



west virginia department of environmental protection

Division of Air Quality
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Charleston, WV 25304
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

June 24, 2015

Mr. Felipe De La Mora, Site Director
Addivant USA, LLC
1000 Morgantown Industrial Park
Morgantown, WV 26501

RE: **Permit Applicability Determination**
Addivant USA, LLC
Morgantown North Plant
Plant ID No. 061-00061
Determination No. PD15-047

Dear Mr. De La Mora:

It has been determined that your proposed changes to the Morgantown North Plant located in the Morgantown Industrial Park are not defined, pursuant to §45-13-2.17, as a “modification.” This determination is based on the information (including your emissions calculations) in your Permit Determination Form (PDF) submitted on June 4, 2015 that indicates that the changes do not have a reasonably calculated maximum potential to increase emissions over two (2) lbs/hr OR five (5) tons/year of total Hazardous Air Pollutants (HAPs); six (6) lbs/hour AND ten (10) TPY or one hundred forty-four (144) pounds per calendar day of any regulated pollutant; or *trigger* a substantive requirement of any State or Federal air quality regulation.

Please be aware that any future changes to the facility (or substantive changes to W705 production process as described in your PDF) may trigger the requirement to obtain a permit if the changes are defined as a “modification” under 45CSR13. Additionally, the DAQ encourages you to maintain an updated facility-wide potential-to-emit to monitor potential applicability to Title V permitting. Should you have any questions, please contact the undersigned engineer at (304) 926-0499 x1219.

Sincerely,

Joe R. Kessler, PE
Engineer

c: Ms. Rebecca Dalrymple, Environmental Engineer (via e-mail)
Addivant USA, LLC