

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 July 27, 2011.

Permit Number: **R30-04100045-2011**
Application Received: **February 26, 2013**
Plant Identification Number: **03-54-04100045**
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: December 17, 2013

Physical Location:	Jane Lew, Lewis County, West Virginia
UTM Coordinates:	552.24 km Easting • 4,328.08 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

Latham 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 the 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. Facility NAICS Code is 326199.

Emissions Summary

The only proposed emission increase is the result of relaxation of the collection efficiency of the filter media in the manufacturing (fabrication) areas. This will only cause a minor increase in annual emissions of 0.6 tpy of particulate matter (PM) and PM₁₀ less than 10 microns (PM₁₀).

Pollutant	Potential emissions before modification (TPY)	Increase in potential emissions (TPY)	Potential emissions after modification (TPY)
PM	9.1	0.6	9.7
PM10	4.0	0.6	4.6

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains 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, 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:	45CSR13 45CSR30	Construction Permit Operating permit requirement.
State Only:	N/A	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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>)
R13-2332E	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 B" which may be downloaded from DAQ's website.

Determinations and Justifications

This significant modification is for incorporating 45CSR13 permit R13-2332E which is a revision of R13-2332D. R13-2332E is for specific changes to the conditions in Permit R13-2332D which increase operational flexibility at the facility. The changes mainly seek relief of specific conditions that restrict the facility's ability to change materials. The facility has enhanced the means of measuring the amount of gel coats and resins applied during the manufacturing process and can now count actual resin and gel coat usage on a real time basis using the TFM system. R13-2332D set compliance with the specific emission limits based on limiting content and application rates in the permit. In R13-2332E, compliance will now be demonstrated directly with the permitted emission rates through calculations rather than using material restrictions and limitations. Latham will be required to take the usage data from the TFM and calculate actual emissions to demonstrate compliance with the emission limits.

Following are the changes made to the permit:

1. Name of the permittee is changed from Viking Pools, LLC to Latham Pool Products, Inc.
2. Changes are made in section 1.1, Emission Units table according to R13-2332E. The following changes are made:
 - a. Emissions from Emission Unit ID EU-1A (Emission point ID EP-07) are vented to Control Device CD-03.
 - b. Emissions from Emission Unit ID EU-02 (Emission point ID EP-09) are fugitive emissions, no control device.
3. Following changes are made in Section 3.0 of the permit:
 - a. Section 3.2.1 requirements are eliminated according to R13-2332E.
 - b. R13-2332E citation is added to Section 3.3.1.
 - c. R13-2332E citation is changed in section 3.4.1.
 - d. Section 3.5.10 is changed according to R13-2332E. R13-2332E condition is changed to reflect that submittal of a revised Styrene Odor Control Plan would only be required in the case of a written request being issued by the Director.
4. Following changes are made in Section 4.0 of the permit:

Old permit conditions 4.1.1 to 4.1.11 (which were requirements from R13-2332D) have been changed according to changes in R13-2332E and consolidated in conditions 4.1.1.a to g. The following changes are made:

The usage and content restrictions in Old Conditions 4.1.2 through 4.1.3 were omitted and replaced with emission limits in revised Condition 4.1.1.b. The PM emission limits were incorporated from old existing Conditions 4.1.8 and 4.1.9 into new Condition 4.1.1.a. Old Condition 4.1.6 was reorganized into new condition 4.1.1.c. The application technology requirements in old Condition 4.1.1 and operating requirements in 4.1.5 and 4.1.7 were consolidated into 4.1.1.d. Old condition 4.1.10 was reorganized into condition 4.1.1.f.

The permanent total enclosure (PTE) requirements of old Condition 4.1.11 were revised and are now 4.1.1.e. The applicant claimed that the testing requirements in old condition 4.3.1 were unnecessary once the applicant conducted a satisfactory Method 204 test. This is confirmed in Air Pollution Control Technology Fact Sheet EPA-452/F-03-033 that once a PTE has been confirmed, no additional capture efficiency testing is required. Thus, Condition 4.3.1 was omitted. The revised condition 4.1.1.e establishes the primary indicator of that PTE is achieved by measuring facial velocity of 200 feet per second or greater, which is the facial velocity directly taken from the Air Pollution Control Technology FactSheet.

