

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09500001-2012**
Plant Identification Number: **095-00001**
Permittee: **MPM Silicones, LLC**
Facility Name: **Sistersville Facility**
Mailing Address: **3500 South State Route 2, Friendly WV 26146**

Revised: N/A

Physical Location:	Friendly, Tyler County, West Virginia
UTM Coordinates:	492 km Easting • 4370.5 km Northing • Zone 17
Directions:	WV State Route 2 approximately six miles south of Sistersville.

Facility Description

MPM Silicones, LLC, is located approximately six miles south of Sistersville, WV on State Route 2. The Sistersville Plant is located in a rural setting and is situated on approximately 1300 acres of land. The operating areas are situated centrally and encompass approximately 50 acres. The Sistersville Plant is engaged in specialty chemical manufacturing (SIC 2869) and manufactures a broad range of silicone and silane products, plus organic chemical intermediates related to the silanes and silicones products. The site operates 24 hours a day and consists of a number of continuous and batch processes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	59.9	33.3
Nitrogen Oxides (NO _x)	146.1	113.9
Particulate Matter (PM ₁₀)	22.9	12.6
Total Particulate Matter (TSP)	22.9	12.6
Sulfur Dioxide (SO ₂)	5.3	2.8
Volatile Organic Compounds (VOC)	633.2	229.9

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Acrylonitrile	1.3	0.4
Allyl Chloride	1.0	0.3
Aniline	0.4	0.1
Chlorine	3.1	2.2
Cumene	0.2	0
Ethyl chloride (Chloroethane)	69.8	1.6
Ethylbenzene	0.5	0.2
Glycol Ethers	6.1	2.2
Hexane, n-	0.3	0.1
Hydrogen chloride	31.5	29.9
Methanol	55.5	29.5
Methyl Chloride	8.8	0
Methyl Methacrylate	0.02	0
Methylene Chloride	3.3	1.6
Propionaldehyde	48.3	0
Toluene	168.1	33.8
Xylene	2.2	0.7
Total HAPs	400.04	106.1

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 146.1 TPY of NO_x, 633.2 TPY of VOC, 69.8 TPY of ethyl chloride, 31.5 TPY of hydrogen chloride, 55.5 TPY of methanol, 48.3 TPY of propionaldehyde, 168.1 TPY of toluene, and 391.82 TPY of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, MPM Silicones, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations.
	45CSR10	To Prevent and Control Particulate Air Pollution from the Emission of Sulfur Oxides.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR permits.
	45CSR16	Standards of Performance for New Stationary Sources pursuant to 40 C.F.R. Part 60.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	40 C.F.R. Part 60, Subpart NNN	Standards of performance for VOC emissions from SOCM distillation operations
	40 C.F.R. Part 60, Subpart IIII	Standards of performance for CI engines
	40 C.F.R. Part 60, Subpart JJJJ	Standards of performance for SI engines
	40 C.F.R. Part 61, Subpart M	Asbestos inspection and removal
	40 C.F.R. Part 61, Subpart FF	Benzene Waste Operations
	40 C.F.R. Part 63, Subpart EEE	National Emission Standards for Hazardous Waste Combustion
	40 C.F.R. Part 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants of Industrial, Commercial, and Institutional Boilers and Process Heaters.
	40 C.F.R. Part 63, Subpart FFFF	National Emission Standard for Misc. Organic Chemical Production and Processes (MON)
	40 C.F. R. Part 63 Subpart EEEE	National Emission Standard for Organic Liquid Distribution (OLD)

	40 C.F. R. Part 63 Subpart ZZZZ	National Emission Standard for Reciprocating Internal combustion Engines (RICE)
	40 C.F.R. Part 68	Chemical Accident Prevention Provisions.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-16	8/16/1973	
R13-50	4/18/1974	
R13-657	4/15/1982	
R13-952C	6/30/2005	
R13-1649B	10/31/2006	
R13-1746B	12/15/2006	
R13-1748A	1/05/2006	
R13-2030A	10/12/1999	
R13-2180C	4/24/2009	
R13-2338I	12/15/2011	
R13-2806	10/5/2009	
G60-C030	1/18/2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Equipment Updates

