

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.

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

1. Woodharbor Custom Cabinetry, located at 3277 9th Street SW, Mason City, Iowa 50401 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Lisa Heimer.
2. Woodharbor Custom Cabinetry is a Wood Cabinetry Manufacturer. This facility consists of 27 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	22.09
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	54.87
Particulate Matter	PM	96.86
Sulfur Dioxide	SO ₂	0.00
Nitrogen Oxides	NO _x	0.24
Volatile Organic Compounds	VOC	245.60
Carbon Monoxide	CO	2.24
Lead	Lead	0
Hazardous Air Pollutants ⁽¹⁾	HAP	55.94

⁽¹⁾ May include the following: See application.

3. Woodharbor Custom Cabinetry submitted a Title V Operating Permit renewal application on May 22, 2024. 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.

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

1. The public comment period for the draft permit will run from January 30, 2025 through March 1, 2025. 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.

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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.

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Review Notes
Facility Name: Woodharbor Custom Cabinetry
Facility Number: 17-01-068
EIQ: 92-6876
Permit Number: 00-TV-027R4
Reviewer: Zane Peters
Date: 1/22/2025

Background:

Woodharbor Custom Cabinetry has applied for the fourth renewal of their Title V Operating Permit for their wood cabinet manufacturing facility located in Mason City. The facility currently consists of twenty-seven (27) significant emission units and ten (10) insignificant emission units.

Title V Applicability

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

Program Applicability

- PSD: The facility is a Synthetic Minor for PSD for VOC. VOCs are limited to 238 tons per rolling 12 month period for all paint booths.
- Part 61 NESHAP: Yes, This facility is subject only to the Subpart M NESHAP for the demolition and renovation of asbestos containing structures identified in 40 CFR 61.145.
- NSPS: Yes
 - 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
- Major Source of HAPs: Yes
- Part 63 NESHAP: Yes

- 40 CFR 63 Subpart JJ, National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations
- 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 ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
- Acid Rain: No.
- Stratospheric Ozone Protection: No.
- Prevention of Accidental Releases: No.

Changes Since the Last Issuance

General Changes

- Permit numbers and relevant dates updated
- Responsible Official information updated (pp. 1)
- Insignificant Activities Equipment List updated (pp. 5)
- General Conditions updated (pp. 49)
- Appendix D - Executive Order 10 (EO10) Rules Crosswalk added (pp. 71)

Emission Point-Specific Changes

- EP-47 & EP-48 – Various Woodworking Processes emission units EU-5 and EU-7 reorganized and re-permitted under DNR Construction Permits 24-A-080 & 24-A-081 (pp. 9-11)
- EP-25 – Emission limits & Associated Monitoring and Recordkeeping updated in accordance with DNR Construction Permit 01-A-1069-S3 (pp.12-14)
- EP-30, EP-33, & EP-38 – Rated capacities updated in accordance with DNR Construction Permits 03-A-1354-S7, 07-A-1074-S2, & 16-A-214-S1 (pp. 20-25)

Periodic Monitoring

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

EU-5 exhausts emissions from Various Woodworking Processes with a baghouse (CE-47) to control emissions. According to the calculations submitted with the permit application, this emission unit requires a CAM plan. Details of the plan can be found in Appendix A.

EU-7 exhausts emissions from Various Woodworking Processes with a baghouse (CE-48) to control emissions. According to the calculations submitted with the permit application, this emission unit requires a CAM plan. Details of the plan can be found in Appendix A.

EU-25 exhausts emissions from Various Woodworking Processes with a baghouse (CE-45) to control emissions. According to the calculations submitted with the permit application, this emission unit requires a CAM plan. Details of the plan can be found in Appendix A. Agency O & M plans (for PM) are required for EPs 3, 8, 9, 10, 13, 14, 19, 28, 29, 30, 32, 33

and 38 due to the Department's policy towards spraying operations. Details of the plans can be found in the body of the permit.

Stack Testing

No stack testing requirements at this time.

Other Comments

Ovens EU-39 Flat Line Drying Oven, EU-40 Linear High Velocity Oven, EU-43 Drying Oven (Flexi Oven) and EU-44 Fast Dry Oven do not combust natural gas. These ovens receive heated air generated at insignificant units. The combustion emissions occur at and are attributed to the insignificant units. There are no applicable requirements for the ovens themselves (i.e. particulate and sulfur dioxide limits) as heated air just passes through them.

EU-41 and EU-42 (Hot Water Boilers) are not subject to 40 CFR 63 Subpart DDDDD as they meet the definition of hot water heater. The boilers were exempt from construction permitting per IAC 22.1(2)a. Fuel-burning equipment for indirect heating and reheating furnaces or cooling units using natural gas or liquefied petroleum gas with a capacity of less than ten million BTU per hour input per combustion unit.

Emission Points 8, 9, 10, 13, 14, 19, 28, 29 and 32 are not subject to 40 CFR 63 Subpart QQQQ. The surface coating of millwork and trim associated with cabinet manufacturing are subject to subpart JJ.

The facility wants to clarify where certain emissions should be attributed. Insignificant units EU-45 and EU-46 are the small hot water boilers that provide heat to warm the air circulated in EP 44 and EP 45. Previously, the combustion emissions had been attributed, incorrectly, to EP 44.