

From: [Reimer, Allen](#)
To: [Alic Bent](#)
Subject: RE: Applicant Review 37603
Date: Tuesday, November 29, 2016 12:28:00 PM

Hi Alic,

The facility has construction approval to start installing the new roll coaters. Because there is no Source Modification for this permit action, they can construct new units, but cannot operate them until the Permit Modification is issued. The Permit Mod has been forwarded through our administrative section for a 15 day EPA review period. I can email you when that period starts if you like. After it comes off EPA review it will only take a day or two to be issued. I will have a better idea of the issuance day in a day or two. Hope this helps.

Allen Reimer
Environmental Manager
Indiana Department of Environmental Management (IDEM)
Office of Air Quality – Permits Branch
acreimer@idem.IN.gov
317-233-0863

From: Alic Bent [mailto:ABent@augustmack.com]
Sent: Tuesday, November 29, 2016 11:14 AM
To: Reimer, Allen
Subject: RE: Applicant Review 37603

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Hi Allen,

Can the facility begin installation of new unit? What is the time estimate for issuance?

Thanks
ALIC BENT
Senior Regulatory Expert

August Mack Environmental, Inc.
1302 N. Meridian St., Suite 300
Indianapolis, Indiana 46202
Phone Number: 317.916.8000
abent@augustmack.com

Expertise. Innovation. Commitment. Experience the August Mack Difference.
<http://blog.augustmack.com/blog/environmental-health-and-safety-consulting>

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From: Reimer, Allen [<mailto:acreimer@idem.IN.gov>]

Sent: Monday, October 3, 2016 2:56 PM

To: Alic Bent <ABent@augustmack.com>

Subject: Applicant Review 37603

Dear Mr. Campbell and Mr. Bent,

Attached please find the draft Part 70 Operating Permit Significant Permit Modification (SPM) for American Woodmark Corporation, with comments for you to address.

IDEM OAQ requests that American Woodmark Corporation complete its review of the draft documents and submit any comments or a response of "no comments" by the end-of-business-day (5:00 pm), **Tuesday, October 18, 2016**, (*preferably by email*). If you need more time to review and comment on the draft documents, please let me know at your earliest convenience by what date you would like to comment. If no response is submitted by **Tuesday, October 18, 2016**, I will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

While you are reviewing the draft documents, the accountability time clock for this application will be stopped.

Please address the comment bubbles in the Technical Support Document (TSD). They relate to the baghouse ID for the sanding operation and the stack ID for the 3rd woodworking area and the sanding operation.

Should you have any questions or comments, please do not hesitate to contact me. Thank you.

Allen Reimer
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Office of Air Quality – Permits Branch
acreimer@idem.IN.gov
317-233-0863

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From: [Alic Bent](#)
To: [Reimer, Allen](#)
Subject: RE: Applicant Review 37603
Date: Tuesday, October 18, 2016 9:07:57 AM

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Allen

We have no additional comments on the permit documents. Please see below for our responses in red to your questions. Please let me know if there is anything else that you need.

- **Page 3 of 21**
 - **Text being referenced:**
 - “(c) One (1) woodworking operation, not directly associated with Finishing Lines 1 or 2, constructed in 2000, with a maximum capacity of 1.25 tons per hour, with particulate emissions controlled by a baghouse (BH-1), which is vented inside or outside of the building through stack S-EU-BH-4.
 - **Comments from IDEM:**

Is this the proper name for this stack? There is some confusion whether this should be S-EU-BH-1 instead. **Please change this to S-EU-BH-1.**

- **Page 3 of 21**
 - **Text being referenced:**
 - (d) One (1) Framing Line, consisting of the following units:
 - (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse, and exhausting inside or outside of the building through stack S-EU-BH-4.
 - **Comments from IDEM:**

Is this baghouse ID BH-4? **Yes. This is BH-4**

- **Page 11 of 21**
 - **Text being referenced:**
 - (a) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Woodworking Operations BH-1, BH-2, and BH-3	Visible Emission Notations (when exhausting to the atmosphere)	Daily
	Baghouse Inspections (when exhausting indoors)	Semi-Annually
Sanding	Visible Emission Notations (when exhausting to	Daily

Operations (SAND) Baghouse	the atmosphere)	
	Baghouse Inspections (when exhausting indoors)	Semi-Annually

o **Comments from IDEM:**

Is this baghouse ID BH-4? **Yes. This is BH-4**

Thanks

ALIC BENT

Senior Regulatory Expert

August Mack Environmental, Inc.

1302 N. Meridian St., Suite 300

Indianapolis, Indiana 46202

Phone Number: 317.916.8000

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From: Reimer, Allen [mailto:acreimer@idem.IN.gov]

Sent: Monday, October 3, 2016 2:56 PM

To: Alic Bent <ABent@augustmack.com>

Subject: Applicant Review 37603

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Should you have any questions or comments, please do not hesitate to contact me. Thank you.