Several revisions were made to the emission units table. Some were due to minor equipment changes and updates. However, the majority of the changes were to simplify and streamline the emission units table. MPM Silicones has requested the removal of equipment from the emission units table with no applicable requirements and no emissions. The majority of these changes have already been made in R13-2338I resulting in the removal of over 100 insignificant emission units. The R13-2338I permit changes were submitted as R30-09500001-2006 (SM04), but they were addressed with this renewal.

MON MACT Supercedance of Rule 27 Term

Previous Condition 4.1.5, which limited acrylonitrile emission from S-197, was derived from WV DAQ Rule 27 and Rule 27 Consent Orders. This condition was later incorporated into permit R13-1092A and then permit R13-2338, which was referenced in this Title V permit. MPM Silicones has requested the removal of this permit condition claiming that the Silanes Unit is now subject to the MON MACT, exempting it from Rule 27 per 45 CSR§27-3.1. In this condition's place, language was added to condition 4.1.23 of R13-2338I requiring the permittee to comply with all applicable requirements of 40 C.F.R. 63, Subpart FFFF. This new NSR permit condition was incorporated by reference into conditions 4.1.20-4.1.26 of this Title V permit.

40 C.F.R. 60, Subpart IIII Applicability

This subpart contains New Source Performance Standards (NSPS) for Compression Ignition (CI) engines. This subpart applies to Diesel Fire Water Pumps P-6 and P-2620. These engines fall into the fire pump engines category with a displacement of less than 30 l/cyl and manufactured prior to the model years in Table 3 of 40 CFR Part 60, Subpart IIII. Therefore the following requirements from this subpart apply:

- The emission standards found in 40 C.F.R. §60.4205(c) and Table 4 of this subpart.
- The fuel requirements found in 40 C.F.R. §60.4207(b).
- The compliance requirements found in 40 C.F.R. §60.4206 and 40 C.F.R. §§60.4211(a), (b), (f), and (g).
- The testing requirements found in 40 C.F.R. §60.4212.
- The Notification, Reports, and Records Requirements found in 40 C.F.R. §60.4214(b).
- The applicable general provisions as outlined in Table 8 to this subpart.

These requirements were added with this Title V renewal as conditions 11.1.18, 11.2.4, 11.3.5, and 11.4.4.

40 C.F.R. 60, Subpart JJJJ Applicability

This subpart contains New Source Performance Standards (NSPS) for Spark Ignition (SI) engines. This subpart applies to natural gas emergency electric generators 1339-F and 60-L. These engines fall into the emergency engine category with an engine output of under 25 horsepower (1339-F) and over 25 horsepower (60-L), that commenced construction after 6/12/2006, and were manufactured on or after 1/1/2009. These engines are certified and maintained in a certified manner and do not use air-to-fuel ratio controllers. Therefore the following requirements apply:

- The emission standards found in 40 C.F.R. §60.4233(a), for 1339-F.
- The emission standards found in 40 C.F.R. §60.4233(d), for 60-L.
- The importing/installation requirements found in 40 C.F.R. §60.4236(c), for 60-L.
- The monitoring requirements found in 40 C.F.R. §60.4237.
- The compliance requirements found in 40 C.F.R. §§60.4234, 4243(d), and 4243(b)(1).
- The notification, reporting, and recordkeeping requirements of 40 C.F.R. §60.4245(a).
- The applicable general provisions as outlined in 40 C.F.R. §60.4246 and Table 3 to this subpart.

These requirements were added with this Title V renewal as conditions 11.1.17, 11.2.3, and 11.4.5.

