

## **PUBLIC NOTICE**

The Iowa Department of Natural Resources (DNR) is proposing to renew the Title V Operating Permit for Bertch Cabinet LLC - Waterloo. This facility is located at 4747 Crestwood Drive, Waterloo, Iowa 50704. DNR is currently reviewing an application for renewal submitted by Bertch Cabinet LLC - Waterloo to operate their existing Wood Cabinet Manufacturing/Coating facility.

Bertch Cabinet LLC - Waterloo is required to obtain a Title V Operating Permit pursuant to 567 Iowa Administrative Code (IAC) 24.101. This facility has the potential to emit the following air pollutants annually:

PM-2.5 (particulate matter 2.5 microns or less in diameter): 29.17 tons

PM-10 (particulate matter ten microns or less in diameter): 49.23 tons

Particulate Matter: 66.84 tons

Sulfur Dioxide: 1.16 tons

Nitrogen Oxides: 28.01 tons

Volatile Organic Compounds: 494.69 tons

Carbon Monoxide: 32.02 tons

Lead: 0 tons

Hazardous Air Pollutants: 269.16 tons

Based on the information provided in the Title V Operating Permit renewal application, the 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.

A copy of the Public Notice is available for public inspection at the:

Waterloo Public Library  
415 Commercial St  
Waterloo, IA 50701  
Phone: 319-291-4496

These documents are also available on the Air Quality Bureau's website at:

[www.iowadnr.gov/titlev-draft](http://www.iowadnr.gov/titlev-draft)

For additional information or for a copy of the draft permit or fact sheet contact:

Zane Peters  
Iowa Department of Natural Resources - Air Quality Bureau  
6200 Park  
Ste #200  
Des Moines, Iowa 50321  
Phone: (515) 808-0458  
E-mail: zane.peters@dnr.iowa.gov

A complete record of the permit review, including the renewal application and the draft permit, is available for public inspection Monday-Friday, 8:00 a.m. - 4:30 p.m., at the DNR address shown above.

The public comment period for the draft permit will run from March 5, 2026 through April 4, 2026. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown above. 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.

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 Zane Peters at the DNR address shown above.

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.

Individuals with disabilities or limited English proficiency are encouraged to participate in all DNR activities, including submitting public comments. If a reasonable accommodation or language services are needed to participate, contact the Air Quality Bureau staff member listed or Relay Iowa TTY Service at 800-735-7942 in advance to advise them of your specific needs. DNR's language access and disability nondiscrimination plans are available at <https://www.iowadnr.gov/about/nondiscrimination-accessibility-language-access>.

**Iowa Department of Natural Resources  
Title V Operating Permit**

**Name of Permitted Facility: Bertch Cabinet, LLC - Waterloo**  
**Facility Location: 4747 Crestwood Drive, Waterloo, Iowa 50704**  
**Air Quality Operating Permit Number: 03-TV-009R4**  
**Expiration Date:**  
**Permit Renewal Application Deadline:**

**EIQ Number: 92-0468**  
**Facility File Number: 07-01-063**

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**Responsible Official**

**Name: Darren Ericson**  
**Title: General Manager**  
**Mailing Address: PO Box 2280, Waterloo, IA 50704**  
**Phone #: 319-269-2987**

**Permit Contact Person for the Facility**

**Name: Matthew Nieswender**  
**Title: Environmental Compliance Manager**  
**Mailing Address: 4747 Crestwood Drive, Waterloo, IA 50704**  
**Phone #: 319-268-2519**

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 24, and is issued subject to the terms and conditions contained in this permit.

**For the Director of the Department of Natural Resources**

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Marnie Stein, Supervisor of Air Operating Permits Section

Date

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## Abbreviations

acfm.....	actual cubic feet per minute
CFR.....	Code of Federal Regulation
CE .....	control equipment
CEM.....	continuous emission monitor
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
EP .....	emission point
EU .....	emission unit
gr/dscf .....	grains per dry standard cubic foot
IAC.....	Iowa Administrative Code
DNR .....	Iowa Department of Natural Resources
MVAC.....	motor vehicle air conditioner
NAICS.....	North American Industry Classification System
NSPS.....	new source performance standard
ppmv .....	parts per million by volume
lb/hr.....	pounds per hour
lb/MMBtu .....	pounds per million British thermal units
SCC.....	Source Classification Codes
scfm.....	standard cubic feet per minute
SIC .....	Standard Industrial Classification
TPY.....	tons per year
USEPA.....	United States Environmental Protection Agency

### Pollutants

PM.....	particulate matter
PM <sub>10</sub> .....	particulate matter ten microns or less in diameter
PM <sub>2.5</sub> .....	particulate matter 2.5 microns or less in diameter
SO <sub>2</sub> .....	sulfur dioxide
NO <sub>x</sub> .....	nitrogen oxides
VOC .....	volatile organic compound
CO.....	carbon monoxide
HAP.....	hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: Bertch Cabinet, LLC - Waterloo

Permit Number: 03-TV-009R4

Facility Description: Wood Cabinet Manufacturing/Coating (SIC 2434)

## Equipment List

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
EP-BAT-001	EU-BAT-001	Bath Boiler	04-A-209-S2
EP-BAT-002	EU-BAT-002	Air Make-Up Unit #1	04-A-210-S1
EP-BAT-003	EU-BAT-003	Air Make-Up Unit #2	04-A-211-S1
EP-BAT-004A	EU-BAT-004	Woodworking Operations	04-A-202-S1
EP-BAT-004B			04-A-203-S1
EP-BAT-005	EU-BAT-005	Spray Booth BAT005	93-A-075-S5
EP-BAT-006	EU-BAT-006	Spray Booth BAT006	92-A-018-S5
EP-BAT-007	EU-BAT-007	Spray Booth BAT007	93-A-078-S5
EP-BAT-010	EU-BAT-010	Spray Booth	13-A-323-S2
EP-BAT-011	EU-BAT-011	Spray Booth	13-A-324-S3
EP-BAT-012	EU-BAT-012	Spray Booth	13-A-325-S3
EP-PAN-001	EU-PAN-001	Panel Mill Boiler	92-A-020-S3
EP-PAN-004	EU-PAN-004	Wood Cutting/Sanding Equipment	25-A-144
EP-PAN-005	EU-PAN-005	Wood Cutting/Sanding Equipment	25-A-145
EP-ROU-006	EU-ROU-006	Wood Cutting/Sanding Equipment	25-A-146
EP-ROU-007	EU-ROU-007	Wood Cutting/Sanding Equipment	25-A-147
EP-ROU-008	EU-ROU-008	Wood Cutting/Sanding Equipment	25-A-148
EP-FIN-001	EP-FIN-001	Finish Mill Boiler	98-A-823-S1
EP-FIN-002	EU-FIN-002	Woodworking Operations	16-A-216-S1
EP-FIN-003			16-A-217-S1
EP-FIN-004	EU-FIN-004	Woodworking Operations	16-A-218-S1
EP-FIN-005			16-A-219-S1
EP-FIN-006	EU-FIN-006		16-A-220-S1
EP-PLY-001	EU-PLY-001	Plywood Mill Boiler	96-A-106-S3
EP-PLY-006	EU-PLY-006	Woodworking Operations	25-A-213
EP-PLY-007	EU-PLY-007		25-A-214
EP-CUS-002	EU-CUS-002	Steam Heated Drying Oven	98-A-824-S1
EP-CUS-003	EU-CUS-003	Spray Booth CUS003	92-A-004-S2
EP-CUS-004	EU-CUS-004	Spray Booth CUS004	92-A-005-S4
EP-CUS-005	EU-CUS-005	Spray Booth CUS005	92-A-006-S4
EP-CUS-006	EU-CUS-006	Spray Booth CUS006	96-A-1132-S5
EP-CUS-007	EU-CUS-007	Spray Booth CUS007	98-A-821-S3
EP-ROU-001	EU-ROU-001	Rough Mill Boiler	87-A-046-S3

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**Equipment List (continued)**

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<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>DNR Construction Permit Number</b>
EP-TIM-001	EU-TIM-001	Timbergate Boiler	88-A-223-S6
BAT-i-001	BAT-i-001	Steam Heated Oven #1	-
BAT-i-002	BAT-i-002	Steam Heated Oven #2	-
BAT-i-003	BAT-i-003	Steam Heated Oven #3	-
BAT-i-008	BAT-i-008	Natural Gas Drying Oven	-
CUS-i-001	CUS-i-001	Natural Gas Fired Oven #1	-
CUS-i-002	CUS-i-002	Natural Gas Fired Oven #2	-
CUS-i-003	CUS-i-003	Natural Gas Fired Oven #3	-
CUS-i-006	CUS-i-006	Drum Storage	-
CUS-i-007	CUS-i-007	Drum Storage	-

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**Insignificant Activities Equipment List**

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<b>Insignificant Emission Unit Number</b>	<b>Insignificant Emission Unit Description</b>
BAT-i-004	Natural Gas Fired Air Make-Up Unit
BAT-i-005	Natural Gas Fired Air Make-Up Unit
BAT-i-006	Natural Gas Fired Air Make-Up Unit
BAT-i-007	Woodworking Operations (vents internally)
FIN-i-001	Natural Gas Fired Air Make-Up Unit
FIN-i-002	Natural Gas Fired Air Make-Up Unit
CUS-i-004	Natural Gas Fired Air Make-Up Unit
CUS-i-005	Natural Gas Fired Air Make-Up Unit
CUS-i-008	Woodworking Operations (vents internally)
PAN-i-001	Ash Dumpster
PAN-i-002	Woodworking Operations (vents internally)
PAR-i-001	Natural Gas Space Heater

## II. Plant-Wide Conditions

Facility Name: Bertch Cabinet, LLC - Waterloo  
Permit Number: 03-TV-009R4

Permit conditions are established in accord with 567 Iowa Administrative Code rule 24.108. When 567 IAC as amended May 15, 2024, and cited in this permit becomes State Implementation Plan (SIP) approved, it will supersede 567 IAC as amended February 8, 2023. Prior to May 15, 2024, all Title V rule citations in this Title V permit were found and cited in 567 IAC Chapter 22. During the period from May 15, 2024, to the date that 567 IAC as amended May 15, 2024, is approved into the SIP, both 567 IAC as amended May 15, 2024 and 567 IAC as amended February 8, 2023 form the legal basis for the applicable requirements included in this permit. A crosswalk showing the citation changes is attached to this permit in Appendix C.

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### Permit Duration

The term of this permit is: 5 Years  
Commencing on:  
Ending on:

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 24.110 - 24.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 24.115.

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### Emission Limits

*Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:*

Opacity (visible emissions): 40% opacity  
Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume  
Authority for Requirement: 567 IAC 23.3(3)"e"

### Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed on or after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or

amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).  
Authority for Requirement: 567 IAC 23.3(2)"a"

Fugitive Dust: Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizer or limestone.
4. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.
6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

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## **NSPS and NESHAP Applicability**

### **40 CFR 60 Subpart A**

This facility is subject to Standards of Performance for New Stationary Sources – General Provisions. The affected unit is EU PAN-001. Appendix B for link to Standard.

Authority for Requirement: 40 CFR 60 Subpart A  
567 IAC 23.1(2)

#### **40 CFR 60 Subpart Dc**

This facility is subject to Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The affected unit is EU PAN-001. See Appendix B for link to Standard.

Authority for Requirement: 40 CFR 60 Subpart Dc  
567 IAC 23.1(2)"III"

#### **40 CFR 63 Subpart A**

This facility is subject to National Emission Standards for Hazardous Air Pollutants – General Provisions. The affected units are EUs BAT-001, BAT-005 – 0012, PAN-001, FIN-001, PLY-001, CUS-002 – 007, ROU-001, TIM-001, TIM-003 – 008, BAT-i-001 – 003, BAT-i-008, CUS-i-001 - 003, CUS-i-006, and CUS-i-007.. See Appendix B for link to Standard.

Authority for Requirement: 40 CFR 63 Subpart A  
567 IAC 23.1(4)"a"

#### **40 CFR 63 Subpart DDDDD**

This facility is subject to National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters. The affected units are EUs BAT-001, PAN-001, FIN-001, PLY-001, ROU-001 and TIM-001. See Appendix B for link to Standard.

Authority for Requirement: 40 CFR 63 Subpart DDDDD

#### **40 CFR 63 Subpart JJ**

This facility is subject to National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations. The affect units are EUs BAT-005 – 0012, CUS-002 – 007, TIM-003 – 008, BAT-i-001 – 003, BAT-i-008, CUS-i-001 - 003, CUS-i-006, and CUS-i-007. See Appendix B for link to Standard.

Authority for Requirement: 40 CFR 63 Subpart JJ  
567 IAC 23.1(4)"aj"

### III. Emission Point-Specific Conditions

Facility Name: Bertch Cabinet Manufacturing  
 Permit Number: **03-TV-009R4**

#### Emission Point ID Number: EP-BAT-001

#### Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-BAT-001	Bath Boiler	CE BAT-001 (Multiclone)	Wood	7.0 MMBtu/hr; Maximum fuel consumption rate: 1,029.41 pounds/hr	04-A-209-S2

#### Applicable Requirements

##### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 04-A-209-S2  
 567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 2.70 lb/hr

Authority for Requirement: DNR Construction Permit 04-A-209-S2

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 04-A-209-S2  
 567 IAC 23.3(2)"b"(2)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 6.0 lb/MMBtu

Authority for Requirement: DNR Construction Permit 04-A-209-S2  
 567 IAC 23.3(3)"a"(3)

**NESHAP Applicability**

The Bath Boiler (EU-BAT-001) is subject to 40 CFR Part 63 Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*.

Authority for Requirement: DNR Construction Permit 04-A-209-S2  
40 CFR 63 Subpart DDDDD

**Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

Operating Limits:

- A. The Bath Boiler (EU-BAT-001) shall fire on dry wood residue only.
- B. The amount of wood combusted by the Bath Boiler (EU-BAT-001) shall not exceed 901,764 pounds per twelve (12) month rolling period.
- C. The owner or operator shall inspect and maintain the multiclone (CE-BAT-001) according to the facility’s (Plant No. 07-01-063) operation and maintenance plan.

