NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date: DRAFT

Region: Fayetteville Regional Office
County: Richmond
NC Facility ID: 7700087
Inspector's Name: Jeffrey D. Cole
Date of Last Inspection: 10/20/2021
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): Latham Pool Products, Inc.

Facility Address:
Latham Pool Products, Inc.
162 Enterprise Drive
Rockingham, NC 28379

SIC: 3089 / Plastics Products, Nec
NAICS: 326199 / All Other Plastics Product Manufacturing

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 02D .0515, 0516, .0521, .1111, .1806. 02Q .0317
NSPS:
NESHAP: WWWW
PSD:
PSD Avoidance: 02Q .0317, VOC
NC Toxics:
112(r):
Other:

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Humberto Viana Plant Manager (704) 972-0632 162 Enterprise Drive Rockingham, NC 28379	Matt Rowe VP of EHS/Quality/Autocovers (800) 833-3800 787 Watervliet Shaker Road Latham, NY 12110	Theresa Elliott Environmental Compliance Manager (813) 783-7212 40119 County Road 54 East Zephyrhills, FL 33540

Application Data

Application Number: 7700087.20B, 20A, 22A, 22B
Date Received: 10/07/2020,07/14/2020, 09/06/2022, 12/12/2022
Application Type: Renewal
Application Schedule: TV-Renewal, 502(b)(10, 502(b)(10), Significant Mod

Existing Permit Data
Existing Permit Number: 09686/T07
Existing Permit Issue Date: 02/05/2020
Existing Permit Expiration Date: 05/31/2021

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2020	---	---	126.68	---	1.48	120.54	107.69 [Styrene]
2019	---	---	71.67	---	0.8100	68.16	61.46 [Styrene]
2018	---	---	67.50	---	0.7800	64.50	58.32 [Styrene]
2017	---	---	70.86	---	0.8000	67.57	61.02 [Styrene]
2016	---	---	43.51	---	0.5100	42.71	38.35 [Styrene]

Review Engineer: Jenny Sheppard

Review Engineer's Signature: **Date:**

Comments / Recommendations:
Issue 09686/T08
Permit Issue Date: DRAFT
Permit Expiration Date: DRAFT

1. Purpose of Application

Latham Pool Products, Inc. currently holds Air Permit No. 09686T07 issued February 5, 2020 and was scheduled to expire May 31, 2021. The renewal application was received on October 7, 2020, or at least six months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied pursuant to 02Q .0513.

During the renewal application completeness review, it was determined that the facility was required to submit additional application forms for a 502(b)(10) request that was received July 14, 2020. The application forms for this modification were not included in the original July 2020 request or renewal application. The renewal application was deemed technically incomplete. The facility submitted the additional information on November 15, 2020.

On September 6, 2022, the facility submitted a second 502(b)(10 modification request to add a 13th material application station within the Production area. This booth is the same configuration and type and function as the existing 12 application stations and will continue to operate under the emission limits and condition in the current permit (09686T07).

On December 12, 2022, the facility submitted an additional one step significant modification application for the addition of a rotary concentrator and regenerative thermal oxidizer for the destruction of VOCs emitted from the production area (ID No. ES-01). This application will be processed with the renewal application.

2. Facility Description

As indicated in a prior permit review, Latham Pool Products, Inc. manufactures swimming pools, spas, and related products made of reinforced plastic composites. There are two production lines in the manufacturing building that run in parallel and can exchange parts. The manufacturing process is a semi-continuous process. Pools and spas are manufactured by applying multiple layers of gelcoat and resins to a plastic mold. The layers are sprayed in multiple steps with time allowed in-between for the coatings to cure at room temperature. A summary of the process is shown below:

In the Mold maintenance rooms (**ID No. ES-02**) equipped with one dust collection system installed for PM control, the molds are repaired or cleaned in preparation for the Production area (**ID No. ES-01**).

The Production area (**ID No. ES-01**) consist of five steps:

a. Gelcoat Layer Steps: Either gelcoat or a combination of gelcoat and "flake" material is applied to give the pool or spa its color.
b. Structural or Corrosion Barrier Layer Step (Vinyl Ester Resin): A vinyl ester resin layer mixed with chopped fiberglass strands for strength is applied.
c. Structural or Ceramic Layer Step (Polyester Resin): A layer of resin mixed with ceramic powder is applied to give the pool some thermal insulation.
d. Structural Layer Step (Polyester Resin): A layer of resin with both chopped fiberglass strands and "stitch mat" is applied for additional strength. The stitch mat is an inert fiberglass mat.
e. Final Cure: The pool is allowed to cure completely and then removed from the mold
   Any defects found in the pool (e.g., cracks) are repaired prior to moving the pool outside the building. Defects are generally repaired by applying a sealant.

