

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Bertch Cabinet Manufacturing, Inc., located at 1230 12th Street, Jesup, IA 50684 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Al Peine.
2. Bertch Cabinet Manufacturing, Inc. is a wood cabinet manufacturer. This facility consists of 15 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	25.76
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	10.79
Particulate Matter	PM	10.91
Sulfur Dioxide	SO ₂	0.92
Nitrogen Oxides	NO _x	18.57
Volatile Organic Compounds	VOC	469.03
Carbon Monoxide	CO	22.25
Lead	Lead	0.00
Hazardous Air Pollutants ⁽¹⁾	HAP	69.81

⁽¹⁾ May include the following: Formaldehyde, Methanol, Naphthalene, Cumene, Ethyl Benzene, MIKB, Toluene, Xylene, Acetaldehyde, Benzene, Acrolein, Hydrogen Chloride, Manganese compounds, Styrene and Methyl Methacrylate.

3. Bertch Cabinet Manufacturing, Inc. submitted a Title V Operating Permit renewal application on September 22, 2023 and any additional information describing the facility on November 14, 2023. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from May 9, 2024 through June 8, 2024. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Taylor Dailey at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Taylor Dailey at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.

The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Title V Permit Review Notes

Applicant:	Bertch Cabinet, LLC – Legacy Division - Jesup
SIC Code:	2434 (Wood Cabinet Manufacturing)
City:	Jesup
County:	Buchanan
EIQ#:	92-6884
Facility#:	10-02-008
Permit #:	01-TV-0034R4
Reviewer:	Taylor Dailey
Date:	4/2024

Facility Identification

Facility Name:	Bertch Cabinet, LLC – Legacy Division - Jesup
Facility Location:	1230 12 th Street, Jesup, IA 50648
Responsible Official:	Al Peine
Phone:	(319) 296-2987

Title V renewal was submitted on 9/21/2023. Facility is subject to Title V as it is a Major source for VOCs and HAPS. Facility manufactures wood cabinets and has 15 emission units with Potential to Emit (annually):

Equipment List

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
JES-001	JES-001	Wood Fired Boiler	99-A-1037-S1
JES-002	JES-002	Drying Oven	99-A-1023-S1
JES-003	JES-003	Drying Oven	99-A-1025-S1
JES-004	JES-004	Drying Oven	99-A-1027-S1
JES-005	JES-005	Spray Booth	99-A-1022-S2
JES-006	JES-006	Spray Booth	99-A-1024-S3
JES-007	JES-007	Spray Booth	99-A-1026-S3
JES-015	JES-015	Spray Booth	08-A-671
JES-016	JES-016	Spray Booth	08-A-672
JES-017	JES-017	Spray Booth	08-A-673
JES-018	JES-018	Spray Booth	08-A-674
JES-019	JES-019	Spray Booth	18-A-269
JES-020	JES-020	Spray Booth	18-A-270
JES-021	JES-021	Venjakob Spray Machine	23-A-380
JES-022	JES-022	Lab Booth	23-A-243

Insignificant Activities Equipment List

Insignificant Emission Unit	Insignificant Emission Unit Description
F1	Finish Sanding
F2	Finish Gluing
MR	Paint Mix Room

Potential to Emit

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	25.76
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Sulfur Dioxide	SO ₂	0.92
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Volatile Organic Compounds	VOC	469.03
Carbon Monoxide	CO	22.25
Lead	Lead	0.00
Hazardous Air Pollutants	HAP	69.81

Regulatory Status:

- Title V Major Source Status by Pollutant

Pollutant	Major for Title V?
PM ₁₀	<input type="checkbox"/>
SO ₂	<input type="checkbox"/>
NO _x	<input type="checkbox"/>
VOC	<input checked="" type="checkbox"/>
CO	<input type="checkbox"/>
Lead	<input type="checkbox"/>
GHG	<input type="checkbox"/>
Individual HAP	<input checked="" type="checkbox"/>
Total HAPs	<input checked="" type="checkbox"/>

Applicable Requirements:

40 CFR Part 63 Subpart JJ- National Emission Standards for Wood Furniture Manufacturing Operations

40 CFR Part 63 Subpart DDDDD

National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Historical

Project 18-211 Note that permits for JES-015 thru JES-016 included a combined limit of 82.41 tpy VOC for JES-015 thru 018, and a combined limit of 248 tpy for JES-011 thru JES-018. Since JES-019 and JES-020 replaces JES-011 thru JES-014, they would normally inherit the 248 tpy limit. However, since JES-019 and JES-020 is limited to requested 94.6 tpy, and JES-015 thru JES-018 is limited to 82.41 tpy, combined limit of $94.6 + 82.41 = 177.01$ tpy VOC, which is less than the previous 248, so supersedes it and do not need to rewrite JES-015 to JES-018.

Changes for Renewal:

EU-MR: Paint Mix Room was moved from significant to insignificant, there is no construction permit associated with this unit.

JES-021 Venkajob Spray Machine: This source is new and added to the equipment list, the associated construction permit is: 23-A-380. This unit is running four guns, each outputting 14.1 oz/min, with a dry filter as the control equipment. PM testing is required by the construction permit, with VOC and HAP recordkeeping in place. Subject to NESHAP Subpart JJ.

JES-022 Lab Booth This source is new and added to the equipment list, the associated construction permit is: 23-A-243 This unit is running one gun at 32 oz/hour, with a dry filter as the control equipment. No testing is required by the construction permit, however VOC and HAPs both have required recordkeeping. This source is subject to NESHAP Subpart JJ.