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Applicant : TeMa North America, LLC **Plant ID No.:** 037-00110

Facility : Jefferson County Facility **R13-** 3414

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Date	To	From	Subject
10-15-18	Steve Pursley	Himanshu Vyas (USEPA)	Comment of Draft Permit
10-18-18	Steve Pursley	Patrick Ward	Information on Propane Tanks

SRP
10/29/2018

Pursley, Steven R

From: Patrick E. Ward <PEWard@potesta.com>
Sent: Thursday, October 18, 2018 9:28 AM
To: Pursley, Steven R
Cc: Tonj Ciotti
Subject: FW: TEMA email draft (0103-17-0435)-lmm.docx
Attachments: Scansiona 38.pdf

Attached is a scanned version of a letter addressing the propane tanks. We will deliver the original when received.

Regards,
Patrick Ward
Potesta & Associates, Inc.
7012 MacCorkle Avenue, S.E.
Charleston, West Virginia 25304
Ph: (304) 342-1400
Direct: (304) 414-4751
Fax: (304) 343-9031

This electronic communication and its attachments contain confidential information. The recommendations and/or design data included herein are provided as a matter of convenience and should not be used for final design or ultimate decision making. Rely only on the final hardcopy materials bearing the consultant's original signature and seal. If you have received this information in error, please notify the sender immediately.

October 17, 2018

Mr. William F. Durham, Director
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street, SE
Charleston, West Virginia 25304

RE: Propane Tanks
Draft Permit R13-3414
Plastics Extrusion Facility
TeMa North America, LLC

Dear Mr. Durham:

This letter is to provide additional details on the propane tanks that TeMa North America, LLC (TeMa) will be using at the facility being permitted under the above draft permit. The propane tanks are for providing fuel to the heating system within the facility on an as needed basis.

TeMa will have four (4) 1,000-gallon propane tanks. These are the typical white pressure propane tanks which are commonplace in West Virginia. The tanks' purpose is only to provide fuel to the space heaters within the building. The emissions from these pressure tanks are negligible; therefore, the tanks were not included in the application.

Furthermore, the United States Environmental Protection Agency states in *AP-42: Compilation of Air Emissions Factors, Section 7, Liquid Storage Tanks, Subsection 7.1.1.6.* the following:

"High-pressure storage tanks can be operated so that virtually no evaporative or working losses occur. In low-pressure tanks, working losses can occur with atmospheric venting of the tank during filling operations. No appropriate correlations are available to estimate vapor losses from pressure tanks."

Please let us know if you have additional questions on these tanks.

Sincerely,

TeMa North America LLC

Tonj Ciotti
Chief Executive Officer

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Pursley, Steven R

From: Vyas, Himanshu <vyas.himanshu@epa.gov>
Sent: Monday, October 15, 2018 11:18 PM
To: Pursley, Steven R
Subject: RE: WV Draft Permit R13-3414 for TeMa North America, LLC; Jefferson County Operations

Dear Mr. Pursley,

Upon review of the draft permit and fact sheet, I have a few clarifying comments to make. These are all recommendations to changing the draft permit and fact sheet rather than significant concerns. I note that this is a minor source of air emissions that does not trigger major NSR.

Fact sheet:

1) On pages 2 through 4, you note that the facility is undergoing construction and you have provided photos of the emissions units and other equipment brought on site and stored there. You also noted that the parking lot was being prepared for paving during your site inspection visit on September 4, 2018. Please provide explanation that all such activities performed by TeMa prior to the issuance of this permit are acceptable under the requirements of the Rule 13 and other relevant WVDEP rules for preconstruction permitting. Do the activities you cite constitute "commenced construction" as defined in R13?

2) For AP-42 factors used for Material Handling Emissions (page 5), to the extent you are able to, please provide clarifying language about the emissions factor rating. If it is a low rated emissions factor, are there better sources of data available such as from TeMa's existing similar operations which would provide greater certainty? I note that while the emissions expected are quite small, this being an R13 permit, the emissions factor used has a C rating:
https://www3.epa.gov/ttn/chief/ap42/ch06/final/c06s06-2.pdf
On the other hand, the emissions factor chosen is quite large and should therefore conservatively overestimate the emissions and even with that overestimation, the emissions are expected to be quite small.

3) In the table on page 6, for clarity, please state what "TPs" stands for, as in Line 2000 TPs, Line 3000 TPs, and Line 4000 TPs.

Draft permit:

1) For the summary table titled Emission Units, starting on page 3 of 20 of the draft permit (page 4 of 21 of the .PDF document), I recommend that at the bottom of the table, please provide what each acronym stands for, for clarity and ease of use of the permit. For example, VF = vent filter.
2) In Section 4, page 15 of 20, for ease of use of the permit please consider providing the production rate in lb/hour (in addition to the kg/hour rates listed), since the emissions rates are listed in lb/hr and tons/year.
3) For monitoring requirements for the baghouses/vent filters, I recommend listing the manufacturer's specifications that will ensure good operating conditions. Alternatively, TeMa's existing monitoring best practices at its existing locations could be used.

I left you a voicemail this afternoon. I am happy to discuss these points over the phone at your convenience.

Thanks,

Himanshu Vyas
Environmental Engineer

U.S. EPA, Region III
Office of Permits and State Programs (3AP10)
1650 Arch Street
Philadelphia, PA 19103-2029

Phone: 215-814-2112
FAX: 215-814-2134

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From: Adkins, Sandra K [mailto:Sandra.K.Adkins@wv.gov]
Sent: Tuesday, September 11, 2018 9:36 AM
To: Vyas, Himanshu <vyas.himanshu@epa.gov>; Maldonado, Zelma <Maldonado.Zelma@epa.gov>; tonj.ciotti@temanorthamerica.com; peward@potesta.com
Cc: Durham, William F <William.F.Durham@wv.gov>; Crowder, Laura M <Laura.M.Crowder@wv.gov>; McKeone, Beverly D <Beverly.D.Mckeone@wv.gov>; McCumbers, Carrie <Carrie.McCumbers@wv.gov>; Hammonds, Stephanie E <Stephanie.E.Hammonds@wv.gov>; Pursley, Steven R <Steven.R.Pursley@wv.gov>; Kindrick, Pamela K <Pamela.K.Kindrick@wv.gov>; Rice, Jennifer L <Jennifer.L.Rice@wv.gov>; Kreger, Joseph A <Joseph.A.Kreger@wv.gov>; Scanlan, Christopher P <Christopher.P.Scanlan@wv.gov>; Tephabock, Brian S <Brian.S.Tephabock@wv.gov>
Subject: WV Draft Permit R13-3414 for TeMa North America, LLC; Jefferson County Operations

Please find attached the Draft Permit R13-3414, Engineering Evaluation, and Public Notice for TeMa North America, LLC's Jefferson County Operations to be located in Jefferson County.

The notice will be published in *The Spirit of Jefferson* on Wednesday, September 12, 2018, and in *The Shepherdstown Chronicle* on Friday, September 14, 2018, and the thirty day comment period will end on Monday, October 15, 2018.

Should you have any questions or comments, please contact the permit writer, Steve Pursley, at 304 926-0499 x1218.

Pursley, Steven R

From: Cheryl Pullen <ccpullen@verizon.net>
Sent: Monday, October 15, 2018 5:19 PM
To: Pursley, Steven R
Subject: Do not grant TeMA an air permit

October 15, 2018

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America, LLC 13-3414

Dear Mr. Pursley:

Please do not issue an air permit grant to TeMA.

Rockwool's air permit grant was based on data over a quarter of a century old. Their air permit needs attention, and a public hearing, before any more air grants are given.

The WVDEP has not responded to questions and concerns from Jefferson County residents nor to requests for a public hearing.

There is also an issue with water. Rockwool will use a lot of water. Our agriculture is an important industry. It cannot exist if the water supply is low. If TeMa is added, there will be even less of a reserve for agriculture in years with less rain. Further, there is the matter of the Karst, our aquifer. There is the possibility of contamination of the water from the air pollutants spewed from Rockwool's stacks.

Why are we supporting these foreign companies? Rockwell is not even hiring that many workers. I don't know about TeMa. Jefferson is the richest county in the state. One reason for that is that we have not had heavy industry. We supply 20% of West Virginia's tourism dollars. We provide homes both as a bedroom community for the DC area and for wealthy retirees. People do not come here to see or experience air pollution..

TeMA's air permit should not be granted.

Cheryl Pullen
ccpullen@verizon.net

RECEIVED

Pursley, Steven R

From: Elizabeth Meehan <gumpstergirl@aol.com>
Sent: Monday, October 15, 2018 4:53 PM
To: Pursley, Steven R
Subject: TeMa North America LLC, 13-3414- comment
Attachments: TeMa North America LLC, 13-3414- comment Meehan .pdf

October 12, 2018

Steven Pursley, WVDEP-DAQ
601 57th St. S. E.
Charleston, WV 254304

Re: TeMa North America LLC, 13-3414-

Dear Mr. Pursley and WVDEP-DAQ,

Thank you for reviewing my concerns about the TeMa air emissions. I am a life long resident of Jefferson County. I am a Thoroughbred Racehorse owner and trainer here in Charles Town and I run a Thoroughbred breeding operation on my family farm in Shepherdstown. I am very concerned about the ill effects of increased air emissions on my horses, my family and my business.

