

# 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) 24.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

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

1. Bertch Cabinet Manufacturing, Inc. – Oasis Facility, located at 4714 Brookpark Road, Waterloo, IA 50407 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Al Peine.
2. Bertch Cabinet Manufacturing, Inc. – Oasis Facility is a composite sink manufacturer. This facility consists of 7 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ( $\leq 2.5 \mu\text{m}$ )	PM <sub>2.5</sub>	13.58
Particulate Matter ( $\leq 10 \mu\text{m}$ )	PM <sub>10</sub>	13.58
Particulate Matter	PM	13.58
Sulfur Dioxide	SO <sub>2</sub>	0.00
Nitrogen Oxides	NO <sub>x</sub>	0.15
Volatile Organic Compounds	VOC	246.00
Carbon Monoxide	CO	0.18
Lead	Lead	0.00
Hazardous Air Pollutants <sup>(1)</sup>	HAP	84.50

<sup>(1)</sup> May include the following: Styrene, Methyl Methacrylate and Dimethyl Phthalate.

3. Bertch Cabinet Manufacturing, Inc. – Oasis Facility submitted a Title V Operating Permit renewal application on September 18, 2024, and submitted additional information on May 6, 2025. 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 24.107.
4. DNR has complied with the procedures set forth in 567 IAC 24.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

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

1. The public comment period for the draft permit will run from June 12, 2025 through July 12, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Jeremy Arndt 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 Rayeann Archibald 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.

Jeremy Arndt  
Iowa Department of Natural Resources - Air Quality Bureau  
6200 Park Ave. Suite 200  
Des Moines, Iowa 50321  
Phone: (515) 725-9511  
E-mail: [Jeremy.Arndt@dnr.iowa.gov](mailto:Jeremy.Arndt@dnr.iowa.gov)

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

## Title V Application Review Notes

Applicant:	<b>Bertch Cabinet Manufacturing, Inc. – Oasis Facility</b>
SIC Code:	3088
City:	Waterloo
County:	Black Hawk
EQ#:	92-0712
Facility#:	07-01-086
Permit #:	03-TV-026R4
Reviewer:	Jeremy Arndt
Date:	

### **Facility Identification**

Facility Name:	Bertch Cabinet Manufacturing, Inc. – Oasis Facility
Facility Location:	4714 Brookpark Road, Waterloo, Iowa 50704
Responsible Official:	Al Peine
Phone:	(319) 296-2987

### **Background:**

Bertch Cabinet Manufacturing, Inc. – Oasis Facility has applied for a renewal of their Title V Operating Permit for their composite sink manufacturing facility located in Waterloo. The facility currently consists of seven (7) significant emission units and five (5) insignificant emission units.

This facility was determined to be separate from the other Waterloo Bertch facility in Waterloo (07-01-063) in 1991 by the construction permitting section.

### **Title V Applicability**

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

### **Program Applicability**

PSD: The facility is a synthetic minor source for PSD for VOC. The facility has a plant-wide limit of 247.00 tons/year VOC from all non-combustion emission units.

- Part 61 NESHAP: No.
- NSPS: No.
- Major Source of HAPs: Yes
- Part 63 NESHAP: Yes
  - 40 CFR 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants from Reinforced Plastic Composites Production
- Acid Rain: No.
- Stratospheric Ozone Protection: No.
- Prevention of Accidental Releases: No.

### **General Comments**

- Update General Conditions
- Update footers
- Update Permit Number
- Update Table of Contents
- EO10 changes incorporated

Resin Storage Tank (Construction Permit 16-A-506) - This emission unit is of the source category for Subpart Kb (*Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*; 40 CFR §60.110b – §60.117b). However, this emission unit is not subject because its storage capacity is less than 75 m<sup>3</sup>.

Gel Coat Oven was added to the significant list for this operating permit as is are considered an affected unit within 40 CFR 63 Subpart WWWW. Drying ovens are not specifically excluded within 40 CFR 63 Subpart WWWW NESHAP. Consequently, the Department has determined that the drying ovens are an affected source within Subpart WWWW. There will be no additional recordkeeping or proof of compliance required. Including the drying ovens as subject to Subpart WWWW does not alter or add any requirements for the facility as the entire facility is already subject to Subpart WWWW. The non-combustion VOC emissions have already been accounted for elsewhere in the paint/finishing process.

The casting machines (OAS-003 & OAS-004) have been replaced by a single, more efficient casting machine that is re-using the OAS-003 designation. Since this unit is vented internally, a construction permit was not required to replace the unit. Construction Permit 95-A-179-S1 has been rescinded.

OAS-i-11 & OAS-i-12 have been removed from the facility.

The Baghouses on EP-OAS-007 and EP-OAS-008 are subject to CAM for PM. The CAM Plan is included within the permit as Appendix A. Facility utilized stack test data for CAM calculations for most recent application. Evaluation of stack test data concluded uncontrolled emissions are still CAM applicable.

The Dry Filters on EP-OAS-001 and EP-OAS-002 are subject to Agency O&M Plan (see page 10 of the permit).