

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant 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(SM01)**  
Application Received: **August 26, 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: *SM01*      Revised: January 26, 2021

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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.

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### 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.

This modification is to relocate EU-1A and EU-1B, replace one material application station in the Green CPC Building, add four mold stations to the mold shop building and increase the VOC emission limit for the mold shop building.

### Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in Emissions (tpy)
VOC	+8.6
PM/PM10	+0.55

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 178.1 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:	45CSR7	To Prevent and Control Particulate Matter Air Pollution Manufacturing Processes and Associated Operations
	45CSR13	NSR Permits
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R 63 Subpart WWWW	NESHAP: Reinforced Plastics 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> )
R13-2332G	November 9, 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

### Regulatory Determinations

- **45CSR7** - The four new mold stations will be subject to the process weight rate-based emission standards of 45CSR7. Maximum hourly emissions (emissions from the new EuroVac system plus the updated material coating emissions) were calculated to be about 0.13 pounds per hour. The rule 7 allowable limit (based on a type a source and a throughput of 6,628 pounds per hour) is 6.63 pounds per hour.
- **40 CFR 63: Subpart WWWW** - Latham's operation is classified as an existing major source of HAPs under 40 CFR 63, Subpart WWWW - National Emission Standard for Hazardous Air Pollutants Reinforced Plastic Composites Production. Since there is no change in the methods of demonstrating compliance with the rule, the proposed changes do not affect the facility's ability to comply with this regulation.
- The 4 new mold stations are part of the Blue Viking Building Mold Shop (EU-1A) and therefore subject to the requirements in Section 5.0

The following changes were made during this modification:

- The Emission Unit table was updated to reflect changes made within the R13-2332G emission unit table.
- Updated condition 3.5.10 to reference the new Odor Control Plan dated August 25, 2020. *Note: the underlying R13 condition has not yet been updated to reflect the approval of a new Odor Control Plan.*
- EP-08 was removed from the list of emission units subject to Section 4.0 and added to Section 5.0.
- Condition 4.1.1 was changed to remove EP-01 and EP-02 (they were relocated to section 5.0 of the permit).
- Condition 4.1.2 was changed to remove EP-01 and EP-02 (they were relocated to section 5.0 of the permit).
- Condition 4.2.5 was changed to remove CD-01 (it was relocated to section 5.0 of the permit).
- Condition 5.1.1 was updated to reflect the new emission limits.
- Condition 5.1.2 was changed to reflect the fact that the molds are now manufactured in the mold shop.

- Condition 5.1.4 was added to the permit.
- Condition 5.2.3 was added to the permit.

### **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: December 9, 2020  
Ending Date: January 8, 2021

### **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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41286  
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.