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**west virginia department of environmental protection**

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Division of Air Quality  
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Earl Ray Tomblin, Governor  
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**MEMORANDUM**

To: Beverly D. McKeone  
From: Steven R. Pursley, PE *SAP*  
Date: June 4, 2015  
Subject: PD15-046

On May 20, 2015, Axens North America, Inc. submitted a request for a permit determination to the West Virginia Division of Air Quality. The request involved separating the exhaust streams from the Extrudate Tray Dryers and the No. 1 Calciner. The request results from problems the facility has been having with exhaust condensing inside the stack. Separating the exhausts should have no effect on emission rates. Additionally, since there is no increase in emissions, the change does not qualify as a “modification” under the NSPS. Therefore, the No. 1 Calciner will NOT become subject to 40 CFR 60 Subpart UUU. Additionally, it should be noted that the change in exhaust routing does not result in a bypass of any pollution control equipment.

Since the change will not increase emissions and will not trigger any new rule or regulation, no permit is required.