Old condition 4.1.4 is eliminated in R13-2332E and subsequently in the Title V permit because according to R13-2332E engineering evaluation, this condition is not necessary to ensure compliance with the limits in Condition 4.1.1.b, nor with Section 6.0 (40 CFR63 Subpart WWWW requirements).

Further, the source needs the operating flexibility to use a wide array of materials to manufacture products under the various brands Viking Pools currently controls.

Old condition 4.1.12 is modified in R13-2332E and is now 4.1.2.

Old condition 4.1.13 is modified in R13-2332E and is now 4.1.1.g.

Old condition 4.1.14 is modified in R13-2332E and is now a part of 4.1.1.e.

Old condition 4.1.15 is now 4.1.3.

Old condition 4.1.16 is modified in R13-2332E (to also apply to mold sanding and reduce the Control efficiency of the Vacuum System and baghouse to 90%) and is now a part of 5.1.3. The grinding activities in old condition 4.1.16 were associated with mold fabrication and repair which is covered in Section 5.0.

Old condition 4.1.17 is modified in R13-2332E and is now 4.1.4.

Condition 4.2.2 is modified according to R13-2332E.

Condition 4.2.3 is modified according to R13-2332E.

Condition 4.2.5 is modified according to R13-2332E.

Condition 4.4.3 is modified according to R13-2332E.

Condition 4.4.5 is eliminated according to deletion in R13-2332E; the requirements are incorporated in Condition 4.2.5.

5. The following changes are made in Section 5.0 of the permit:

Condition 5.1.1 is modified according to R13-2332E. According to R13-2332E engineering evaluation - Styrene, methyl methacrylate (MMA) and Total HAPs limits were deleted from Condition 5.1.1., as their emissions are regulated under 40CFR63 Subpart WWWW requirements and such limits are not necessary to ensure compliance with criteria pollutant (i.e. VOC, PM/PM₁₀) emission limits that establish the Facility as a PSD synthetic minor source.

Conditions 5.1.2 and 5.1.3 were deleted as they are not necessary to ensure compliance with the emission limits set forth in Condition 5.1.1., and also to allow the source the operating flexibility to use a wide array of materials to manufacture products under the various brands Viking Pools currently controls.

Old Condition 5.1.4 is now 5.1.2.

A new condition 5.1.3 is added to incorporate new condition 5.1.5 in R13-2332E. The requirements for grinding activities were previously included as old Condition 4.1.16.

Conditions 5.2.1 and 5.2.2 were modified according to R13-2332E.

6. The following changes are made in Section 6.0 of the permit:

Condition 6.1.2 was modified according to R13-2332E. Compliance methods to show compliance with organic HAP limits have been added.

Old condition 6.1.3 was deleted according to R13-2332E. Old condition 6.1.4 is now 6.1.3.

Old condition 6.1.5 is now 6.1.4 with changes according to R13-2332E.

Old condition 6.2.1 was eliminated from R13-2332E and the Title V permit. This compliance requirement is incorporated in section 6.1.2.

Old condition 6.2.2 is now 6.2.1 with changes according to R13-2332E.

Section 6.4.1 has been changed according to changes in R13-2332E.

Old condition 6.4.2 is eliminated from R13-2332E and the Title V permit. Recordkeeping for the compliance option chosen in 40 CFR§63.5810 is stated in section 6.2.1.

Section 6.5.1 has been changed according to changes in R13-2332E.

Old condition 6.5.2 is deleted according to R13-2332E. R13-2332E evaluation states “Strike Condition 6.5.2. as it is not consistent with the codified language and requirements of 40 CFR 63 Subpart WWWW as it applies to products made for corrosion resistant end use application.”

Non-Applicability Determinations

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

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 modification has not 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: October 30, 2013
Ending Date: December 2, 2013

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

U.K.Bachhawat
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

U.K. Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.