Reporting & Recordkeeping:

- A. By the end of the following month, the owner or operator shall record the amount of wood, in pounds, combusted by the Bath Boiler (EU-BAT-001) over the previous month and over the previous twelve (12) months.
- B. The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment. This log shall include, but is not limited to:
  - The date and time any inspection and/or maintenance was performed on the control equipment;
  - Any issues identified during the inspection;
  - Any issues addressed during the maintenance activities; and
  - Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 04-A-209-S2

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

- Stack Height, (ft, from the ground): 40
- Stack Opening, (inches, dia.): 16
- Exhaust Flow Rate (scfm): 7,270
- Exhaust Temperature (°F): 482
- Discharge Style: Vertical, Unobstructed
- Authority for Requirement: DNR Construction Permit 04-A-209-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operation & Maintenance Plan Required?**                      Yes  No
- Facility Maintained Operation & Maintenance Plan Required?**                      Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

## Emission Point ID Number: EP-BAT-002 (Inside Venting)

### Associated Equipment

<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EU-BAT-002	Air Make-Up Unit #1	NA	Natural Gas	5.3 MMBtu/hr	04-A-210-S1

### Applicable Requirements

#### **Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 04-A-210-S1  
567 IAC 23.3(2)"d"

<sup>(1)</sup> The presence of visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.04 lb/hr

Authority for Requirement: DNR Construction Permit 04-A-210-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.04 lb/hr, 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 04-A-210-S1  
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: DNR Construction Permit 04-A-210-S1  
567 IAC 23.3(3)"e"

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Exhaust Flow Rate (scfm): 45,000

Exhaust Temperature (°F): 90

Authority for Requirement: DNR Construction Permit 04-A-210-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: EP-BAT-003 (Inside Venting)**

Associated Equipment

<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EU-BAT-003	Air Make-Up Unit #2	NA	Natural Gas	8.5 MMBtu/hr	04-A-211-S1

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 04-A-211-S1  
567 IAC 23.3(2)"d"

<sup>(1)</sup> The presence of visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.06 lb/hr

Authority for Requirement: DNR Construction Permit 04-A-211-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.06 lb/hr, 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 04-A-211-S1  
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: DNR Construction Permit 04-A-211-S1  
567 IAC 23.3(3)"e"

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Exhaust Flow Rate (scfm): 45,000

Exhaust Temperature (°F): 90

Authority for Requirement: DNR Construction Permit 04-A-211-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Numbers: EP-BAT-004A & EP-BAT-004B**

Associated Equipment

<b>Emission Point</b>	<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EP-BAT-004A	EU-BAT-004	Woodworking	CE BAT-004 (Baghouse)	Wood	3,030 cabinet equivalents/week	04-A-202-S1
EP-BAT-004B						04-A-203-S1

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permits 04-A-202-S1 & 04-A-203-S1  
567 IAC 23.3(2)"d"

<sup>(1)</sup> The presence of visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.40 lb/hr

Authority for Requirement: DNR Construction Permits 04-A-202-S1 & 04-A-203-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.003 gr/dscf

Authority for Requirement: DNR Construction Permits 04-A-202-S1 & 04-A-203-S1

**Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

Operating Limits:

A. All control equipment shall be maintained according to the manufacturer’s specifications.

Reporting & Recordkeeping:

A. The owner or operator shall maintain a record of all inspections of the control equipment.

The owner or operator shall document the results of the inspections and note any repairs that were the result of the inspections.

Authority for Requirement: DNR Construction Permits 04A-202-S1 & 04-A-203-S1

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 11

Stack Opening, (inches, dia.): 36

Exhaust Flow Rate (scfm): 35,000

Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permits 04-A-202-S1 & 04-A-203-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

*Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.*

*The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.*

*Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.*

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Numbers: EP-BAT-005, EP-BAT-006, EP-BAT-007**

Associated Equipment

<b>Emission Point</b>	<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EP-BAT-005	EU-BAT-005	Spray Booth BAT005	CE BAT-005 (Dry Filter)	Coating	2176 lb/hr	93-A-075-S5
EP-BAT-006	EU-BAT-006	Spray Booth BAT006	CE BAT-006 (Dry Filter)	Coating	2176 lb/hr	92-A-018-S5
EP-BAT-007	EU-BAT-007	Spray Booth BAT007	CE BAT-007 (Dry Filter)	Coating	2176 lb/hr	93-A-078-S5

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

<b>EP</b>	<b>Opacity</b>	<b>PM<sub>10</sub></b>	<b>PM</b>	<b>Volatile Organic Compounds (VOCs)</b>	<b>Authority for Requirement</b>
EP-BAT-005	40% <sup>(1)</sup>	0.375 lb/hr	0.0024 gr/dscf	130.7 tons/yr	93-A-075-S5, 567 IAC 23.3(2)"d"
EP-BAT-006	40% <sup>(1)</sup>	0.78 lb/hr	0.005 gr/dscf		92-A-018-S5, 567 IAC 23.3(2)"d"
EP-BAT-007	40% <sup>(1)</sup>	0.375 lb/hr	0.0024 gr/dscf		93-A-078-S5, 567 IAC 23.3(2)"d"

<sup>(1)</sup> The presence of visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

**NESHAP Applicability**

These emission units are subject to 40 CFR 63 Subpart A - National Emission Standards for Hazardous Air Pollutants for Source Categories - General Provisions and 40 CFR 63 Subpart JJ – National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations.

Authority for Requirement: DNR Construction Permits 93-A-075-S5, 92-A-018-S5, 93-A-078-S5  
 40 CFR 63 Subpart A  
 567 IAC 23.1(4)  
 40 CFR 63 Subpart JJ  
 567 IAC 23.1(4)"aj"

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

#### Operating Limits:

- A. All control equipment shall be maintained according to the manufacturer's specifications.
- B. Total VOC emissions from the spraying operations of Spray Booth BAT005, Spray Booth BAT006 and Spray Booth BAT007, combined, shall not exceed 130.7 tons per twelve-month period. For this permit, spraying operations includes any paint, thinner, stain, solvent, etc. that is used with a surface coating activity.
- C. The owner or operator shall abide by all operating limits specified in NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.

#### Reporting & Recordkeeping:

- A. The owner or operator shall maintain a record of all inspections of the control equipment. The owner or operator shall document the results of the inspections and note any repairs that were the result of the inspections.
- B. The owner or operator shall maintain monthly records that show the identity, quantity and VOC content of each VOC containing material used in the spraying operations of Spray Booth BAT005, Spray Booth BAT006 and Spray Booth BAT007, combined.
- C. The owner or operator shall record the VOC emissions from all the spraying operations of Spray Booth BAT005, Spray Booth BAT006 and Spray Booth BAT007, combined, each month. The owner or operator shall calculate a rolling 12-month total for VOC emissions from all the spraying operations of Spray Booth BAT005, Spray Booth BAT006 and Spray Booth BAT007, combined.
- D. For the purpose of calculating monthly emissions for all the spraying operations of Spray Booth BAT005, Spray Booth BAT006 and Spray Booth BAT007, combined, all VOC containing materials shall be considered emitted on the day they are delivered to the plant.
- E. The owner or operator shall maintain all recordkeeping requirements of NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.

Authority for Requirement: DNR Construction Permits 93-A-075-S5, 92-A-018-S5,  
93-A-078-S5

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

<b>Emission Point</b>	<b>Stack Height, (ft, from the ground)</b>	<b>Stack Opening, (inches, dia.)</b>	<b>Exhaust Flow Rate (scfm)</b>	<b>Exhaust Temperature (°F)</b>	<b>Discharge Style</b>	<b>Authority for Requirement</b>
EP-BAT-005	37.3	32	18,200	Ambient	Vertical Unobstructed	93-A-075-S5
EP-BAT-006	34	32	18,200	Ambient	Vertical Unobstructed	92-A-018-S5
EP-BAT-007	30	32	18,200	Ambient	Vertical Unobstructed	93-A-078-S5

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

**Agency O&M Required for CE BAT-005, CE BAT-006, & CE BAT-007**

Relevant requirements of O & M plan for this equipment:

1. Weekly
  - Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
  - Maintain a written record of the observation and any action resulting from the inspection.
2. Record Keeping & Reporting
  - Maintenance and inspection records will be kept for five years and available upon request.
3. Quality Control
  - The filter equipment will be operated and maintained according to the manufacturer’s recommendations.

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Numbers: EP-BAT-010, EP-BAT-011, EP-BAT-012**

Associated Equipment

<b>Emission Point</b>	<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EP-BAT-010	EU-BAT-010	Spray Booth	CE BAT-010 (Dry Filter)	Stain and Sealer	2.45 gal/hr	13-A-323-S2
EP-BAT-011	EU-BAT-011	Spray Booth	CE BAT-011: (Dry Filter)	Stain and Sealer	8.35 gal/hr	13-A-324-S3
EP-BAT-012	EU-BAT-012	Spray Booth	CE BAT-012: (Dry Filter)	Coating	8.35 gal/hr	13-A-325-S3

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

<b>EP</b>	<b>Opacity</b>	<b>PM<sub>10</sub></b>	<b>PM</b>	<b>Volatile Organic Compounds (VOCs)</b>	<b>Authority for Requirement</b>
EP-BAT-010	40% <sup>(1)</sup>	0.0188 lb/hr	0.01 gr/dscf	94.3 tons/yr	13-A-323-S2, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)
EP-BAT-011	40% <sup>(1)</sup>	0.063 lb/hr	0.01 gr/dscf		13-A-324-S3, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)
EP-BAT-012	40% <sup>(1)</sup>	0.065 lb/hr	0.01 gr/dscf		13-A-325-S3, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)

<sup>(1)</sup>An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

### **NESHAP Applicability**

These emission units are subject to 40 CFR 63 Subpart A - National Emission Standards for Hazardous Air Pollutants for Source Categories - General Provisions and 40 CFR 63 Subpart JJ – National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations.

Authority for Requirement: DNR Construction Permits 13-A-323-S2, 13-A-324-S3,  
13-A-325-S3  
40 CFR 63 Subpart A  
567 IAC 23.1(4)  
40 CFR 63 Subpart JJ  
567 IAC 23.1(4)"aj"

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

- A. All control equipment shall be maintained according to the manufacturer's specifications.
  1. The owner or operator shall maintain a record of all inspections of the control equipment. The owner or operator shall document the results of the inspections and note any repairs that were made as a result of the inspections.
- B. This booth is limited to the spray application of stain and sealer only (this limit applies to EU BAT-010 and BAT-011 only).
- C. Total VOC emissions from emission units EU BAT-010, BAT-011 and BAT-012 (Manually Operated Spray Booths) shall not exceed 94.3 tons per twelve-month rolling period. For this permit, spraying operations includes any paint, thinner, stain, solvent, etc. that is used with a surface coating activity.
  - (1) The owner or operator shall record the VOC content for each surface coating material and solvent used in emission units EU BAT-010, BAT-011 and BAT-012 (Manually Operated Spray Booths).
  - (2) The owner or operator shall record daily the amount of each surface coating material and solvent used in emission units EU BAT-010, BAT-011 and BAT-012 (Manually Operated Spray Booths). Calculate and record 12-month rolling totals. For the purposes of recording daily surface coating material and solvent usage, the facility may assume all materials are used the day the materials are delivered to the facility.
  - (3) The owner or operator shall calculate the VOC emissions from emission units EU BAT-010, BAT-011 and BAT-012 (Manually Operated Spray Booths) on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 75 TPY. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted from emission units EU BAT-010, BAT-011 and BAT-012 (Manually Operated Spray Booths). Calculation requirements will revert back to a monthly basis if the 12-month rolling total of VOC is returned to below 75 TPY.

- (4) Retain Material Safety Data Sheets (MSDS) for all surface coating materials and solvents used in Spray Booth BAT-012.
- D. The owner or operator shall abide by all operating limits specified in NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.
  1. The owner or operator shall maintain all recordkeeping requirements of NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.

Authority for Requirement: DNR Construction Permit 13-A-323-S2, 13-A-324-S3, 13-A-325-S3

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 30

Stack Opening, (inches, dia.): 36

Exhaust Flow Rate (scfm): 15,400

Exhaust Temperature (°F): 60-100

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permits 13-A-323-S2, 13-A-324-S3, 13-A-325-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Agency O&M Required for CE BAT-010, CE BAT-011, & CE BAT-012

Relevant requirements of O & M plan for this equipment:

1. Weekly
  - Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
  - Maintain a written record of the observation and any action resulting from the inspection.
2. Record Keeping & Reporting
  - Maintenance and inspection records will be kept for five years and available upon request.
3. Quality Control
  - The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 24.108(3)

## Emission Point ID Number: EP-PAN-001

### Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-PAN-001	Panel Mill Boiler	CE PAN-001 (Multiclone)	Wood	27.4 MMBtu/hr; Maximum fuel consumption rate: 4,029.41 pounds/hr	92-A-020-S3

### Applicable Requirements

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 92-A-020-S3  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 16.44 lb/hr

Authority for Requirement: DNR Construction Permit 92-A-020-S3

Pollutant: Particulate Matter (PM)

Emission Limit(s): 16.44 lb/hr, 0.6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 92-A-020-S3  
567 IAC 23.3(2)"b"(2)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 92-A-020-S3  
567 IAC 23.3(3)"a"(3)

### **NSPS and NESHAP Applicability**

The Panel Mill Boiler (EU-PAN-001) is subject to 40 CFR 60 Subpart A - *Standards of Performance for New Stationary Sources - General Provisions* and Subpart Dc – *Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units*.