Thoroughbred Racehorses must perform on at maximal intensity. My concern is that the increased air pollution will lead to increased airway inflammation in my racehorses. This inflammation will lead to decreased or poor performance and can lead to other injuries and illnesses. This would be at best a hard ship on my business and could be devastating. As horses earn less per start and have fewer starts per year this directly effects my business bottom line and my ability to invest in breeding for future years racing stock. As you can see this is a snowball effect.

We can not simply change our training regimes to avoid bad air quality days. We already have some moderate air quality days in Ranson where populations such as horses who are sensitive to poor air quality should not exercise. Some may think harm could be avoided by changing the exercise regime on those days. However our exercise regimes are optimized to reduce risk of musculoskeletal injury and adjustments may lead to increased risk of injury.

I am also concerned for my horses quality of life and their after racing career. Many of my horses go on to be sport horses after they race. If they develop inflammatory airway disease or a musculoskeletal injury while racing this will not be possible. Increased air pollution will increase this risk.

Working at the race track and on the farm has many great advantages. I enjoy working outside and I and my family have a healthy active life style. We enjoy working together outside at the farm or the track. However I worry that I will have to limit my children's outside time if air quality decreases and air emissions increase. I believe that my children have learned great values by working with their father and I at the racetrack and on the farm and I would hate for them to miss out on this.

Both my husband and I work in the Thoroughbred Racehorse industry in Jefferson County. We make good upper middle class incomes and we really love our jobs and love it here but we may be forced to leave if the air emissions in the county are allowed to increase.

This industry supplies great opportunity for the next generation supplying a variety of good jobs from entry level to highly skilled. This is a clean industry where parents can bring their children to work and teach them about work ethic and business. We believe this historic industry should be preserved and protected. For this reason we ask you to deny the air permit to TeMa as it will increase the air emissions in Jefferson County posing a risk to the Thoroughbred Industry in Jefferson Coutny.

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Thank you again.

Sincerely,

Elizabeth Meehan

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Pursley, Steven R

From: Matt Robinson <matt.c.robinson@gmail.com>
Sent: Monday, October 15, 2018 4:49 PM
To: Pursley, Steven R
Subject: TeMa North America LLC, 13-3414

October 15, 2018

Mr. Steven Pursley
WVDEP-DAQ
601 57th St. S.E.
Charleston, WV 25304

Mr. Pursley,

I am writing you in regards to the TeMa air permit in Jefferson County, WV – TeMa North American LLC, application number 13-3414.

With the WV DEP's recent approval of an air permit for Rockwool (#14-0037 - Roxul USA, Inc), I object to any new air permits being approved in Jefferson County. Rockwool will be a major source of air pollution and substantially change the air quality in the county. I have serious concerns about any additional facilities being permitted that will further contribute to air pollution in Jefferson County. Rockwool has also publicly announced that they will be changing their manufacturing process and ingredients. This was after the air permit was approved. It is quite possible their emission levels will change and they may need to amend their air permit. Shouldn't any new air permits in the county at least be put on hold until Rockwool is operational and their actual emissions are known?

I also have several concerns with the proposed TeMa facility and their application. Below are some of these concerns:

1. I am concerned about the amount and type of pollutants that will be emitted from the TeMa facility and the impacts they will have on residents of Jefferson County, WV. While the permitted levels on their own may meet federal and state standards for acceptable level of risk, these levels coupled with the emissions from Rockwool and other facilities already permitted in the county (including Millville Quarry, DALB, and Ox Paperboard) will have a significant impact on Jefferson County's air quality. The cumulative impact increases the likelihood of exceeding the National Ambient Air Quality Standards for certain pollutants and potentially changing Jefferson County from an attainment county to non-attainment county. How can WV DEP approve another facility to emit pollutants in the county when permitted air pollutant levels are already high (if you count Rockwool's planned emissions) and could potentially affect the attainment status for the county?

2. I am concerned about the "future expansion" area identified in the application, what activities will occur there, and how that might affect emissions. The size of the expansion area is approximately the same size as the current proposed facility. If the intent of this area is to double the size of the facility, then pollution emissions could also double. That is a very different scenario from what is outlined in the current permit application, but one that is increasingly likely if the current air permit is approved.

3. I am concerned about the lack of modelling information available with the TeMa application. Has any modeling being conducted to show the effects and potential distribution of air pollutants emitted from the facility? If not, why? Isn't this type of information important (regardless of size) in determining whether this facility's air permit should be approved or not?

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4. I am concerned about the lack of information regarding the Air Pollution Control Devices in the application. While it says that the units will have a "control efficiency of 98% or greater", it does not specify what type of unit will be used (it just says that the "units will be a dust collector or vacuum filters") and it does not specify a manufacturer either. Isn't this information important in determining whether this facility's air permit should be approved or not?

5. I am concerned about the lack of information on how emissions will be released in the application – specifically the number of stacks and their individual heights. Unless I missed something, I did not see this information. If no stacks are required and emissions will be released through vents, this is not clear in the application. It seems this would be important information in determining whether the facility's air permit should be approved or not.

If there are any "stacks" at that facility, then I have potential concerns about visual impacts. Depending on the number, size, and height of any stacks, they could have significant visual impact on the surrounding area. Any structures over 200-feet tall would also need to be lit (according to FAA guidelines), which would further add to the visual impact.

6. I am concerned about the existing sinkhole on the property and potential issues it may cause to the facility, large vehicles accessing the property, and to groundwater resources. Have any geologic studies been conducted on the property to determine the extent of the existing sinkhole or if there are any other hazardous or problematic karst features on the property? This type of information seems important in determining whether to permit this facility or not.

7. I am concerned about the lack of monitoring information in the application. The only statement regarding monitoring that I saw in the application was that "TeMa North America, LLC plans to follow the monitoring, recordkeeping, reporting, and testing required by the issued permit." What type of monitoring system are they going to use? Where are they going to place the monitors? What pollutants will they be monitoring and at what frequency? Isn't this type of information important in determining whether an air permit should be approved for this facility or not?

Based on the above, I do not believe TeMa's permit should be approved. The application raises many concerns and the cumulative impacts of emissions from existing industry (including Millville Quarry, DALB, and Ox Paperboard) plus the newly permitted Rockwool facility already present a significant impact to air quality in Jefferson County. Any additional or new facilities permitted to release air pollutants in the county only increase the likelihood of exceeding the National Ambient Air Quality Standards for certain pollutants and potentially changing Jefferson County from an attainment county to non-attainment county.

Thank you for your time and consideration.

Sincerely,

Matt Robinson

Matt Robinson

PO Box 1724
Shepherdstown, WV 25443

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Pursley, Steven R

From: Lynn Delles <lbdelles@gmail.com>
Sent: Monday, October 15, 2018 4:48 PM
To: Pursley, Steven R
Subject: Air Permit Application: TeMa North America, LLC 13-3414

October 15, 2018

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America, LLC 13-3414

Dear Mr. Pursley:

Please reject the air permit for TeMa North America referenced above. Jefferson County, with its long history advancing and promoting the equine industry with breeding, training, and racing, simply cannot afford any additional toxic emissions in its air.

I recently bought a small farm in Ranson near where this facility will be built. We have horses already and are soon going to start a breeding program. This plant will be hazardous for the health of our herd and may cause us to relocate our operations outside of the dangerous plume zone.

There is a study that will soon be published in the *Journal of Veterinary Internal Medicine* that will state horses are **15 times more sensitive to inhaled particulate matter** than humans. Inhaled particulate matter causes airway inflammation to horses. This is especially significant as horses live predominantly outside (unlike humans) and this are constantly exposed to these pollutants. Horses, especially thoroughbreds (which is the leading industry in Jefferson County), must perform at maximal exercise and are housed and work year round here. Horses in Jefferson County are at the highest risk for harm by heavy industry and its polluters like TeMa. This is simply unacceptable.

The equine industry has been a cash cow for Jefferson County and the entire state for decades. In 2010, the owners, breeders, and trainers were responsible for producing $79.4 million in direct business volume and $191 million in total business volume in Jefferson County alone (see the report here: http://www.harnesstracks.com/docdatabase/alice/5364.pdf). This revenue will literally evaporate as more horses are affected by these pollutants. The equine industry in this county employs thousands of people, supports hundreds of small businesses. These numbers eclipse any data that TeMa or other future heavy industry applicants could ever produce. Without the equine industry here to support them, these employers and small business owners will have to pull out of the area to salvage their livelihoods.

These risks posed by further air emissions and pollution to the equine industry and economy of Jefferson County and the state of West Virginia outweigh and benefit offered by TeMa. I urge you to deny the air permit for TeMa on the grounds that it will cause significant irreparable harm to a substantial historical existing industry in Jefferson County.

Best regards,

Lynn Delles
3546 Old Leetown Pike

Ranson, WV 25438

Pursley, Steven R

From: Susie Wimer <susiewimer@yahoo.com>
Sent: Monday, October 15, 2018 4:35 PM
To: Pursley, Steven R
Subject: TeMa

Susie Wimer
Ranson, WV 25438

October 15, 2018

Steven Pursley, WVDEP-DAQ
601 57th St. S.E.
Charleston, WV
Re:TeMa North American LLC, 13-3414

Dear Mr. Pursley and WVDEP-DAQ

I am writing to register my complaint against the proposed TeMa plant in Jefferson county. The levels of pollution created are simply unacceptable. Couple this with the possible Rockwool plant and the levels of air pollution far exceed what we are willing to tolerate in Jefferson county.

