

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to these Significant and Minor Modifications, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on February 1, 2022.

Permit Number: **R30-04100045-2022(SM01 & MM01)**  
Application Received: **(SM01) August 16, 2022; (MM01) January 5, 2023**  
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 & MM01*    Revised: *March 28, 2023*

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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.

The significant modification is to increase RTO burner size, remove the “soft wall” from the CPC building, add the mixing of materials in drums/totes and update RC/RTO monitoring parameters. These changes were approved under R13-2332K.

The minor modification is to correct errors with the emission limits in condition 4.1.5. These changes were approved under R13-2332L.

**Emissions Summary**

This modification results in the following emission changes:

Pollutant	Change in Emissions (+ or -) TPY
CO	+0.85
NO <sub>x</sub>	+1.02
PM	+0.07
VOC	+0.05

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 178.18 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.

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

Federal and State:	45CSR6 45CSR13 45CSR30 40 C.F.R 63 Subpart WWWW	Open burning prohibited. NSR Permits Operating permit requirement. 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

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> )
R13-2332K	October 26, 2022	
R13-2332L	January 19, 2023	

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 to the Title V permit under Significant & Minor Modifications R30-04100045-2022(SM01 & MM01):

- Updated active permits table.
- Updated the citations of Title V boilerplate conditions 2.11.4 and 2.22.1.
- Updated US EPA address in condition 3.5.3.
- The following changes were made as a result of the issuance of R13-2332L.
  - Condition 4.1.5 limits emissions from the RTO. Permit R13-2332K changed the burner size of the RTO from 1.0 mmbtu/hr to 2.4 mmbtu/hr. However, when that permit was issued, the emission limits included in condition 4.1.5 only reflected the INCREASE in emissions, not the total emissions. This is obviously a mistake and was corrected in R13-2332L.
  - Condition 4.1.5 had previously included total VOC emissions from the RTO. However, the production VOC emissions being controlled by the RTO are already accounted for in condition 4.1.1. Therefore, the language of the permit and the emission limits of condition 4.1.5 were changed to reflect R13-2332L and only include the combustion of natural gas in the RTO.
- The application for the significant modification contained an updated CAM plan for the RC/RTO based on the equipment manufacturer's recommendations and recent actual operating conditions. The updated CAM plan resulted in the following changes.
  - Updated condition 4.1.6 to include four new operating parameters in addition to the RTO combustion chamber operating temperature. These new operating parameters include rotary concentrator (RC) inlet fan speed, RC wheel rotation speed, RC desorption temperature, and RTO inlet fan speed.
  - Updated condition 4.2.6 to include monitoring requirements for the new operating parameters.

- While the mixing of materials in drums/totes does not change anything in the permit Section 6.0, 40 C.F.R. 63 Subpart WWWW has conditions applicable to mixing operations.

### **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: February 8, 2023  
Ending Date: March 10, 2023

### **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  
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.