Latham Pool Products, Inc. has a fiberglass pad filter system designed to remove fine aerosols or particulate matter emitted from the production area. The pads are mounted vertically and perpendicular to the building ventilation air flow. The filter functions as a large spray booth with no VOC controls. The system is considered an integral part of the process equipment designed to protect the ventilation system fans from damage from resin particles that can stick to surfaces.

Raw material storage area (**ID No. F-01**): Resin is stored typically in plastic totes in the material storage area. Gelcoat is generally stored in 55 gallon drums. Other VOC-containing materials are typically stored in 1 – 5 gallon pails. VOC/HAP emissions are generated primarily from the filling of resin storage vessels or totes.

Finishing operations (**ID No. F-02**): Once the manufacturing steps inside the building are completed, the pool is lifted off its mold and placed outside the building for finishing. At this time, additional work is done including some minor sanding of edges, as well as cementing of decorative tiles.

3. History/Background/Application Chronology

Permitting History

February 2, 2007	Permit 09686R00 issued to Viking Pools LLC –Rockingham Facility and classified as a Title V facility.
January 2008	The facility submitted its first time Title V permit application in January 2008. In April 2009, the facility requested that the Title V permit application be "frozen," as the facility had been shut down due to economic conditions since mid-2008.
May 13, 2009	Permit 09686R01 issued to the facility changing the fee class from Title V to Synthetic minor (application received April 20, 2009). The Title V application was subsequently withdrawn on May 13, 2009.
February 2011	Viking Pools LLC – Rockingham Facility resumed operations. The company acquired the assets of the Blue Hawaiian Products facility in Rocky Mount, NC (facility ID No. 3300187) in early 2011. The company shut down the Blue Hawaiian operation and consolidated the two facilities into one operation, located at the Rockingham site.
December 13, 2011	Permit 09686R02 renewal issued, application submitted December 5, 2011
May 17, 2012	Permit 09686R03 issued to remove synthetic minor limitations and restore fee class to Title V.
June 19, 2012	Permit 09686R04 administrative amendment issued to correct an error.
April 2, 2013	Permit 09686R05 issued permit to change name to Latham Pool Products, Inc. d/b/a Viking Pools – NC
June 3, 2016	Permit 09686T06 issued 1st Time Title V
March 17, 2017	Facility submitted 502(b)(10) Notification deemed not need as the stations requested to construct were already in the permit.
February 5, 2020	Permit 09686T07 TV State Only modification for Styrene modeling to revise modeling and emissions calculations that demonstrate compliance with the styrene Acceptable Ambient Level (AAL) after the addition of a second stack/emission point to emission source ID No. ES-01.
July 14, 2020	502(b)(10) notification submitted for the addition of a EuroVac fabric filters (and associated emission point) to control dust emissions from the sanding/buffing activity associated with Mold Maintenance Area 2 (Mold Room #2), which is part of the Mold maintenance rooms (ID No. ES-02). This will be processed with the renewal application.
October 07, 2020	Renewal application received but was deemed incomplete for processing on October 16, 2020 and information was requested. The facility provided the additional information for completeness on November 15, 2020 (EuroVac fabric filters application forms and calculations).
November 15, 2020	Application deemed complete.
September 06, 2022	A second 502(b)(10 modification request to add a 13th material application station within the Production area
December 12, 2022	Significant Modification received for addition of RTO (ID No. CD-RCRTO) to production area (ID No. ES-01).

Application Chronology

October 07, 2020	Renewal application received but was deemed incomplete for processing on October 16, 2020 and information was requested to complete the application for the July 14th 502(b)(10) submittal. The facility provided the additional information for completeness on November 15, 2020. Note the renewal application has dropped the d/b/a Viking Pools – NC.
November 15, 2020	Application deemed complete.
September 6, 2022	Facility submits additional 502(b)(10) to add a material application station to the production area (ID No. ES-01) and is incorporated into the renewal application
December 12, 2022	A one step significant modification application for the addition of a rotary concentrator and regenerative thermal oxidizer for the destruction of VOCs emitted from the production area (ID No. ES-01) to be processed with the renewal.
February 12, 2023	Modeling review completed for the significant modification.
April 4, 2023	Received comments on the permit application from the facility and an application addendum changing the two EuroVav fabric filters to one dust collection system consisting of a Camfil Model No. GS4HV (502(b)(10) application 7700087.20A)
May 4, 2023	Draft sent to Fayetteville Regional Office (FRO).
May	To be completed at notice.

