

To: File
From: John Legg
Date: September 1, 2016

John Legg
9/1/16

Subj: R13-3162A - Class I Administrative Update
Soles Electric Company
Fairmont, Marion County, WV
Plant ID No.: 049-00033
Permit No.: R13-3162A

On June 27, 2016, the Division of Air Quality (DAQ) received a one-page letter from Roger P. Stewart II, President of Soles Electric Company (Soles) located in Fairmont, Marion County, WV requesting changes be made to Soles' R13-3162 permit. The writer was assigned to the application on June 29, 2016.

On July 1, 2016, the writer email Roger Stewart asking that Soles send in to the DAQ the overlooked MSDS's mentioned in his letter so that any overlooked HAPs could be added to the table in section 7.1.1 of permit R13-3162.

On July 5, 2016, Rae Dyer of Soles sent via email five (5) MSDSs. These MSDS were examined by the writer. All the HAPs in the five (5) MSDS were already contained in the table in section 7.1.1 of permit R13-3162.

On August 31, 2016, the writer make changes to permit R13-3162. These changes are summarized by the paragraph given below (which appears in Permit R13-3162A on page 1 and is labeled as "Description of Change:"). The changes are detailed in the compare file which is attached to this engineering evaluation memo in Attachment 1.

Summary

(Description of Change:)

-

The facility is located in Marion County which is a non-Rule 21 county. Rule 21 related requirements that required the permittee to perform daily VOC calculations were changed to monthly VOC calculations. Also, section 7.1.1 was changed so that only new surface coatings that contain a HAP not already listed in the table for section 7.1.1 have to submit a MSDS to the Air Director within 30 days of using the new surface coating.



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

Attachment 1

Compare File Comparing R13-3162A to R13-3162

**Soles Electric Company
Fairmont, Marion County, WV**

WordPerfect Document Compare Summary

Original document: Q:\AIR_QUALITY\LEGG\Soles Electric Company - Fairmont\049-00033_PERM_13-3162.wpd

Revised document: @PFDesktop\MyComputer\Q:\AIR_QUALITY\LEGG\Soles Electric Company - Fairmont\049-00033_PERM_13-3162a.wpd

Deletions are shown with the following attributes and color:

~~Strikeout~~, **Blue** RGB(0,0,255).

Deleted text is shown as full text.

Insertions are shown with the following attributes and color:

Double Underline, Redline, **Red** RGB(255,0,0).

The document was marked with 45 Deletions, 55 Insertions, 0 Moves.

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Permit to Construct Update



R13-3162A

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Soles Electric Company
Fairmont, Marion County, WV
049-00033

*William F. Durham
Director*

Issued: ~~July 8, 2014~~ September 1, 2014 • ~~Effective: July 8, 2014~~ 2016

This permit does not supercede or replace another permit.

Facility Location: Fairmont, Marion County, West Virginia

Mailing Address: 1552 Tulip Lane, Fairmont, WV 26554

Facility Description: Electric Motor Repair/Rebuild Shop

NAICS Codes: 811310 - Commercial and Industrial Machinery and Equipment (Except Automotive and Electronic) Repair and Maintenance

UTM Coordinates: 574,095 km Easting • 4,367.292 km Northing • Zone 17

Permit Type: ~~Construction (After-the-fact)~~

Description of Change:

~~Construction of:~~

- ~~1) Four (4) natural gas-fired Ovens:
 - ~~- Two (2) Burnout Ovens (1S and 2S)~~
 - ~~- Two (2) Bake Ovens (3S and 4S)~~~~
- ~~2) One (1) Paint Booth (5S)~~
- ~~3) One (1) Vacuum Pressure Impregnation (VPI) coater (6S)~~
- ~~4) Two (2) Varnish Dip Tanks (7S and 8S)~~
- ~~5) One (1) Parts Cleaner (9)~~
- ~~6) Two (2) Abrasive Blast Booths (10S and 11S)~~ Class I Administrative Update

Description
of Change:

The facility is located in Marion County which is a non-Rule 21 county. Rule 21 related requirements that required the permittee to perform daily VOC calculations were changed to monthly VOC calculations. Also, section 7.1.1 was changed so that only new surface coatings that contain a HAP not already listed in the table for section 7.1.1 have to submit a MSDS to the Air Director within 30 days of using the new surface coating.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is not subject to 45CSR30.

