West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

Permit Number: **R30-04100045-2011**
Application Received: **February 14, 2011**
Plant Identification Number: **041-00045**
Permittee: **Viking Pools, LLC**
Facility Name: **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	2010 Actual Emissions
Particulate Matter (PM_{10}) *PM_{10} is a component of TSP.*	4.0	<0.90
Total Particulate Matter (TSP)	9.1	0.90
Volatile Organic Compounds (VOC)	168.7	46.35
Hazardous Air Pollutants	**Potential Emissions**	**2010 Actual Emissions**
Styrene	141.5	39.13
MMA	25.0	5.92

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

Title V Program Applicability Basis

This facility has the potential to emit 168.7 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, Viking Pools. LLC 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
	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. 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 request any pertinent information such as annual emission inventory reporting is provided in WV Code § 22-5-4(a)(14). 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 *(if any)*
R13-2332D	February 15, 2011	

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 B," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a permit renewal for this facility. This renewal also incorporates the minor modification requested by the facility on September 28, 2010 and authorized by NSR Permit R13-2332D. The following changes have occurred since the most recent permit was issued:

Title V Boilerplate changes:

A new Section 1.2 Table was added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. The underlying authority for any conditions from R13, R14, and/or R19 permits have been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table.

Conditions 3.1.1. and 3.1.2. were revised because the language in 45CSR§§6-3.1. and 3.2. changed.

Condition 3.1.3. citation was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34.

Condition 3.3.1.d. was added.

Conditions 3.5.3. and 3.5.5. were revised to address electronic submittal of the annual certification to the USEPA. The certification shall now only be submitted to the USEPA by e-mail.

Other changes:

Condition 3.5.10. - Removed language requiring submittal of annual Styrene Odor Control Plan for the first three years of the initial permit since this time period has passed. The facility may still be required to submit a Styrene Odor Control Plan upon written request by the Director, so this part of the requirement was retained.

R13-2332D - Incorporated changes from the class II administrative amendment to R13-2334, which allowed several raw material and operational changes.

Section 4.0. changes: Table 4.1.2. now lists separate limits for each building, and includes concentration limits for MMA and styrene, as well as daily usage limits. Table 4.1.3. now lists separate limits for each building and for different operating modes, a routine operating mode and a contingent operating mode. Condition 4.1.10. was changed to require replacement of fabric filters when the pressure drop across the baghouse falls outside of manufacturer's specifications. This requirement is still considered sufficient for Title V purposes to demonstrate compliance with Condition 4.1.8. Condition 4.1.16. was added to require grinding emissions to be controlled by a new central vacuum system vented to a baghouse. Compliance with the requirement to achieve control device efficiency of 99.9% shall be demonstrated by inspection, preventative maintenance, and recordkeeping in accordance with Conditions 4.4.1. and 4.4.2. Conditions 4.2.5. and 4.4.5. were

added to require daily monitoring and recordkeeping of baghouse pressure drops across each baghouse.

Section 5.0. changes: Condition 5.1.3. increases the allowable styrene content from 43.5% to 47% by weight and added a limit for MMA content to 5% by weight. The MRR requirements authorized by the NSR permit were deemed to be sufficient for Title V purposes.

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).

Greenhouse Gas Permitting - This is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit. Therefore, there are no applicable GHG requirements.

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: June 22, 2011
Ending Date: July 22, 2011

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

Bobbie Scroggie
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

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.

Point of Contact

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478

Response to Comments

Section 3.7. - Permit Shield. USEPA commented that 45CSR14 should not be listed under the Permit Shield. In the event the facility installed equipment or made changes that triggered PSD without a permit, the state and USEPA would be limited in the enforcement action that could be taken. In addition, the facility did not request a permit shield for 45CSR14, therefore DAQ made the decision to remove Condition 3.7.2.b. from the permit.