4. Permit Modifications/Changes and TVEE/ESM Changes/Discussion

The following table describes the modifications to the current permit under this permit modification.

Pages	Section	Description of Changes
Cover and throughout	--	Updated all dates and permit revision number throughout document. Converted cover letter and attachments to cover letter to current shell.
4	Section 1	Added CD-RCRTO to the production area and CD-03 to mold maintenance rooms
5	Section 2.1	Added control device to description for production area. Updated summary of limits and standards table
5	2.1 A.1	Updated 02D .0515 condition to current language and format
6	2.1 A.2	Added 02D .0516 requirements for CD-RCRTO
6	2.1 A.3	Update 02D .0521 condition to current language and added CD-RCRTO
7	2.1 B	Added CD-03 to mold maintenance rooms description. Updated summary of limits and standards table to current format
7	2.1 B.1	Updated 02D .0515 condition to current format and language and added MRR for the control devices
8	2.1 B.2	Updated 02D .0521 condition to current format and language, added MRR for ES-02 with associated control CD-03
10	2.2 A	Updated summary of limits and standards table
10	2.1 A.1	Updated language and format for MACT WWWW
14	2.1 A.2	Updated language and format for PSD avoidance condition
16	Section 3	Added this Section for future use, current no insignificant activities at the facility
17	Section 4	Made General Conditions Section 4 and updated to current conditions

5. Regulatory Review

The facility is currently subject to the following regulations:
15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
15A NCAC 02D .0521 "Control of Visible Emissions"
15A NCAC 02D .1111 "Maximum Achievable Control Technology" (Subpart WWWW)
15A NCAC 02Q .0317 "Avoidance Conditions" (PSD)
15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"

15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
This regulation establishes an allowable emission rate for particulate matter from any stack, vent, or outlet resulting from any industrial process for which no other emission control standards are applicable. This regulation applies to Total Suspended Particulate (TSP) or PM less than 100 micrometers (μm). The allowable emission rate is calculated using the following equation:

$E = 4.10 \times P^{0.67}$ for $P \leq 30$ tph
$E = 55 \times P^{0.11} - 40$ for $P > 30$ tph

Where, E = allowable emission rate (lb/hr)
P = process weight rate (tph)

Production Area (ID No. ES-01), per application 7700087.20B and discussed above, this process has inherent overspray filters to protect the blower motor. The stated maximum hourly PM emissions for the production area is 0.48 pounds per hour (lb/hr). From Table B-2 of the application, the stated process rate per hour for the production area (ID No. ES-01) is 0.38 tons per year (tph) making the allowable emission rate is calculated to be 2.16 lb/hr. Compliance is expected.

Mold maintenance rooms (ID No. ES-02) controlled by two EuroVac fabric filters (ID Nos. CD-02 and CD-03). The EuroVac fabric filters were installed under a 502(b)(10) request submitted on July 14, 2020. This requested change was acknowledged by the division on July 17, 2020 via email (submittal completed 11/15/20). Based on the information in the renewal application and the additional information request for the two fabric filters, the expected maximum hourly PM emissions are 0.068 lb/hr. Based on the information on the application forms the stated process rate is 0.0046 tph

and the allowable emission rate is calculated to be 0.11 lb/hr. Compliance is expected. On April 4, 2022, the facility submitted an addendum to the significant modification that is being processed with the renewal. This addendum removes the two EuroVac fabric filters and replaces them with one dust collection system (ID No. CD-03, Camfil Model No. GS4HV). From the addendum, the amount of particulate matter to be conveyed to the vacuum filter is 288,000 pounds per year with 99.9% efficiency results an after control emission rate of 288 lb/yr or 0.033 lb/hr. The allowable emission rate is 0.11 lb/hr based on production rate. Compliance is expected.

Finishing Operations (ID No. F-02), The stated maximum hourly PM emissions for the production area is 0.20 pounds per hour (lb/hr). From Table B-2 of the application, the stated process rate per hour for the finishing operations (ID No. F-02) is 0.39 tons per year (tph) making the allowable emission rate is calculated to be 2.2 lb/hr. Compliance is expected.

