NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a Minor Source Operating Permit (MSOP) for Lakota Corporation in Elkhart County

MSOP Renewal No.: M039-41919-00763

The Indiana Department of Environmental Management (IDEM) has received an application from Lakota Corporation located at 4 Stoutco Drive, Bristol, IN 46507 for a renewal of its MSOP issued on January 21, 2015. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Lakota Corporation to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM’s preliminary findings are available at:

Bristol Public Library
505 West Vistula Street
Bristol, IN 46507

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will
make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M039-41919-00753 in all correspondence.

**Comments should be sent to:**

Travis Flock  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Travis Flock or (317) 233-1782  
Or dial directly: (317) 233-1782  
Fax: (317) 232-6749 attn: Travis Flock  
E-mail: TFllock@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Travis Flock of my staff at the above address.

---

Brian Williams, Section Chief  
Permits Branch  
Office of Air Quality
Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Lakota Corporation
4 Stoutco Dr.
Bristol, Indiana 46507

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

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SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1  General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

| Source Address: | 4 Stoutco Dr., Bristol, Indiana 46507 |
| General Source Phone Number: | 574-848-1636 |
| SIC Code: | 3792 (Travel Trailer and Campers) |
| County Location: | Elkhart |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program |
| | Minor Source, under PSD and Emission Offset Rules |
| | Minority Source, Section 112 of the Clean Air Act |
| | Not 1 of 28 Source Categories |

A.2  Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) Assembly Line, identified as (AL1), constructed in 2014, with a maximum capacity of 0.75 units per hour, applying glues, caulk, and adhesive to wood and plastic substrates, uncontrolled, and exhausting indoors.

(b) One (1) Woodworking Operation, identified as (WW1), constructed in 2014, with a maximum capacity of 1500 pounds per hour, equipped with an integral baghouse as control, and exhausting indoors.

(c) One (1) Welding Operation, collectively identified as (Weld 1), and consisting of the following emission units:

   (1) Ten (10) TIG welders, each with a maximum electrode consumption of 2 pounds of electrode per hour, uncontrolled, and exhausting indoors.

   (2) Twenty-five (25) MIG welders, each with a maximum electrode consumption of 5 pounds per hour, uncontrolled, and exhausting indoors.

(d) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:

   (1) Three (3) air make up units and ten (10) radiant tube heaters, with a total maximum heat capacity of 4.8 MMBtu/hr.

(e) Paved and unpaved roads and parking lots with public access.
SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
(a) This permit, M039-41919-00763, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information
(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M039-41919-00763 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due.
document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.,

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

   (a) Violation of any conditions of this permit.
   (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
   (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
   (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
   (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

   (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
   (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.
C.6 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

1. When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
2. If there is a change in the following:
   (A) Asbestos removal or demolition start date;
   (B) Removal or demolition contractor; or
   (C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements  [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing  [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements  [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements  [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring  [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps**

**C.12 Response to Excursions or Exceedances**

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

1. initial inspection and evaluation;
2. recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
3. any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

1. monitoring results;
2. review of operation and maintenance procedures and records; and/or
3. inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or
certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Assembly Line, identified as (AL1), constructed in 2014, with a maximum capacity of 0.75 units per hour, applying glues, caulk, and adhesive to wood and plastic substrates, uncontrolled, and exhausting indoors.

(b) One (1) Woodworking operation, identified as (WW1), constructed in 2014, with a maximum capacity of 1500 pounds per hour, equipped with an integral baghouse as control, and exhausting indoors.

(d) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:

   (1) Three (3) air make up units and ten (10) radiant tube heaters, with a total maximum heat capacity of 4.8 MMBtu/hr.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

(a) The VOC usage, including dilution solvents and cleaning solvents, at the Assembly Line, identified as (AL1) shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from the assembly line to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.1.2 Particulate Matter Emissions (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Indirect Heating), particulate emissions from the three (3) air make up units and the ten (10) radiant tube heaters shall be limited to 0.6 pounds per million British thermal units (lbs/MMBtu) heat input.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their corresponding control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM) Control [326 IAC 6-3-2]

In order to ensure the Woodworking operation (WW1) is exempt from the requirements of 326 IAC 6-3-2, the baghouse for particulate control shall be in operation and control emissions from the Woodworking operation (WW1) at all times when the Woodworking operation (WW1) is in operation.
D.1.5  Compliance Determination Requirements [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC limit contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.6  Baghouse Inspections

The Permittee shall perform quarterly inspections of the baghouse controlling particulate emissions from the woodworking operation (WW1) to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.7  Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.8  Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the utilization usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.