Authority for Requirement: DNR Construction Permit 92-A-020-S3  
40 CFR 60 Subpart A  
567 IAC 23.1(2)  
40 CFR 60 Subpart Dc  
567 IAC 23.1(2)"III"  
40 CFR 63 Subpart DDDDD

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

#### Operating Limits:

- A. The Panel Mill Boiler (EU-PAN-001) shall fire on dry wood residue only.
- B. The amount of wood combusted by the Panel Mill Boiler (EU-PAN-001) shall not exceed 3,529,764 pounds per twelve (12) month rolling period.
- C. The owner or operator shall inspect and maintain the multiclone (CE-PAN-001) according to the facility's (Plant No. 07-01-063) operation and maintenance plan.
- D. The owner or operator shall comply with the applicable requirements in 40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* [§60.40c - §60.48c].

#### Operating Condition Monitoring and Recordkeeping:

- A. By the end of the following month, the owner or operator shall record the amount of wood, in pounds, combusted by the Panel Mill Boiler (EU-PAN-001) over the previous month and over the previous twelve (12) months.
- B. The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment. This log shall include, but is not limited to:
  - The date and time any inspection and/or maintenance was performed on the control equipment;
  - Any issues identified during the inspection;
  - Any issues addressed during the maintenance activities; and
  - Identification of the staff member performing the maintenance or inspection.
- C. The owner or operator shall comply with the reporting and recordkeeping requirements as outlined in 40 CFR §60.48c, including, but not limited to the following:
  - Per 40 CFR §60.48c(g)(1), the owner or operator shall record and maintain records of the amount of each fuel combusted during each operating day; or
  - Per 40 CFR §60.48c(g)(2), record and maintain records of the amount of each fuel combusted during each calendar month; or
  - Per 40 CFR §60.48c(g)(3), record and maintain records of the total amount of

each steam generating unit fuel delivered to the property during each calendar month.

Authority for Requirement: DNR Construction Permit 92-A-020-S3

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 75

Stack Opening, (inches, dia.): 31

Exhaust Flow Rate (scfm): 9,680

Exhaust Temperature (°F): 500

Discharge Style: Vertical, Unobstructed

Authority for Requirement: DNR Construction Permit 92-A-020-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

*Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.*

*The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.*

*Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.*

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: EP-PAN-004, EP-PAN-005, EP-ROU-006,  
EP-ROU-007, EP-ROU-008**

Associated Equipment

<b>Emission Point</b>	<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
PAN-004	PAN-004	Wood Cutting/Sanding	2 Baghouses (CE-PAN-002 and CE-PAN-003)	Cabinets	115 cabinets/hr	25-A-144
PAN-005	PAN-005	Wood Cutting/Sanding	Baghouse (CE-PAN-005)		2,981,100 ft <sup>3</sup> /hr	25-A-145
ROU-006	ROU-006	Wood Cutting/Sanding	2 Baghouses (CE-ROU-002 and CE-ROU-003)		1,020 board ft <sup>2</sup> /hr	25-A-146
ROU-007	ROU-007	Wood Cutting/Sanding	Baghouse (CE-ROU-007)		3,834,922 ft <sup>3</sup> /hr	25-A-147
ROU-008	ROU-008	Wood Cutting/Sanding	Baghouse (CE-ROU-008)		3,937,952 ft <sup>3</sup> /hr	25-A-148

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

For EP-PAN-004 & EP-ROU-006

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permits 25-A-144 & 25-A-146  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 1.09 lb/hr

Authority for Requirement: DNR Construction Permits 25-A-144 & 25-A-146

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 2.4 lb/hr

Authority for Requirement: DNR Construction Permits 25-A-144 & 25-A-146

Pollutant: Particulate Matter (PM)

Emission Limit(s): 2.4 lb/hr, 0.1 gr/dscf

Authority for Requirement: DNR Construction Permits 25-A-144 & 25-A-146  
567 IAC 23.3(2)"a"

For EP-PAN-005, EP-ROU-007 & EP-ROU-008

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permits 25-A-145, 25-A-147, & 25-A-148  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.99 lb/hr

Authority for Requirement: DNR Construction Permits 25-A-145, 25-A-147, & 25-A-148

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 2.1 lb/hr

Authority for Requirement: DNR Construction Permits 25-A-145, 25-A-147, & 25-A-148

Pollutant: Particulate Matter (PM)

Emission Limit(s): 2.1 lb/hr, 0.1 gr/dscf

Authority for Requirement: DNR Construction Permits 25-A-145, 25-A-147, & 25-A-148  
567 IAC 23.3(2)"a"

**Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

- A. The following emission points shall have a maximum number of woodworking tools as follows:

EP	Max Number Sanding Operations	Max Number Sawing or Milling and Routing Operations	Max Airflow (SCFM) for combined pickup points
PAN-004	3	22	80,000
PAN-005	3	25	70,000
ROU-006	0	26	80,000
ROU-007	4	35	70,000
ROU-008	5	31	70,000

- (1) The owner or operator shall maintain updated records of the total number and type of woodworking machines, associated air volume for each pickup point, and total air volume for each emission point.
- (2) The owner or operator shall establish an operational and maintenance plan to ensure the total air volume is maintained below the associated maximum air

volume per emission point. The owner or operator shall make the plan available for inspection and maintain all records required by the plan.

- (3) The owner or operator shall operate all woodworking machines in the manner normally used during the plant's highest production rate during any required stack test.
- B. The owner or operator shall check daily for visible emissions from each emission point. The check is not required on the days the equipment is not in use or the stack is venting inside.
- (1) The owner or operator shall keep a log of the visibility results for each emission point. If visible emissions are noted, the log shall also include the corrections made to the units involved.
  - (2) The owner or operator shall record the days any emission point vents indoors.
- C. The owner or operator shall operate, inspect, and maintain each baghouse according to the manufacturer's specifications and instructions.
- (1) The owner or operator shall keep a log of all maintenance and inspection activities performed on each baghouse. At a minimum, the log shall include the following:
    - a. The date that any inspection and/or maintenance was performed on each baghouse.
    - b. Any issues identified during inspection and maintenance activities
    - c. The date each issue was resolved; and
    - d. Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148

### **Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

<b>EP ID</b>	<b>Stack Height (feet)</b>	<b>Discharge Style <sup>1</sup></b>	<b>Stack Opening (inches)</b>	<b>Stack Temperature (°F)</b>	<b>Exhaust Flowrate (scfm)</b>
PAN-004	37	Vertical unobstructed	60 x 61	70	80,000
PAN-005	37	Vertical unobstructed	60 x 61	70	70,000
ROU-006	37	Vertical unobstructed	60 x 61	70	80,000
ROU-007	37	Vertical unobstructed	60 x 61	70	70,000
ROU-008	37	Vertical unobstructed	60 x 61	70	70,000

<sup>1</sup> The stack is also allowed to be vented indoors.

Authority for Requirement: DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

### **Stack Testing:**

Pollutant – Particulate Matter (PM<sub>2.5</sub>)

Stack Test to be Completed by (date) – <sup>(1)</sup><sup>(2)</sup>

Test Method - 40 CFR 51, Appendix M, 201A with 202

Authority for Requirement: DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148

Pollutant - Particulate Matter (PM<sub>10</sub>)

Stack Test to be Completed by (date) - <sup>(1)</sup><sup>(2)</sup>

Test Method - 40 CFR 51, Appendix M, 201A with 202

Authority for Requirement: DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148

Pollutant - Particulate Matter (PM)

Stack Test to be Completed by (date) - <sup>(1)</sup><sup>(2)</sup>

Test Method - 40 CFR 60, Appendix A, Method 5

40 CFR 51, Appendix M, Method 202

Authority for Requirement: DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148

- <sup>(1)</sup> Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- <sup>(2)</sup> The owner or operator shall either conduct representative initial compliance testing for EP PAN-004, EP PAN-005, EP ROU-006, EP ROU-007 or EP ROU-008, or conduct initial compliance testing on all five (5) emission points. If the owner or operator decides to conduct representative initial compliance testing, it shall conduct testing on one (1) of the following emission points: EP PAN-004, EP PAN-005, EP ROU-006, EP ROU-007 or EP ROU-008. The initial compliance test results from that test shall be considered representative for the other listed emission points. If the tested emission point indicates non-compliance, the facility will be considered in violation of the emission limits set for the other emission points, or they may be tested independently to verify compliance.

*The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)*

**Agency Approved Operation & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No   
For EP-PAN-004, EP-PAN-005, EP-ROU-006

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No   
For EP-ROU-007, EP-ROU-008

*Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.*

*The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.*

*Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.*

Authority for Requirement: 567 IAC 24.108(3)

## Emission Point ID Number: EP-FIN-001

### Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-FIN-001	Finish Mill Boiler	CE FIN-001 (Multiclone)	Wood	5.6 MMBtu/hr; Maximum fuel consumption rate: 823.53 pounds/hr	98-A-823-S1

### Applicable Requirements

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 98-A-823-S1  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 25% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 1.6 lb/hr

Authority for Requirement: DNR Construction Permit 98-A-823-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 98-A-823-S1  
567 IAC 23.3(2)"b"(2)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 98-A-823-S1  
567 IAC 23.3(3)"a"(3)

#### NESHAP Applicability

The Finish Mill Boiler (EU-FIN-001) is subject to 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*.

Authority for Requirement: DNR Construction Permit 98-A-823-S1  
40 CFR 63 Subpart DDDDD

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

#### Operating Limits:

- A. The Finish Mill Boiler (EU-FIN-001) shall fire on dry wood residue only.
- B. The amount of wood combusted by the Finish Mill Boiler (EU-FIN-001) shall not exceed 721,411 pounds per twelve (12) month rolling period.
- C. The owner or operator shall inspect and maintain the multiclone (CE-FIN-001) according to the facility's (Plant No. 07-01-063) operation and maintenance plan.

#### Operating Condition Monitoring and Recordkeeping

- A. By the end of the following month, the owner or operator shall record the amount of wood, in pounds, combusted by the Finish Mill Boiler (EU-FIN-001) over the previous month and over the previous twelve (12) months.
- B. The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment. This log shall include, but is not limited to:
  - The date and time any inspection and/or maintenance was performed on the control equipment;
  - Any issues identified during the inspection;
  - Any issues addressed during the maintenance activities; and
  - Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 98-A-823-S1

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 50

Stack Opening, (inches, dia.): 20

Exhaust Flow Rate (scfm): 1,400

Exhaust Temperature (°F): 425

Discharge Style: Vertical, Unobstructed

Authority for Requirement: DNR Construction Permit 98-A-823-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Numbers: EP-FIN-002, EP-FIN-003, EP-FIN-004,  
EP-FIN-005, EP-FIN-006**

Associated Equipment

<b>Emission Point</b>	<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EP-FIN-002	EU-FIN-002	Woodworking Operations (shaving/chipping/fine sawing/sanding)	Cartridge Filters (CE-FIN-002)	Wood	1,575,573 ft <sup>3</sup> sawdust/hr	16-A-216-S1
EP-FIN-003						16-A-217-S1
EP-FIN-004	EU-FIN-004	Woodworking Operations (shaving/chipping/fine sawing/sanding)	Cartridge Filters (CE-FIN-004)		563,507 ft <sup>3</sup> sawdust/hr	16-A-218-S1
EP-FIN-005						16-A-219-S1
EP-FIN-006	EU-FIN-006	Woodworking Operations (shaving/chipping/sanding)	Cartridge Filters (CE-FIN-006)		1,011,885 ft <sup>3</sup> sawdust/hr	16-A-220-S1

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permits 16-A-216-S1, 16-A-217-S1, 16-A-218-S1, 16-A-219-S1, 16-A-220-S1  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of no 'visible emissions' will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.65 lb/hr, 0.1 gr/dscf

Authority for Requirement: DNR Construction Permits 16-A-216-S1, 16-A-217-S1, 16-A-218-S1, 16-A-219-S1, 16-A-220-S1  
567 IAC 23.3(2)"a"

### **Operating Requirements with Associated Monitoring and Recordkeeping**

All records as required by these permits shall be available on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:

- D. The owner or operator shall operate and maintain the Cartridge Filters (CE-FIN-002, CE-FIN-004, and CE-FIN-006) according to the manufacturer's specifications. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the Cartridge Filters (CE-FIN-002, CE-FIN-004, and CE-FIN-006). This log shall include, but is not necessarily limited to:
  - a. The date and time any inspection and/or maintenance was performed on the Cartridge Filters (CE-FIN-002, CE-FIN-004, and CE-FIN-006);
  - b. Any issues identified during the inspection and the date each issue was resolved;
  - c. Any issues identified during the maintenance activities and the date each issue was resolved; And,
  - d. Identification of the staff member performing the maintenance or inspection.
- E. The owner or operator shall maintain an equipment list for each part of the process in the woodworking operations line (EU-FIN-002, EU-FIN-004, and EU-FIN-006). The equipment list shall include a description of the equipment, the type of equipment (sander or other), and the maximum design capacity of the equipment, in cubic feet of sawdust generated per hour. The combined maximum design capacity of all equipment listed in EU-FIN-002 is limited to 1,575,573 cubic feet per hour. The combined maximum design capacity of all equipment listed in EU-FIN-004 is limited to 536,507 cubic feet per hour. The combined maximum design capacity of all equipment listed in EU-FIN-006 is limited to 1,011,885 cubic feet per hour.