15A NCAC 02D .0521 "Control of Visible Emissions"
Visible emission (VE) standards provided in this regulation are applicable to potential VE emissions from any stack, vent, or outlet. This regulation limits visible emissions to no more than 20 percent opacity when averaged over a six-minute period, except that six-minute periods averaging more than 87 percent opacity may occur not more than once in any hour not more than four times in any 24-hour period. Compliance with this standard is expected.

Per the significant permit modification submitted on December 12, 2022, the facility is installing a rotary concentrator with a regenerative thermal oxidizer (ID No. CD-RCRTO). The associated permit condition will require that Latham Pool Products make a monthly VE observation (ID No. ES-01 only) and submit a summary report twice per year. The facility will need to reestablish normal after commencing operation of the control device. This change has been made to the condition in the permit.

15A NCAC 02D .1111, Maximum Achievable Control Technology (MACT)
The facility is subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, as promulgated under 40 CFR Part 63 Subpart WWWW (also referred to as MACT WWWW). See Section VI for further discussion on MACT.

15A NCAC 02Q .0317 "Avoidance Conditions" (Avoidance of PSD Applicability)
Because potential VOC emissions exceed 250 tpy, via e-mail on October 17, 2014, the facility requested that a (PSD Applicability) avoidance condition limiting facility-wide potential VOC emissions to less than 250 tons/year be added to the permit.

The associated permit condition will require that Latham Pool Products calculate consecutive 12-month VOC emissions on a monthly basis and submit a summary report twice per year.

State-Only Requirements
15A NCAC 02D .1806 "Control of Odors"
The permit requires the Permittee to provide for the control and prohibition of objectionable odorous emissions. This rule applies to all operations at the facility that may produce odorous emissions that can cause or contribute to objectionable odors beyond the facility's boundaries. Compliance with this standard is expected.

6. NSPS, NESHAPS/MACT, NSR/PSD, 112(r), CAM, attainment status

NSPS
The Permittee is not currently subject to any New Source Performance Standards. This permit modification does not affect this status.

NESHAPS/MACT
The facility is subject to MACT WWWW. As indicated previously, the facility was initially subject to MACT WWWW because it is a reinforced plastic composites production facility and was major for HAPs when it was first permitted. When the facility accepted limits to become synthetic minor, the facility remained subject to MACT WWWW under EPA's "Once-In-Always-In" policy (which has since been rescinded with MM2A, Dec 2020). The first Time Title V permit was issued June 3, 2016.

MACT WWWW has distinct requirements for reinforced plastic composite facilities that emit less than 100 tpy of HAPs and those that emit over this amount. For those emitting over 100 tpy, the facility must reduce the total organic HAP emissions by at least 95 percent by weight and meet any applicable work practice standards in Table 4 of the Subpart.

Although, Latham Pool Products, Inc. has the potential to emit more than 100 tpy as shown in Attachment 1, they are exempt from the 95% HAPs emission reduction requirement based on the large parts exclusion described under 40 CFR 63.5805(d)(1). As indicated in the review for the initial Title V permit,[2] the facility indicated that its products qualify as "large parts" because they are larger than 250 cubic feet, typically ranging from 500 to 2,000 cubic feet.

MACT WWWW has distinct requirements for reinforced plastic composite facilities that emit less than 100 tpy of HAPs and those that emit over this amount. For those emitting over 100 tpy, the facility must reduce the total organic HAP emissions by at least 95 percent by weight and meet any applicable work practice standards in Table 4 of the Subpart. Although, Latham Pool Products, Inc. has the potential to emit more than 100 tpy as shown in Attachment 1, they are exempt from the 95% HAPs emission reduction requirement based on the large parts exclusion in 40 CFR 63.5805(d)(1) and as discussed below.

The facility's current operations use open molding—non-CR/HS (corrosion resistant/high strength) with mechanical or manual resin application. From Table 3 of Subpart WWWW 'organic HAP Emissions Limits for New Open Molding Sources' the current operations at the facility will be subject to the following limitations:

Source	Activity	lb/ton of resin used (lbs/ton) limit	Table 3 reference
ES-02	Maintenance	440	6. a.
ES-01	Gelcoat Layer Steps	605	6. d.
	Skin Layer or Corrosion Barrier Step (Vinyl Ester Resin)	113	1. a.
	Structural or Ceramic Layer Step (Polyester Resin)	113	1. a.
	Structural Layer Step (Polyester Resin)	113	1. a.