40 C.F.R. 63, Subpart ZZZZ Applicability

This subpart contains National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE). The compliance date for these requirements is May 3, 2013. This subpart applies to two emergency diesel generators (E-429 and P-2139), and two fire water pump engines (P-5 and P-1375). These are emergency Compression Ignition (CI) engines that fall in the existing stationary engines rated at less than or equal to 500 HP located at major source of HAP category. Therefore the following requirements apply:

- The emission limitations found in 40 C.F.R. §63.6602 and Table 2c to 40 C.F.R. Part 63 Subpart ZZZZ.
- The monitoring requirements found in 40 C.F.R. §§63.6625(e), (f), (h), and (i).
- The compliance requirements found in 40 C.F.R. §§63.6605, 63.6640(a) and (f)(1), and Table 6 to 40 C.F.R. Part 63 Subpart ZZZZ.
- The recordkeeping requirements found in 40 C.F.R. §63.6655, excluding 63.6655(c).
- The reporting requirements found in Footnote 1 of Table 2c to 40 C.F.R. Part 63 Subpart ZZZZ, and 40 C.F.R. §§ 63.6640(b) and (e).
- The general provisions of 40 C.F.R. 63. Except per 40 C.F.R. § 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

These requirements were added with this Title V renewal as conditions 11.1.19, 11.2.5, 11.4.6, 11.5.1, and 11.5.2.

This subpart also applies to two other diesel generators (E-676 and E-915). These engines fall into the existing emergency stationary engine rated at over 500 HP located at a major source of HAP category. Therefore, these engines must operate according to the limitations in 40 C.F.R. §63.6640(f)(2). If they do not, the engines will not be considered an emergency engine under this Subpart ZZZZ and will need to meet all requirements for non-emergency engines. This requirement was added with this Title V renewal as condition 11.1.20.

The ES Sullair Air Compressor is a 475 hp diesel (compression ignition) engine installed at MPM in 2012. This compressor is a rental unit and was previously installed at other facilities. According to 40 C.F.R. §63.6590(a)(2)(ii), it is a new stationary RICE since it has a site rating of less than 500 bhp at a major source of HAPs and was constructed after June 12, 2006. 40 C.F.R. § 63.6590 (c) (7) states that a new compression ignition stationary RICE with a site rating of less than or equal to 500 bhp, located at a major source of HAP emissions, must meet the requirements of 40 C.F.R. Part 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. Part 60 Subpart IIII for compression ignition engines and no further requirements apply to the engine under 40 C.F.R. 63, Subpart ZZZZ. According to 40 C.F.R. § 60.4208 (i), the importing requirements of 40 C.F.R. Part 60 Subpart IIII do not apply to this compressor since it has been removed from one location and reinstalled at another location. Also since the compressor was installed after July 11, 2005, but manufactured in January 2006, before the applicable date for 40 C.F.R. Part 60 Subpart IIII specified in 40 C.F.R. §60.4200(a)(2)(i) for engines that are not fire pump engines, it is not subject to any other requirements of 40 C.F.R. Part 60 Subpart IIII.

40 C.F.R. 63, Subpart DDDDD (Boiler MACT) Requirements for Natural Gas-Fired Boilers [9053 and 9055]. On February 21, 2011, EPA signed the final rule for the Boiler MACT. This rule was published in the Federal Register on March 21, 2011 which established the existing source compliance date as March 21, 2014 [the new source compliance date was May 20, 2011). The #3 and #5 Boilers [9053 and 9055] are natural gas-fired with a maximum design heat input of 150 and <99 MMBtu/hr, respectively. The 40 C.F.R. 63, Subpart DDDDD, “National Emission Standards for Hazardous Air Pollutants for Major

Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters,” placeholder language was included as Condition 11.1.14.

On May 18, 2011 EPA published a Federal Register final rule (76 FR 28662-28664) staying 40 CFR 63, Subpart DDDDD in its entirety along with an indefinite delay of its effective date. However, on January 9, 2012 the US District Court for the District of Columbia declared unlawful EPA’s May 18, 2011 stay and delay of the major source Boiler MACT (40 CFR 63, Subpart DDDDD) and new portions of CISWI (40 CFR 60, Subparts CCCC and DDDD). However, EPA has plans to finalize its reconsidered versions of these rules by Spring 2012, and replace these newly reinstated rules, including re-setting of reporting and compliance timelines. In a January 18, 2012 letter to Senator Wyden of Oregon, EPA Administrator Jackson stated that using its enforcement discretion, EPA does not intend for the recent court decision to impact new or existing sources in the interim before the new rules are promulgated.