Authority for Requirement: DNR Construction Permits 16-A-216-S1, 16-A-217-S1, 16-A-218-S1, 16-A-219-S1, 16-A-220-S1

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 16

Stack Opening, (inches): 47.04 x 47.04

Exhaust Flow Rate (scfm): 40,000

Exhaust Temperature (°F): 70

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permits 16-A-216-S1, 16-A-217-S1, 16-A-218-S1, 16-A-219-S1, 16-A-220-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

*Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.*

*The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.*

*Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.*

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: EP-PLY-001**

Associated Equipment

<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EU-PLY-001	Plywood Mill Boiler	CE PLY-001 (Multiclone)	Wood	5 MMBtu/hr; Maximum fuel consumption rate: 735.29 pounds/hr	96-A-106-S3

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 96-A-106-S3  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 1.50 lb/hr

Authority for Requirement: DNR Construction Permit 96-A-106-S3

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 96-A-106-S3  
567 IAC 23.3(2)"b"(2)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 96-A-106-S3  
567 IAC 23.3(3)"a"(3)

**NESHAP Applicability**

The Plywood Mill Boiler (EU-PLY-001) is subject to 40 CFR Part 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

Authority for Requirement: DNR Construction Permit 96-A-106-S3  
40 CFR 63 Subpart DDDDD

**Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

Operating Limits:

- A. The Plywood Mill Boiler (EU-PLY-001) shall fire on dry wood residue only.
- B. The amount of wood combusted by the Plywood Mill Boiler (EU-PLY-001) shall not exceed 644,117 pounds per twelve (12) month rolling period.
- C. The owner or operator shall inspect and maintain the multiclone (CE-PLY-001) according to the facility’s (Plant No. 07-01-063) operation and maintenance plan.

Operating Condition Monitoring and Recordkeeping:

- A. By the end of the following month, the owner or operator shall record the amount of wood, in pounds, combusted by the Plywood Mill Boiler (EU-PLY-001) over the previous month and over the previous twelve (12) months.
- B. The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment. This log shall include, but is not limited to:
  - The date and time any inspection and/or maintenance was performed on the control equipment;
  - Any issues identified during the inspection;
  - Any issues addressed during the maintenance activities; and
  - Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 96-A-106-S3

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

- Stack Height, (ft, from the ground): 45
- Stack Opening, (inches, dia.): 15
- Exhaust Flow Rate (scfm): 3,460
- Exhaust Temperature (°F): 425
- Discharge Style: Unobstructed Vertical
- Authority for Requirement: DNR Construction Permit 96-A-106-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operation & Maintenance Plan Required?**                      Yes  No
- Facility Maintained Operation & Maintenance Plan Required?**                      Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?**                      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Numbers: EP-PLY-006, EP-PLY-007**

Associated Equipment

<b>Emission Point</b>	<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EP-PLY-006	EU-PLY-006	Woodworking Operations	CE PLY-006 (Baghouse)	Wood	70 plywood sheets/hr	25-A-213
EP-PLY-007	EU-PLY-007		CE PLY-007 (Baghouse)		70 plywood sheets/hr	25-A-214

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

For EP-PLY-006

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 25-A-213  
IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 1.25 lb/hr

Authority for Requirement: DNR Construction Permit 25-A-213

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 2.7 lb/hr

Authority for Requirement: DNR Construction Permit 25-A-213

Pollutant: Particulate Matter (PM)

Emission Limit(s): 2.7 lb/hr, 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 25-A-213  
567 IAC 23.3(2)"a"

For EP-PLY-007

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 25-A-214  
IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.85 lb/hr

Authority for Requirement: DNR Construction Permit 25-A-214

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 1.83 lb/hr

Authority for Requirement: DNR Construction Permit 25-A-214

Pollutant: Particulate Matter (PM)

Emission Limit(s): 1.83 lb/hr, 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 25-A-214  
567 IAC 23.3(2)"a"

**Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for these permits shall be:*

- A. The following emission points shall have a maximum number of woodworking tools as follows:

EP	Max Number Sanding Operations	Max Number Sawing or Milling and Routing Operations	Max Airflow (SCFM) for combined pickup points
PLY-006	2	29	90,000
PLY-007	1	15	61,000

- (1) The owner or operator shall maintain updated records of the total number and type of woodworking machines, associated air volume for each pickup point, and total air volume for each emission point.
- (2) The owner or operator shall establish an operational and maintenance plan to ensure the total air volume is maintained below the associated maximum air volume per emission point. The owner or operator shall make the plan available for inspection and maintain all records required by the plan.

- (3) The owner or operator shall operate all woodworking machines in the manner normally used during the plant's highest production rate during any required stack test.
- B. The owner or operator shall check daily for visible emissions from each emission point. The check is not required on the days the equipment is not in use or the stack is venting inside.
  - (1) The owner or operator shall keep a log of the visibility results for each emission point. If visible emissions are noted, the log shall also include the corrections made to the units involved.
  - (2) The owner or operator shall record the days any emission point vents indoors.
- C. The owner or operator shall operate, inspect, and maintain each baghouse according to the manufacturer's specifications and instructions.
  - (2) The owner or operator shall keep a log of all maintenance and inspection activities performed on each baghouse. At a minimum, the log shall include the following:
    - a. The date that any inspection and/or maintenance was performed on each baghouse.
    - b. Any issues identified during inspection and maintenance activities
    - c. The date each issue was resolved; and
    - d. Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permits 25-A-213 & 25-A-214

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

EP ID	Stack Height (feet)	Discharge Style	Stack Opening (inches)	Stack Temperature (°F)	Exhaust Flowrate (scfm)
PLY-006	37	Vertical unobstructed <sub>1</sub>	60 x 61	70	90,000
PLY-007	37	Vertical unobstructed <sub>1</sub>	60 x 61	70	61,000

Authority for Requirement: DNR Construction Permits 25-A-213 & 25-A-214

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Stack Testing:**

Pollutant – Particulate Matter (PM<sub>2.5</sub>)  
Stack Test to be Completed by (date) – <sup>(1)</sup>  
Test Method - 40 CFR 51, Appendix M, 201A with 202  
Authority for Requirement: DNR Construction Permits 25-A-213 & 25-A-214

Pollutant - Particulate Matter (PM<sub>10</sub>)  
Stack Test to be Completed by (date) - <sup>(1)</sup>  
Test Method - 40 CFR 51, Appendix M, 201A with 202  
Authority for Requirement: DNR Construction Permits 25-A-213 & 25-A-214

Pollutant - Particulate Matter (PM)  
Stack Test to be Completed by (date) - <sup>(1)</sup>  
Test Method - 40 CFR 60, Appendix A, Method 5  
40 CFR 51, Appendix M, Method 202  
Authority for Requirement: DNR Construction Permits 25-A-213 & 25-A-214

- <sup>(1)</sup> Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- <sup>(2)</sup> If the owner or operator decides to conduct representative initial compliance testing, it shall conduct testing on one (1) of the following emission points: EP PLY-006 or EP PLY-007. The initial compliance test results from that test shall be considered representative for the other listed emission point. If the tested emission point indicates non-compliance, the facility will be considered in violation of the emission limits set for the other emission points, or they may be tested independently to verify compliance.

**Agency Approved Operation & Maintenance Plan Required?** Yes  No

**Facility Maintained Operation & Maintenance Plan Required?** Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?** Yes  No

*Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.*

*The data pertaining to the plan shall be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.*

*Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.*

Authority for Requirement: 567 IAC 24.108(3)

## Emission Point ID Number: EP-CUS-002

### Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-CUS-002	Steam Heated Drying Oven	NA	Steam	NA	98-A-824-S1

### Applicable Requirements

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 98-A-824-S1  
567 IAC 23.3(2)"d"

<sup>(1)</sup> The presence of visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 98-A-824-S1  
567 IAC 23.3(2)"a"

#### NESHAP Applicability

These emission units are subject to 40 CFR 63 Subpart A - National Emission Standards for Hazardous Air Pollutants for Source Categories - General Provisions and Subpart JJ – National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations.

Authority for Requirement: 40 CFR 63 Subpart A  
567 IAC 23.1(4)"a"  
40 CFR 63 Subpart JJ  
567 IAC 23.1(4)"aj"

**Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

- A. All VOC emissions from this oven shall be accounted for with the associated surface coating equipment.

Authority for Requirement: DNR Construction Permit 98-A-824-S1

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 38.7

Stack Opening, (inches, dia.): 8

Exhaust Flow Rate (scfm): 370

Exhaust Temperature (°F): 110

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 98-A-824-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Numbers: EP-CUS-003, EP-CUS-004, EP-CUS-005,  
EP-CUS-006, EP-CUS-007**

Associated Equipment

<b>Emission Point</b>	<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EP-CUS-003	EU-CUS-003	Spray Booth CUS003	CE CUS-003 (Dry Filter)	Coating	1451 lb/hr	92-A-004-S2
EP-CUS-004	EU-CUS-004	Spray Booth CUS004	CE CUS-004 (Dry Filter)	Coating	1451 lb/hr	92-A-005-S4
EP-CUS-005	EU-CUS-005	Spray Booth CUS005	CE CUS-005 (Dry Filter)	Coating	1451 lb/hr	92-A-006-S4
EP-CUS-006	EU-CUS-006	Spray Booth CUS006	CE CUS-006 (Dry Filter)	Coating	1451 lb/hr	96-A-1132-S5
EP-CUS-007	EU-CUS-007	Spray Booth CUS007	CE CUS-007 (Dry Filter)	Coating	1 Spray Gun at 3 gal/hr	98-A-821-S3

**Applicable Requirements**

**Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)**

*The emissions from these emission points shall not exceed the levels specified below.*

<b>EP</b>	<b>Opacity</b>	<b>PM<sub>10</sub></b>	<b>PM</b>	<b>Volatile Organic Compounds (VOCs)</b>	<b>Total HAP</b>	<b>Authority for Requirement</b>
EP-CUS-003	40% <sup>(1)</sup>	NA	1.26 lb/hr 0.01 gr/dscf	189.8 tons/yr <sup>(3)</sup>	See Note (5)	92-A-004-S2, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)
EP-CUS-004	40% <sup>(2)</sup>	0.07 lb/hr	1.59 lb/hr 0.01 gr/dscf			92-A-005-S4, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)
EP-CUS-005	40% <sup>(2)</sup>	0.059 lb/hr	1.26 lb/hr 0.01 gr/dscf			92-A-006-S4, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)
EP-CUS-006	40% <sup>(2)</sup>	0.055 lb/hr	0.055 lb/hr 0.01 gr/dscf	39.4 tons/yr		96-A-1132-S5, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)
EP-CUS-007	40% <sup>(2)</sup>	0.20 lb/hr	0.20 lb/hr 0.01 gr/dscf	39.4 tons/yr <sup>(4)</sup>		98-A-821-S3, 567 IAC 23.3(2)"d", 567 IAC 23.4(13)

<sup>(1)</sup> An exceedance of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

(3) This limit is for the emissions from Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS-005, combined.

(4) This is a combined limit for Spray Booth CUS007 and Spray Booth FIN007.

(5) The Volatile HAP content of the finishing material (i.e. surface coatings) used in this emissions unit and at this facility shall meet the emission limits for an existing source from Table 3 of 40 CFR Part 63, Subpart JJ, *National Emission Standards for Wood Furniture Manufacturing Operations*.

### **NESHAP Applicability**

These emission units are subject to 40 CFR 63 Subpart A - National Emission Standards for Hazardous Air Pollutants for Source Categories - General Provisions and 40 CFR 63 Subpart JJ – National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations.

Authority for Requirement: DNR Construction Permits 92-A-004-S2, 92-A-005-S4,  
92-A-006-S4, 96-A-1132-S5, 98-A-821-S3  
40 CFR 63 Subpart A  
567 IAC 23.1(4)  
40 CFR 63 Subpart JJ  
567 IAC 23.1(4)"aj"

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

#### **Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CU005:**

- A. All control equipment shall be maintained according to the manufacturer's specifications.
  - (1) The owner or operator shall maintain a record of all inspections of the control equipment. The owner or operator shall document the results of the inspections and note any repairs that were made as a result of the inspections.
- B. Total VOC emissions from the spraying operations of Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS005, combined, shall not exceed 189.80 tons per twelve-month period. For this permit, spraying operations includes any paint, thinner, stain, solvent, etc. that is used with a surface coating activity.
  - (1) The owner or operator shall maintain records that show the identity, quantity, in pounds or gallons, and VOC content, in pounds per gallon, of each VOC containing material used in the spraying operations of Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS005, combined.
  - (2) The owner or operator shall record the VOC emissions from all the spraying operations of Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS005, combined, each month. The owner or operator shall calculate a rolling 12-month total for VOC emissions from all the spraying operations of Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS005, combined.
  - (3) For the purpose of calculating monthly emissions for all the spraying operations of Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS005, combined, all VOC containing materials shall be considered emitted on the day

they are delivered to the plant.

- (4) The owner or operator shall calculate the VOC emissions from Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS005, combined on a monthly basis. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 152 TPY. At this point, the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted from Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS005. Calculation requirements will revert back to monthly basis if the 12-month rolling total of VOC is returned to below 152 TPY.
  - (5) Retain Material Safety Data Sheets (MSDS) for all surface coating materials and solvents used in Spray Booth CUS003, Spray Booth CUS004 and Spray Booth CUS005.
- C. The owner or operator shall abide by all operating limits specified in NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.
- (1) The owner or operator shall maintain all recordkeeping requirements of NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.

Authority for Requirement: DNR Construction Permits 92-A-004-S2, 92-A-005-S4,  
92-A-006-S4

Spray Booth CUS006:

- A. All control equipment shall be maintained according to the manufacturer's specifications.
  - (1) The owner or operator shall maintain a record of all inspections of the control equipment. The owner or operator shall document the results of the inspections and note any repairs that were made as a result of the inspections.
- B. Total VOC emissions from the spraying operations of Spray Booth CUS006 shall not exceed 39.40 tons per twelve-month period. For this permit, spraying operations includes any paint, thinner, stain, solvent, etc. that is used with a surface coating activity.
  - (1) The owner or operator shall maintain records that show the identity, quantity, in pounds or gallons, and VOC content, in pounds per gallon, of each VOC containing material used in the spraying operations of Spray Booth CUS006.
  - (2) The owner or operator shall record the VOC emissions from all the spraying operations of Spray Booth CUS006 each month. The owner or operator shall calculate a rolling 12-month total for VOC emissions from all the spraying operations of Spray Booth CUS006.
  - (3) For the purpose of calculating monthly emissions for all the spraying operations of Spray Booth CUS006, all VOC containing materials shall be considered emitted on the day they are delivered to the plant.
  - (4) The owner or operator shall calculate the VOC emissions from Spray Booth CUS006 on a monthly basis. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 31.52 TPY. At this point, the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted from Spray Booth CUS006. Calculation requirements will revert back to monthly basis if the 12-month rolling total of VOC is returned to below 31.52 TPY.
  - (5) Retain Material Safety Data Sheets (MSDS) for all surface coating materials and

solvents used in Spray Booth CUS006

- C. The owner or operator shall abide by all operating limits specified in NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.
  - (1) The owner or operator shall maintain all recordkeeping requirements of NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.

