



STATEMENT OF BASIS
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 BAQ Air Permitting Division

Company Name:	Leisure Pools And Spas Manufacturing North	Permit Writer:	Mareesa J Singleton
Agency Air Number:	America Inc	Date:	DRAFT
Permit Number:	1660-0029		
	TV-1660-0029 v2.0		

DATE APPLICATION RECEIVED: September 30, 2024
DATE OF LAST INSPECTION: April 29, 2024; The facility had records of pressure drop readings for DC01 prior to February 2022. The readings have all been recorded as "IDLE" since February 2022 and the material being processed is Thermex (corrugated plastic) instead of wood. The DC01 baghouse is no longer operated. This is a violation of permit conditions, and the matter has been referred to the BAQ Enforcement Section for resolution.

PROJECT DESCRIPTION: TV Renewal

FACILITY DESCRIPTION: Standard Industrial Classification (SIC) CODE: 3089, 3732 / North American Industry Classification System (NAICS) CODE: 326199, 336612; The facility manufactures pools, tanks, and other reinforced composite parts.

CHANGES SINCE LAST OP ISSUANCE

- Removed the following from Emission Unit ID 02: Equip ID 1B (CNC Router #2), Equip ID 2A (Edgebander #1), Equip ID 2B (Edgebander #2), and Equip ID 3 (Cold Press for Formica).
- Emission Unit ID 02: Equip ID 1A (CNC Router #1) is now processing Thermex (corrugated plastic) instead of wood. This operation is insignificant and has been added to the insignificant activity list.
- Emission Unit ID 02: Control Device DC01 is no longer operated but is still onsite. Therefore, it has been added to the insignificant activity list.

VOID EQUIPMENT

The following emission units/equipment have been deemed VOID and will be removed from the current operating permit. A comprehensive record of voided equipment for the site can be found in ePermitting under Program Components.

Emission Unit ID	EU Description	Equipment ID	Equipment Description	Reason for VOID Status	Date Removed
02	Woodworking Process	1A	CNC Router #1	Moved to Insignificant Activity List	2024
		DC01	AMW 8.5-150-12 Filter Dust Collector		
		1B	CNC Router #2	Removed from site	2022
		2A	Edgebander #1		
		2B	Edgebander #2		
		3	Cold Press for Formica		

EMISSIONS

- Styrene and Methyl Methacrylate (MMA): Unified Emission Factors for Open Molding of Composites (UEF); 10/13/2009 Update



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- Potential Used (gal) x density (lb/gal) x UEF
- The emission factor for Dimethyl Phthalate (DMP) or other utilized organic is 0.04% of the available DMP by weight or 0.0172 (0.04 x 43%).
- Volatile Organic Compounds (VOC): Material balance for VOC and Hazardous Air Pollutants (HAP) other than styrene, MMA, and DMP
 - Potential Used (gal) x density (lb/gal) x Material wt%
- Particulate Matter (PM)
 - Spray Guns
 - Uncontrolled = Potential Used (gal) x density (lb/gal) x wt% Solids x (1 - deposition efficiency (DE)); DE=98.5%
 - Controlled = Uncontrolled x (1-control efficiency (CE)); CE=90%
- Cobalt
 - Spray Guns
 - Uncontrolled = PM uncontrolled x wt% cobalt
 - Controlled = Uncontrolled x (1 - control efficiency (CE)); CE=90%

FACILITY WIDE EMISSIONS*			
Pollutant	Uncontrolled	Controlled	PTE
	TPY	TPY	TPY
PM	8.88	0.09	8.88
PM ₁₀	8.88	0.09	8.88
PM _{2.5}	8.88	0.09	8.88
VOC	579.0	--	<250.0 Existing Sources** <250.0 New Sources***
Styrene	513.5	--	219.0
Methyl Methacrylate	1.8	--	0.77
Dibutyl Phthalate	--	--	--
Methyl Isobutyl Ketone	0.08	--	0.08
Diphenylmethane 4,4-Dissocynate	--	--	--
Toluene	0.2	--	0.2
Xylene	0.1	--	0.1
Cumene	--	--	--
Ethyl Benzene	--	--	--
Dimethyl Phthalate	0.02	--	0.01
Formaldehyde	0.002	--	0.002
Glycol Ethers	--	--	--
Methyl Ethyl Ketone	7.6	--	3.3
Methanol	--	--	--
Hexane	--	--	--