(1) The VOC content of each material and solvent used at the assembly line each month.

(2) The amount of each material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The weight of VOC used for each compliance period.
(b) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.1.6.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.
Indiana Department of Environmental Management
Office of Air Quality
Compliance and Enforcement Branch

Quarterly Report

Source Name: Lakota Corporation
Source Address: 4 Stoutco Dr., Bristol, Indiana 46507
MSOP Permit No.: M039-41919-00763
Source: Assembly Line (AL1)
Pollutant: Total VOC Emissions
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period.

<table>
<thead>
<tr>
<th>QUARTER :</th>
<th>YEAR: __________________</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________
Title / Position: ____________________________
Date: ____________________________
Phone: ____________________________
This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Lakota Corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>4 Stoutco Dr.</td>
</tr>
<tr>
<td>City:</td>
<td>Bristol, Indiana 46507</td>
</tr>
<tr>
<td>Phone #:</td>
<td>574-848-1636</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M039-41919-00763</td>
</tr>
</tbody>
</table>

I hereby certify that Lakota Corporation is:
- [ ] still in operation.
- [ ] no longer in operation.

I hereby certify that Lakota Corporation is:
- [ ] in compliance with the requirements of MSOP M039-41919-00763.
- [ ] not in compliance with the requirements of MSOP M039-41919-00763.

Authorized Individual (typed):

Title:

Signature:

Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:
MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER _____, 25 TONS/YEAR SULFUR DIOXIDE _____, 25 TONS/YEAR NITROGEN OXIDES _____, 25 TONS/YEAR HYDROGEN SULFIDE _____, 25 TONS/YEAR TOTAL REDUCED SULFUR _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS _____, 25 TONS/YEAR FLUORIDES _____, 100 TONS/YEAR CARBON MONOXIDE _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) _____.

EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____________.

THIS INCIDENT MEETS THE DEFINITION OF “MALFUNCTION” AS LISTED ON REVERSE SIDE? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT? Y N

COMPANY:_________________________________________________________PHONE NO.  (      )___________________
LOCATION: (CITY AND COUNTY)_________________________________________________________________________
PERMIT NO. ________________ AFS PLANT ID: ________________ AFS POINT ID: ________________ INSP:__________
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:________________________________________
_____________________________________________________________________________________________________
DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____    _________________________________________ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:___________________________________________

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE______/______/ 20____   _______________ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:________________________________________

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:_______________________________________

MEASURES TAKEN TO MINIMIZE EMISSIONS:______________________________________________________________
___________________________________________________________________________________________________

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:
INTERIM CONTROL MEASURES: (IF APPLICABLE)
_____________________________________________________________________________________________________
_____________________________________________________________________________________________________

MALFUNCTION REPORTED BY:__________________________________TITLE:___________________________
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_______________________DATE:__________________TIME:__________________

*SEE PAGE 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1  Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39  “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*Essential services are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

________________________________________________________________________
________________________________________________________________________
Indiana Department of Environmental Management  
Office of Air Quality  

Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP) Renewal

<table>
<thead>
<tr>
<th>Source Description and Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Name: Lakota Corporation</td>
</tr>
<tr>
<td>Source Location: 4 Stoutco Drive, Bristol, IN 46507</td>
</tr>
<tr>
<td>County: Elkhart</td>
</tr>
<tr>
<td>SIC Code: 3792 (Travel Trailers and Campers)</td>
</tr>
<tr>
<td>Permit Renewal No.: M039-41919-00763</td>
</tr>
<tr>
<td>Permit Reviewer: Travis Flock</td>
</tr>
</tbody>
</table>

On September 13, 2019, Lakota Corporation submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Lakota Corporation relating to the operation of a stationary travel trailer and camper manufacturing operation. Lakota Corporation was issued its first MSOP (M039-34922-00763) on January 21, 2015.