My family is involved in the horse racing industry here and the pollution, especially, the particulate matter will effect the training and racing of Thorobreds living at the Charles Town Track, as well as the many neighboring farms. I also have a small farmers market based business that depends on local agriculture for local fruit. I don't think I want to use fruit grown in the fallout of such pollution.

If this plant is built, many folks who can afford to move, will leave the area. My family will be among those exiting for cleaner surroundings. We never dreamed we would leave as I am 13th generation in this area, my grandchildren being 15th.

In the last 15 years, all of the superfund site in Jefferson county have been remediated. It seems ridiculous to create a site needing to be cleaned up at some point in the future.
Our area should be concentrating on getting businesses that are not polluting.

Thank you,
Susie Wimer

Sent from my iPad

Pursley, Steven R

From: Laura Levesque <unextinguished@gmail.com>
Sent: Monday, October 15, 2018 4:26 PM
To: Pursley, Steven R
Subject: Re: Air Permit Application: TeMa North America, LLC 13-3414

October 15, 2018

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America, LLC 13-3414

Mr. Pursley,

Jefferson County needs a moratorium on all new air permit applications until Rockwool's air permit is resolved. There are problems & questions with Rockwool's air permit that have yet to be solved or answered.

One problem with Rockwool's air permit application, is their air modeling report cherry picked the air monitors by using 1992 land use data. There is more current data available. Using Frostburg, Maryland's air monitor for particulate matter is absolutely absurd. Jefferson County would dead by the time any of Rockwool's particular matter ever made it to Frostburg.

Rockwool has publicly stated they will be changing their manufacturing process & ingredients. They have stated they will not be using pet coke & not milling coal at their facility. This will change the amounts of pollutants. We must be able to hold them to their application and permit. Their air permit needs to be modified & I demand a public hearing for this modification.

I'm extremely frustrated with the lack of transparency from the WVDEP. The WVDEP has not released all documents pertaining to Rockwool's air permit & this has resulted in more questions than answers. We need all documents relating to section 7 (Endangered Species) & section 106 (National Historic Preservation Act) processes. We should not have to file FOIAs to receive any documents. You have other Rockwool documents on your website. Why not list them all? In addition, you should be cooperatively working with all government agencies. The city of Charles Town has requested documents from the DEP, they have not received them, and now they have to file FOIAs. This is unacceptable.

There are serious concerns Jefferson County does not have enough water to support the heavy usage of Rockwool. Rockwool is violating county ordinances for water usage. Now with the addition of TeMa our water supply is threatened further. Our geological Karst system is very sensitive to groundwater contamination & water usage. I realize water is not your department, however, the air pollution will contaminate groundwater. What goes up, comes down.

I'm insulted that the DEP would have a public hearing for TeMa & Bardon at no request from the public & did not offer the same luxury to the citizens for Rockwool's permit. The comment period for TeMa & Bardon was not even up yet when you held your public meeting on Oct. 4 in Ranson.

Furthermore, we are still waiting for a public meeting specifically for Rockwool. The DEP has left citizens to fumble around in the dark for weeks. You should have been here on the ground weeks ago. Instead, the DEP attends a closed door meeting with local & state officials & Rockwool at the Bavarian Inn on Aug. 8th which only raised more public suspicion of unfair practices & secret discussions.

Polluting companies are quickly being shoved through Jefferson County's door. These actions will quickly make it a non-attainment area if it isn't a non-attainment area already because of Rockwool's major pollution. Given the close proximity of Jefferson County to Maryland & Virginia, these states need to be consulted on air pollution as well. West Virginia is not being a good neighbor.

I also have serious concerns with TeMa's air permit. At the Oct. 4th meeting, you said there are not EPA guidelines for plastic extrusion manufacturing & that you used general guidelines. I do not feel that this is specific enough to issue a permit. EPA's guidelines establish processes & procedures & set limits for pollutant emissions at each stage/step of manufacture processes. It is industry specific & should be not generalized.

In addition, TeMa's application was very hard to follow & poorly compiled using both English & Italian. Also, the majority of DEP documents are scanned documents which result in images compiled in PDFs and they are not text based. These documents do not comply with The Americans with Disabilities Act (ADA). Persons needing devices such as text-to-speech devices would not be able to access your documents.

TeMA's air permit should not be granted.

Sincerely,
Laura Levesque
154 High Street
Charles Town WV 25414

NON-CONFIDENTIAL

Pursley, Steven R

From: Chrissy Wimer <clwimer1@yahoo.com>
Sent: Monday, October 15, 2018 4:16 PM
To: Pursley, Steven R
Subject: TeMa North America LLC, 13-3414
Attachments: THe economic impact of the CT TB horse racing industry on the JC and WV economics.pdf; TeMa North America LLC, 13-3414 air emissions permit comments from Wimer .pdf

Dear Steven Pursley,

Please see attached comments on TeMa North America LLC, 13-3414.

Best Regards
Christine Wimer MS, DVM, DACVS-LA

Christine Wimer MS, DVM, DACVS-LA
Ranson WV, 25438

October 15, 2018

Steven Pursley, WVDEP-DAQ
601 57th St. S. E.
Charleston, WV 254304

Re: TeMa North America LLC, 13-3414-

Dear Mr. Pursley and WVDEP-DAQ,

Thank you, for your service and for reviewing my concerns on this matter. I am a veterinarian, board certified in equine and large animal surgery. I also have a masters in applied molecular biology and have performed equine immunology research at Cornell University for many years. I ask that you deny the air permit for TeMa in Jefferson County. Increasing air emissions and pollution in Jefferson County poses a risk to the Jefferson County Equine Industry.

It is known from a recently completed and accepted study soon to be published in the journal of Veterinary Internal Medicine that **horses are** 15 times **more sensitive** to inhaled particulate matter than humans. Horses are also affected by both PM10 and PM 2.5 (humans are more effected by PM 2.5). While we do not have many studies on the other pollutants TeMa will emit, we can extrapolate from the human modeling. When doing this we must consider several differences between horses and humans. **Horses have longer exposure time** to air pollutants as they live outside. Thoroughbred **racehorses must perform at maximal intensity**. This forces them to carry contaminants such as particulate matter to the deepest portions of their lungs where air exchange happens, and also means small changes in performance level really matter. This all suggests that **horses will be far more affected by increase in air emissions and pollutants than humans.**

Inhaled particulate matter causes airway inflammation in horses. Even small subclinical amounts of inflammation in the lungs of horses negatively affect performance (2, 3, 4, 5, 10). This inflammation can also cause increased recovery times following racing (6, 10). Reduced performance and training interruptions can lead to higher risk of injury, reduced winning average, fewer yearly starts, lower yearly earnings, shortened career length, fewer lifetime starts, reduced lifetime earnings, and reduced quality of life (2,7,8, 10). This will lead to decreased return on investment, decreased cash flow, and decreased over all earnings for owners,

trainers, and breeders with horses at this track and in this area. It would also mean that horses that are trained elsewhere and shipped in to race maybe at an advantage over the local horses sending the money from our track out of state. The knowledge of this increased air emission and pollution in the heart of the county will likely also drive away outside investors who invest in West Virginia breads further damaging the industry.

The local equine industry supplies thousands of jobs, and millions of dollars in state and local taxes and tens of millions of dollars in the local economy (9). Please find attached the economic impact study I urge you to review it. In 2010 the owners, breeders, and trainers were responsible for producing 79.4 million dollars in direct business volume and 191 million dollars in total business volume in Jefferson County alone. This same year the Racetrack played over 12 million dollars in taxes to Jefferson County and the municipalities of Charles town and Ranson. These economic contributions dwarf those proposed by TeMa.

The true risks to the equine industry, by the increased air emissions, are multifactorial. The most obvious is that horses will have increased subclinical airway inflammation causing poor performance and secondary injury and illness all leading to decrease in over all earnings and success of owners breeders and trainers. This will trickle down to decreased employment and depression of wedges for other horsemen and equine professionals. Less obviously this will lead some owners, trainers, and breeders to leave the county and the state. Horses are a long-term investment with a lot of risk involved. From the time a breeder pays the stud fee to the time they sell to another owner or race the horse is years and there are many risks along the way. Therefore people look to minimize risk wherever possible. It is likely that some owners and breeders some of whom do not live her and only invest here will see the increased air pollution as a risk they are not willing to bear and simply breed, foal and grow their horses elsewhere. This will move all of this money and jobs out of state. Trainers who are also owners and breeders may leave for the vary same reason, they may simply leave out of concern for their horses health and businesses' welfare, or they may leave as they see their owners (clients) leaving. This will cause shrinking of the industry. This will lead to less business volume and a smaller lower earning tax base for the county and state.

If this industry declines it will not be for the normal reasons industries decline. As a service industry its jobs cannot be shipped over seas, nor can these jobs be automated. As a form of entertainment technology has only made it more ubiquitous not obsolete. If this local industry declines it will because it was endangered by the willful ignorance and poor decisions of those charged with protecting and promoting the public welfare. Please consider the ill effects increased air emission and pollutants could have on the equine industry and economy.

These risks posed by further air emissions and pollution to the equine industry and economy of Jefferson County and the state of West Virginia outweigh and benefit offered by TeMa. I urge you to deny the air permit for TeMa on the grounds that it

RECEIVED

will cause significant irreparable harm to a substantial historical existing industry in Jefferson County.