Other Permit Changes

The following additional changes were made to this Title V permit:

- The following equipment was added to this permit: Emergency Generators 1339-F and 60-L; Heat Exchangers H-1343 and H-1308; EDA scrubber on T-1022; and S-272 scrubber on T-596.
- The following equipment was removed from this permit: Emission Group 310; references of K-1 and K-3 sumps as control devices; and Drum Flash Unit/Scrubber S-158.
- Permits R13-530 and R13-1107 were removed from the Active R13, R14, and R19 Permits table. The permittee has requested the deactivation of these permits.
- G60-C030 (approved on 1/18/2011) was added to the Active R13, R14, and R19 Permits table.
- Emission unit C-406 was renumbered as C-405 in the emission units table. This change was also made in conditions 5.2.4, 5.4.6, and 5.4.7.
- Condition 4.3.1 was removed from this permit since this condition has been removed from R13-2338I.
- Condition 6.1.21 was removed. This condition repeated Condition 5.1.12.
- References to the K81 sump and T-658 control devices were removed from conditions 6.2.4, 6.4.9, and 6.4.10. These units were removed from this permit.
- Section 7.0, formerly referring to “Specialties East”, was renamed as “New Product Development”.
- Condition 9.1.4 referenced deactivated permit R13-1107. Therefore, this condition was removed.
- Section 11.0, formerly referring to “Boilers”, was renamed as “Generators, Water Pumps and Energy Systems”.
- References to Boilers #1 and #2 were removed from conditions 11.1.2 and 11.1.6. These units were shutdown and removed from this permit.
- Former condition 11.1.8 was removed since Boiler #1 has been shutdown.
- References to emission point 9051 in conditions 11.1.8 and 11.1.9 were corrected to refer to emission point 9055 (Boiler #5).
- Condition 11.1.16, which references G60-C030, was added providing maximum emission limits for Emergency Generators 1339-F and 60-L.
- The previous condition 11.5.2, which required notification of the construction of Boiler #5, was removed. Construction has been completed.

Greenhouse Gas Tailoring Rule: This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 C.F.R. §§60.40b-60.49b NSPS Subpart Db (June 19, 1984)	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. Boiler #3 (150 MM Btu/hr) started up in Dec. 1964; Current capacities are essentially as built; maintenance & capital work on boilers have been routine maintenance, repair & replacement, and not “modifications” Boiler #5 is below 100 MM Btu/hr.
40 C.F.R. §§60.110-60.113 NSPS Subpart K (June 11, 1973)	Standards of Performance for Storage Vessels for Petroleum Liquids For Which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978. Petroleum liquid storage vessels have capacities less than 40,000 gallons.
40 C.F.R. §§60.110a-60.115a NSPS Subpart Ka (May 19, 1978)	Standards of Performance for Storage Vessels for Petroleum Liquids For Which Construction, Reconstruction, or Modification Commenced after May 18, 1978 and prior to July 23, 1984. Petroleum liquid storage vessels have capacities less than 40,000 gallons.
40 C.F.R. §§60.110b-60.117b NSPS Subpart Kb (July 23, 1984)	All tanks were found not to be subject to NSPS Kb since all: <ol style="list-style-type: none"> 1) Were built before July 23, 1984, and no physical modifications or reconstructions were performed since July 23, 1984 and/or 2) Are of capacity less than 19,813 gallons and/or 3) Are of a capacity greater than 39,890 gallons, and have a maximum true vapor pressure of 0.51 psia or less and/or 4) Are of a capacity between 19,818 gallons and 39,890 gallons and have a maximum true vapor pressure of 2.2 psia or less.
40 C.F.R. §§60.150-60.156 NSPS Subpart O	Standards of Performance for Sewage Treatment Plants. The Permittee does not operate a municipal treatment plant.
40 C.F.R. §§60.610-60.618 NSPS Subpart III (October 21, 1983)	Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Process. This facility does not produce any of the listed chemicals as a product, co-product, by-product, or intermediate.
40 C.F.R. §§60.700-60.708 NSPS Subpart RRR (6/29/1990)	Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes. This facility does not produce any of the listed chemicals as a product, co-product, by-product, or intermediate.
40 C.F.R. §§ 60.480-60.489 NSPS Subpart VV (1/5/1981)	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry. This facility does not produce final or intermediate products as defined in § 60.489.
40 C.F.R. §§ 63.100-63.107 Subpart F	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry is not applicable to the facility. The facility does not produce any of the listed chemicals as a primary product.