Authority for Requirement: DNR Construction Permits 96-A-1132-S5

Spray Booth CUS007 and Spray Booth FIN007:

- A. All control equipment shall be maintained according to the manufacturer's specifications.
  - (1) The owner or operator shall maintain a record of all inspections of the control equipment. The owner or operator shall document the results of the inspections and note any repairs that were made as a result of the inspections.
- B. Total VOC emissions from the spraying operations of Spray Booth CUS007 and Spray Booth FIN007 shall not exceed 39.40 tons per twelve-month period. For this permit, spraying operations includes any paint, thinner, stain, solvent, etc. that is used with a surface coating activity.
  - (1) The owner or operator shall maintain records that show the identity, quantity, in pounds or gallons, and VOC content, in pounds per gallon, of each VOC containing material used in the spraying operations of Spray Booth CUS007 and Spray Booth FIN007.
  - (2) The owner or operator shall record the VOC emissions from all the spraying operations of Spray Booth CUS007 and Spray Booth FIN007 each month. The owner or operator shall calculate a rolling 12-month total for VOC emissions from all the spraying operations of Spray Booth CUS007 and Spray Booth FIN007.
  - (3) For the purpose of calculating monthly emissions for all the spraying operations of Spray Booth CUS007 and Spray Booth FIN007, all VOC containing materials shall be considered emitted on the day they are delivered to the plant.
  - (4) The owner or operator shall calculate the VOC emissions from Spray Booth CUS007 and Spray Booth FIN007 on a monthly basis. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 31.52 TPY. At this point, the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted from Spray Booth CUS007 and Spray Booth FIN007. Calculation requirements will revert back to monthly basis if the 12-month rolling total of VOC is returned to below 31.52 TPY.
  - (5) Retain Material Safety Data Sheets (MSDS) for all surface coating materials and solvents used in Spray Booth CUS007 and Spray Booth FIN007
- C. The owner or operator shall abide by all operating limits specified in NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.
  - (1) The owner or operator shall maintain all recordkeeping requirements of NESHAP Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations.

Authority for Requirement: DNR Construction Permit 98-A-821-S3

**Emission Point Characteristics**

*The emission points shall conform to the specifications listed below.*

<b>Emission Point</b>	<b>Stack Height, (ft, from the ground)</b>	<b>Stack Opening, (inches, dia.)</b>	<b>Exhaust Flow Rate (scfm)</b>	<b>Exhaust Temperature (°F)</b>	<b>Discharge Style</b>	<b>Authority for Requirement</b>
EP-CUS-003	33.5	42	16,000	Ambient	Vertical Unobstructed	92-A-004-S2
EP-CUS-004	33.7	34	20,500	70	Vertical Unobstructed	92-A-005-S4
EP-CUS-005	38.2	34	16,000	70	Vertical Unobstructed	92-A-006-S4
EP-CUS-006	38.3	36	16,000	70	Vertical Unobstructed	96-A-1132-S5
EP-CUS-007	38.3	36	16,000	Ambient	Vertical, Unobstructed	98-A-821-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Relevant requirements of O & M plan for this equipment:

1. Weekly
  - Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
  - Maintain a written record of the observation and any action resulting from the inspection.
2. Record Keeping & Reporting
  - Maintenance and inspection records will be kept for five years and available upon request.
3. Quality Control
  - The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 24.108(3)

## Emission Point ID Number: EP-ROU-001

### Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-ROU-001	Rough Mill Boiler	CE ROU-001 (Multiclone)	Wood	5.5 MMBtu/hr; Maximum fuel consumption rate: 808.82 lbs/hr	87-A-046-S3

### Applicable Requirements

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 87-A-046-S3  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 25% will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit(s): 4.38 lb/hr, 0.6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 87-A-046-S3  
567 IAC 23.3(2)"b"(2)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 87-A-046-S3  
567 IAC 23.3(3)"a"(3)

#### NESHAP Applicability

The Rough Mill Boiler (EU-ROU-001) is subject to 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.*

Authority for Requirement: DNR Construction Permit 87-A-046-S3  
40 CFR 63 Subpart DDDDD

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

#### Operating Limits:

- A. The Rough Mill Boiler (EU-ROU-001) shall fire on dry wood residue only.
- B. The amount of wood combusted by the Rough Mill Boiler (EU-ROU-001) shall not exceed 708,529 pounds per twelve (12) month rolling period.
- C. The owner or operator shall inspect and maintain the multiclone (CE-ROU-001) according to the facility's (Plant No. 07-01-063) operation and maintenance plan.

#### Operating Condition Monitoring and Recordkeeping:

- A. By the end of the following month, the owner or operator shall record the amount of wood, in pounds, combusted by the Rough Mill Boiler (EU-ROU-001) over the previous month and over the previous twelve (12) months.
- B. The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment. This log shall include, but is not limited to:
  - The date and time any inspection and/or maintenance was performed on the control equipment;
  - Any issues identified during the inspection;
  - Any issues addressed during the maintenance activities; and
  - Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 87-A-046-S3

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 31

Stack Opening, (inches, dia.): 14

Exhaust Flow Rate (scfm): 1,700

Exhaust Temperature (°F): 500

Discharge Style: Unobstructed Vertical

Authority for Requirement: DNR Construction Permit 87-A-046-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

## Emission Point ID Number: EP-TIM-001

### Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-TIM-001	Timbergate Boiler	CE TIM-001: Multiclone	Wood	2.0 MMBtu/hr Maximum fuel consumption rate: 294.12 lbs/hr	88-A-223-S6

### Applicable Requirements

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 % <sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 88-A-223-S6  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 0.567 lb/hr

Authority for Requirement: DNR Construction Permit 88-A-223-S6

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 88-A-223-S6  
567 IAC 23.3(2)"b"(2)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 6 lb/MMBtu

Authority for Requirement: DNR Construction Permit 88-A-223-S6  
567 IAC 23.3(3)"a"

#### NESHAP Applicability

The Timbergate Boiler (EU-TIM-001) is subject to 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*.

Authority for Requirement: DNR Construction Permit 88-A-223-S6  
40 CFR 63 Subpart DDDDD

### **Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:*

#### Operating Limits:

- A. The Timbergate Boiler (EU-TIM-001) shall fire on dry wood residue only.
- B. The amount of wood combusted by the Timbergate Boiler (EU-TIM-001) shall not exceed 257,647 pounds per twelve (12) month rolling period.
- C. The owner or operator shall inspect and maintain the multiclone (CE-TIM-001) according to the facility's (Plant No. 07-01-063) operation and maintenance plan.

#### Operating Condition Monitoring and Recordkeeping:

- A. By the end of the following month, the owner or operator shall record the amount of wood, in pounds, combusted by the Timbergate Boiler (EU-TIM-001) over the previous month and over the previous twelve (12) months.
- B. The owner or operator shall keep a log of all maintenance and inspection activities performed on the control equipment. This log shall include, but is not limited to:
  - The date and time any inspection and/or maintenance was performed on the control equipment;
  - Any issues identified during the inspection;
  - Any issues addressed during the maintenance activities; and
  - Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 88-A-223-S6

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height, (ft, from the ground): 34

Stack Opening, (inches, dia.): 14

Exhaust Flow Rate (scfm): 773

Exhaust Temperature (°F): 500

Discharge Style: Vertical, Unobstructed

Authority for Requirement: DNR Construction Permit 88-A-223-S6

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Numbers: BAT-i-001, BAT-i-002, BAT-i-003, CUS-i-001, CUS-i-002, CUS-i-003, CUS-i-006, CUS-i-007, TIM-i-001, TIM-i-003**

Associated Equipment

<b>Emission Point</b>	<b>Emission Unit</b>	<b>Emission Unit Description</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
BAT-i-001	BAT-i-001	Steam Heated Oven #1	Steam	-	-
BAT-i-002	BAT-i-002	Steam Heated Oven #2	Steam	-	-
BAT-i-003	BAT-i-003	Steam Heated Oven #3	Steam	-	-
BAT-i-008	BAT-i-008	Natural Gas Drying Oven	Natural Gas	1.6 MMBtu/hr	-
CUS-i-001	CUS-i-001	Natural Gas Fired Oven #1	Natural Gas	0.4 MMBtu/hr	-
CUS-i-002	CUS-i-002	Natural Gas Fired Oven #2	Natural Gas	0.4 MMBtu/hr	-
CUS-i-003	CUS-i-003	Natural Gas Fired Oven #3	Natural Gas	0.4 MMBtu/hr	-
CUS-i-006	CUS-i-006	Drum Storage	Coating	-	-
CUS-i-007	CUS-i-007	Drum Storage	Coating	-	-

**Applicable Requirements**

**Operational Limits & Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below.*

**NESHAP Applicability**

These emission units are subject to 40 CFR 63 Subpart A and Subpart JJ – National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations.

Authority for Requirement: 40 CFR 63 Subpart A  
 567 IAC 23.1(4)"a"  
 40 CFR 63 Subpart JJ  
 567 IAC 23.1(4)"aj"

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 24.108(3)

## **IV. General Conditions**

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code (IAC). When 567 IAC as amended May 15, 2024, and cited in this permit becomes State Implementation Plan (SIP) approved, it will supersede 567 IAC as amended February 8, 2023. Prior to May 15, 2024, all Title V rule citations in this Title V permit were found and cited in 567 IAC Chapter 22. During the period from May 15, 2024, to the date that 567 IAC as amended May 15, 2024, is approved into the SIP, both 567 IAC as amended May 15, 2024, and 567 IAC as amended February 8, 2023 form the legal basis for the applicable requirements included in this permit. A crosswalk showing the citation changes is attached to this permit in Appendix C.

### **G1. Duty to Comply**

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 24.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 24.105(2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 24.108(1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 24.108(14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 24.108(9)"b"*
6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. *567 IAC 24.108(15)"c"*

### **G2. Permit Expiration**

1. Except as provided in rule 567—24.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—24.105(455B). *567 IAC 24.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 24.105(2). *567 IAC 24.105*

### **G3. Certification Requirement for Title V Related Documents**

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable

inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 24.107(4)

#### **G4. Annual Compliance Certification**

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 24.108(15)"e"

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 24.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 24.108 (5)

#### **G6. Annual Fee**

1. The permittee is required under subrule 567 IAC 24.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
4. The fee shall be submitted annually by July 1 with forms specified by the department.
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 24.115(1)"d".

### **G7. Inspection of Premises, Records, Equipment, Methods and Discharges**

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 24.108 (15)"b"*

### **G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 24.108 (9)"e"*

### **G9. General Maintenance and Repair Duties**

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 21.8(1)*

### **G10. Recordkeeping Requirements for Compliance Monitoring**

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance

records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:

- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
- b. Maintain a log at the permitted facility of the scenario under which it is operating.
- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 24.108(4), 567 IAC 24.108(12)*

#### **G11. Evidence used in establishing that a violation has or is occurring.**

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of

whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 24;
  - b. Compliance test methods specified in 567 Chapter 21; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

#### **G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 24.108(6)*

#### **G13. Hazardous Release**

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in *567 IAC 131.2(2)*. *567 IAC Chapter 131-State Only*

#### **G14. Excess Emissions and Excess Emissions Reporting Requirements**

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning

is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

## 2. Excess Emissions Reporting

a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 21.10(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 21.10(1) ) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 21.7(1)-567 IAC 21.7(4)*

**G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 24.108(5)"b"*

**G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations**

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

**G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification**

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 24.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—24.140(455B) through 567 - 24.144(455B));.
  - e. The changes comply with all applicable requirements.
  - f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

- i. A brief description of the change within the permitted facility,
  - ii. The date on which the change will occur,
  - iii. Any change in emission as a result of that change,
  - iv. The pollutants emitted subject to the emissions trade
  - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
  - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
  - vii. Any permit term or condition no longer applicable as a result of the change.
- 567 IAC 24.110(1)*

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 24.110(2)*

3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 24.110(1). *567 IAC 24.110(3)*

4. The permit shield provided in subrule 24.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 24.110(4)*

5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 24.108(11)*

#### **G18. Duty to Modify a Title V Permit**

##### 1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that does any of the following:

- i. Correct typographical errors
- ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- iii. Require more frequent monitoring or reporting by the permittee; or
- iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

## 2. Minor Title V Permit Modification.

a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:

- i. Do not violate any applicable requirement;
- ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;
- iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;
- iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
- v. Are not modifications under any provision of Title I of the Act; and
- vi. Are not required to be processed as significant modification under rule 567 - 24.113(455B).

b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:

- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- ii. The permittee's suggested draft permit;
- iii. Certification by a responsible official, pursuant to 567 IAC 24.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 24.107(7).

c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 24.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

## 3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the

method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 24, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 24.111-567 IAC 24.113*

#### **G19. Duty to Obtain Construction Permits**

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. *567 IAC 22.1(1)*

#### **G20. Asbestos**

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (*567 IAC 23.1(3)"a"*); training fires and controlled burning of a demolished building (*567 IAC 23.2*).