Best regards,

Christine Wimer MS, DVM, DACVS-LA

References:
1. https://dep.wv.gov/daq/Documents/March%202018%20Drafts%20and%20IP R/037-00108_IPR_R14-0037.pdf

2. Couëtil LL, Cardwell JM, Gerber V, Lavoie JP, Léguillette R, Richard EA. Inflammatory airway disease of horses—revised consensus statement. Journal of veterinary internal medicine. 2016 Mar;30(2):503-15.

3. Richard EA, Fortier GD, Pitel PH, Dupuis MC, Valette JP, Art T, Denoix JM, Lekeux PM, Van Erck E. Sub-clinical diseases affecting performance in Standardbred trotters: diagnostic methods and predictive parameters. The Veterinary Journal. 2010 Jun 1;184(3):282-9.

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6. Couëtil LL, Hoffman AM, Hodgson J, Buechner-Maxwell V, Viel L, Wood JL, Lavoie JP. Inflammatory airway disease of horses. Journal of veterinary internal medicine. 2007 Mar;21(2):356-61.

7. Hernandez J, Hawkins DL, Scollay MC. Race-start characteristics and risk of catastrophic musculoskeletal injury in Thoroughbred racehorses. Journal of the American Veterinary Medical Association. 2001 Jan 1;218(1):83-6.

8. Auer JA, Stick JA. Equine Surgery 4th edn, Saunders, 2012.

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http://www.harnesstracks.com/docdatabase/alice/5364.pdf

10. Anderson JO, Thundiyil JG, Stolbach A. Clearing the air: a review of the effects of particulate matter air pollution on human health. Journal of Medical Toxicology. 2012 Jun 1;8(2):166-75.

Pursley, Steven R

From: CITIZENS CONCERNED ABOUT ROCKWOOL <ccarwv@gmail.com>
Sent: Monday, October 15, 2018 3:24 PM
To: Andrews, Edward S; Pursley, Steven R
Subject: TeMa public comments from Jefferson County Vision

October 15, 2018

Mr. Stephen Pursley
WVDEP -DAQ
601 5th Street, SE
Charleston, WV 25304
Via email STEVEN.R.PURSLEY@WV.GOV

Dear Mr. Pursley:

Jefferson County Vision, a non-profit organization in Jefferson County, would like to comment on Permit number R-13-3414, for the proposed TeMa North America, LLC, manufacturing plant located in Kearneysville, West Virginia. Thank you for this opportunity.

Our technical volunteers attempted to evaluate all three documents available; The TeMa Engineering Evaluation Fact sheet; the Permit Application and the DRAFT Permit to Construct. Overall the documents frequently shift from metric to English units making calculation comparisons difficult. More troubling, the stack tests are written largely in Italian. It is challenging to expect citizens to convert units back and forth or to translate information into English to evaluate permits for comment. For this reason, we believe the Permit should not be awarded until a clearly written document is available for review.

One result is that it is difficult to understand the sources and actual expected pollution limits planned for TeMa. In the DRAFT Permit to Construct limits are listed for just the extruders that are: VOC: 5.49 tons/yr and PM of 1.62 ton/yr. But the advertisement that TeMa ran in the July 27, 2018 *Shepherdstown Chronicle* read:

"The applicant estimates the potential to discharge the following Regulated Air Pollutants will be: PM of 34.03 tons per year (tpy) including fugitive emissions of 14.49, PM10 of 23.81 tpy including fugitive emissions of 4.27 tpy, PM2.5 of 19.96 tpy including fugitive emissions of 0.42 tpy, VOC of 4.99 tpy.

Another related pollution source that is unclear are the haul road calculations. The table on page six of the Engineering report seems to show a large amount of PM emissions. We would appreciate clarification of this table and how it compares to TeMa's expected emissions above. More generally we are trying to understand the significant trucking impact detailed in the permit, and how it comports with TeMa's public comments in the *Journal News* on April 11, 2018 that maximum operations would generate just "six to eight flat-bed truckloads of products a day".

Regarding water, while we see references to water used by TeMa in their cooling process we see no mention of total expected water usage or the source. As you know, Jefferson County has a facility-based restriction of .25 a gallon of water per day per square foot. What is the best way to obtain this water usage estimate?

Finally, we find the following paragraph in the Draft Permit to Construct especially troubling:

> Due to unavoidable malfunction of equipment, emissions exceeding those set forth in this rule may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of

major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. §45-7-9.1

That approach is unacceptable given the sensitive populations near Burr Business Park. TeMa should provide immediate notice and operations should halt upon malfunction, particularly a major malfunction. A ten day "free to pollute" malfunction plan seems inconsistent with the Clean Air Act, which directs that operators make corrective measures in the **minimum** time possible.

Thank you for your consideration and response to these concerns and requests for clarification.

Sincerely,

Leigh Smith
President of the Board
Jefferson County Vision

PO Box 103, Shenandoah Junction, West Virginia 25442

Pursley, Steven R

From: Addison Reese <areese@k12.wv.us>
Sent: Monday, October 15, 2018 2:29 PM
To: Pursley, Steven R
Subject: TeMa North America, LLC, 13-3414

Why do you approve permits simultaneously (Rockwool and TEMA) without having to account for the other potential emissions? If both facilities are built, will their air permits have to be modified?

During the public comment in Ranson, it was mentioned that TEMA does not have stacks but they have vents, does this mean the pollution could potentially stay closer to the ground and impact the schools and local communities more than if the emissions were coming out of taller stacks?

Are you willing to put in new air monitoring units at the schools since they are so close to two companies with significant air pollution?

Why was TEMAs air permit originally posted in the Shepherdstown Chronicle when we were told that The Spirit of Jefferson is the paper of record for Jefferson County?

During the meeting we were told that there are no EPA guidelines for plastic emulsion factories. Would the EPA agree with this assertion? Are there guidelines that would be relevant to the processes that will be used by TEMA?

Where will TEMA get the plastic products that they will be melting down to make their products? Is all of the plastic the same type or could the varied make-up of the plastics change the level of emissions?

Thank you,

Addison Reese
122 Larkspur Lane
Shepherdstown, WV 25443
301-788-7239

Pursley, Steven R

From: Chris & Heather <alwaysbsideu@gmail.com>
Sent: Monday, October 15, 2018 1:57 PM
To: Pursley, Steven R
Subject: Re: Air Permit Application: TeMa North America, LLC 13-3414

October 12, 2018

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America, LLC 13-3414

Mr. Pursley,

Jefferson County needs a moratorium on all new air permit applications until Rockwool's air permit and on-going development issues are resolve. There are problems & questions with Rockwool's air permit that have yet to be solved or answered in addition to land use and zoning irregularities that need to be investigated.

One problem with Rockwool's air permit application, is their air modeling report cherry picked the air monitors by using 1992 land use data. There is more current data available. Using Frostburg, Maryland's air monitor for particulate matter is absolutely absurd. Jefferson County would blanketed with toxic particulate matter by the time any of Rockwool's particular matter ever made it to Frostburg. This is a fairly nonsensical approach to monitoring and enforcing air quality in Jefferson County.

Rockwool has publicly stated they will be changing their manufacturing process & ingredients. They have stated they will not be using pet coke & not milling coal at their facility. This will change the amounts of pollutants. We must be able to hold them to their application and permit. Their air permit needs to be modified & I demand a public hearing for this modification.

I'm extremely frustrated with the lack of transparency from the WVDEP, JCDA, Jefferson County Commission and the City of Ranson, all of which appear to be colluding to push heavy industrial uses where they are least beneficial, but detrimental to the general public and clearly not wanted by citizens throughout the region. The WVDEP has not released all documents pertaining to Rockwool's air permit & this has resulted in more questions than answers. We need all documents relating to section 7 (Endangered Species) & section 106 (National Historic Preservation Act) processes. We should not have to file FOIAs to receive any documents. You have other Rockwool documents on your website. Why not list them all? In addition, you should be cooperatively working with all government agencies. The City of Charles Town has requested documents from the DEP, they have not received them, and now they have to file FOIAs. This is unacceptable and a highly visible poor example of intergovernmental cooperation and clear unresponsiveness to the public.

There are serious concerns Jefferson County does not have enough water to support the heavy usage of Rockwool. Rockwool is violating county ordinances for water usage, local zoning laws, state planning and zoning regulatory statutes. Now with the addition of TeMa our water supply is threatened further. TeMa may also possess the same faulty land use and zoning practices as Rockwool. Our geological Karst system is very sensitive to groundwater contamination

PSC-COMMENT-1

& water usage. I realize water is not your department, however, the air pollution will contaminate groundwater. What goes up, comes down.

We, the tax paying citizens of Jefferson County, are insulted that the DEP would have a public hearing for TeMa & Bardon at no request from the public & did not offer the same luxury to the citizens for Rockwool's permit. The comment period for TeMa & Bardon was not even up yet when you held your public meeting on Oct. 4 in Ranson.

Furthermore, we are still waiting for a public meeting specifically for Rockwool. The DEP has left citizens to fumble around in the dark for weeks. You should have been here on the ground weeks ago. Instead, the DEP attends a closed door meeting with local & state officials and applicants, in this case, Rockwool at the Bavarian Inn on Aug. 8th which only raised more public suspicion of unfair practices and secret discussions which flies in the face of transparent government.