Allen Reimer
Environmental Manager
Indiana Department of Environmental Management (IDEM)
Office of Air Quality – Permits Branch
acreimer@idem.IN.gov
317-233-0863

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From: [Alic Bent](#)
To: [Reimer, Allen](#)
Subject: Re: one final thing for 37603
Date: Friday, September 23, 2016 8:50:41 AM

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I am ok with those changes.
Thanks Alic

Sent from my iPhone

On Sep 23, 2016, at 8:18 AM, Reimer, Allen <acreimer@idem.IN.gov> wrote:

Hi Alic,

Thank you for your response. Are visible emissions observations ok for the sanding operation (SAND) as well? Also, currently the permit calls for quarterly baghouse inspections for the woodworking operations and the sanding operations. When venting indoors, semi-annual baghouse inspections are required, not quarterly. I just wanted to let you know so that the change doesn't come as a big surprise. I will make this change for both woodworking and sanding operations baghouses.

Allen Reimer
Environmental Manager
Indiana Department of Environmental Management (IDEM)
Office of Air Quality – Permits Branch
acreimer@idem.IN.gov
317-233-0863

From: Alic Bent [<mailto:ABent@augustmack.com>]
Sent: Tuesday, September 20, 2016 10:48 AM
To: Reimer, Allen
Subject: FW: one final thing for 37603

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Allen

Here is the rest of the information that you requested regarding the stacks assignments.

1. The ultraviolet light oven – please refer to the roof exhaust as S-EU-2-15
2. Three (3) woodworking operations, and the sanding operation –

- The woodworking operation associated with Finishing Line 1 (Main Line) bag house would be S-EU-BH-2-A and S-EU-BH-2-B.
 - The woodworking operation associated with Finishing Line 2 (Hybrid Line) would be S-EU-BH-3.
 - The 3rd woodworking operation and sanding operation associated with Framing Line (Roll Coat Line) would be S-EU-BH-4.
3. For the woodworking operation do you prefer doing daily visible emissions observations or daily pressure drop reading. - **Visible emissions.**

Thanks
ALIC BENT
Senior Regulatory Expert

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From: Alic Bent
Sent: Friday, September 16, 2016 11:28 AM
To: 'Reimer, Allen' <acreimer@idem.IN.gov>
Subject: RE: one final thing for 37603

We mistakenly omitted the HAP numbers.

Section 15 of the SDSs list the amount of 2-(2-ethoxyethoxy)ethyl acrylate (CAS # 7328-17-8) that is present. Some of it is not considered volatile thus the percent HAP is higher than the VOC number. All the other HAP components are only present in trace amounts so they are not listed. All the HAPs are organic HAPs (VOCs). Therefore, single HAP/total HAPs contents are the same as the VOC content.

Thanks

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From: Reimer, Allen [<mailto:acreimer@idem.IN.gov>]

Sent: Friday, September 16, 2016 10:57 AM

To: Alic Bent <ABent@augustmack.com>

Subject: RE: one final thing for 37603

Hi Alic,

I've gone through the MSDSs you provided, and the VOC info looks fine. The HAP info, however, is not complete. The data sheets say that the H/G Stone Gray UV Topcoat and the Cashmere Topcoat have HAPs, but do not provide the percentage. I will need that information from the manufacturer to estimate the PTE. Please provide the % (by weight) for the following HAPs:

H/G Stone Gray UV Topcoat:

2-(2-ethoxyethoxy)ethyl acrylate (CAS # 7328-17-8)

Cashmere Topcoat:

2-(2-ethoxyethoxy)ethyl acrylate (CAS # 7328-17-8)

2-propenoic acid (CAS # 79-10-7)

Toluene (CAS # 108-88-3)

Xylene, mixed isomers (CAS # 1330-20-7)

Cumene (CAS # 98-82-8)

I'll continue on with the rest of the documents, but this info will be needed by the time the permit goes on Public Notice. Thank you.

Allen Reimer

Environmental Manager

Indiana Department of Environmental Management (IDEM)

Office of Air Quality – Permits Branch

acreimer@idem.IN.gov

317-233-0863

From: Alic Bent [<mailto:ABent@augustmack.com>]

Sent: Friday, September 16, 2016 8:06 AM

To: Reimer, Allen

Subject: RE: one final thing for 37603

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Here you go.

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From: Reimer, Allen [<mailto:acreimer@idem.IN.gov>]

Sent: Friday, September 16, 2016 7:57 AM

To: Alic Bent <ABent@augustmack.com>

Subject: one final thing for 37603

Hi Alic,

Could you also send along digital copies of the MSDSs for the roller coaters? I have the coatings down as Cashmere UV Primer, Cashmere UV Topcoat, and H/G Stone Gray UV Top Coat. I just need to confirm everything submitted. Thanks.

Allen Reimer
Environmental Manager
Indiana Department of Environmental Management (IDEM)
Office of Air Quality – Permits Branch
acreimer@idem.IN.gov
317-233-0863

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From: [Alic Bent](#)
To: [Reimer, Allen](#)
Subject: RE: one final thing for 37603
Date: Friday, September 16, 2016 11:46:03 AM

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We mistakenly omitted the HAP numbers.