NOTE: *The WVDEP DAQ did not take delegation from the US EPA of air toxics provision 40 CFR 63, Subpart HHHHH, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources," and therefore can make no determination as to the provision's applicability to the facility permitted herein. The permittee must work with the US EPA to determine if the subject provision is applicable to its facility and if so, what actions/measures must be taken to meet the*

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit ~~does not supersede or~~ supersedes and replace ~~a s~~ previously issued ~~p~~ Permit R13-2682. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Applications R13-3162, R13-3162A and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

7.0. Source-Specific Requirements [Paint Booth (5S), VPI (6S), Varnish Dip Tanks (7S and 8S), Parts Cleaner (9S), and Abrasive Blast booths (10S and 11S)]

7.1. Limitations and Standards

7.1.1. The facility-wide emission rate of Hazardous Air Pollutants (HAPs) shall not exceed, on a per HAP basis, ten (10) tons per year, or on a total HAP basis, 25 tons per year. Listed below are HAPs recognized as being used at the facility:

Hazardous Air Pollutant (HAP)	CAS #
Ethylbenzene	100-41-4
Tetrachloroethylene (Perchloroethylene)	127-18-4
Toluene	108-88-3
Xylene	1330-20-7

The use of any new surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and already listed in the table above shall be in accordance with the following items “b.” through “d.” below. A new surface coating containing a HAP not already listed in the table above shall be in accordance with items “a.” through “d.” below.

- a. The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
- b. The use of the new surface coating shall be incorporated into the record keeping requirements used by the company to show compliance.
- c. Emissions from the use of the new surface coating when combined with emissions from surface coatings already in use shall not exceed:
 - The facility-wide, single HAP emission limit of 10 ton/yr,
 - The facility-wide, total/aggregated HAP emission limit of 25 ton/yr, and
 - The hourly or annual VOC emission limitations given in Section 7.1.2 and Sections 7.1.4³ thru 7.1.7 of this permit.
- d. For the purposes of this permit, surface coatings shall be defined as a material applied onto, or impregnated into, a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, stains, thinners, solvents, sealers, varnishes, paints, primers, catalysts, acrylics, lacquers, and temporary protective coatings, or combinations of the above materials as applied.

- 7.1.2. All emissions from Paint Booth (5S) shall be vented through the filter system having a minimum PM control efficiency of 90%. The filter system shall be in place, properly maintained and functioning before the booth is placed into operation.
- 7.1.3. Emissions from the filter system located downstream of the Paint Booth (5S - Emission Unit ID; 5E - Emission Point ID) shall not exceed the following hourly and annual emission limitations:

Pollutant	Emission Limitation	
	Hourly (lb/hr)	Annual ⁽²⁾ (ton/yr)
PM ₁₀	1.69 ⁽¹⁾	0.12 ⁽¹⁾
Volatile Organic Compounds (VOC)	23.9	1.47
(1) Controlled PM ₁₀ emissions after filter system having a minimum PM ₁₀ control efficiency of 90%. (2) Based on operating the Paint Booth (5S) a maximum of 1,095 hours per year.		

- 7.1.4. Cleaning solvent ~~emissions~~ VOC emissions shall not exceed 15 ~~lb/day~~ lb/hr and 3,600 pounds per year (based on using 500 gallons/yr of xylene with a weight of 7.2 lb/gallon).
- 7.1.5. VOC emissions from the Vacuum Pressure Impregnation System (VPI) (6S - Emission Unit ID; 6E - Emission Point ID) shall not exceed 1.0 lb/hr and 0.49 ton/yr.
- 7.1.6. VOC emissions from the Varnish Dip Tanks (7S and 8S - Emission Unit IDs; 7E and 9E - Emission Point ID) shall not exceed 1.0 lb/hr and 0.42 ton/yr per each tank.
- 7.1.7. VOC emissions from the Parts Cleaner (9S - Emission Unit ID; 94 - Emission Point ID) shall not exceed 1.0 lb/hr and 0.71 ton/yr.
- 7.1.8. The Parts Cleaner (9S) when not in use shall be covered to minimize VOC emissions to the atmosphere.
- 7.1.9. The Parts Cleaner (9S) is approved to use Safety Kleen solvent. The permittee shall notify the Director in writing if a solvent(s) other than Safety Kleen is/are to be used and the VOC(s) content of the solvent(s) within thirty (30) days of the use. Additionally, an MSDS sheet for each parts cleaning solvent(s) shall be submitted at this time to the Director.
- 7.1.10. The two (2) abrasive blast booths (Emission Unit IDs: 10S and 11S) shall use no more than 30,000 lb/yr of abrasive blast media.

The exhausts from the two (2) abrasive blast booths (Emission Point IDs: 10E and 11E) shall be vented to their respective dust collection filter assemblies (4C or 5C) to control PM emissions.

The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted for the Paint Booth (5S) at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at the Paint Booth (5S) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source using the procedures and requirements of Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

7.3. Testing Requirements

[Reserved]

7.4. Recordkeeping Requirements

7.4.5. **Paint Booth (5S) Operation.** For the purpose of determining compliance with the VOC emission limitations set forth in Section 7.1.3 of this permit, the permitted facility shall record on a ~~daily~~ least a monthly basis:

- the date and time, the name, identification number, and number of gallons of each coating used/applied,
- the pounds of VOC per gallon of each coating (minus water and exempt compounds), as applied. This value should ~~take~~ into account VOC added from thinner/solvent addition.