Polluting companies are quickly being shoved through Jefferson County's door with little to no public input. These actions will quickly make it a non-attainment area if it isn't a non-attainment area already because of Rockwool's major pollution. Given the close proximity of Jefferson County to Maryland & Virginia, these states need to be consulted on air pollution as well. West Virginia is earning a reputation for not being a good neighbor.

I also have serious concerns with TeMa's air permit and land use / zoning approvals. At the Oct. 4th meeting, you said there are not EPA guidelines for plastic extrusion manufacturing & that you used general guidelines. I do not feel that this is specific enough to issue a permit. EPA's guidelines establish processes / procedures and set limits for pollutant emissions at each stage/step of manufacture processes. It is industry specific & should be not generalized.

In addition, TeMa's application was very hard to follow & poorly compiled using both English & Italian. Also, the majority of DEP documents are scanned documents which result in images compiled in PDFs and they are not text based. These documents do not comply with The Americans with Disabilities Act (ADA). Persons needing devices such as text-to-speech devices would not be able to access your documents.

TeMA's air permit should not be granted.

Respectfully,

Christopher J. Garcia, AICP, Assoc. AIA
25 Bayberry Court
Harpers Ferry, WV 25425
830-237-1484

Sent from my iPhone, please excuse any typographical errors due to use of a mobile device

Pursley, Steven R

From: Paul Holzberger <paul@holzberger.com>
Sent: Monday, October 15, 2018 1:32 PM
To: Pursley, Steven R
Subject: Re: Air Permit Application: TeMa North America, LLC 13-3414

Mr. Pursley,

I am copying below a letter you received from another Jefferson County citizen that is far more informative and elegant than anything I could write. I just want to add that as a father of four children (three of whom are in Jefferson County Public Schools currently), I find it deeply disturbing that anyone could permit a huge industrial pollutant source to be located within two miles of four schools, and now we are considering allowing even more pollution into our area? Please stop this dead in its tracks.

Here is the much more informative letter, all of which I am echoing because I believe in it strongly:

"Jefferson County needs a moratorium on all new air permit applications until Rockwool's air permit is resolved. There are problems & questions with Rockwool's air permit that have yet to be solved or answered.

One problem with Rockwool's air permit application, is their air modeling report cherry picked the air monitors by using 1992 land use data. There is more current data available. Using Frostburg, Maryland's air monitor for particulate matter is absolutely absurd. Jefferson County would dead by the time any of Rockwool's particular matter ever made it to Frostburg.

Rockwool has publicly stated they will be changing their manufacturing process & ingredients. They have stated they will not be using pet coke & not milling coal at their facility. This will change the amounts of pollutants. We must be able to hold them to their application and permit. Their air permit needs to be modified & I demand a public hearing for this modification.

I'm extremely frustrated with the lack of transparency from the WVDEP. The WVDEP has not released all documents pertaining to Rockwool's air permit & this has resulted in more questions than answers. We need all documents relating to section 7 (Endangered Species) & section 106 (National Historic Preservation Act) processes. We should not have to file FOIAs to receive any documents. You have other Rockwool documents on your website. Why not list them all? In addition, you should be cooperatively working with all government agencies. The city of Charles Town has requested documents from the DEP, they have not received them, and now they have to file FOIAs. This is unacceptable.

There are serious concerns Jefferson County does not have enough water to support the heavy usage of Rockwool. Rockwool is violating county ordinances for water usage. Now with the addition of TeMa our water supply is threatened further. Our geological Karst system is very sensitive to groundwater contamination & water usage. I realize water is not your department, however, the air pollution will contaminate groundwater. What goes up, comes down.

I'm insulted that the DEP would have a public hearing for TeMa & Bardon at no request from the public & did not offer the same luxury to the citizens for Rockwool's permit. The comment period for TeMa & Bardon was not even up yet when you held your public meeting on Oct. 4 in Ranson.

Furthermore, we are still waiting for a public meeting specifically for Rockwool. The DEP has left citizens to fumble around in the dark for weeks. You should have been here on the ground weeks ago. Instead, the DEP attends a closed door meeting with local & state officials & Rockwool at the Bavarian Inn on Aug. 8th which only raised more public suspicion of unfair practices & secret discussions.

Polluting companies are quickly being shoved through Jefferson County's door. These actions will quickly make it a non-attainment area if it isn't a non-attainment area already because of Rockwool's major pollution. Given the close

proximity of Jefferson County to Maryland & Virginia, these states need to be consulted on air pollution as well. West Virginia is not being a good neighbor.

I also have serious concerns with TeMa's air permit. At the Oct. 4th meeting, you said there are not EPA guidelines for plastic extrusion manufacturing & that you used general guidelines. I do not feel that this is specific enough to issue a permit. EPA's guidelines establish processes & procedures & set limits for pollutant emissions at each stage/step of manufacture processes. It is industry specific & should be not generalized.

In addition, TeMa's application was very hard to follow & poorly compiled using both English & Italian. Also, the majority of DEP documents are scanned documents which result in images compiled in PDFs and they are not text based. These documents do not comply with The Americans with Disabilities Act (ADA). Persons needing devices such as text-to-speech devices would not be able to access your documents.

TeMA's air permit should not be granted."

End of quoted email, but let me repeat again, TeMA's air permit should not be granted.

Thank you,
Paul Holzberger, Jr.
Charles Town, WV
Jefferson County Resident
Father of 4

Pursley, Steven R

From: Van Stemple <vastemple@yahoo.com>
Sent: Monday, October 15, 2018 1:25 PM
To: Pursley, Steven R
Subject: Air Permit Application: TeMa North America, LLC 13-3414

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America, LLC 13-3414

Mr. Pursley,

I'm writing to ask you for a moratorium on all Jefferson County air permit applications for new construction. Companies like TeMa, Bardon, and Rockwool are suddenly being thrust upon Jefferson County by both elected and non-elected officials who did not obtain county resident input before doing so. These types of companies will quickly make Jefferson county a non-attainment area. Rockwool alone would become the 2nd largest polluter in the entire state of WV. Yet, they were approved and more companies want to add to that pollution? We need this sudden assault on the air we breath in Jefferson county to please stop.

For starters, there are problems with TeMa's air permit. TeMa's application was very hard to follow & poorly compiled using both English & Italian. Shouldn't they be required to submit an application that conforms to standards you require in order to evaluate? I'm sorry to say I can't read Italian, can you?

I do appreciate that a public hearing was held on this application. At the Oct. 4th meeting, you said there are no EPA guidelines for plastic extrusion manufacturing. I believe it was stated that "general" guidelines would be used. When does resident input on whether we want to breath the pollution come into consideration? Is that not part of the equation? If not, it most certainly should be. Isn't the main goal of the WVDEP to protect the environment for WV residents? Doesn't that mean protecting the air we breath?

I can sympathize with workload and limited resources that the WVDEP may have in dealing with all these applications. But, that does not mean the WVDEP should not take as much time as needed to make sure citizens and the environment are not harmed by these businesses. Again, assuming that is what you are inherently supposed to be doing.

As I've stated above several times, concerns about who the WVDEP is representing/portecting when it comes to air permits have been raised. A big reason for this is the lack of transparency from the WVDEP in regards to the Rockwool air permit application. I do not know if you were assigned that permit or not, but all air permits are part of the bigger picture of course. There was no public hearing on the Rockwool permit. Yet, the WVDEP attended a closed door meeting with local and state officials and Rockwool at the Bavarian Inn on Aug. 8th. This raises more public suspicion of unfair practices & secret discussions. I would hope that these suspicions are unfounded, yet I have them.

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In conclusions, TeMA's air permit should not be granted. Also, a pubic hearing on Rockwool's air permit should be held and the WVDEP needs to consider citizen input and concerns from the very county that these businesses wish to operate in.

Sincerely,
Van Stemple

3970 Ridge Rd.
Shepherdstown, WV 25443
304-995-9115

Pursley, Steven R

From: Rosemary Nickerson <rnickerson@hagerstowncc.edu>
Sent: Monday, October 15, 2018 1:25 PM
To: Pursley, Steven R

October 15, 2018

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America, LLC 13-3414

Mr. Pursley,
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One problem with Rockwool's air permit application, is their air modeling report cherry picked the air monitors by using 1992 land use data. There is more current data available. Using Frostburg, Maryland's air monitor for particulate matter is absolutely absurd. Jefferson County would dead by the time any of Rockwool's particular matter ever made it to Frostburg.

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NON-CONFIDENTIAL

I also have serious concerns with TeMa's air permit. At the Oct. 4th meeting, you said there are not EPA guidelines for plastic extrusion manufacturing & that you used general guidelines. I do not feel that this is specific enough to issue a permit. EPA's guidelines establish processes & procedures & set limits for pollutant emissions at each stage/step of manufacture processes. It is industry specific & should be not generalized.

In addition, TeMa's application was very hard to follow & poorly compiled using both English & Italian. Also, the majority of DEP documents are scanned documents which result in images compiled in PDFs and they are not text based. These documents do not comply with The Americans with Disabilities Act (ADA). Persons needing devices such as text-to-speech devices would not be able to access your documents.
TeMA's air permit should not be granted.