<table>
<thead>
<tr>
<th>Existing Approvals</th>
</tr>
</thead>
<tbody>
<tr>
<td>The source was issued MSOP No. M039-34922-00763 on January 21, 2015. There have been no subsequent approvals issued.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Units and Pollution Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>The source consists of the following permitted emission units:</td>
</tr>
<tr>
<td>(a) One (1) Assembly Line, identified as (AL1), constructed in 2014, with a maximum capacity of 0.75 units per hour, applying glues, caulk, and adhesive to wood and plastic substrates, uncontrolled, and exhausting indoors.</td>
</tr>
<tr>
<td>(b) One (1) Woodworking Operation, identified as (WW1), constructed in 2014, with a maximum capacity of 1500 pounds per hour, equipped with an integral baghouse as control, and exhausting indoors.</td>
</tr>
<tr>
<td>(c) One (1) Welding Operation, collectively identified as (Weld 1), and consisting of the following emission units:</td>
</tr>
<tr>
<td>(1) Ten (10) TIG welders, each with a maximum electrode consumption of 2 pounds of electrode per hour, uncontrolled, and exhausting indoors.</td>
</tr>
<tr>
<td>(2) Twenty-five (25) MIG welders, each with a maximum electrode consumption of 5 pounds per hour, uncontrolled, and exhausting indoors.</td>
</tr>
<tr>
<td>(d) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:</td>
</tr>
<tr>
<td>(1) Three (3) air make up units and ten (10) radiant tube heaters, with a total maximum heat capacity of 4.8 MMBtu/hr.</td>
</tr>
<tr>
<td>(e) Paved and unpaved roads and parking lots with public access.</td>
</tr>
</tbody>
</table>
“Integral Part of the Process” Determination

As part of MSOP NSC No. M039-34922-00763, issued on January 21, 2015, IDEM, OAQ previously determined that air pollution control equipment, i.e. baghouse, is an integral part of the woodworking operation, identified as WW1 at this source.

IDEM, OAQ is not reevaluating this integral justification at this time. Therefore, the potential to emit particulate matter from the woodworking operation, identified as WW1 will continue to be calculated after the baghouse for purposes of determining permitting level and applicability of 326 IAC 6-3 and 326 IAC 2-2. Operating conditions in the proposed permit will specify that the baghouse shall operate at all times when the woodworking machinery is in operation.

In October 1993, a Final Order Granting Summary Judgment was signed by Administrative Law Judge (“ALJ”) Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, the potential to emit particulate matter from the woodworking operations was calculated after control for purposes of determining permitting level and applicability of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 6.5 (Particulate Matter Limitations Except Lake County).

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO2</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O3</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM2.5</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM2.5 standard.</td>
</tr>
<tr>
<td>PM10</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO2</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO2 standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as
attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM$_{2.5}$
Elkhart County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

The fugitive emissions of criteria pollutants and hazardous air pollutants (HAP) are counted toward the determination of MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.
Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM(^1)</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitive Emissions</strong></td>
</tr>
<tr>
<td>14.8</td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></td>
</tr>
<tr>
<td>--</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Source-Wide Fugitives</strong></td>
</tr>
<tr>
<td>21.76</td>
</tr>
<tr>
<td><strong>MSOP Thresholds</strong></td>
</tr>
<tr>
<td>25</td>
</tr>
</tbody>
</table>

\(^1\)Under the Part 70 Permit program (40 CFR 70), PM\(^{10}\) and PM\(^{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

\(^2\)PM\(^{2.5}\) listed is direct PM\(^{2.5}\).

\(^3\)Single highest source-wide HAP (Toluene).

*Fugitive HAP emissions are always included in the source-wide emissions.