Daily records of the amount and composition of HAP-containing coatings shall be kept. The HAP emission factors shall be calculated monthly, based on the HAP emission factor from the equations in NESHAP WWWW (shown below for current facility operations), and compliance shall be based on one of the methods described in 40 CFR 63.5810 and the air permit. Specifically, considering the source and type of activity, compliance shall be shown by one of these methods: (1) individual resin or gel coat, as applied (2) meet individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type or (3) weighted average emission limit.

HAP emission factors for current operations at the facility [Table 1 NESHAP WWWW]:
(EF is pounds of organic HAPs e emitted per ton of resin or gelcoat processed)

Source	**Activity**	**Materials with less than 33% organic HAP**	**Materials with 33 % or more organic HAP**
ES-02	Mold Maintenance	EF = 0.445 x %HAP x 2000	EF = ((1.03646 x %HAP)-0.195) x 2000
ES-01	Gelcoat Layer steps	EF = 0.445 x %HAP x 2000	EF = ((1.03646 x %HAP)-0.195) x 2000
ES-01	Skin Layer or Corrosion Barrier Step (Non-atomized VE Resin)	EF= 0.107 x %HAP x 2000	EF= ((0.157 x %HAP)-0.0165) x 2000
ES-01	Structural Layer Step (Non-atomized PE Resin)	EF= 0.107 x %HAP x 2000	EF= ((0.157 x %HAP)-0.0165) x 2000

Where %HAP is entered as a decimal. For example, 0.30 for a 30% HAP material.

The changes to the table in are minor, the note at top of table from styrene to organic HAPs and removed ES-01 Ceramic Layer (Atomized ISO Resin) line item as it has been stated that the resin is no longer in use by the facility.

As noted above, the Permittee is exempted from meeting the 95% HAPs emission reduction requirement for sources that exceed 100 tons per year under Subpart WWWW based on the large parts exclusion described in 40 CFR 63.5805(d)(1). As per 40 CFR 63.5805(d)(2)(i) "If your new facility manufactures large reinforced plastic composites parts using open molding or pultrusion operations, the specific open molding and pultrusion operations used to produce large parts are not

required to reduce HAP emissions by 95 weight percent, but must meet the emission limits in Table 3 to this subpart (as shown above), and as per 40 CFR 63.5805(d)(2) (ii) "A large open molding part is defined as a part that, when the final finished part is enclosed in the smallest rectangular six-sided box into which the part can fit, the total interior volume of the box exceeds 250 cubic feet, or any interior sides of the box exceed 50 square feet." As stated earlier, the applicant indicated that the products at this facility "will qualify as "large parts" because they are larger than 250 cubic feet. They typically range from 500 to 2000 cubic feet" and thus, this facility is not required to reduce the HAPs emissions from these sources by 95%.

The facility has installed regenerative thermal oxidizer (ID No. CD-RCRTO) on the Production Area (ID No. ES-01) as discretionary VOC abatement as needed. Emissions will be routed to the RC/RTO using a new separate and redundant ventilation system leaving the existing system in place and unchanged.

NSR/PSD

Richmond County is in attainment. As shown in Attachment 1, emissions of VOCs from the facility are estimated at 221 tpy. These emissions are calculated using industry emission factors and maximum production rates based on sister facilities. Latham Pool Products also increased its maximum anticipated application and usage rates by 10% as a "safety factor" to arrive at a conservative estimate of emissions. Even with the conservative emission estimates, the potential emissions of VOC are less than the major PSD threshold of 250 tpy. Therefore, the facility is considered minor for PSD, and no avoidance condition is needed in the permit.

Because potential VOC emissions exceed 250 tpy, via e-mail on October 17, 2014, the facility requested that a (PSD Applicability) avoidance condition limiting facility-wide potential VOC emissions to less than 250 tons/year be added to the permit.

The associated permit condition require that Latham Pool Products calculate consecutive 12-month VOC emissions on a monthly basis and submit a summary report twice per year. No changes to the existing permit condition for PSD avoidance

Richmond County is in attainment. For PSD increment tracking purposes, Richmond County has been triggered for PM10, SO2 and NOx, as a result of the permit modifications associated with this renewal application will result in an increase in 0.016 pounds per hour of PM_{10}, 0.002 pounds per hour of SO_2, and 0.22 pounds per hour of NO_X. Facility-wide potential VOC emissions exceed 250 tons/year, and has a PSD Applicability avoidance condition limiting facility-wide potential VOC emissions to less than 250 tons per year. No changes to this condition were made as a result of the renewal or modifications.