Best regards,

Rosemary Nickerson

Rosemary Nickerson, Ph.D.
Professor of Biology
Hagerstown Community College

Pursley, Steven R

From: Kendra Clark <ksclark@k12.wv.us>
Sent: Monday, October 15, 2018 12:52 PM
To: Pursley, Steven R
Subject: Re: Air Permit Application: TeMa North America, LLC 13-3414

Mr. Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Jefferson County needs a moratorium on all new air permit applications until Rockwool's air permit is resolved. There are problems and questions with Rockwool's air permit that have yet to be solved or answered.

For example, Rockwool's air permit application using their air modeling report from 1992 land use data. There is more current data available. It is ridiculous to use Frostburg, Maryland's air monitor for particulate matter. I think you know this.

Rockwool has publicly stated they will be changing their manufacturing process and ingredients. They have stated they will not be using pet coke and not milling coal at their facility. This will change the amount of pollutants. We must be able to hold them to their application and permit. Their air permit needs to be modified and I demand a public hearing for this modification.

I am appalled at the lack of transparency from the WVDEP. The WVDEP has not released all documents pertaining to Rockwool's air permit. We need all documents relating to section 7 (Endangered Species) and section 106 (National Historic Preservation Act) processes. We should not have to file FOIAs to receive documents. The DEP has also denied documents to the City of Charles Town.

Rockwool is also violating county ordinances for water usage. TeMa threatens our water supply further. Our karst system is also very sensitive to contamination from above and below ground.

A healthy environment = healthy communities = a healthy state

Yet politicians and rich corporations continue to poison the land and people of West Virginia. Those involved need to admit to the countless mistakes in the conceiving, selling, planning and executing the disastrous choice of heavy polluting industries. We see the failure of leadership and its consequences. This is about incompetence and negligence, betrayal of trust and abuse of power. Air is the basic necessity of human life. The air in Jefferson County is clean for now, we need to keep it clean.

At the October 4th meeting you said there are no EPA guidelines for plastic extrusion manufacturing and that you use general guidelines. That is not very specific and incredibly worrisome. Strict guidelines should be in place.

In addition, TeMa's application was hard to follow and poorly conceived.

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TeMa's air permit should not be granted.

Kind Regards
Kendra Clark
211 Devonshire Drive
Charles Town WV 25414

Pursley, Steven R

From: Linda Zwobota <zwobota@aol.com>
Sent: Monday, October 15, 2018 11:55 AM
To: Pursley, Steven R
Subject: 13-3414

October 15, 2018

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America, LLC 13-3414

Mr. Pursley,

Jefferson County needs a moratorium on all new air permit applications until Rockwool's air permit is resolved. There are problems & questions with Rockwool's air permit that have yet to be solved or answered.

One problem with Rockwool's air permit application, is their air modeling report cherry picked the air monitors by using 1992 land use data. There is more current data available. Using Frostburg, Maryland's air monitor for particulate matter is absolutely absurd. Jefferson County would dead by the time any of Rockwool's particular matter ever made it to Frostburg.

Rockwool has publicly stated they will be changing their manufacturing process & ingredients. They have stated they will not be using pet coke & not milling coal at their facility. This will change the amounts of pollutants. We must be able to hold them to their application and permit. Their air permit needs to be modified & I demand a public hearing for this modification.

I'm extremely frustrated with the lack of transparency from the WVDEP. The WVDEP has not released all documents pertaining to Rockwool's air permit & this has resulted in more questions than answers. We need all documents relating to section 7 (Endangered Species) & section 106 (National Historic Preservation Act) processes. We should not have to file FOIAs to receive any documents. You have other Rockwool documents on your website. Why not list them all? In addition, you should be cooperatively working with all government agencies. The city of Charles Town has requested documents from the DEP, they have not received them, and now they have to file FOIAs. This is unacceptable.

There are serious concerns Jefferson County does not have enough water to support the heavy usage of Rockwool. Rockwool is violating county ordinances for water usage. Now with the addition of TeMa our water supply is threatened further. Our geological Karst system is very sensitive to groundwater contamination & water usage. I realize water is not your department, however, the air pollution will contaminate groundwater. What goes up, comes down.

I'm insulted that the DEP would have a public hearing for TeMa & Bardon at no request from the public & did not offer the same luxury to the citizens for Rockwool's permit. The comment period for TeMa & Bardon was not even up yet when you held your public meeting on Oct. 4 in Ranson.

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Furthermore, we are still waiting for a public meeting specifically for Rockwool. The DEP has left citizens to fumble around in the dark for weeks. You should have been here on the ground weeks ago. Instead, the DEP attends a closed door meeting with local & state officials & Rockwool at the Bavarian Inn on Aug. 8th which only raised more public suspicion of unfair practices & secret discussions.

Polluting companies are quickly being shoved through Jefferson County's door. These actions will quickly make it a non-attainment area if it isn't a non-attainment area already because of Rockwool's major pollution. Given the close proximity of Jefferson County to Maryland & Virginia, these states need to be consulted on air pollution as well. West Virginia is not being a good neighbor.

I also have serious concerns with TeMa's air permit. At the Oct. 4th meeting, you said there are not EPA guidelines for plastic extrusion manufacturing & that you used general guidelines. I do not feel that this is specific enough to issue a permit. EPA's guidelines establish processes & procedures & set limits for pollutant emissions at each stage/step of manufacture processes. It is industry specific & should be not generalized.

In addition, TeMa's application was very hard to follow & poorly compiled using both English & Italian. Also, the majority of DEP documents are scanned documents which result in images compiled in PDFs and they are not text based. These documents do not comply with The Americans with Disabilities Act (ADA). Persons needing devices such as text-to-speech devices would not be able to access your documents.

TeMA's air permit should not be granted.

Best regards,

Linda Zwobota
478 Red Fox Road
Harpers Ferry, WV 25425
Zwobota@aol.com

Sent from AOL Mobile Mail
Get the new AOL app: mail.mobile.aol.com

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Pursley, Steven R

From: william h Adams <whadams@frontiernet.net>
Sent: Monday, October 15, 2018 11:45 AM
To: Pursley, Steven R
Subject: Re: Comments on TeMa application-TeMa North America LLC, 13-3414

Sent from my iPhone
Mr. Pursley,
As a longtime land owner and resident in Jefferson County I am deeply concerned by the undercover operations of the development operation and the subterfuge surrounding environmental issues. With this letter I respectfully request that a public hearing be held on the proposed factory of TeIMa North America that seriously threatens our health and economy.
william h adams
1633 warm springs rd
shenandoah jct. wva 25442
304 596 1157
RESIST
OPPOSE

NON CONFIDENTIAL

Pursley, Steven R

From: Liz Burns <lizgc1@yahoo.com>
Sent: Monday, October 15, 2018 10:27 AM
To: Pursley, Steven R
Subject: TeMa Air permit

October 15, 2018

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America,
LLC 13-3414

Mr. Pursley,

I am addressing you today as a concerned parent of three young children and 15 year Jefferson county resident. Jefferson County needs a moratorium on all new air permit applications until Rockwool's air permit is revised and resolved. There are serious problems and questions with Rockwool's air permit that have yet to be resolved or answered.

One problem with Rockwool's air permit application, is their air modeling report cherry picked the air monitors by using 1992 land use data. There is more current data available. Using Frostburg, Maryland's air monitor for particulate matter is absolutely absurd and is an insult to the citizens in Jefferson County.

Rockwool has publicly stated they will be changing their manufacturing process and ingredients. They have stated they will not be using Petroleum Coke (thankfully) and they will not be milling coal at their facility. This will change the amounts of pollutants. We must be able to hold them accountable to their application and permit. Their air permit needs to be modified and revised in light of these public commitments. I demand a public hearing for these modifications.

I'm extremely frustrated with the lack of transparency from the WVDEP. The WVDEP has not released all documents pertaining to Rockwool's air permit, which has resulted in more public questions than answers. We need all documents relating to section 7 (Endangered Species) and section 106 (National Historic Preservation Act) processes. We should not have to file FOIAs to receive any documents, given the high number of public concerns. You have other Rockwool documents on your website. Why not list them all? In addition, you should be fully cooperatively working with all government agencies. The city of Charles Town has requested documents from the WVDEP, they have not received them, and now they have to file FOIAs. This is unacceptable and highly concerning.

Im addition, there are serious concerns that Jefferson County does not have enough water to support the daily heavy usage of Rockwool. Rockwool is violating county ordinances for water usage. Now with the addition of TeMa our water supply is threatened even further. Our geological Karst system is very sensitive to groundwater contamination and water usage. I realize water is not your area or department, however, the air pollution will slowly contaminate our groundwater over time.

It is baffling and confusing that the WVDEP would have a public hearing for TeMa and Bardon at no request from the public. Why did the WVDEP not offer the same luxury to the citizens for Rockwool's permit?? What is Rockwool or the

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WVDEP afraid of the public uncovering in a public hearing? We need consistency in this process. The comment period for TeMa and Bardon was not even up yet when you held the public meeting on October 4th in Ranson.

Furthermore, we are still waiting for a public meeting specifically for Rockwool. The WVDEP has left citizens alone to fumble around in the dark for weeks with unanswered questions. You should have been here in the county weeks ago answering our questions and concerns. Instead, the WVDEP attends a closed door meeting with local and state officials with Rockwool representatives at the Bavarian Inn on August 8th which only raised more questions and more public suspicion of unfair practices and secret discussions. The citizens of Jefferson county deserve more transparency and we are demanding more!