~~These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.~~

Using the above information, the permittee shall also calculate and record on a ~~daily~~ monthly basis:

1. Total ~~daily~~ monthly VOC emissions from the paint booth operation, as calculated using the following equation:

$$T = \sum_{I=1}^n A_I B_I$$

where:

T = Total VOC emissions from the Paint Booth (5S) in units in lb/daylb/month;

n = Number of different coatings applied during the daymonth;

I = Subscript denoting an individual coating;

A_I = Mass of VOC per volume of coating (I) (minus water and exempt compounds), as applied, used in units of pounds VOC per gallon (lb VOC/gal); and

B_I = Volume of coating (I) (minus water and exempt compounds), as applied, in units of gallons per daymonth (gal/daygal/mo). The instrument or method by which the owner or operator accurately measured or calculated the volume of each coating, as applied, used shall be document.

2. The 12-month rolling total for VOC emissions from the paint booth operation.

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

- 7.4.6. **Record of Monthly Opacity Reading For Paint Booth.** For the purpose of demonstrating compliance with the opacity limit given in Section 7.1.11 (per 45CSR7-3.1), the permittee shall maintain records (see example form given in attached Appendix A) of all monitoring data documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

7.4.7. **Operation of VPI System and Varnish Dip Tanks.** For the purpose of determining compliance with the VOC limitations set forth in Sections 7.1.5 and 7.1.6 of this permit, the permitted facility shall record on ~~a daily basis:~~

~~the number of hours the VPI system and varnish dip tanks were operated;~~
~~at least a monthly basis for the VPI System and each of the dip tanks:~~

~~=~~ the date and time, and the amount of varnish ~~used and/or added~~ to the VPI System and each of the dip tanks, and

~~the VOC content of varnish used; and~~
~~the HAP content of varnish used:~~

Using the above information, the permittee shall calculate and record on a monthly basis for the VPI System and each of the dip tanks:

1. The monthly and average hourly VOC emission rate and,
2. The 12-month rolling total for VOC emissions.

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

7.4.8. **Operation of Parts Cleaner (9S).** For the purpose of minimizing VOC emissions as set forth in Sections 7.1.7 and 7.1.8 of this permit, the permitted facility shall record on ~~a daily basis:~~

at least a monthly basis:

- ~~=~~ the date and time, and amount of cleaner solvent added,
~~=~~ the VOC content of the parts cleaner solvent used, and
~~-~~ the number of hours the cover of the parts cleaner (9S) was operated;
~~-~~ ~~the amount of cleaner solvent added, if any, and~~
~~-~~ ~~the hours the cover was on.~~

Using the above information, the permittee shall calculate and record on a monthly basis for the parts cleaner (9S):

1. The monthly and average hourly VOC emission rate and,
2. The 12-month rolling total for VOC emissions.

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

7.4.9. **Operation of Abrasive Blast booths.** For the purpose of determining compliance with the limitations set forth in Sections 7.1.10. ~~and 7.1.11.~~ of this permit, the permitted facility shall record on ~~a daily basis:~~

~~the number of hours at least a monthly basis; the date and time, and amount of abrasive blast media added to each abrasive blast booth was operated; and the~~

Using the above information, the permittee shall calculate and record on a monthly basis for the abrasive blast booths: the 12-month rolling total amount of abrasive blast media used and/or added to each abrasive blast booth.

~~These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.~~

7.4.10. **Daily Cleaning Solvents Usage.** For the purpose of determining compliance with the VOC limitations set forth in Section 7.1.4. of this permit, the permitted facility shall record on a ~~daily~~ at least a monthly basis for cleaning solvent:

~~= the date and time, and amount of cleaning solvent(s) used, and the VOC content of the cleaning solvent(s) (if less than 100%); the daily~~

Using the above information, the permittee shall calculate and record on a monthly basis for the cleaning solvent:

1. The monthly and average hourly VOC emission rate and,
2. The 12-month rolling total for VOC cleaning solvent emission rate for the facility emissions.

~~These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.~~

7.4.11. **Facility HAP Emission Rates.** For the purpose of determining compliance with the HAP emission rate limitations established in Section 7.1.1. of this permit, ~~records shall be kept on a daily basis detailing each single HAP emission rate and the total aggregated HAP emission rate for the facility~~ the permitted facility shall calculate on at least a monthly basis using information collected from the Paint Booth (5S) operation (coating and added thinner) and from cleaning solvent(s) usage for the facility. In addition to the daily HAP emission rates, 12-month rolling single HAP emission rates and a 12-month HAP emission totals for:

~~= each single HAP actively used at the facility and a total aggregated HAPs emission rate are to be calculated and recorded daily. for the facility.~~

These records shall be maintained on-site for a period of not less than three (3) years and shall be made available to the Director or his duly authorized representative upon request.

7.5. Reporting Requirements

7.5.1. Per Section 7.2. of this permit:

The permittee shall notify the Director in writing of any new surface coating(s) containing any HAP(s) not listed in the section 7.1.1 table 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.

7.5.2. Per Section 7.9. of this permit:

The permittee shall notify the Director in writing of any new parts solvent cleaner used in the parts cleaner (9S) and the VOC content of the cleaner within thirty (30) days of use. An MSDS sheet for the parts solvent cleaner shall be included with the notice to the Director.