

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04100045-2022**

Application Received: **April 8, 2021 (Renewal), June 10, 2021 (MM02), October 4, 2021 (MM03)**

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**

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. Blue Viking Building and Green CPC Building). 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.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	0.37	Not Reported
Nitrogen Oxides (NO _x)	0.43	Not Reported
Particulate Matter (PM _{2.5})	6.6	0.32
Particulate Matter (PM ₁₀)	6.6	0.90
Total Particulate Matter (TSP)	6.6	2.78
Sulfur Dioxide (SO ₂)	0.01	Not Reported
Volatile Organic Compounds (VOC)	178.1	128.62

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Styrene	128.3	108.60
Methyl Methacrylate	14.9	14.36
Ethylbenzene	<0.02	Not Reported
Dimethyl Phthalate	<0.02	<0.01
Total HAPs	143.24	122.97

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 178.1 tpy VOC, 128.3 tpy Styrene, 14.9 tpy Methyl Methacrylate, and 143.24 tpy Total HAPs. 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	To Prevent And Control Particulate Matter Air Pollution from Manufacturing Processes And Associated Operations
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits
	45CSR20	Good Engineering Practice as Applies To Stack Heights

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R 63 Subpart WWWW	NESHAP: Reinforced Plastics Composites Production
State Only:	45CSR4	No objectionable odors.

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2332J	October 7, 2021	

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

This is the third renewal of this Title V permit and has been combined with Minor Modifications R30-04100045-2017(MM02) and R30-04100045-2017(MM03).

R30-04100045-2017(MM02)

This modification is to convert one vinyl ester resin application station to a gelcoat application station, which will be routed to the rotary concentrator/regenerative thermal oxidizer (RC/RTO) and to increase the number of material application stations routed to the RC/RTO from four to six. Correspondingly, the number of material application stations not routed to the RC/RTO will decrease from four to two.

- The above changes do not result in any changes to the Title V Permit since all the application stations are existing parts of EU-1B and there are no changes to the permitted emissions and there were no changes to R13-2332I.

R30-04100045-2017(MM03)

This modification is to incorporate language changes made to R13-2332J.

- The language of condition 4.1.4 was updated. The updated language accurately reflects what the company proposed in permit application R13-2332H (and what was included in said application's emission calculations). Additionally, this language change was requested in permit application R13-2332I but was erroneously omitted.
- Condition 6.1.2 language was updated to allow Latham to use any of the four methods of determining compliance with the emissions limits of 40 CFR 63 Subpart WWWW instead of limiting them to one method. Since all four methods are now available to be used, all of 40 CFR §63.5810 was included in the condition instead of just 40 CFR §63.5810(c).

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Section 4.0 Manufacturing Process Requirements [EP-03, EP-04, EP-11, EP-12]

- There has been no change to the applicable requirements of 45CSR7, 45CSR6 and 45CSR20 since the last renewal.
- Latham requested additional language to conditions 4.2.2, 4.2.6, and 4.4.3. The addition of recordkeeping to document when the RTO is in operation and being used to control emissions will better account for reduction in VOCs from the use of the RTO.
- R30-04100045-2017(SM02) added a rotary concentrator and regenerative thermal oxidizer (RTO) as a control device (CD-06) to EU-1B. EU-1B is a Pollutant-Specific Emissions Unit (PSEU) for VOC subject to Compliance Assurance Monitoring (CAM) under 40 CFR 64 since potential VOC emissions exceed the major source threshold before controls and control device CD-06 is used to demonstrate compliance with the VOC emission limits in condition 4.1.5. The CAM requirements were added to the Title V permit as follows:
 - Added 40 C.F.R. §§64.3(a) and 64.6(c) to the citation of condition 4.1.6 establishing the performance indicators of 1,500 °F in the combustion chamber of the RTO.
 - Added conditions 4.1.9 – 4.1.14 to incorporate the applicable requirements of 40 C.F.R. 64.
 - Added 40 C.F.R. §64.6(c) to the citation of condition 4.2.6 requiring hourly monitoring of the RTO combustion chamber temperature.
 - Added condition 4.4.5 with 40 C.F.R. 64 general recordkeeping requirements.
 - Added condition 4.5.2 with 40 C.F.R. 64 general reporting requirements.

Section 5.0 Mold Fabrication/Repair and Research and Development Requirements [EP-01, EP-02, EP-07, EP-08, EP-10]

- There has been no change to the applicable requirements of 45CSR7 and 45CSR20 since the last renewal.

Section 6.0 40 CFR Part 63, Subpart WWWW - Specific Requirements

- 40 CFR 63 Subpart WWWW was last updated on March 20, 2020. The following changes were made to section 6.0.
 - Updated condition 6.1.4 to include all the general requirements of 40 CFR §63.5835.

- Updated condition 6.1.5 to include all the continuous compliance options of 40 CFR §63.5900(a).
- Added condition 6.1.6 to include the requirement of 40 CFR §63.5900(c) to meet the applicable organic HAP emission limits and work practice standards at all times.
- Added conditions 6.2.2 and 6.2.3 to include monitoring and data collection when using an add-on control device.
- Added the testing requirements of 40 CFR §63.5845 and §63.5850 (conditions 6.3.1 and 6.3.2) now that there is an add-on control device (RC/RTO) that requires testing if the method used to demonstrate compliance with the emission limits of Table 6.1.2 requires the use of a control device.
- Added the recordkeeping requirements of 40 CFR §63.5915(b) for an add-on control device as condition 6.4.2.
- Added the recordkeeping requirements of 40 CFR §63.5920 as condition 6.4.5.
- Removed old condition 6.5.1.d since the underlying requirement was removed from 40 CFR 63 subpart WWWW on March 20, 2020.
- Added condition 6.5.2 to incorporate the 40 CFR §63.5900(b) requirement to report deviations from each standard.
- Added condition 6.5.3 to incorporate 40 CFR §63.5912 which was added to 40 CFR 63 subpart WWWW to specify how the permittee submits reports.

Note: The facility currently uses the 40 CFR §63.5810(c) “weighted average” method to demonstrate compliance with the HAP emission limits of 40 CFR 63 Subpart WWWW. This method does not use a control device to achieve compliance with the HAP limits, but for operational flexibility the option to use an add-on control device was included. The following conditions contain requirements related to the use of the add-on control device and are only applicable if and when the control device is being used to demonstrate compliance with 40 CFR 63 Subpart WWWW emission limits: 6.1.2.a, 6.1.4.b, 6.1.5.a, 6.2.2, 6.2.3, 6.3.1, 6.3.2, and 6.4.2.

Non-Applicability Determinations

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

- a. 45CSR§7-3.7. - The facility does not have storage structures which produce particulate emissions.
- b. 45CSR17 - The facility is not subject to 45CSR17 because it is subject to 45CSR7.
- c. 45CSR21 - The facility is not in a county regulated by this rule.
- d. 45CSR27 - The facility is not a source of toxic air pollutants.

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: December 15, 2021
Ending Date: January 14, 2022

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
304/926-0499 ext. 41286
Robert Mullins

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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.