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FACILITY WIDE EMISSIONS*			
Pollutant	Uncontrolled	Controlled	PTE
	TPY	TPY	TPY
Methylene Diphenyl Diisocyanate (MDI)	--	--	--
Cobalt Compounds	0.03	0.003	0.01
Ethyl Acetate	0.4	--	0.18
Methylene Chloride	40.4	--	17.3
Total HAP	555.7	555.7	237.1

*Includes emissions from all the sources from construction permit CP-50000030 v1.0.

**Existing Sources: GSG, RS1/Guns A1, B1, C1, D1, E1, and FOU

***New Sources: RS1/Guns F1, G1, RS2/Guns A2, B2, C2, D2 and FW/Winder A, B.

SPECIAL CONDITIONS, MONITORING, LIMITS

- The Permit Extension Joint Resolution of 2023 (Joint Resolution) suspends the running of the time periods and any associated vested right of development approvals that are current and valid at any point during the period beginning January 1, 2020, and ending December 31, 2023. For development approvals issued between January 1, 2020, and December 31, 2023, the time period will begin to run on January 1, 2024. Construction permit CP-50000030 v1.0 was issued March 7, 2023 and thus is covered by the Joint Resolution. Therefore, the permit clock for the sources where construction has not yet commenced started on January 1, 2024. The remaining sources that have not started construction are: GSG: 2 Gelcoat Atomized Spray Guns, RS1: 2 Non-atomized Resin Flow Coaters and Hand Lay-up, FW: 1 winder to Filament Winding, RS2: 5 non-atomized Resin Flow Coaters and Hand Lay-up, CM: Closed Molding Process consisting of three (3) resin injection.

- The algorithm for Styrene and Methyl Methacrylate (MMA):

Styrene or MMA Emissions (tons/month) = MU x MD x UEF

Where:

MU is the material used in gallons/month.

MD is the material density in pounds per gallon.

UEF is the Unified Emission Factors for Open Molding of Composites for styrene and MMA.

The algorithm for Dimethyl Phthalate (DMP):

DMP Emissions (tons/month) = MU x MD x EF

Where:

MU is the material used in gallons/month.

MD is the material density in pounds per gallon.

EF for DMP is 0.04% of the available DMP by weight.

The algorithm for VOC other than styrene, MMA, and DMP

Other VOC Emissions (tons/month) = MU x MD x wt% other VOC



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Where:

MU is the material used in gallons/month.

MD is the material density in pounds per gallon.

wt% other VOC is the weight percent of the VOC in the material.

The algorithm when manufacturer's data is available:

Emissions = MU x MER

Where:

MU is the material used.

MER is manufacture's provided emitted rate.

REGULATIONS

Applicable - Section II(E) (Synthetic Minor) - The facility has a Prevention of Significant Deterioration (PSD) avoidance for VOC limit of less than 250.0 tons per year (tpy) from the following sources: GSG/Six (6) Gelcoat Guns (four (4) currently installed), RS1/ Five (5) Resin Guns, FOU. The facility also has a PSD avoidance for VOC limit of less than 250.0 tpy from the following sources RS1/ Four (4) Resin Guns (two (2) currently installed), RS2/ Nine (9) Resin Guns (four (4) currently installed), CM/ Two (2) Closed Molding (none currently installed), FW/ Three (3) Winders (two (2) currently installed).

Synthetic Minor Limits					
Permit ID	Equipment ID	Permit Issue Date	Pollutant	Emission Limit (TPY)	Explanation
CP-50000030 v1.0	Project Wide	3/7/2023	VOC	<250.0	PSD avoidance for RS1/Guns F1, G1, RS2/Guns A2, B2, C2, D2 and FW/Winder A, B.
CP-50000030 v1.0	Existing Sources	3/7/2023	VOC	<250.0	PSD Avoidance for GSG, RS1/Guns A1, B1, C1, D1, E1, and FOU

Applicable - Standard No. 1 (Emissions from Fuel Burning Operations) – The insignificant heaters are subject.