**Baghouse is considered integral to WW1 operations, and unrestricted potential emissions are calculated after integral control devices.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, VOC PTE is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

Potential to Emit After Issuance

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.
### Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled/Unlimited)

<table>
<thead>
<tr>
<th></th>
<th>PM(^1)</th>
<th>PM(_{10})</th>
<th>PM(_{2.5})(^1,2)</th>
<th>SO(_2)</th>
<th>NO(_x)</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP(^3)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitive Emissions(^*)</strong></td>
<td>14.8</td>
<td>14.92</td>
<td>41.92</td>
<td>0.01</td>
<td>2.06</td>
<td>56.43</td>
<td>1.73</td>
<td>8.69</td>
<td>8.96</td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Source-Wide Fugitives(^*)</strong></td>
<td>21.76</td>
<td>21.88</td>
<td>21.88</td>
<td>0.01</td>
<td>2.06</td>
<td>56.43</td>
<td>1.73</td>
<td>8.69</td>
<td>8.96</td>
</tr>
<tr>
<td><strong>MSOP Thresholds</strong></td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 10</td>
<td>&lt; 25</td>
</tr>
<tr>
<td><strong>PSD Major Source Thresholds</strong></td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td><strong>Emission Offset Major Source Thresholds</strong></td>
<td>---</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

\(^1\)Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

\(^2\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

\(^3\)Single highest source-wide HAP (Toluene).

\(^*\)Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for this source, because the source does not operate an automobile or light duty truck assembly plant.

(b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Part and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80, are not included in the permit for the source, because the source is an area source for hazardous air pollutants (HAPs) and does not include any surface coating facilities.
(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP and 326 IAC 20-81 are not included in the permit for this source, because the source is an area source for hazardous air pollutants (HAPs).

(g) The requirements of the National Emission Standards of Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit, because the source does not operate any paint stripping or surface coating operation.

(h) The requirements of the National Emission Standards of Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart III, are not included in the permit, because the source is not a manufacturer of automobiles and light-duty trucks and therefore does not involve the surface coating of automobiles and light-duty trucks. The source manufactures travel trailers and campers, which are not considered to be automobiles or light-duty trucks.

(h) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

(j) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.
326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1). Opacity limitations for this source are as follows:

1. Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

2. Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved and unpaved roads within and around the source have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

<table>
<thead>
<tr>
<th>State Rule Applicability – Individual Facilities</th>
</tr>
</thead>
</table>

State rule applicability has been reviewed as follows:

Natural Gas Combustion Units:

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

\[ Pt = \frac{1.09}{Q^{0.26}} \]

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility’s permit application, except when some lower capacity is contained in the facility’s operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.
## Indirect Heating Units Which Began Operation After September 21, 1983

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date (Removal Date)</th>
<th>Operating Capacity (MMBtu/hr)</th>
<th>Q (MMBtu/hr)</th>
<th>Calculated Pt (lb/MMBtu)</th>
<th>Particulate Limitation, Pt (lb/MMBtu)</th>
<th>PM PTE based on AP-42 (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Three (3) air make up units and 10 (10) radiant tube heaters</td>
<td>2014</td>
<td>4.8</td>
<td>4.8</td>
<td>0.724</td>
<td>0.6</td>
<td>0.002</td>
</tr>
</tbody>
</table>

Where: \( Q = \) Summation of the heating capacity from each unit involved in natural gas combustion at this source.

### Assembly Line Operation:

#### 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
This operation was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the operation is not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the operation to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the operation is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

1. The VOC usage, including dilution solvents and cleaning solvents, at the Assembly Line Operation, identified as AL1, shall be less than twenty-five (25) tons per year per twelve (12) consecutive period, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from the assembly line to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

#### 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a)(E) this operation is not subject to the requirements of 326 IAC 8-2-9 because the assembly line, identified as AL1, does not coat metal substrates or parts. Although this operation does involve the surface coating of plastics, it is not located in Lake or Porter County, and therefore this operation is exempt from the requirements of 326 IAC 8-2-9 for the coating of plastics.

