

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 24.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Latham Pool Products, Inc., located at 818 East Industrial St., DeWitt, IA has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Matt Rowe.
2. Latham Pool Products, Inc. is a plastic products manufacturer. This facility consists of 4 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	3.2
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	3.2
Particulate Matter	PM	3.2
Sulfur Dioxide	SO ₂	0.04
Nitrogen Oxides	NO _x	6.65
Volatile Organic Compounds	VOC	122.37
Carbon Monoxide	CO	5.58
Lead	Lead	NA
Hazardous Air Pollutants ⁽¹⁾	HAP	118.03

⁽¹⁾ May include the following: Styrene, Methyl Methacrylate, Vinyl Toluene and Butoxy Ethanol.

3. Latham Pool Products, Inc. submitted a Title V Operating Permit renewal application on October 25, 2023 and any additional information describing the facility on February 5, 2024. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.
4. DNR has complied with the procedures set forth in 567 IAC 24.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from July 11, 2024 through August 10, 2024. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Jason Dowie at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Jason Dowie at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 21-33, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 21-33.
4. DNR is required to comply with 567 IAC Chapter 24 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Facility Name: Latham Pool Products, Inc.
 Facility Number: 23-02-028
 EIQ: 92-6989
 Permit Number: 19-TV-002-R1
 Reviewer: Jason Dowie
 Date: 4/3/2024

Latham Pool Products, Inc. is applying for a renewal Title V Permit for its new pool production facility in DeWitt, Iowa. The application was received by the DNR on October 25, 2023. The facility is subject to Title V as it is a Major Source for VOCs and HAPs. Latham Pool Products, Inc. is a plastic products manufacturer with 4 emissions points and has the potential to emit (annually):

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	3.2
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	3.2
Particulate Matter	PM	3.2
Sulfur Dioxide	SO ₂	0.04
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Applicable Requirements:

40 CFR 63 Subpart A – General Provisions (§§ 63.1 through 63.15)
 40 CFR 63 Subpart WWWW – National Emission Standards for Hazardous Air Pollutants:
 Reinforced Plastic Composites Production

Changes from previously issued TV permit:

- The permit number was updated to 19-TV-002-R1 from 19-TV-002-M001 (pp 1, 4, 5, 7 and footer).
- The applicable dates were updated.
- The titles and phone numbers for the Responsible Official and Permit Contact were both updated.
- Emission unit EU-1e (Ceramic Station 1) was removed from the equipment list because the equipment was removed from the facility in late 2019.
- The description for emission unit EU-3 was changed from Finishing to Outfitting at the request of the facility.
- General Conditions were updated to the most recent version.
- Minor spelling and punctuation corrections.
- The 40 CFR 63 Subpart hyperlinks in Appendix A were updated.
- Mailing address for Iowa DNR was updated (effective 5-1-2024).
- Appendix C: Executive Order 10 (EO10) Rules Crosswalk was added to the end of the permit.

Note: The facility made a request in their cover letter to remove language from the operating permit that they felt was “overly burdensome” (pp 9, 15 & 22). The quoted text is below:

- A. “If the 12-month rolling total of VOCs emitted from the facility exceeds 92.0 tons per rolling 12-month period, the owner or operator shall also maintain the following daily records:
- (1) The emission rate (tons) of total VOCs from the facility, excluding emissions from storage tanks and combustion;
 - (2) The 365-day rolling total VOCs from the facility, excluding emissions from storage tanks and combustion.
- Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions drops below 92.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per this section of this permit. If the emissions once again exceed 92.0 tons, daily recordkeeping will be required per this section of this permit.”

This language is directly from the construction permits for the emission points EP-1, EP-2, EP-3 and EP-4 (17-A-307-S2, 17-A-308-S2, 17-A-309-S1 & 17-A-310-S1, respectively). This language was not removed from the Title V operating permit as any alteration or removal of the language must be done by modifying the associated construction permits first.

It was also requested that the catalyst emission value of 1.0% be changed to 0.04% by citing a specific paper available on the South Carolina Department of Health and Environmental Control (DHEC) website (https://scdhec.gov/sites/default/files/docs/Environment/docs/composite_catalyst_factors.pdf). The catalyst emission value was not changed because the issue was already addressed in the Engineering Evaluation for construction permitting project 18-363 in 2018.

It was agreed to be indicated in these notes that, per the facility, that the Maximum Capacities for emission units EU-1a, EU-1b, EU-1c, EU-1d, EU-1f and EU-1g (pp. 7 & 14) are the manufacturer's rated short-term capacity. The maximum hourly material usage rates are substantially lower due to process limitations and actual conditions of equipment use.