

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 10, 2017.

Permit Number: **R30-04100045-2017**
Application Received: **February 21, 2020**
Plant Identification Number: **03-54-041-00045**
Permittee: **Latham Pool Products, Inc.**
Facility Name: **Viking Pools-WV/Jane Lew**
Mailing Address: **P.O. Box 550, Jane Lew, WV 26378**

Permit Action Number: *MM01* Revised: June 30, 2020

Physical Location:	Jane Lew, Lewis County, West Virginia
UTM Coordinates:	552.3 km Easting • 4328.1 km Northing • Zone 17
Directions:	From Interstate 79, take exit 105 and proceed west on WV County Route 7 for approximately 0.5 miles. Turn left on Lewis County Industrial Park Road (County Route 78) and proceed approximately 0.5 miles to the plant site on the left.

Facility Description

Viking Pool's Jane Lew facility manufactures swimming pools, spas, and related products made of reinforced plastic (referred to as reinforced plastic composite). There are two production lines at the facility (i.e. Building One and Building Two). The manufacturing process is a semi-continuous process consisting typically of between 6-10 steps. Actual number of steps can be more or less than this range. Pools and spas are manufactured by applying multiple layers of gel coat and resins to a plastic mold. Gel coats are used to provide color to the pools. Additional steps consist of the fabrication of structural layers which can be application of resins mixed with structural additives (e.g. ceramic powder, fiberglass strands or mat, etc.). The layers are sprayed in multiple steps with time allowed between sprays for the coatings to "cure" (polymerization of the resin monomer contained in the coatings). The coating is cured at room temperature.

This modification involves implementing more appropriate emission limits based on the correct classification of some of their resins. Previously, to demonstrate compliance the company had utilized a “Corrosion Resistant/High Strength” (CR/HS) organic HAP emission limit of 113 pounds per ton for all three of its resins. Two of those resins were determined not to qualify for the CR/HS limit, and to be subject to the stricter, non-CR/HS limit of 88 pounds per ton.

Emissions Summary

There are no changes in the facility’s PTE as a result of this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 168.8 tpy of VOCs, 141.5 tpy of Styrene, and 25.0 tpy of Methyl Methacrylate. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Latham Pool Products, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	NSR Permit
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. 63, Subpart WWWW	National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
State Only:	None.	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2332F	April 20, 2020	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's

operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made during this modification.

- Conditions 3.5.3, 3.5.5, and 3.5.6 were updated with new contact information for WVDEP DAQ and U.S. EPA.
- The citation for condition 4.1.4 was corrected.
- The emission limits table of condition 6.1.2 was updated to reflect changes made with the issuance of R13-2332F and includes new emission limits based on the correct classification of some of the resins used at the facility.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41286 • Fax: 304/926-0478
Robert.A.Mullins@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.