#### 326 IAC 8-10 (VOC Rules: Automobile Refinishing)
Pursuant to 326 IAC 8-10-1, this operation is not subject to the requirements of 326 IAC 8-10 because the assembly line, identified as AL1, is located in Elkhart County. The requirements of 326 IAC 8-10 are applicable for sources located in Clark, Floyd, Lake, or Porter County. Since Elkhart County is not one of the listed, affected counties under 326 IAC 8-10-1, the assembly line, identified as AL1, is not subject to the requirements of 326 IAC 8-10.
Woodworking Operation:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), this unit is not subject to the requirements of 326 IAC 6-3, since the potential emissions of particulate matter is less than 0.551 pounds per hour.

In order to assure the woodworking operation is not subject to the requirements of 326 IAC 6-3-2, the integral baghouse for particulate control shall be in operation and control emissions from the woodworking operation at all times the woodworking emission unit(s) is in operation.

Welding and Cutting Operation:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(b)(9), the welding operation is exempt from the requirements of this rule because the maximum amount of rods consumed at the operation is less than 625 pounds per day.

Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this source are as follows:

(1) In order to ensure the Woodworking operation (WW1) is exempt from the requirements of 326 IAC 6-3-2, the baghouse for particulate control shall be in operation and control emissions from the Woodworking operation (WW1) at all times when the Woodworking operation (WW1) is in operation.

(2) Compliance with the VOC usage limit shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Emission Unit (Control Device)</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>WW1 (Baghouse)</td>
<td>Baghouse inspection</td>
<td>Quarterly</td>
<td>Verify that the baghouse is being operated and maintained within accordance of the manufacturer’s specifications.</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the baghouse for the woodworking operation, identified as WW1, must operate properly to assure compliance with 326 IAC 6-3-2.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 13, 2019.

The operation of this stationary travel trailer and camper manufacturer shall be subject to the conditions of the attached proposed MSOP Renewal No. M039-41919-00763.

The staff recommends to the Commissioner that the MSOP Renewal be approved.
(a) If you have any questions regarding this permit, please contact Travis Flock, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-1782 or (800) 451-6027, and ask for Travis Flock or (317) 233-1782.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
## Appendix A: Emission Calculations

### PTE Summary

**Company Name:** Lakota Corporation  
**Source Address:** 4 Stoutco Drive, Bristol, IN 46507  
**Permit Number:** M039-41919-00763  
**Reviewer:** Travis Flock

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assembly</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>8.69</td>
</tr>
<tr>
<td>Welding and thermal cutting</td>
<td>13.63</td>
<td>13.63</td>
<td>13.63</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.23</td>
</tr>
<tr>
<td>Natural Gas combustion</td>
<td>0.04</td>
<td>0.16</td>
<td>0.16</td>
<td>0.07</td>
<td>2.06</td>
<td>0.11</td>
<td>1.73</td>
<td>0.04</td>
</tr>
<tr>
<td>WWI</td>
<td>1.13</td>
<td>1.13</td>
<td>1.13</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total PTE Excluding Fugitives from Unpaved Roads</strong></td>
<td>14.80</td>
<td>14.92</td>
<td>14.92</td>
<td>0.01</td>
<td>2.06</td>
<td>56.43</td>
<td>1.73</td>
<td>8.96</td>
</tr>
</tbody>
</table>

*PM2.5 listed is direct PM2.5
** Note: PM, PM10, PM2.5 emissions from the woodworking operation were calculated after consideration of the controls based on the integral to the process determination.*
# Emission Calculations

## Assembly Line Operation (AL1)

**Company Name:** Lakota Corporation  
**Source Address:** 4 Stoutco Drive, Bristol, IN 46507  
**Permit Number:** M039-41919-00763  
**Reviewer:** Travis Flock

<table>
<thead>
<tr>
<th>Plant Name</th>
<th>Maximum Production Rate (units/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant 1</td>
<td>0.75</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Product Name</th>
<th>Material Used</th>
<th>Density lbs/gal</th>
<th>Usage Per Unit Gal</th>
<th>Usage Lbs/unit</th>
<th>% VOC</th>
<th>Toluene wt %</th>
<th>VOC emissions lbs/hr</th>
<th>VOC emissions tpy</th>
<th>Toluene Emissions lbs/hr</th>
<th>Toluene emissions tpy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rubber Glue</td>
<td>wood and plastic</td>
<td>6.61</td>
<td>2.00</td>
<td>13.22</td>
<td>83.00%</td>
<td>15.00%</td>
<td>8.23</td>
<td>36.04</td>
<td>1.98</td>
<td>8.69</td>
</tr>
<tr>
<td>Caulk</td>
<td>wood and plastic</td>
<td>10.68</td>
<td>0.84</td>
<td>8.97</td>
<td>15.70%</td>
<td>0.00%</td>
<td>1.41</td>
<td>6.17</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Adhesive</td>
<td>wood and plastic</td>
<td>5.80</td>
<td>0.75</td>
<td>4.35</td>
<td>74.00%</td>
<td>0.00%</td>
<td>3.22</td>
<td>14.10</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