Not Applicable - Standard No. 3 (state only) (Waste Combustion and Reduction) - No waste combustion or reduction sources.

Applicable - Standard No. 4 (Emissions from Process Industries)
 Section VIII

Process	Max Process Weight Rate (tons/hr)	PM Allowable at Max (lb/hr)	Uncontrolled Emissions PM (lb/hr)	Controlled Emissions PM (lb/hr)	Monitoring
01	2.18	6.91	19.20	1.92	Filter Inspections and Replacement



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Section IX – The facility is subject to 20% opacity.

Not Applicable - Standard No. 5 (Volatile Organic Compounds) - This facility was not in existence during the effective date of this Standard.

Not Applicable - Standard No. 5.2 (Control of Oxides of Nitrogen (NOx)) - The insignificant 267 HP diesel fire pump and heaters is exempt from the standard per exemption (I)(B)(3).

Not Applicable - Standard No. 7 (Prevention of Significant Deterioration) - The facility is not one of the 28 source categories; therefore, its major source limit is 250.0 tpy. The facility has the potential to emit above 250.0 tpy for VOC and has federally enforceable facility wide VOC limits of: Less than 250.0 tpy from the following sources: GSG/Six (6) Gelcoat Guns (four (4) currently installed), RS1/ Five (5) Resin Guns, FOU and less than 250.0 tpy from the following sources RS1/ Four (4) Resin Guns (two (2) currently installed), RS2/ Nine (9) Resin Guns (four (4) currently installed), CM/ Two (2) Closed Molding (none currently installed), FW/ Three (3) Winders (two (2) currently installed).

Applicable - 61-62.6 (Control of Fugitive Particulate Matter) – The facility is subject to the statewide requirements.

40 CFR 60 and 61-62.60 (New Source Performance Standards (NSPS))

Not Applicable - Subpart JJJJ: The insignificant fire pump is not subject because it was installed in 1986 which is before the applicability date.

40 CFR 61 and 61-62.61 (National Emission Standards for Hazardous Air Pollutants (NESHAP))

Not Applicable - This facility does not emit the pollutants in a way that is subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).

40 CFR 63 and 61-62.63 (National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories)

Not Applicable:

Subpart JJ - The facility is no longer engaged in the manufacture of wood furniture and wood furniture components. Although this Subpart is part of the once in always in, since the facility is not conducting the activity, it is not subject.

Applicable:

Subpart VVVV - While not currently planned to manufacture fiberglass boats, the site would like to continue to maintain the flexibility to use existing permitted equipment to manufacture fiberglass boats. This the facility will continue to be subject to this subpart.

Subpart WWWW – The facility is subject to this subpart.



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Subpart ZZZZ – The insignificant fire pump is subject.

Not Applicable - 61-62.68 (*Chemical Accident Prevention Provisions*) - Facility does not use/store subject chemicals above threshold values.

Not Applicable - 40 CFR 64 (*Compliance Assurance Monitoring*) – The facility has the potential to emit above the major source threshold for VOC. However, the control devices at the facility are not for the control of VOC emissions. Therefore, CAM does not apply.

AMBIENT AIR STANDARDS REVIEW

Applicable - Standard No. 2 (*Ambient Air Quality Standards*) - The criteria pollutants are below the exemption thresholds. See modeling summary dated September 29, 2022.

Applicable - Standard No. 8 (state only) (*Toxic Air Pollutants*) - The facility modeled for cobalt and methylene chloride. All other pollutants are Subject to 40 CFR 63 Subpart WWWW and/or de minimis. See modeling summary dated September 29, 2022.

PERIODIC MONITORING

Permit Condition	Monitoring Basis/ Justification
B.3 for B.2	With control device installed and operating correctly, emissions will be below the limit
B.4 for B.1	Opacity is not expected, and qualitative visual inspections shall suffice for monitoring
B.6 for B.5	Direct comparison to limit
B.8 for B.7	Direct comparison to limit
C.4	Post-11/1990 Federal Regulation.* Monitoring inherently adequate
C.5	Post-11/1990 Federal Regulation.* Monitoring inherently adequate

*40 CFR 64.2(b)(1)(i) - Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.

PUBLIC NOTICE

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II(N) and SC Regulation 61-62.70.7(h).

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.