

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on October 4, 2006.

Permit Number: **R30-04100045-2006**

Plant Identification Number: **03-54-041-00045**

Permittee: **Viking Pools, LLC**

Facility Name: **Jane Lew**

Mailing Address: **P.O. Box 550 Jane Lew, WV 26378**

Permit Action Number: *MM01*; Revised: *May 16, 2008*

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). This update is to allow the facility to use atomized spray gun to apply the IOS-Ceramic layer to the product. In addition, Viking requested to make other operational changes to Permit R13-2332B and their Title V Permit.

Emissions Summary

This Title V permit minor modification will result in a decrease in annual emissions from the manufacturing process of 1 ton per year (tpy) of styrene, 7 tpy of Methyl Methacrylate (MMA), and 7 tpy of Volatile Organic Compounds (VOCs).

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 174 tons per year of Volatile Organic Compounds, 142.2 tons per year of a single HAP, and 170.6 tons per year of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, 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.

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

Federal and State:	45CSR13	Construction Permit
	45CSR30	Operating permit requirement.

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, 45CSR15, 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>)
R13-2332C	March 19, 2008	

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).

Determinations and Justifications

Due to the administrative update to R13-2332B, the following changes were made to the Title V permit:

Pump pressure ranges were corrected for resin and gelcoats application. The resin and gelcoat applicators could not operate at the ranges listed in the permit. Viking Pools entered into Consent Order CO-R13,30-E2008-2 which resolved this issue and allows the Rule 13 permit to be changed under the administrative update process. The pump pressure ranges in Table 4.1.1. were revised to a maximum pump pressure setting of 70 psig for all five of the application types.

The application method for the ISO-Ceramic Resin was changed from non-atomized to atomized. As part of this proposed change, Viking agreed to take a lower styrene content limit for the resin used. Viking also agreed to take lower styrene and MMA content limits for the clear and color gelcoats listed in Table 4.1.3. of the permit. These changes were reflected in permit conditions 4.1.1., 4.1.2., and 4.1.3.

Viking Pools is modifying the annual usage rates of the specific resins and gelcoats. This will reflect a more accurate representation of the raw material usage at the plant, which is presented in the following table.

Table #1 Resin Usage Changes			
Material Category	Permitted Material Usage under R13-2332B (lbs/year)	Requested Usage Limits (lbs/year)	Net Difference lbs/year (-)
Clear gel coat (crystite)	576,770	403,551	(173,219)
Color Gel Coat	327,712	645,681	317,969
Vinyl Ester Resin	614,460	847,457	232,997
ISO Resin (Ceramic filter)	880,726	807,102	(73,624)
General Purpose Resin	1,986,754	1,331,718	(655,036)
MEKP (catalyst)	87,729	74,569	(13,160)

These usage changes coupled with the other changes will result in a decrease in annual emissions from the manufacturing process of 1 ton per year (tpy) of styrene, 7 tpy of MMA, and 7 tpy of VOCs. Condition 4.1.3. was revised to reflect these usage limits and annual VOC emission limit.

The initial testing requirement for the Method 204 test was removed from Condition 4.3.1. The initial test was completed on September 11, 2007.

Permit R13-2332B, Section 5 set restrictions on materials used in the repair and maintenance of molds. The molds are repaired on as needed basis and setting individual usage limits for different materials was too restrictive. Viking Pools has consolidated the raw materials and usage rates, however the consumption rates of tooling gelcoats and gel coats was omitted. The current permit specifically noted that the usage of resins was counted against the resin limit stated Table 4.1.3. of the permit. Condition 5.1.3. was created to limit the tooling gelcoat to 7,500 pounds per year. This proposed usage limit is a decrease of 7,864 pounds of tooling gel coat per year, and a decrease in permitted emissions of styrene of 1 ton per year. Condition 5.1.2. limits the facility consumption of materials used in the repair and manufacturing of molds to 22,800 pounds annually.

MSDS and other vendor-provided documentation were added to Certificates of Analysis (COAs) as information sources to gather characteristics of the gelcoats and resins. Currently, Viking Pools is required to gather characteristic information of the gelcoats and resins (i.e. styrene content, VOC percent by weight) by using Certificates of Analysis. Viking Pools has requested the option of using MSDS sheets as an approved source of gathering gelcoat and resin data and the request has been approved. It should be noted that the gelcoats used by Viking are manufactured by Cook Composites and Polymers. The COAs that Cook provides do not contain styrene or other key data of the batch of gelcoat shipped that the DAQ would use to determine compliance. The DAQ recognizes that this issue lies with Cook and not with Viking. Therefore, granting relief of the COA restriction in Condition 3.2.1. is not considered a relaxation of the condition.

Non-Applicability Determinations

No new non-applicability determinations were made.

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: Not applicable for Minor Modifications
Ending Date: N/A

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. • Fax: 304/926-0479

Response to Comments

None received.