| Total        |                   |                 |                   |               |       |             | 56.31                | 8.69            |                        |                      |
### Appendix A: Emission Calculations

**Woodworking Operations**

**Company Name:** Lakota Corporation  
**Source Address:** 4 Stoutco Drive, Bristol, IN 46507  
**Permit Number:** M039-41919-00763  
**Reviewer:** Travis Flock

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Control Efficiency</th>
<th>Grain Loading per Actual Cubic foot of Outlet Air</th>
<th>Gas or Air Flow Rate (acfm.)</th>
<th>Emission Rate before Controls (lbs/hr)</th>
<th>Emission Rate before Controls (tons/yr)</th>
<th>Emission Rate after Controls (lbs/hr)</th>
<th>Emission Rate after Controls (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WW1</td>
<td>98.50%</td>
<td>0.004</td>
<td>7500</td>
<td>17.14</td>
<td>75.09</td>
<td>0.26</td>
<td>1.13</td>
</tr>
</tbody>
</table>

**TOTAL**  

**Methodology**

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)
## Appendix A: Emission Calculations

### Welding and Thermal Cutting

**Company Name:** Lakota Corporation  
**Source Address:** 4 Stoutco Drive, Bristol, IN 46507  
** Permit Number:** M039-41919-00763  
**Reviewer:** Travis Flock

### Emission Factors

#### Emission Calculations

<table>
<thead>
<tr>
<th></th>
<th>Number of Stations</th>
<th>Max. Metal Cutting Rate (in./minute)</th>
<th>EMISSION FACTORS (lb pollutant / lb electrode)*</th>
<th>EMISSIONS (lb/hr)</th>
<th>TOTAL HAPs (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>WELDING PROCESS</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Metal Inert Gas (MIG)(7053)</td>
<td>25</td>
<td>0.1622</td>
<td>0.0005</td>
<td>0.0001</td>
<td>3.013</td>
</tr>
<tr>
<td>Tungsten Inert Gas (TIG) Steel</td>
<td>10</td>
<td>0.005</td>
<td>0.0005</td>
<td>0.00</td>
<td>0.100</td>
</tr>
</tbody>
</table>

Max per day: 168

### Methamysis

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions (lb/hr) = (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions (lb/hr) = (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1” thick)

Emissions (tons/yr) = emissions (lb/hr) x 8,760 (hrs/day) x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.
# Appendix A: Emissions Calculations

## Natural Gas Combustion Only

### MM BTU/hr <100

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Lakota Corporation</th>
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<tbody>
<tr>
<td>Source Address:</td>
<td>4 Stoutco Drive, Bristol, IN 46507</td>
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<tr>
<td>Permit Number:</td>
<td>M039-41919-00763</td>
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<tr>
<td>Reviewer:</td>
<td>Travis Flock</td>
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</table>

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmBlu</td>
<td>MMCF/yr</td>
</tr>
<tr>
<td>4.8</td>
<td>1020</td>
<td>41.2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.04</td>
<td>0.16</td>
<td>0.16</td>
<td>0.01</td>
<td>2.06</td>
<td>0.11</td>
<td>1.73</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined. **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

## Methodology

All emission factors are based on normal firing.  