112(r)

The facility is not subject to Section 112(r) because it does not store any of the regulated substances in quantities above the applicable thresholds. This permit modification does not affect the status with respect to 112(r).

CAM

40 CFR Part 64 is applicable to any pollutant-specific emission unit, if the following three conditions are met:

- the unit is subject to any (non-exempt: e.g. pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- the unit's precontrol potential emission rate exceeds either 100 tpy (for criteria pollutants) or 10/25 tpy (for HAPs).

Latham Pool Products has a fiberglass pad filter system designed to remove fine aerosols or particulate matter emitted from the manufacturing area. The pads are mounted vertically and perpendicular to the building ventilation air flow. The filter functions as a large spray booth with no VOC controls. It is considered an integral part of the process equipment designed to protect the ventilation system fans from damage from resin particles that can stick to surfaces. As such, the fiberglass pad filter system is not considered a control device and is not applicable to CAM.

Latham Pool Products is installing a rotary concentrator/regenerative thermal oxidizer on the production area as a part of this renewal and the significant modification submitted in December of 2022 which will control VOCs.

40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. Only the production area (ID No. ES-01) has emissions that are potentially subject to CAM due to the natural gas-fired regenerative thermal oxidizer (ID No. CD-RCRTO) installed for discretionary VOC abatement

which will further ensure compliance with the 250 tons per year volatile organic compound emission limit. The revised PSD avoidance condition continues to require the Permittee to calculate VOC emissions, using a continuous compliance determination method. There are no short-term emission limits or control efficiency requirements for VOCs.

Part 64 defines continuous compliance determination method as "a method specified by the applicable standard or an applicable permit condition which is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard and provides data either in units of the standard or correlated directly with the compliance limit."

The PSD avoidance condition requires that the Permittee calculate VOC emissions by multiplying the total amount of VOC-containing material consumed by the VOC content of the material. This is completed by the referenced mass balance determination method. DAQ agrees that this method is consistent with the continuous compliance determination method described in Part 64; but the applicant is exempt due to 02D .0414(b)(1)(e) "emissions cap" approval under 02Q .0317. Therefore, specific CAM requirements will not be included as part of this renewal.

7. Facility Wide Air Toxics

The facility conducted a facility-wide air toxics evaluation for its initial permit application. Potential emissions of styrene were shown to be over the toxics permitting emission rate (TPERs), and modeling was conducted to demonstrate compliance with the Acceptable Ambient Levels (AAL) for styrene. An emission limit for styrene and operating restrictions were placed in the permit to ensure compliance with the AAL. Also, WWWW is the only MACT for this facility. Therefore, the facility has fulfilled the requirements of 2Q .0705.

The facility conducted a facility-wide air toxics evaluation for Styrene with the proposed installation of the regenerative thermal oxidizer to be installed on the production area with a significant modification submitted on December 12, 2023. The AQAB has reviewed the modeling and in a memo dated February 16, 2023, found that the modeling demonstrated compliance and acceptable risk with the guidelines. Because the facility sources are exempt from air toxics under 02Q .0702 due to being subject to NESHAP the modeled emissions rates for styrene will not be included. In addition by deeming compliance with 02D .1100, DAQ determined that no unacceptable risk to human health would exist.

8. Compliance Status

DAQ has reviewed the compliance status of this facility. During the most recent inspection, conducted on October 20, 2021 by Mr. Jeffrey Cole of the FRO, the facility appeared to be in compliance with all applicable requirements. The last violation on record for the facility was November 21, 2011 for 02D .0202 Registration of Air Pollution Sources (AQEI for renewal). This violation was resolved on December 06, 2011.

9. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The State of Virginia and the Forsyth County Local Program are affected state/local program within 50 miles of the facility.

UPDATE AFTER PUBLIC NOTICE PERIOD.

10. Conclusions, Comments, and Recommendations

A P.E. seal is not required for the renewal application. A P.E. seal was required for the addition of the rotary concentrator/regenerative thermal oxidizer (app ID. 7700087.22B) and was sealed by David Scott Buchalter.
A zoning consistency determination is not required for the renewal application but a zoning consistency determination was required for the regenerative thermal oxidizer and was submitted with the permit application.

The permit renewal and modification application for Latham Pool Products, Inc. located in Rockingham, Richmond County, NC has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ

has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The NC DAQ recommends the issuance of Air Permit No. 09686T08.