



Soles Electric Company

"Quality Electric Motor Repair"

24/7/365

1552 Tulip Lane
Fairmont, WV 26554
304-363-2058

6/23/16

Ms. Bev McKeone
NSR Permitting Supervisor
WV Division of Air of Quality
601 57th Street, SE
Charleston, WV 25304



RE: Requested Changes to Soles Electric Co. Permit #R13-3162

Dear Ms. McKeone:

Pursuant to the following language contained in Permit #R13-3162, which states: "The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13," Soles Electric Co. (Soles) requests a Class I Administrative Update to its existing permit. Soles received Permit #R13-3162 in July 2014, and the permit's recordkeeping was set up for its eleven (11) sources on a daily basis. As Soles is located in Marion County and is therefore not subject to 45CSR21, we respectfully request that the recordkeeping for these sources where applicable be set up for monthly recordkeeping, as this more accurately reflects how our operations are performed. Obviously, for sources like the paint booth, some information will be kept on a daily basis, but will then be collated monthly. Also, specifically, the amounts added to both the VPI and dip tanks are added on a monthly basis, and can best be kept by the amount of resin added.

Additionally, regarding the requirements for the Paint Booth (5S), item 7.5.1. states: "Per Section 7.2. of this permit: The permittee shall notify the Director in writing of any new surface coating containing any HAP(s) within thirty (30) days of using the new surface coating. An MSDS sheet for the surface coating shall be included with the notice to the Director." Soles requests that the phrase "not accounted for in the original application" be added after the term 'HAP(s)' in this requirement. Thank you for your consideration in this matter.

Sincerely,

Roger P. Stewart II

President