MMBtu = 1,000,000 Btu  

MMCF = 1,000,000 Cubic Feet of Gas  

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  

Potential Throughput (MMCF) = Heat Input Capacity (MMBlu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

## HAPS Calculations

### HAPS - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>3.879E-02</td>
</tr>
</tbody>
</table>

| Potential Emission in tons/yr | 4.328E-05 | 2.473E-05 | 1.546E-03 | 3.710E-02 | 7.008E-05 |

### HAPS - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>1.130E-04</td>
</tr>
</tbody>
</table>

| Potential Emission in tons/yr | 1.031E-05 | 2.267E-05 | 2.886E-05 | 7.832E-06 | 4.328E-05 |

Methodology is the same as above.

The five highest organic and metal HAPS emission factors are provided above.

Additional HAPS emission factors are available in AP-42, Chapter 1.4.
Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cars and Pickup Trucks</td>
<td>48.0</td>
<td>1.5</td>
<td>72.0</td>
<td>0.100</td>
<td>4.8</td>
<td>1752.0</td>
</tr>
<tr>
<td>Forklift</td>
<td>24.0</td>
<td>5.0</td>
<td>120.0</td>
<td>0.200</td>
<td>4.8</td>
<td>1752.0</td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = 4.4 tons/trip
Average Miles Per Trip = 0.14 miles/trip

Unmitigated Emission Factor, \( Ef = k \times \left[ \frac{s}{12} \right]^a \times \left[ \frac{W}{3} \right]^b \) (Equation 1a from AP-42 13.2.2)

\[\text{PM} \quad \text{PM10} \quad \text{PM2.5}\]

where

\( k = \begin{cases} 4.5 & 4.8 & 2.4 \\ 4.9 & 4.9 & 4.9 \end{cases} \) lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)

\( s = \begin{cases} 0.15 & 4.8 & 4.8 \\ 4.8 & 4.8 & 4.8 \end{cases} \) % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)

\( a = \begin{cases} 1.5 & 0.9 & 0.9 \\ 0.9 & 0.9 & 0.9 \end{cases} \) = constant (AP-42 Table 13.2.2-2 for Industrial Roads)

\( W = \begin{cases} 4.4 & 4.4 & 4.4 \end{cases} \) tons = average vehicle weight (provided by source)

\( b = \begin{cases} 0.45 & 0.45 & 0.45 \end{cases} \) = constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( E_{ext} = E \times \left[ \frac{365 - P}{365} \right] \) (Equation 2 from AP-42 13.2.2)

\[\text{PM} \quad \text{PM10} \quad \text{PM2.5}\]

\[\text{Cars and Pickup Trucks} \quad \text{Mitigated Emission Factor, } E_{ext} = 2.01 \quad 0.51 \quad 0.05 \text{ lb/mile} \]

\[\text{Delivery Trucks} \quad \text{Mitigated Emission Factor, } E_{ext} = 2.01 \quad 0.51 \quad 0.05 \text{ lb/mile} \]

\[\text{Forklift} \quad \text{Mitigated Emission Factor, } E_{ext} = 2.01 \quad 0.51 \quad 0.05 \text{ lb/mile} \]

\[\text{Payloader} \quad \text{Mitigated Emission Factor, } E_{ext} = 2.01 \quad 0.51 \quad 0.05 \text{ lb/mile} \]

\[\text{Dust Control Efficiency} = 0\% 0\% 0\% \text{ (pursuant to control measures outlined in fugitive dust control plan)} \]

\[\text{Cars and Pickup Trucks} \quad \text{Dust Control Efficiency} = 0\% 0\% 0\% \text{ (pursuant to control measures outlined in fugitive dust control plan)} \]

\[\text{Delivery Trucks} \quad \text{Dust Control Efficiency} = 0\% 0\% 0\% \text{ (pursuant to control measures outlined in fugitive dust control plan)} \]

\[\text{Forklift} \quad \text{Dust Control Efficiency} = 0\% 0\% 0\% \text{ (pursuant to control measures outlined in fugitive dust control plan)} \]

\[\text{Payloader} \quad \text{Dust Control Efficiency} = 0\% 0\% 0\% \text{ (pursuant to control measures outlined in fugitive dust control plan)} \]