Polluting companies are quickly being introduced in Jefferson County by the JCDA, against the majority of the residents wishes here. These collective factories will quickly make Jefferson county a non-attainment area - if it isn't considered a non-attainment area already because of Rockwool's heavy pollution numbers. Given the close proximity of Jefferson County to Maryland and Virginia, these states need to be consulted on air pollution as well. West Virginia is not being a good neighbor.

I also have serious concerns with TeMa's air permit. At the October 4th meeting, you said there are no existing EPA guidelines for plastic extrusion manufacturing and that you used general guidelines. I do not feel that this is specific enough to issue a permit. EPA's guidelines establish processes and procedures to set limits for pollutant emissions at each stage and step of the manufacturing processes. Therefore, it is industry specific and should be not generalized.

In addition, TeMa's application was very hard to follow. It seems poorly compiled using both English and Italian. The majority of WVDEP documents are scanned documents which result in images compiled in PDFs and they are not text based. These documents do not comply with The Americans with Disabilities Act (ADA). Persons needing devices such as text-to-speech devices would not be able to access your documents.

In conclusion, TeMA's air permit should not be granted until further review and not until revision of the Rockwool permit is corrected and finalized. Lastly, we deserve and must have a public hearing on Rockwool -to be fair and consistent- before any other air permits can be obtained in Jefferson county.

Truly,

Liz Burns

Sent from my iPhone

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Pursley, Steven R

From: Danielle <danielle.fleming9@gmail.com>
Sent: Monday, October 15, 2018 9:19 AM
To: Pursley, Steven R
Subject: TeMa North America LLC, 13-3414

TeMa North America LLC, 13-3414

Steven Pursley
WVDEP-DAQ
601 57th St. S.E.
Charleston, WV 25304.

Mr. Pursley,
I am against allowing a foreign company to come in to our county and pollute our air, water and soil. I understand this is not going to put out as much air pollution as Rockwool (which will be the 2nd worse polluter in our state if built) but it seems to me that the cumulative effects of these plants will be catastrophic.
Where is the water coming from? How much will they use? Even more important...where will the wastewater go and how will we ensure it does not enter our water supply?
What health effects will these projects have on our county? If they are built will the soil need to be remediated once the incentives run out and they leave? How and who will be responsible?

Please don't let our heavy industry happy local yahoos make this county one of the most polluted in the state. WV needs to move away from heavy industry and into the 21st century. If we allow things to continue like this, we'll always remain the poorest state. Please help us kick these foreign companies to the curb. We don't need them and don't want them. Tell these companies to set up shop in their own country...if they can meet the stricter requirements. This is not a partisan problem...it's a West Virginian issue and we all need to work together to fix it.

Thanks,
Danielle Fleming
63 Silverleaf Dr
Charles Town, WV 25414

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Pursley, Steven R

From: Sarah Adams <sarahadams@fltg.net>
Sent: Monday, October 15, 2018 8:52 AM
To: Andrews, Edward S; Pursley, Steven R
Subject: Comments on TeMa application-TeMa North America LLC, 13-3414

Dear Mr Pursley,

I am writing to request that a Public Hearing be scheduled for the the Proposed TeMa Insulation facility at the Burr Industrial Park.

In light of all of the concern over the proposed Rockwool facility and the fact that the combined cumulative impacts of both these

industries on the quaity of life for Jefferson County residents has not been evaluated.

"TeMa North America LLC is a proposing to install an extrusion process in the Burr Business Park in Jefferson County, West Virginia. The facility will utilize polypropylene (PP) and polyethylene (PE), including high density polyethylene (HDPE). Additions to the PE, PP, and HDPE include flame retardants, fluidizers and colorants. ."

I am concerned about the impact on air-quality, ground-water pollution, water usage, gas emissions, and truck traffict that this project could have.

The company has already said that they hope to expand-where is the evaluation of this ? What are the cumulative impacts on the neighboring schools?

Please add my name to the list of local residnets who have serious concerns about the addition of this facility and demand that there be a Public Hearing held so that these issues can be answered before proceding with the permitting process.

Sincerely,

Sarah Adams

1633 Warm Springs Road

Shenandaoh Jct, WV

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Jennifer LaFear Ward
502 South Samuel Street, Charles Town, WV 25414
PHONE: 304-728-7805 E-MAIL: jlafearward@comcast.net

October 8, 2018

RECEIVED
OCT 12 2018
WV DEP / DIV OF AIR QUALITY

Steven Pursley
WVDEP-DAQ
601 57th St. SE
Charleston, WV 25304

Dear Mr. Pursley,

I write as a lifelong citizen of West Virginia and resident of Jefferson County to express my concerns regarding the permits the State is giving to new industries in Jefferson County that will significantly affect the air in our community.

The WVDEP is offering permitting to polluting industries in Jefferson County, including new major and new minor source emitters with little regard for the cumulative and total amount of hazardous pollutants that citizens will be exposed to. I call for a moratorium on all new air permitting in Jefferson County, WV.

Specifically, I call on you to reject permit 13-3414 to the TEMA North America LLC which proposes to emit acetaldehyde and formaldehyde, both probable human carcinogens, as well as hexane and toluene – all regarded to be hazardous air pollutants.

Among other reasons, the company has nearly completed construction of its proposed facility before a Permit to Construct was even issued by WV DEP, and certainly before the Jefferson County public had an opportunity to be heard regarding our opposition to this project and its air impacts. How can you construct a polluting facility without getting a permit to construct from WV DEP first?

Further, TEMA will be located within ½ mile of a day care center and within one mile of an elementary school, each which are already under threat for exposure from a major source of hazardous air pollutants from the Rockwool facility.

The U.S. Environmental Protection Agency has crafted School Sitting Guidelines that localities avoid building schools that are in close proximity to pollution sources, especially multiple sources. I suggest that polluting industries that emit toxics and carcinogens avoid building near existing schools.

The citizens of Jefferson County, WV, demand safe schools and clean air for our children. The State of West Virginia must not issue pollution permits with such little regard for the location of our schools or the health of children and families in our Jefferson County community.

Sincerely,

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Jennifer LaFear Ward

cc: Governor Jim Justice, Senator Capito, Senator Manchin, Superintendent Steve Paine, Secretary Caperton, Director Durham

Pursley, Steven R

From: Eversweet Apiaries <info@eversweetapiaries.com>
Sent: Friday, October 12, 2018 8:02 AM
To: Pursley, Steven R
Cc: kleonhardt@wvda.us; Phyllis.Randall@loudoun.gov; srogers@charlestownwv.us
Subject: West Virginia Air Permit Application: TeMa North America, LLC 13-3414

October 12, 2018

Steven Pursley
WVDEP-DAQ, 601
57th St. S.E.
Charleston, WV 25304

Re: Air Permit Application: TeMa North America, LLC 13-3414

Mr. Pursley,

Jefferson County needs a moratorium on all new air permit applications until Rockwool's air permit is resolved. There are problems & questions with Rockwool's air permit that have yet to be solved or answered.

One problem with Rockwool's air permit application, is their air modeling report cherry picked the air monitors by using 1992 land use data. There is more current data available. Using Frostburg, Maryland's air monitor for particulate matter is absolutely absurd. Jefferson County would dead by the time any of Rockwool's particular matter ever made it to Frostburg.

Rockwool has publicly stated they will be changing their manufacturing process & ingredients. They have stated they will not be using pet coke & not milling coal at their facility. This will change the amounts of pollutants. We must be able to hold them to their application and permit.
Their air permit needs to be modified & I demand a public hearing for this modification.

I'm extremely frustrated with the lack of transparency from the WVDEP. The WVDEP has not released all documents pertaining to Rockwool's air permit & this has resulted in more questions than answers. We need all documents relating to section 7 (Endangered Species) & section 106 (National Historic Preservation Act) processes. We should not have to file FOIAs to receive any documents. You have other Rockwool documents on your website. Why not list them all? In addition, you should be cooperatively working with all government agencies. The city of Charles Town has requested documents from the DEP, they have not received them, and now they have to file FOIAs. This is unacceptable.

There are serious concerns Jefferson County does not have enough water to support the heavy usage of Rockwool. Rockwool is violating county ordinances for water usage. Now with the addition of TeMa our water supply is threatened further. Our geological Karst system is very sensitive to groundwater contamination & water usage. I realize water is not your department, however, the air pollution will contaminate groundwater. What goes up, comes down.

I'm insulted that the DEP would have a public hearing for TeMa & Bardon at no request from the public & did not offer the same luxury to the citizens for Rockwool's permit. The comment period for TeMa & Bardon was not even up yet when you held your public meeting on Oct. 4 in Ranson.

Furthermore, we are still waiting for a public meeting specifically for Rockwool. The DEP has left citizens to fumble around in the dark for weeks.

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You should have been here on the ground weeks ago. Instead, the DEP attends a closed door meeting with local & state officials & Rockwool at the Bavarian Inn on Aug. 8th which only raised more public suspicion of unfair practices & secret discussions.

Polluting companies are quickly being shoved through Jefferson County's door. These actions will quickly make it a non-attainment area if it isn't a non-attainment area already because of Rockwool's major pollution. Given the close proximity of Jefferson County to Maryland & Virginia, these states need to be consulted on air pollution as well. West Virginia is not being a good neighbor.

I also have serious concerns with TeMa's air permit. At the Oct. 4th meeting, you said there are not EPA guidelines for plastic extrusion manufacturing & that you used general guidelines. I do not feel that this is specific enough to issue a permit. EPA's guidelines establish processes & procedures & set limits for pollutant emissions at each stage/step of manufacture processes. It is industry specific & should be not generalized.