40 C.F.R. §§ 63.110-63.153 Subpart G	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Tanks, Transfer Operations, and Wastewater is not applicable to the facility. The facility does not produce any of the listed chemicals as a primary product.
40 C.F.R. §§63.160-63.183 Subpart H	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Equipment Leaks is not applicable to the facility. The facility does not produce any of the listed chemicals as a primary product.
40 C.F.R. §§63.40-63.44 Subpart B	Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112 (g) and 112(j) is currently not applicable to the facility.
40 C.F.R. §§63. 7880-63.7957 Subpart GGGGG	National Emission Standards for Site Remediation is not currently applicable to any remediation activities being conducted at the facility. There are no existing sources at the facility subject to this MACT.
40 C.F.R. Part 64	<p>Compliance Assurance Monitoring does not apply to this facility.</p> <p>Potential pre-control device emissions are less than Title V major source levels, per 40 C.F.R. §64.2(a)(3) for the following control devices: S-205, M-319, S-203, S-157, C-426, E-1442, S-192, E-1281, C-196, C-448, C-80, C-589, E-1537, and S-75.</p> <p>Continuous compliance determination method is in place per 40 C.F.R. §64.2(b)(1)(vi) for the following control devices: S-174, E-1353, S-171, S-137, S-196, S-197, S-224, E-2322, S-223, S-270, S-257, S-260, S-132, S-272, E-2229, S-248, S-237, S-10001, S-10003, S-10005, S-162, S-163, M-320, and S-164.</p> <p>The following control devices are subject to the MON MACT (40 C.F.R. 63, Subpart FFFF): C-49, C-405, C-370, and C-65. These control devices are not subject to CAM because they are subject to 40 C.F.R. Part 63, Subpart FFFF that was proposed after November 11, 1990. 40 C.F.R. §64.2(b)(1)(i) exempts emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act; and 40 C.F.R. §64.2(b)(1)(vi) exempts emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method.</p> <p>The following control devices are subject to no emission standard or limitation: S-240, C-363, EDA Scrubber, S-247, S-241, S-210, and S-209.</p> <p>The Esters HCl Absorption System does not meet definition of control device (40 CFR 64.1), as this is inherent process equipment.</p>
4 CSR§ 7-4.2	Emission Points 2001, 2005, 2020, 4001, 4002, and 4006 are exempt from the mineral acid (sulphuric acid) requirements as a result of 45CSR§7-10.6
40 CSR 10A	Testing, Monitoring, Record Keeping, and Reporting Requirements under 45CSR10 section 8 are not applicable to the facility since its fuel burning units only combust natural gas. This exemption is provided within 45CSR§10.3.
45 CSR 21	Regulation to Prevent and Control Air Pollution from the Emissions of Volatile Organic Compounds. This regulation applies to sources located in Putnam County, Kanawha County, Cabell County, Wayne County, and Wood County.

45 CSR 29	Emission statements for VOCs are not applicable to Tyler County facilities.
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Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: May 9, 2012
Ending Date: June 8, 2012

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Rex Compston, P.E.
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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.