Process Unmitigated PTE of PM (tons/yr) Unmitigated PTE of PM10 (tons/yr) Unmitigated PTE of PM2.5 (tons/yr) Mitigated PTE of PM (tons/yr) Mitigated PTE of PM10 (tons/yr) Mitigated PTE of PM2.5 (tons/yr) Controlled PTE of PM (tons/yr) Controlled PTE of PM10 (tons/yr) Controlled PTE of PM2.5 (tons/yr)

\[\text{Cars and Pickup Trucks} \quad 2.68 \quad 0.68 \quad 0.07 \quad 1.76 \quad 0.45 \quad 0.04 \quad 1.76 \quad 0.45 \quad 0.04 \]

\[\text{Delivery Trucks} \quad 0.27 \quad 0.07 \quad 0.01 \quad 0.18 \quad 0.04 \quad 0.00 \quad 0.18 \quad 0.04 \quad 0.00 \]

\[\text{Forklift} \quad 2.68 \quad 0.68 \quad 0.07 \quad 1.76 \quad 0.45 \quad 0.04 \quad 1.76 \quad 0.45 \quad 0.04 \]

\[\text{Payloader} \quad 1.34 \quad 0.34 \quad 0.03 \quad 0.88 \quad 0.22 \quad 0.02 \quad 0.88 \quad 0.22 \quad 0.02 \]

\[\text{Totals} \quad 6.96 \quad 1.77 \quad 0.18 \quad 4.58 \quad 1.17 \quad 0.12 \quad 4.58 \quad 1.17 \quad 0.12 \]

Methodology

\[\text{Total Weight driven per day (ton/day)} = \frac{\text{Maximum one-way distance (mi/day)}}{5280} \text{ (tons/trip/5280 ft/mile)} \]

\[\text{Average Vehicle Weight Per Trip (ton/trip)} = \frac{\text{Total Weight driven per day (ton/day)}}{\text{Maximum trips per day (trip/day)}} \]

\[\text{Controlled PTE (tons/yr)} = \frac{\text{Mitigated PTE (tons/yr)}}{1 - \text{Dust Control Efficiency}} \]

Abbreviations

PM = Particulate Matter
PM0.1 = Particulate Matter (<0.10 um)
PM0.5 = Particulate Matter (<0.5 um)
PTE = Potential to Emit
November 7, 2019

Janet Dudley
Lakota Corporation
4 Stoutco Dr
Bristol, IN 46507

Re: Public Notice
Lakota Corporation
Permit Level: MSOP Renewal
Permit Number: 039-41919-00763

Dear Janet Dudley:

Enclosed is a copy of your draft MSOP Renewal, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Syracuse Public Library, 11 East Main St in Syracuse IN 46567. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Travis Flock, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-1782 or dial (317) 233-1782.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
November 7, 2019

To: Syracuse Public Library 11 East Main St Syracuse IN 46567 (Library)

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Lakota Corporation
Permit Number: 039-41919-00763

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

November 7, 2019
Lakota Corporation
039-41919-00763

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 4/12/2019
### Mail Code 61-53

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<tr>
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<th>LPOGOST 11/7/2019 Lakota Corporation 039-41919-00763 draft/</th>
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#### Name and address of Sender

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<td>1</td>
<td></td>
<td>Janet Dudley  Lakota Corporation 4 Stoutco Dr Bristol IN 46507 (Source CAATS)</td>
<td></td>
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<tr>
<td>2</td>
<td></td>
<td>Erik Smith  President Lakota Corporation 4 Stoutco Dr Bristol IN 46507 (RO CAATS)</td>
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<td>Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)</td>
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<td>Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)</td>
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<td>6</td>
<td></td>
<td>Mr. Greg Towler Keramida Environmental, Inc. 51657 Pebble Brooke Drive Granger IN 46530 (Consultant)</td>
<td></td>
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<td>7</td>
<td></td>
<td>Jeri Seely  The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)</td>
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<td>8</td>
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<td>Mr. Roger Schneider  The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)</td>
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**Handing Charges**: 

**Act. Value (If Registered)**: 

**Insured Value**: 

**Due Send if COD**: 

**R.R. Fee**: 

**S.D. Fee**: 

**S.H. Fee**: 

**Rest. Del. Fee**: 

**Remarks**: 

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