

Fact Sheet



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

Permit Number: **R30-04100045-2017**
Application Received: **January 27, 2016**
Plant Identification Number: **041-00045**
Permittee: **Latham Pool Products, Inc.**
Facility Name: **Viking Pools-WV/Jane Lew**
Mailing Address: **P.O. Box 550, Jane Lew, WV 26378**

Revised: N/A

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.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Particulate Matter (PM _{2.5})	6.8	0.45
Particulate Matter (PM ₁₀)	6.8	1.27
Total Particulate Matter (TSP)	6.8	1.62
Volatile Organic Compounds (VOC)	168.8	101.74

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Styrene	141.5	69.02
Methyl Methacrylate	25.0	9.33

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

Title V Program Applicability Basis

This facility has the potential to emit 168.8 tpy of VOCs, 141.5 tpy of Styrene, and 25.0 tpy of MMA. Due to this facility's potential to emit over 100 tons per year of a 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	PM emission limits - manufacturing processes
	45CSR11	Standby plans for emergency episodes
	45CSR13	Construction permit
	45CSR20	Recommended stack heights
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for HAPs
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting
	40 CFR Part 61	Asbestos inspection and removal
	40 CFR Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 63, Subpart WWWW	Reinforced Plastics Composites MACT
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 CFR Part 60 (NSPS), 40 CFR Part 61 (NESHAPs), and 40 CFR 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>)
R13-2332E	October 21, 2013	

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 a second permit renewal for this facility. The following changes have occurred since the most recent permit was issued:

Emissions Unit Table - Emissions Unit EU-04 has been removed at the request of the facility. EU-04 (Haul Road Particulate Fugitives) is not subject to any requirements under the source's current Reg. 13 and Reg. 30 permits.

Non-Applicability Determinations

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

- 45CSR§7-3.7. - The facility does not have storage structures which produce particulate emissions.
- 45CSR17 - The facility is not subject to 45CSR17 because it is subject to 45CSR7.
- 45CSR21 - The facility is not in a county regulated by this rule.
- 45CSR27 - The facility is not a source of toxic air pollutants.
- 45CSR29 - The facility is not in a county regulated by this rule.

40 CFR Part 64 - Compliance Assurance Monitoring. The manufacturing processes are subject to 40 CFR Part 63, Subpart WWWW, the Reinforced Plastics Composites MACT, and are therefore exempt from CAM in accordance with 40 CFR § 64.2(b)(1)(i). None of the pollutant-specific emissions units are a pre-control device major source for PM and are therefore exempt from CAM for PM in accordance with 40 CFR § 64.2(a)(3).

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: Wednesday, November 23, 2016
Ending Date: Friday, December 23, 2016

Point of Contact

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

Bobbie Scroggie
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Division of Air Quality
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Charleston, WV 25304
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Bobbie.Scroggie@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.