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west virginia department of environmental protection

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Division of Air Quality  
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Charleston, WV 25304-2345  
Phone: 304 926 0475 • Fax: 304 926 0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
www.dep.wv.gov

September 12, 2016

Mr. Todd Shirley  
Projects General Manager  
Morgantown Energy Associates  
555 Beechurst Avenue  
Morgantown, WV 26505

Re: Permit Applicability Determination  
Morgantown Energy Associates  
Determination No. PD16-052  
Plant ID No. 61-00027

Dear Mr. Shirley:

It has been determined that your permit determination request submitted on September 1, 2016, for the replacement of air nozzles in the gird floor for CFB Boilers 1 and 2 lacks enough information to make a decision. The area of your determination that lacks information to the replacement of the air nozzles in the gird floor pertains whether does this replacement activity meets the definition of "reconstruction" as defined in 40 CFR §60.15 for Subpart Da of Part 60.

Subpart Da of Part 60 was promulgated on September 18, 1978. However, the new source performance standards under this subpart has been revised several times over the years with the most recent change occurring on May 3, 2011. The justification provide in your determination does not satisfactory prove that "reconstruction" is not trigger for this particular case. Please evaluate your project and determine if "reconstruction" is or is not trigger as defined in 40 CFR §60.15.

Should you have any questions, please contact the undersigned engineer at (304) 926-0499 ext. 1214.

Sincerely,

Edward S. Andrews, P.E.  
Engineer

Response to Mr. Shirley's Determination Request  
September 12, 2016  
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