#### **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only*

#### **G22. Acid Rain (Title IV) Emissions Allowances**

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 24.108(7)*

#### **G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.

- d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

#### **G24. Permit Reopenings**

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 24.108(9)"c"*
2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;
  - b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original

permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 24.108(17)"a", 567 IAC 24.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination;
  - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
  - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
  - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 24.114*
4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 24.114*
5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 24.114*

#### **G25. Permit Shield**

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the permit; or
- b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

3. A permit shield shall not alter or affect the following:
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
  - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 24.108 (18)*

**G26. Severability**

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 24.108 (8)*

**G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 24.108 (9)"d"*

**G28. Transferability**

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of *567 IAC 24.111(1)*. *567 IAC 24.111 (1)"d"*

**G29. Disclaimer**

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

**G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification**

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of *567 – Chapter 23* or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks (42 days) of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically

altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator  
Iowa DNR, Air Quality Bureau

6200 Park Ave  
Suite 200  
Des Moines, IA 50321  
(515) 343-6589

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

*567 IAC 21.10(7)"a", 567 IAC 21.10(9)*

**G31. Prevention of Air Pollution Emergency Episodes**

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons.

*567 IAC 26.1(1)*

**G32. Contacts List**

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer  
Air Branch  
Enforcement and Compliance Assurance Division  
U.S. EPA Region 7  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
6200 Park Ave  
Suite 200  
Des Moines, IA 50321  
(515) 313-8325

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

**Field Office 1**

1101 Commercial Court, Suite 10  
Manchester, IA 52057  
(563) 927-2640

**Field Office 2**

2300-15th St., SW  
Mason City, IA 50401  
(641) 424-4073

**Field Office 3**

1900 N. Grand Ave.  
Spencer, IA 51301  
(712) 262-4177

**Field Office 4**

1401 Sunnyside Lane  
Atlantic, IA 50022  
(712) 243-1934

**Field Office 5**

6200 Park Ave  
Suite 200  
Des Moines, IA 50321  
(515) 725-0268

**Field Office 6**

*1023 West Madison Street*  
Washington, IA 52353-1623  
(319) 653-2135

**Polk County Public Works Dept.**

Air Quality Division  
5885 NE 14th St.  
Des Moines, IA 50313  
(515) 286-3351

**Linn County Public Health**

Air Quality Branch  
1020 6<sup>th</sup> Street SE  
Cedar Rapids, IA 52401  
(319) 892-6000

## V. Appendix A: CAM Plans

### Compliance Assurance Monitoring Plan Baghouse for PM Control

I. **Emission Points applicable to this CAM Plan:** ROU-007, ROU-008

II. **Applicable Permits and Emission Limits:**

ROU-007 and ROU-008

- Construction Permit Nos. 25-A-147 and 25-A-148
- PM Emission limits: 2.1 lb/hr and 0.1 gr/dscf
- PM10 Emission Limit: 2.1 lb/hr
- PM 2.5 Emission Limit 0.99 lb/hr (applies to ROU-008, only)
- Opacity: 40 Percent

III. **Monitoring Approach**

A. Indicator

Daily visible emissions will be used as an indicator.

B. Measurement Approach

An employee familiar with normal process operations and the appearance of the exhaust from the affected source is responsible for observing visible emissions from the emission point once per day during operating hours.

C. Indicator Range

The presence of any visible emissions would be considered an excursion and trigger the operator to take corrective actions. An excursion is defined as a discrete event that results in visible emissions from the unit defined under this CAM Plan.

D. QIP (Quality Improvement Plan) Threshold

The QIP threshold is six excursions in a six month reporting period.

E. Performance criteria

- Data representativeness: The presence of any visible emissions from a properly maintained and operating baghouse is an appropriate indicator that a bag rupture or leak is occurring and that corrective action may be necessary.
- QA/QC practices and criteria: Employees performing visible emissions observations have a detailed understanding of the proper operation of the affected source. During normal operations the bagfilters do not emit visible emissions. The presence of emissions from this unit is indicative of a likely malfunction.

- Monitoring frequency and Data collection procedure: Staff with detailed knowledge of facility operations will record the date of excursions if and when they occur. If the frequency of excursions exceeds the QIP Threshold, the action plan to improve improvement plans will be retained by Bertch Cabinet for a period of at least 5 years.

## **VI. Appendix B: Links to Standards**

40 CFR 60 Subpart A – Standards of Performance for New Stationary Sources – General Provisions

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-A?toc=1>

40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial –Commercial-Institutional Steam Generating Units

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Dc>

40 CFR 63 Subpart A – National Emission Standards for Hazardous Air Pollutants for Source Categories – General Provisions

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-AAAA>

40 CFR 63 Subpart JJ – National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-JJ>

40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-DDDDDD>

## **VII. Appendix C: Executive Order 10 (EO10) Rules Crosswalk**

Previous Chapter Number (Prior to 5/15/2024)	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
20	20 (Reserved)	Scope of Title - Definitions	N/A	Definitions moved to Ch. 21, 22 and 23. Rescinded Ch. 20. (Reserved)
21	21	Compliance	Compliance, Excess Emissions, and Measurement of Emissions	Kept and combined with rules from Chapters 24, 25, 26, and 29.
22	22	Controlling Pollution-Permits	Controlling Air Pollution - Construction Permitting	Kept construction permit rules and combined with Ch. 20 (definitions) and Ch. 28 (NAAQS). Moved operating permit rules to Chapter 24.
22.100 - 22.300(12)	(New) 24	N/A	Operating Permits	Moved operating permit rules from Ch. 22 to Ch. 24.
23	23	Emission Standards	Air Emission Standards	Kept
24	(New) 21	Excess Emissions	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21. Moved TV rules here (to Ch. 24).
25	(New) 21	Emissions Measurement	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21. Rescinded Ch. 25. (Reserved)
26	(New) 21	Emergency Air Pollution Episodes	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21. Rescinded Ch. 26. (Reserved)
27	27	Local Program Acceptance	Local Program Acceptance	Kept
28	22	NAAQS	N/A	Moved rules and combined with Ch. 22. Rescinded Ch. 28. (Reserved)
29	(New) 21	Opacity Qualifications	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21. Rescinded Ch. 29. (Reserved)
30	30	Fees	Fee	Kept
31	31	Nonattainment Areas	Nonattainment New Source Review	Kept
32	N/A	AFO Field Study	N/A	Rescinded Ch. 32. (Reserved)
33	33	Special regulations and construction permit requirements for major stationary sources—Prevention of significant deterioration (PSD) of air quality	Construction permit requirements for major stationary sources—Prevention of significant deterioration (PSD)	Kept
34	N/A	Emissions Trading-CAIR-CAMR	N/A	Rescinded Ch. 34. (Reserved)
35	N/A	Grant Assistance Programs	N/A	Rescinded Ch. 35. (Reserved)

Previous Chapter Number (Prior to 5/15/2024)	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
<b>20</b>	<b>20 (Reserved)</b>	<b>Scope of Title - Definitions</b>	<b>N/A</b>	<b>Definitions moved to Ch. 21, 22 and 23.</b> <b>Rescinded Ch. 20. (Reserved)</b>
20.1	N/A	Scope of title	N/A	
20.2	Ch. 21, 22, 23	Definitions	Definitions	See beginning of Ch. 21, 22, and 23
20.3	N/A	Air quality forms generally	N/A	

<b>21</b>	<b>21</b>	<b>Compliance</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Kept and combined with rules from Chapters 24, 25, 26, and 29.</b>
21.1	21.1	Compliance Schedule	Definitions and compliance requirements	Added definitions from Ch. 21, some language updated
21.2	21.2	Variances	Variances	Some language updated
21.3	21.3	Emission reduction program	Reserved	Reserved
21.4	21.4	Circumvention of rules	Circumvention of rules	Minor language updated
21.5	21.5	Evidence used in establishing that a violation has or is occurring	Evidence used in establishing that a violation has occurred or is occurring	21.5(2) Reserved, some language updated
21.6	21.6	Temporary electricity generation for disaster situations	Temporary electricity generation for disaster situations	Minor language updated
24.1	21.7	Excess emission reporting	Excess emission reporting	Moved from Ch. 24, some language updated
24.2	21.8	Maintenance and repair requirements	Maintenance and repair requirements	Moved from Ch. 24, some language updated
N/A	21.9	N/A	Compliance with other requirements	New language
25.1	21.10	Testing and sampling of new and existing equipment	Testing and sampling of new and existing equipment	Moved from Ch. 25, some language updated
25.2	21.11	Continuous emission monitoring under the acid rain program	Continuous emission monitoring under the acid rain program	Moved from Ch. 25, some language updated
25.3	N/A	Mercury emissions testing and monitoring	N/A	Rescinded. Except 25.3(5)
25.3(5)	21.12	Affected sources subject to Section 112(g)	Affected sources subject to Section 112(g)	Moved from Ch. 25, some language updated
29.1	21.13	Methodology and qualified observer	Methodology and qualified observer	Moved from Ch. 29, some language updated
26.1	21.14	Prevention of air pollution emergency episodes - General	Prevention of air pollution emergency episodes	Moved from Ch. 26, some language updated
26.2	21.15	Episode criteria	Episode criteria	Moved from Ch. 26, some language updated
26.3	21.16	Preplanned abatement strategies	Preplanned abatement strategies	Moved from Ch. 26, some language updated
26.4	21.17	Actions taken during episodes	Actions taken during episodes	Moved from Ch. 26, some language updated
Ch 26 Table III	Table I	Abatement strategies emission reduction actions alert level	Abatement strategies emission reduction actions alert level	Moved from Ch. 26, reference federal appendix table
Ch 26 Table IV	Table II	Abatement strategies emission reduction actions warning level	Abatement strategies emission reduction actions warning level	Moved from Ch. 26, reference federal appendix table
Ch 26 Table V	Table III	Abatement strategies emission reduction actions emergency level	Abatement strategies emission reduction actions emergency level	Moved from Ch. 26, reference federal appendix table

<b>22</b>	<b>22</b>	<b>Controlling Pollution-Permits</b>	<b>Controlling Air Pollution - Construction Permitting</b>	<b>Kept construction permit rules and combined with Ch. 20 (definitions) and Ch. 28 (NAAQS).</b> <b>Moved operating permit rules to Chapter 24.</b>
22.1	22.1	Permits required for new or existing stationary sources	Definitions and permit requirements for new or existing stationary sources	Added definitions from Ch. 20, some language updated
22.2	22.2	Processing permit applications	Processing permit applications	
22.3	22.3	Issuing permits	Issuing permits	
22.4	22.4	Special requirements for major stationary sources located in areas designated attainment or unclassified (PSD)	Major stationary sources located in areas designated attainment or unclassified (PSD)	
22.5	22.5	Special requirements for nonattainment areas	Major stationary sources located in areas designated Nonattainment	
22.6	22.6	Nonattainment area designations	Reserved	

Previous Chapter Number (Prior to 5/15/2024)	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
22.7	22.7	Alternative emission control program	Alternative emission control program	
22.8	22.8	Permit by rule	Permit by rule	
22.9	22.9	Special requirements for visibility protection	Special requirements for visibility protection	A lot of language updated or removed
22.10	22.10	Permitting requirements for country grain elevators, country grain terminal elevators, grain terminal elevators and feed mill equipment	Permitting requirements for country grain elevators, country grain terminal elevators, grain terminal elevators and feed mill equipment	
28.1	22.11	Ambient air quality standards - Statewide standards	Ambient air quality standards	Moved from Ch. 28, minor language updated
22.12 to 22.99	N/A	Reserved	N/A	Removed

22.100 - 22.300(12)	(New) 24	N/A	Operating Permits	Moved operating permit rules from Ch. 22 to Ch. 24.
22.100	24.100	Definitions for Title V operating permits	Definitions for Title V operating permits	Moved from Ch. 22, some language updated, many 40 CFR 70 definitions adopted by reference
22.101	24.101	Applicability of Title V operating permit requirements	Applicability of Title V operating permit requirements	Moved from Ch. 22, some language updated to correct punctuation and remove old dates
22.102	24.102	Source category exemptions	Source category exemptions	Moved from Ch. 22, some language updated to correct punctuation
22.103	24.103	Insignificant activities	Insignificant activities	Moved from Ch. 22, some language updated to correct typos and remove old dates
22.104	24.104	Requirement to have a Title V permit	Requirement to have a Title V permit	Moved from Ch. 22, some language updated no changes to rule text
22.105	24.105	Title V permit applications	Title V permit applications	Moved from Ch. 22, updated language to address electronic submissions and remove past application due dates
22.106	24.106	Annual Title V emissions inventory	Annual Title V emissions inventory	Moved from Ch. 22, no changes to rule text
22.107	24.107	Title V permit processing procedures	Title V permit processing procedures	Moved from Ch. 22, some language updated to update locations of public records and remove old CFR amendment dates
22.108	24.108	Permit content	Permit content	Moved from Ch. 22, some language updated to correct punctuation, remove old dates, and adopt 40 CFR 70 rules by reference
22.109	24.109	General permits	General permits	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.110	24.110	Changes allowed without a Title V permit revision (off-permit revisions)	Changes allowed without a Title V permit revision (off-permit revisions)	Moved from Ch. 22, some language updated to remove redundant language
22.111	24.111	Administrative amendments to Title V permits	Administrative amendments to Title V permits	Moved from Ch. 22, no changes to rule text
22.112	24.112	Minor Title V permit modifications	Minor Title V permit modifications	Moved from Ch. 22, no changes to rule text
22.113	24.113	Significant Title V permit modifications	Significant Title V permit modifications	Moved from Ch. 22, no changes to rule text
22.114	24.114	Title V permit reopenings	Title V permit re-openings	Moved from Ch. 22 to Ch. 24, some language updated to adopt 40 CFR 70 rules by reference
22.115	24.115	Suspension, termination, and revocation of Title V permits	Suspension, termination, and revocation of Title V permits	Moved from Ch. 22, no changes to rule text
22.116	24.116	Title V permit renewals	Title V permit renewals	Moved from Ch. 22, no changes to rule text
22.117-22.119	24.117-24.119	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
22.120	24.120	Acid rain program—definitions	Acid rain program—definitions	Moved from Ch. 22, some language updated to remove old CFR amendment dates and address electronic submissions
22.121	24.121	Measurements, abbreviations, and acronyms	Reserved	Moved from Ch. 22, no changes to rule text
22.122	24.122	Applicability	Applicability	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.123	24.123	Acid rain exemptions	Acid rain exemptions	Moved from Ch. 22, some language updated to correct punctuation
22.124	24.124	Retired units exemption	Reserved	Moved from Ch. 22, no changes to rule text
22.125	24.125	Standard requirements	Standard requirements	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.126	24.126	Designated representative—submissions	Designated representative—submissions	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.127	24.127	Designated representative—objections	Designated representative—objections	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.128	24.128	Acid rain applications—requirement to apply	Acid rain applications—requirement to apply	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference

22.129	24.129	Information requirements for acid rain permit applications	Information requirements for acid rain permit applications	Moved from Ch. 22, no changes to rule text
Previous Chapter Number (Prior to 5/15/2024)	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
22.130	24.130	Acid rain permit application shield and binding effect of permit application	Acid rain permit application shield and binding effect of permit application	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.131	24.131	Acid rain compliance plan and compliance options—general	Acid rain compliance plan and compliance options—general	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.132	24.132	Repowering extensions	Reserved	Moved from Ch. 22, no changes to rule text
22.133	24.133	Acid rain permit contents—general	Acid rain permit contents—general	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.134	24.134	Acid rain permit shield	Acid rain permit shield	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.135	24.135	Acid rain permit issuance procedures—general	Acid rain permit issuance procedures—general	Moved from Ch. 22, no changes to rule text
22.136	24.136	Acid rain permit issuance procedures—completeness	Acid rain permit issuance procedures—completeness	Moved from Ch. 22, no changes to rule text
22.137	24.137	Acid rain permit issuance procedures—statement of basis	Acid rain permit issuance procedures—statement of basis	Moved from Ch. 22, no changes to rule text
22.138	24.138	Issuance of acid rain permits	Issuance of acid rain permits	Moved from Ch. 22, some language updated to remove old dates and deadlines
22.139	24.139	Acid rain permit appeal procedures	Acid rain permit appeal procedures	Moved from Ch. 22, no changes to rule text
22.140	24.140	Permit revisions—general	Permit revisions—general	Moved from Ch. 22, some language updated to remove old dates
22.141	24.141	Permit modifications	Permit modifications	Moved from Ch. 22, no changes to rule text
22.142	24.142	Fast-track modifications	Fast-track modifications	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.143	24.143	Administrative permit amendment	Administrative permit amendment	Moved from Ch. 22, some language updated to remove fax option
22.144	24.144	Automatic permit amendment	Automatic permit amendment	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.145	24.145	Permit reopenings	Permit re-openings	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.146	24.146	Compliance certification—annual report	Compliance certification—annual report	Moved from Ch. 22, no changes to rule text
22.147	24.147	Compliance certification—units with repowering extension plans	Reserved	Moved from Ch. 22, no changes to rule text
22.148	24.148	Sulfur dioxide opt-ins	Sulfur dioxide opt-ins	Moved from Ch. 22, some language updated to update the 40 CFR Part 74 amendment date
22.149 - 22.199	24.149 - 24.299	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
22.200	24.200 - 24.299	Definitions for voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.201	24.200 - 24.299	Eligibility for voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.203	24.200 - 24.299	Voluntary operating permit applications	Reserved	Moved from Ch. 22, no changes to rule text
22.204	24.200 - 24.299	Voluntary operating permit fees	Reserved	Moved from Ch. 22, no changes to rule text
22.205	24.200 - 24.299	Voluntary operating permit processing procedures	Reserved	Moved from Ch. 22, no changes to rule text
22.206	24.200 - 24.299	Permit content	Reserved	Moved from Ch. 22, no changes to rule text
22.207	24.200 - 24.299	Relation to construction permits	Reserved	Moved from Ch. 22, no changes to rule text
22.208	24.200 - 24.299	Suspension, termination, and revocation of voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.209	24.200 - 24.299	Change of ownership for facilities with voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.210 - 22.299	24.200 - 24.299	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
22.300	24.300	Operating permit by rule for small sources	Operating permit by rule for small sources	Moved from Ch. 22, no changes to rule text

23	23	Emission Standards	Air Emission Standards	Kept
23.1	23.1	Emission standards	Emission standards	Kept, language updated, tables used
23.2	23.2	Open burning	Open burning	Kept, some language updated
23.3	23.3	Specific contaminants	Specific contaminants	Kept, some language updated
23.4	23.4	Specific processes	Specific processes	Kept, some language updated
23.5	23.5	Anaerobic lagoons	Anaerobic lagoons	Kept, some language updated
23.6	23.6	Alternative emission limits (the “bubble concept”)	Reserved	Removed

Previous Chapter Number (Prior to 5/15/2024)	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
<b>24</b>	<b>(New) 21</b>	<b>Excess Emissions</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined with Ch. 21.</b> <b>Moved operating permit rules here (to Ch. 24).</b>
24.1	21.7	Excess emission reporting	Excess emission reporting	Moved from Ch. 24, some language updated
24.2	21.8	Maintenance and repair requirements	Maintenance and repair requirements	Moved from Ch. 24, some language updated
<b>25</b>	<b>(New) 21</b>	<b>Emissions Measurement</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined with Ch. 21.</b> <b>Rescinded Ch. 25. (Reserved)</b>
25.1	21.10	Testing and sampling of new and existing equipment	Testing and sampling of new and existing equipment	Moved from Ch. 25, some language updated
25.2	21.11	Continuous emission monitoring under the acid rain program	Continuous emission monitoring under the acid rain program	Moved from Ch. 25, some language updated
25.3		Mercury emissions testing and monitoring	N/A	Rescinded. Except 25.3(5)
25.3(5)	21.12	Affected sources subject to Section 112(g)	Affected sources subject to Section 112(g)	Moved from Ch. 25, some language updated
<b>26</b>	<b>(New) 21</b>	<b>Emergency Air Pollution Episodes</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined with Ch. 21.</b> <b>Rescinded Ch. 26. (Reserved)</b>
26.1	21.14	Prevention of air pollution emergency episodes - General	Prevention of air pollution emergency episodes	Moved from Ch. 26, some language updated
26.2	21.15	Episode criteria	Episode criteria	Moved from Ch. 26, some language updated
26.3	21.16	Preplanned abatement strategies	Preplanned abatement strategies	Moved from Ch. 26, some language updated
26.4	21.17	Actions taken during episodes	Actions taken during episodes	Moved from Ch. 26, some language updated
Ch 26 Table III	Table I	Abatement strategies emission reduction actions alert level	Abatement strategies emission reduction actions alert level	Moved from Ch. 26, reference federal appendix table
Ch 26 Table IV	Table II	Abatement strategies emission reduction actions warning level	Abatement strategies emission reduction actions warning level	Moved from Ch. 26, reference federal appendix table
Ch 26 Table V	Table III	Abatement strategies emission reduction actions emergency level	Abatement strategies emission reduction actions emergency level	Moved from Ch. 26, reference federal appendix table
<b>27</b>	<b>27</b>	<b>Local Program Acceptance</b>	<b>Local Program Acceptance</b>	<b>Kept</b>
27.1	27.1	General	General	Kept, some language updated
27.2	27.2	Certificate of acceptance	Certificate of acceptance	Kept, some language updated
27.3	27.3	Ordinance or regulations	Ordinance or regulations	Kept, some language updated
27.4	27.4	Administrative organization	Administrative organization	Kept, some language updated
27.5	27.5	Program activities	Program activities	Kept, some language updated
<b>28</b>	<b>22</b>	<b>NAAQS</b>	<b>N/A</b>	<b>Moved rules and combined with Ch. 22.</b> <b>Rescinded Ch. 28. (Reserved)</b>
28.1	22.11	Ambient air quality standards - Statewide standards	Ambient air quality standards	<b>Moved from Ch. 28, minor language updated</b>  Rescinded Ch. 28. (Reserved)
<b>29</b>	<b>(New) 21</b>	<b>Opacity Qualifications</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined with Ch. 21.</b> <b>Rescinded Ch. 29. (Reserved)</b>
29.1	21.13	Methodology and qualified observer	Methodology and qualified observer	Moved from Ch. 29, some language updated

Previous Chapter Number (Prior to 5/15/2024)	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
<b>30</b>	<b>30</b>	<b>Fees</b>	<b>Fee</b>	<b>Kept</b>
30.1	30.1	Purpose	Purpose	Kept, language updated
30.2	30.2	Fees associated with new source review applications	Fees associated with new source review applications	Kept, some language updated
30.3	30.3	Fees associated with asbestos demolition or renovation notification	Fees associated with asbestos demolition or renovation notification	Kept, some language updated
30.4	30.4	Fees associated with Title V operating permits	Fees associated with Title V operating permits	Kept, some language updated
30.5	30.5	Fee advisory groups	Fee advisory groups	Kept, language updated
30.6	30.6	Process to establish or adjust fees and notification of fee rates	Process to establish or adjust fees and notification of fee rates	Kept, some language updated
30.7	30.7	Fee revenue	Reserved	Language removed

<b>31</b>	<b>31</b>	<b>Nonattainment Areas</b>	<b>Nonattainment New Source Review</b>	<b>Kept</b>
31.1	31.1	Permit requirements relating to nonattainment areas	Permit requirements relating to nonattainment areas	Kept, some language updated
31.2	31.2	Conformity of general federal actions to the Iowa state implementation plan or federal implementation plan - Rescinded	Reserved	Language removed
31.3	31.3	Nonattainment new source review requirements for areas designated nonattainment on or after May 18, 1998	Nonattainment new source review (NNSR) requirements for areas designated nonattainment	Kept, some language updated
31.4	31.4	Preconstruction review permit program	Preconstruction review permit program	Kept
31.5 - 31.8	31.5 - 31.8	Reserved	Reserved	Kept
31.9	31.9	Actuals PALs	Actuals PALs	Kept, some language updated
31.10	31.10	Validity of rules	Validity of rules	Kept
31.11 - 31.19	N/A	Reserved	N/A	Rescinded and removed
31.20	N/A	Special requirements for nonattainment areas designated before May 18, 1998	N/A	Rescinded and removed

<b>32</b>	<b>N/A</b>	<b>AFO Field Study</b>	<b>N/A</b>	<b>Rescinded Ch. 32. (Reserved)</b>
32.1	N/A	Animal feeding operations field study	N/A	Rescinded, reserved, and language removed
32.2	N/A	Definitions	N/A	Rescinded, reserved, and language removed
32.3	N/A	Exceedance of the health effects value (HEV) for hydrogen sulfide	N/A	Rescinded, reserved, and language removed
32.4	N/A	Exceedance of the health effects standard (HES) for hydrogen sulfide	N/A	Rescinded, reserved, and language removed
32.5	N/A	Iowa Air Sampling Manual	N/A	Rescinded, reserved, and language removed

<b>33</b>	<b>33</b>	<b>Special regulations and construction permit requirements for major stationary sources—Prevention of significant deterioration (PSD) of air quality</b>	<b>Construction permit requirements for major stationary sources—Prevention of significant deterioration (PSD)</b>	<b>Kept</b>
33.1	33.1	Purpose	Purpose	Kept, some language updated
33.2	33.2	Reserved	Reserved	Kept
33.3	33.3	Special construction permit requirements for major stationary sources in areas designated attainment or unclassified (PSD)	PSD construction permit requirements for major stationary sources	Kept, some language updated
33.4 - 33.8	33.4 - 33.8	Reserved	Reserved	Kept
33.9	33.9	Plantwide applicability limitations (PALs)	Plantwide applicability limitations (PALs)	Kept, some language updated
33.10	33.10	Exceptions to adoption by reference	Exceptions to adoption by reference	Kept, some language updated

Previous Chapter Number (Prior to 5/15/2024)	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
<b>34</b>	<b>N/A</b>	<b>Emissions Trading-CAIR-CAMR</b>	<b>N/A</b>	<b>Rescinded Ch. 34. (Reserved)</b>
34.1	N/A	Purpose	N/A	Rescinded, reserved, and language removed
34.2 - 34.199	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.200	N/A	Provisions for air emissions trading and other requirements for the Clean Air Interstate Rule (CAIR) - rescinded	N/A	Rescinded, reserved, and language removed
34.201	N/A	CAIR NOx annual trading program general provisions - rescinded	N/A	Rescinded, reserved, and language removed
34.202	N/A	CAIR designated representative for CAIR NOx sources - rescinded	N/A	Rescinded, reserved, and language removed
34.203	N/A	Permits - rescinded	N/A	Rescinded, reserved, and language removed
34.204	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.205	N/A	CAIR NOx allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.206	N/A	CAIR NOx allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed
34.207	N/A	CAIR NOx allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
34.208	N/A	Monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
34.209	N/A	CAIR NOx opt-in units - rescinded	N/A	Rescinded, reserved, and language removed
34.210	N/A	CAIR SO2 trading program - rescinded	N/A	Rescinded, reserved, and language removed
34.211 - 34.219	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.220	N/A	CAIR NOx ozone season trading program - rescinded	N/A	Rescinded, reserved, and language removed
34.221	N/A	CAIR NOx ozone season trading program general provisions - rescinded	N/A	Rescinded, reserved, and language removed
34.222	N/A	CAIR designated representative for CAIR NOx ozone season sources - rescinded	N/A	Rescinded, reserved, and language removed
34.223	N/A	CAIR NOx ozone season permits - rescinded	N/A	Rescinded, reserved, and language removed
34.224	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.225	N/A	CAIR NOx ozone season allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.226	N/A	CAIR NOx ozone season allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed
34.227	N/A	CAIR NOx ozone season allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
34.228	N/A	CAIR NOx ozone season monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
34.229	N/A	CAIR NOx ozone season opt-in units - rescinded	N/A	Rescinded, reserved, and language removed
34.230 - 34.299	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.300	N/A	Provisions for air emissions trading and other requirements for the Clean Air Mercury Rule (CAMR) - rescinded	N/A	Rescinded, reserved, and language removed
34.301	N/A	Mercury (Hg) budget trading program general provisions - rescinded	N/A	Rescinded, reserved, and language removed
34.302	N/A	Hg designated representative for Hg budget sources - rescinded	N/A	Rescinded, reserved, and language removed
34.303	N/A	General Hg budget trading program permit requirements - rescinded	N/A	Rescinded, reserved, and language removed
34.304	N/A	Hg allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.305	N/A	Hg allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed

AQB Rule Tracking Crosswalk

34.306	N/A	Hg allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
<b>Previous Chapter Number (Prior to 5/15/2024)</b>	<b>Current Chapter Number</b>	<b>Previous Title and Description (Prior to 5/15/2024)</b>	<b>Current Title and Description</b>	<b>Actions Taken</b>
34.307	N/A	Monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
34.308	N/A	Performance specifications - rescinded	N/A	Rescinded, reserved, and language removed

<b>35</b>	<b>N/A</b>	<b>Grant Assistance Programs</b>	<b>N/A</b>	<b>Rescinded Ch. 35. (Reserved)</b>
35.1	N/A	Purpose	N/A	Rescinded, reserved, and language removed
35.2	N/A	Definitions	N/A	Rescinded, reserved, and language removed
35.3	N/A	Role of the department of natural resources	N/A	Rescinded, reserved, and language removed
35.4	N/A	Eligible projects	N/A	Rescinded, reserved, and language removed
35.5	N/A	Forms	N/A	Rescinded, reserved, and language removed
35.6	N/A	Project selection	N/A	Rescinded, reserved, and language removed
35.7	N/A	Funding sources	N/A	Rescinded, reserved, and language removed
35.8	N/A	Type of financial assistance	N/A	Rescinded, reserved, and language removed
35.9	N/A	Term of loans	N/A	Rescinded, reserved, and language removed
35.10	N/A	Reduced award	N/A	Rescinded, reserved, and language removed
35.11	N/A	Fund disbursement limitations	N/A	Rescinded, reserved, and language removed
35.12	N/A	Applicant cost share	N/A	Rescinded, reserved, and language removed
35.13	N/A	Eligible costs	N/A	Rescinded, reserved, and language removed
35.14	N/A	Ineligible costs	N/A	Rescinded, reserved, and language removed
35.15	N/A	Written agreement	N/A	Rescinded, reserved, and language removed
35.16	N/A	Financial assistance denial	N/A	Rescinded, reserved, and language removed

# 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., located at 4747 Crestwood Drive, Waterloo, Iowa 50704 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Al Piene.
2. Bertch Cabinet Manufacturing, Inc. is a Wood Cabinet Manufacturing/Coating facility. This facility consists of 60 emission units with potential emissions of:

<b>Pollutant</b>	<b>Abbreviation</b>	<b>Potential Emissions (Tons per Year)</b>
Particulate Matter ( $\leq 2.5 \mu\text{m}$ )	PM <sub>2.5</sub>	29.17
Particulate Matter ( $\leq 10 \mu\text{m}$ )	PM <sub>10</sub>	49.23
Particulate Matter	PM	66.84
Sulfur Dioxide	SO <sub>2</sub>	1.16
Nitrogen Oxides	NO <sub>x</sub>	28.01
Volatile Organic Compounds	VOC	494.69
Carbon Monoxide	CO	32.02
Lead	Lead	0
Hazardous Air Pollutants <sup>(1)</sup>	HAP	269.16

<sup>(1)</sup> May include the following: See application.

3. Bertch Cabinet Manufacturing, Inc. submitted a Title V Operating Permit renewal application on February 28, 2025 and any additional information on December 10, 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 **Publication Date** through **End Date**. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters 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 Zane Peters 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.

Zane Peters  
Iowa Department of Natural Resources - Air Quality Bureau  
6200 Park Ave  
Ste #200  
Des Moines, Iowa 50321  
Phone: (515) 808-0458  
E-mail: zane.peters@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 21-33, 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 21-33.
4. DNR is required to comply with 567 IAC Chapter 24 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. – Waterloo</b>
SIC Code:	2434
City:	Waterloo
County:	Black Hawk
EQ#:	92-0468
Facility#:	07-01-063
Permit #:	03-TV-009R4
Reviewer:	Zane Peters
Date:	05/08/2025

### **Facility Identification**

Facility Name:	Bertch Cabinet Manufacturing, Inc. - Waterloo
Facility Location:	4747 Crestwood Drive, Waterloo, Iowa 50704
Responsible Official:	Darren Ericson
Phone:	319-269-2987

### **Background:**

Bertch Cabinet Manufacturing, Inc. – Waterloo facility has applied for a renewal of their Title V Operating Permit for their wood kitchen cabinet manufacturing facility located in Waterloo. The facility currently consists of fifty (50) significant emission units and twelve (12) insignificant emission units.

This facility was determined to be separate from the other Waterloo Bertch facility in Waterloo (07-01-086) in 1991 by the construction permitting section.

### **Title V Applicability**

<b>Pollutant</b>	<b>Major for Title V?</b>
PM <sub>10</sub>	<input checked="" 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: Yes.

- Part 61 NESHAP: No.
- NSPS: Yes
  - 40 CFR 60 Subpart A, General Provisions
  - 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- Major Source of HAPs: Yes
- Part 63 NESHAP: Yes
  - 40 CFR 63 Subpart A, General Provisions
  - 40 CFR 63 Subpart DDDDD, National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters
  - 40 CFR 63 Subpart JJ, National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations
- Acid Rain: No.
- Stratospheric Ozone Protection: No.
- Prevention of Accidental Releases: No.

## **Changes Since the Last Issuance**

### **General Changes**

- Responsible Official, Permit Contact, and relevant permitting dates updated
- Executive Order 10 language added to the Plant-Wide Conditions page. Rule references updated throughout the permit
- General Conditions updated
- Executive Order 10 Rules Crosswalk added to the appendices

### **Emission Point-Specific Changes**

- EP-PAN-004, EP-PAN-005, EP-ROU-006, EP-ROU-007, & EP-ROU-008 added to the permit in accordance with DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148 (pp. 28-33)
- EP-FINN-002, EP-FINN-003, EP-FINN-004, EP-FINN-005, & EP-FINN-006 – Emission unit description, control equipment, and rated capacity updated in accordance with DNR Construction Permits 16-A-216-S1, 16-A-217-S1, 16-A-218-S1, 16-A-219-S1, and 16-A-220-S1 (pp. 37-39)
- EP-PLY-002, EP-PLY-00, EP-PLY-004, and EP-PLY-005 consolidated into EP-PLY-006 & EP-PLY-007 in accordance with DNR Construction Permits 25-A-213 and 25-A-214 (pp. 43-46)
- EPs TIM-i-001 & TIM-i-003 REMOVED from the permit at the request of the facility.
- EU TIM-i-002 – REMOVED from the Insignificant Activities Equipment List.
- EP-TIM-002, EP-TIM-003, EP-TIM-004, EP-TIM-005, EP-TIM-006, EP-TIM-007, & EP-TIM-008 REMOVED from the permit in accordance with the rescission of the relevant construction permits.

## **Stack Testing**

### **EP-PAN-004, EP-PAN-005, EP-ROU-006, EP-ROU-007, & EP-ROU-008**

Pollutant – Particulate Matter (PM<sub>2.5</sub>)

Stack Test to be Completed by (date) – <sup>(1)</sup><sup>(2)</sup>

Test Method - 40 CFR 51, Appendix M, 201A with 202

Authority for Requirement: DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148

Pollutant - Particulate Matter (PM<sub>10</sub>)

Stack Test to be Completed by (date) - <sup>(1)</sup><sup>(2)</sup>

Test Method - 40 CFR 51, Appendix M, 201A with 202

Authority for Requirement: DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148

Pollutant - Particulate Matter (PM)

Stack Test to be Completed by (date) - <sup>(1)</sup><sup>(2)</sup>

Test Method - 40 CFR 60, Appendix A, Method 5

40 CFR 51, Appendix M, Method 202

Authority for Requirement: DNR Construction Permits 25-A-144, 25-A-145, 25-A-146, 25-A-147, & 25-A-148

- <sup>(1)</sup> Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- <sup>(2)</sup> The owner or operator shall either conduct representative initial compliance testing for EP PAN-004, EP PAN-005, EP ROU-006, EP ROU-007 or EP ROU-008, or conduct initial compliance testing on all five (5) emission points. If the owner or operator decides to conduct representative initial compliance testing, it shall conduct testing on one (1) of the following emission points: EP PAN-004, EP PAN-005, EP ROU-006, EP ROU-007 or EP ROU-008. The initial compliance test results from that test shall be considered representative for the other listed emission points. If the tested emission point indicates non-compliance, the facility will be considered in violation of the emission limits set for the other emission points, or they may be tested independently to verify compliance.

### EP-PLY-006 & EP-PLY-007

Pollutant – Particulate Matter (PM<sub>2.5</sub>)

Stack Test to be Completed by (date) – <sup>(1)</sup>

Test Method - 40 CFR 51, Appendix M, 201A with 202

Authority for Requirement: DNR Construction Permits 25-A-214 & 25-A-215

Pollutant - Particulate Matter (PM<sub>10</sub>)

Stack Test to be Completed by (date) - <sup>(1)</sup>

Test Method - 40 CFR 51, Appendix M, 201A with 202

Authority for Requirement: DNR Construction Permits 25-A-214 & 25-A-215

Pollutant - Particulate Matter (PM)

Stack Test to be Completed by (date) - <sup>(1)</sup>

Test Method - 40 CFR 60, Appendix A, Method 5

40 CFR 51, Appendix M, Method 202

Authority for Requirement: DNR Construction Permits 25-A-214 & 25-A-215

- <sup>(1)</sup> Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

### **Periodic Monitoring Guidance**

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document.

EP-BAT-004A & EP-BAT-004B are woodworking emission points with a baghouse (CE BAT-004) to control emissions. Due to the nature of these emission points and the Department's policy towards fugitive dust, a Facility Maintained O&M Plan will be required for this renewal.

EP-BAT-005, EP-BAT-006, & EP-BAT-007 are coating spray booths with dry filters (CE BAT-005, CE BAT-006, & CE BAT-007) to control emissions. Due to the nature of these emission points and the Department's policy towards spray coating operations, an Agency Approved O&M Plan will be required for this renewal.

EP-BAT-010, EP-BAT-011, & EP-BAT-012 are stain and sealer spray booths with dry filters (CE BAT-010, CE BAT-011, & CE BAT-012) to control emissions. Due to the nature of these emission points and the Department's policy towards spray coating operations, an Agency Approved O&M Plan will be required for this renewal.

EP-PAN-001 is a panel mill boiler with a multiclone (CE PAN-001) to control emissions. Due to the nature of this emission point and the Department's policy towards fugitive dust, a Facility Maintained O&M Plan will be required for this renewal.

EP-PAN-004, EP-PAN-005, EP-ROU-006, EP-ROU-007, & EP-ROU-008 are woodworking emission points with many baghouses (see permit) to control emissions. Due to the nature of these emission points and the Department's policy towards fugitive dust, a Facility Maintained O&M Plan will be required for this renewal for EP-PAN-004, EP-PAN-005, & EP-ROU-006. Due to the

calculations submitted with the permit application, a CAM plan will be required for this renewal for EP-ROU-007 & EP-ROU-008. Details of the plan can be found in the body of the permit.

EP-FIN-002, EP-FIN-003, EP-FIN-004, EP-FIN-005, & EP-FIN-006 are woodworking emission points with cartridge filters (CE FIN-002, CE FIN-004, & CE FIN-006) to control emissions. Due to the nature of these emission points and the Department's policy towards fugitive dust, a Facility Maintained O&M Plan will be required for this renewal.

EP-PLY-006 and EP-PLY-007 are woodworking emission points with baghouses (CE PLY-006 & CE PLY-007) to control emissions. Due to the nature of these emission points and the Department's policy towards fugitive dust, a Facility Maintained O&M Plan will be required for this renewal.

EP-CUS-003, EP-CUS-004, EP-CUS-005, EP-CUS-006, & EP-CUS-007 are coating spray booths with dry filters (CE CUS-003, CE CUS-004, CE CUS-005, CE CUS-006 & CE CUS-007) to control emissions. Due to the nature of these emission points and the Department's policy towards spray coating operations, an Agency Approved O&M Plan will be required for this renewal.

EP-ROU-002, EP-ROU-003, EP-ROU-004, & EP-ROU-005 are woodworking emission points with baghouses (CE ROU-002, CE ROU-003 CE ROU-004, & CE ROU-005) to control emissions. Due to the nature of these emission points and the Department's policy towards fugitive dust, a Facility Maintained O&M Plan will be required for this renewal.

### **Other Notes**

From previous Title V renewal:

- The drum storage units were added to the significant list for this operating permit as they are considered affected units within 40 CFR 63 Subpart JJ (see §63.803(g)). The VOC emissions have already been accounted for elsewhere in the paint/finishing process.
- Drying Ovens were added to the significant unit list as they are affected units within 40 CFR 63 Subpart JJ. Drying ovens are not specifically excluded within 40 CFR 63 Subpart JJ NESHAP for Wood Furniture Manufacturing Operations. Furthermore, drying ovens are included in the performance test methods within §63.805. Consequently, the Department has determined that the drying ovens are an affected source within Subpart JJ. There will be no additional recordkeeping or proof of compliance required. Including the drying ovens as subject to Subpart JJ does not alter or add any requirements for the facility as the entire facility is already subject to Subpart JJ. The non-combustion VOC emissions have already been accounted for elsewhere in the paint/finishing process.