paint booth, model no. TTB-SE-14150-EI-ME ¹	Not Applicable
#15	2005 Cefla Flacioni Kleenspray automatic paint sprayer, Model 12 ¹ . The sprayer uses an air assisted air mix method of spraying.	Not Applicable
#22	Emergency Generator #1 with a heat output of 350 horsepower, fueled with diesel fuel	Not Applicable
#23	Emergency Generator #2 with a heat output of 398 horsepower, fueled with diesel fuel	Not Applicable
#24	<u>2013 Rampf vacuum dispense coating machine</u>	<u>Not Applicable</u>

Unit	Description	Control Device
#25	2012 Bartech vacuum dispense coating machine	Not Applicable
#26	2005 Precision Valve and Automation (PVA) primer coating machine, model PVA 2000	Not Applicable

¹ – Coating operation includes the equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning); all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

6.0 CONTROL OF REGULATED AIR POLLUTANTS

6.3 Organic hazardous air pollutant emission limit. In accordance with ARSD 74:36:08:37, as referenced to 40 CFR §§ 63.3890(b), on and after January 2, 2007, the owner or operator shall limit the organic hazardous air pollutant emissions from Units #1, #2, #3, #12, #13, #14, ~~and #15,~~ [#24, and #25](#) to no more than 0.31 kilograms (2.6 pounds) organic hazardous air pollutant per liter (gallon) coating solids used during each 12-month compliance period. Initial compliance with this permit condition shall be demonstrated based on the permit conditions in Chapter 10.0 or 12.0. Continuous compliance with this permit condition shall be demonstrated based on the permit conditions in Chapter 11.0 or 13.0.