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Thanks

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Sent: Friday, September 16, 2016 10:57 AM
To: Alic Bent <ABent@augustmack.com>
Subject: RE: one final thing for 37603

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Subject: RE: one final thing for 37603

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Here you go.

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From: [Alic Bent](#)
To: [Reimer, Allen](#)
Subject: RE: one final thing for 37603
Date: Friday, September 16, 2016 8:10:38 AM
Attachments: [DOC071216-07122016131121 - UV Roll Coat - Silk.pdf](#)
[DOC071316-07132016104842 - double rollers.pdf](#)
[SDS 971-D6V-560 - basecoat.pdf](#)
[SDS 973-D6V-893 - topcoat.pdf](#)

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Here you go.

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Senior Regulatory Expert

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From: [Alic Bent](#)
To: [Reimer, Allen](#)
Subject: RE: Application Received 37603
Date: Thursday, September 15, 2016 1:48:53 PM

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Hi Allen

Go ahead and add the four (4) roller coaters to the existing PSD minor limit for the Framing Line.

I am waiting for a decision on daily VE versus PD readings and the stack designations.

Thanks

ALIC BENT
Senior Regulatory Expert

August Mack Environmental, Inc.
1302 N. Meridian St., Suite 300
Indianapolis, Indiana 46202
Phone Number: 317.916.8000
abent@augustmack.com

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From: Reimer, Allen [mailto:acreimer@idem.IN.gov]
Sent: Thursday, September 15, 2016 12:05 PM
To: Alic Bent <ABent@augustmack.com>
Subject: RE: Application Received 37603

Hello Alic,

Upon further review of the Part 70 Operating Permit, this application will need to be processed as a Significant Permit Modification (SPM) due to the fact that the Compliance Monitoring conditions for the woodworking operations will need to be changed. Currently the permit requires quarterly baghouse inspections for the woodworking operations (since they vent indoors). Having the option to vent indoors or outdoors will require semi-annual baghouse inspections (when venting indoors) and either daily visible emission notations or daily pressure drop (when venting outdoors). This constitutes a significant change to monitoring conditions, so pursuant to 326 IAC 2-7-12(d)(1), this change will be need to be made as a Significant Permit Modification.

Would American Woodmark Corporation like to have daily visible emission notations or pressure drop? I will replace the quarterly baghouse inspections in Condition D.2.5 with semi-annual baghouse inspections when venting indoors.

The ultraviolet light oven, three (3) woodworking operations, and the sanding operation will all exhaust inside or outside of the building, do you have stack information for each?

Since this will be an SPM, would you like to add the four (4) roller coaters to the existing PSD minor limit for the Framing Line? This will be an easy change, and I think I will be able to have a draft ready for a 2-week applicant review period by the end of next week. Thank you.

Allen Reimer
Environmental Manager
Indiana Department of Environmental Management (IDEM)
Office of Air Quality – Permits Branch
acreimer@idem.IN.gov
317-233-0863

From: Alic Bent [<mailto:ABent@augustmack.com>]
Sent: Wednesday, September 14, 2016 2:06 PM
To: Reimer, Allen
Subject: RE: Application Received 37603

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Hi Allen

We will go with the easier Administrative Amendment option.

Thanks
ALIC BENT
Senior Regulatory Expert

August Mack Environmental, Inc.
1302 N. Meridian St., Suite 300
Indianapolis, Indiana 46202

Phone Number: 317.916.8000
abent@augustmack.com

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From: Reimer, Allen [<mailto:acreimer@idem.IN.gov>]
Sent: Wednesday, September 14, 2016 10:17 AM
To: Alic Bent <ABent@augustmack.com>
Subject: Application Received 37603

Hello Mr. Bent,

IDEM OAQ has received the air permit application you submitted for American Woodmark Corporation. I will be working on this project, and I have one initial question before I can proceed with processing the application.

In the application letter on page 4 you state that the framing line has an existing PSD Minor Limit under TVOP 053-32368-00058. To add the four (4) roll coaters to this existing limit the application will need to be processed as a Significant Permit Modification (SPM). This does not have an application fee, but will require a 30 day Public Notice period as well as a 15 day EPA Review period. The new roll coaters will not be able to be operated until after the permit has been issued. The statutory days available for this action is 270 days (although it shouldn't take longer than one or two weeks to get the permit to public notice).

The other option is to not include the four (4) roll coaters in the existing limit on the framing line and process the application as an Administrative Amendment. This also does not have an application fee, and the roll coaters may be operated before the issuance of the permit. The statutory days available for this action is 60 days.

In both cases, the new roll coaters are subject to NESHP JJ, which will require a \$625 NESHP Review fee.

Please let me know how you would like to proceed. I will let you know if I have more questions as I

continue reviewing the application. Thank you.

Allen Reimer
Environmental Manager
Indiana Department of Environmental Management (IDEM)
Office of Air Quality – Permits Branch
acreimer@idem.IN.gov
317-233-0863

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