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TeMA's air permit should not be granted.

Best regards,
Jennifer King
Eversweet Apiaries
85 Everhart Dr.,
Kearneysville, WV 25430
304-876-3832
info@eversweetapiaries.com

cc:
Kent Leonhardt, WV Commissioner of Agriculture Phyllis J. Randall, Chair at Large, Loudoun County Board of Supervisors
Scott Rogers, Mayor of Charles Town

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Pursley, Steven R

From: Pursley, Steven R
Sent: Thursday, October 11, 2018 4:31 PM
To: 'O. Colin Stine'
Subject: RE: TeMa hearing

Mr. Stine,

A copy of the application and all other documents can be downloaded from our website here:

https://dep.wv.gov/daq/Pages/NSRPermitsforReviewCurrent.aspx

Go to that page and read the instructions carefully and you should be able to download any documents you wish. If you have any trouble let me know.

Steve

From: O. Colin Stine <ocsphd@gmail.com>
Sent: Thursday, October 11, 2018 4:27 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: Re: TeMa hearing

Der Mr Pursley,

Would you please send a copy of the air quality permit application submitted by TeMa.

Thank you very much,

Colin Stine

On Wed, Oct 10, 2018 at 5:25 PM O. Colin Stine <ocsphd@gmail.com> wrote:

Dear Mr. Pursley,

How much ozone will the TeMa factory produce? What other chemicals will be released by the TeMa factory? When the emissions from the TeMa Factory are combined with those from the Rockwool Factory what will be the combined totals be?

The Rockwool Factory alone will significantly decrease the yield soybeans, a critical cash crop. The soybean crop yields are likely to be reduced by 50 to 75%. In dollar terms, the $3.8 million dollars of soybeans our county sold a couple years ago, would be reduced between $1.9 million dollars and $950 thousand dollars. I reached this conclusion by using the facts present at the last Farmland Protection meeting. First, more ozone decreases the yield of soybeans. Second, the ozone emitted by a Rockwool factory increases the ozone levels downwind. When you put them together, the yield soybeans will be decreased substantially.

My calculations are likely to be an underestimate because I did not include any increase in ozone due to the higher average temperature, 87 degrees in Jefferson County versus 71 degrees in Wales. Higher temperature means more ozone and fewer soybeans. Second, since ozone is heavier than most air, it settles, and the Blue Ridge will block its escape, setting up summer ozone smog, further decreasing the amount of soybeans.

Although the Rockwool emissions are within EPA limits, EPA limits are designed to measure acute (one time, short term) exposure, and the limits do not attempt to measure chronic exposure. The classic example of acute versus chronic exposure is cigarettes one time has no effect and is not regulated, but daily use of cigarettes leads to higher rates of cancer, stroke and heart attacks. Rockwool is the very definition of chronic exposure, 24 hours a day, 7 days a week, 365 days a year of exposure. Chronic exposure to us and our soybeans. The effect will have significant detrimental economic impact on farmers in Jefferson County.

Sincerely,

Colin Stine
7633 Flowing Springs Road
Shepherdstown, WV 25443.

NON-CONFIDENTIAL

Pursley, Steven R

From: O. Colin Stine <ocsphd@gmail.com>
Sent: Thursday, October 11, 2018 4:27 PM
To: Pursley, Steven R
Subject: Re: TeMa hearing

Der Mr Pursley,

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Sincerely,

Colin Stine
7633 Flowing Springs Road
Shepherdstown, WV 25443.

Pursley, Steven R

From: O. Colin Stine <ocsphd@gmail.com>
Sent: Wednesday, October 10, 2018 5:30 PM
To: Pursley, Steven R
Subject: Re: TeMa hearing
Attachments: AAPediatricsWV_Letter (1).pdf

Dear Mr. Pursley,

I am attaching a letter about the significant effects that TeMa and Rockwool will have on the children of Jefferson County. Both factories will emit ozone and particulates. The effects are not independent, it is cumulative. The attached letter describes the minimum effects of these two facilities on the children of Jefferson County.

Colin Stiine

On Wed, Oct 10, 2018 at 5:25 PM O. Colin Stine <ocsphd@gmail.com> wrote:

Dear Mr. Pursley,

How much ozone will the TeMa factory produce? What other chemicals will be released by the TeMa factory? When the emissions from the TeMa Factory are combined with those from the Rockwool Factory what will be the combined totals be?

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Sincerely,

Colin Stine
7633 Flowing Springs Road
Shepherdstown, WV 25443.

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American Academy of Pediatrics
DEDICATED TO THE HEALTH OF ALL CHILDREN®

West Virginia Chapter of the American Academy of Pediatrics
INCORPORATED IN WV

WV Chapter AAP
Robert C Byrd HSC
PO Box 9214 – Suite 2350
Morgantown, WV 26506
Phone: 304/612-3314
Fax: 304/293-5491
E-mail: chamilton@aap.net

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www.aap.org

Rockwool's entrance into Jefferson County, West Virginia, has been accompanied by opposition by many and support by a few. But more than anything, it has brought up questions.

- Questions about the future of a rural community on the outskirts of Washington DC.
- Questions about how politics plays into poverty.
- Questions about negotiating health over industry, or vice versa.

These are questions that are hard to answer.

Thankfully, there are certain facts that cannot be questioned.

The location of the Rockwool plant in Ranson is across the street from North Jefferson Elementary School. It is within 2 miles of 4 public schools housing 30% of Jefferson County's student population, as well as several daycare centers.

- The placement of the plant to within 2 miles of 4 public schools goes against the recommendations of the Environmental Protection Agency and The World Health Organization, who both state that schools should not be located near heavy industry. The WHO specifically states that schools should not be within 2 miles of heavy industry. (www.who.int/school_youth_health/media/en/physical_sch_environment_v2.pdf?ua=1)

The facility has been approved for heavy toxic emissions, with smokestacks 21 stories high. In Rockwool's air quality application, it states that there will be large amounts of particulate matter per year (154 tons of PM10 and 134 tons of PM2.5).

- The American Heart Association concluded that exposure to particulate matter air pollution contributes to cardiovascular morbidity and mortality and long term exposure reduces life expectancy. (https://www.ncbi.nlm.nih.gov/m/pubmed/20458016)
- Ongoing research in the US, Canada, Italy and China has linked elevated PM2.5 exposure during pregnancy to premature delivery and low birth weight. The association has been replicated in multiple studies.

This plant will make Rockwool the #2 biggest polluter in the entire state of West Virginia.

- And yet, Rockwool's Clean Air Permit was given without a hearing in the community in which the plant would be built. No evaluation of the impact of the toxic emissions on the nearby schools has been conducted.

Unfortunately, this leads to more questions:

- How did Rockwool get approval to build this plant across the street from an elementary school when there is scientific evidence of the harm caused by toxic emissions and particulate matter air pollution?
- How does the addition of 150 jobs compare to the detrimental effect this plant will have on already established businesses and livelihoods based in agriculture and tourism?
- How is land that was zoned to be for mixed use residential become rezoned for industrial use

- How did this plant make it through the application review process without questions of public welfare and safety being addressed?

As pediatricians in Jefferson County, West Virginia, we see how poverty affects our patients on a daily basis. Some of our patients miss appointments because they do not have transportation. Other patients fail to gain weight or develop properly due to food scarcity. Many do not go outside due to not having access to safe neighborhoods or play spaces. And many of their parents have little time for anything else besides work and sleep-and most definitely do not have the energy to read notices in the local newspaper, speak to officials or hold their politicians accountable.

Once the Rockwool plant is open, we wonder if our patients will go outside less frequently due to concerns about air quality. Will they have access to clean local water? Will we be treating more asthma exacerbations? More cystic fibrosis exacerbations? Who will speak for these children? Do we need to witness the harm done to them before we act?

The good news is that the Rockwool plant is not a done deal. There are ways to stop Rockwool from opening the Ranson plant. Rockwool still needs approvals of the water bond, the sewer bond and the building permit to proceed. There is a grassroots citizen group that is actively opposing the Rockwool plant and has undertaken a legal fight.

We can speak for the children of the Jefferson County starting right now.

For more information, please go to https://www.toxicrockwool.com or join the Facebook group Concerned Citizens Against Rockwool.

Sincerely,

Christine Whitman, MD
Pediatrician
Member of the West Virginia Chapter, American Academy of Pediatrics

Eleanor Smith, MD
Pediatrician
Member of the West Virginia Chapter, American Academy of Pediatrics

NON CONFIDENTIAL

Pursley, Steven R

From: O. Colin Stine <ocsphd@gmail.com>
Sent: Wednesday, October 10, 2018 5:25 PM
To: Pursley, Steven R
Subject: TeMa hearing

Dear Mr. Pursley,

How much ozone will the TeMa factory produce? What other chemicals will be released by the TeMa factory? When the emissions from the TeMa Factory are combined with those from the Rockwool Factory what will be the combined totals be?

The Rockwool Factory alone will significantly decrease the yield soybeans, a critical cash crop. The soybean crop yields are likely to be reduced by 50 to 75%. In dollar terms, the $3.8 million dollars of soybeans our county sold a couple years ago, would be reduced between $1.9 million dollars and $950 thousand dollars. I reached this conclusion by using the facts present at the last Farmland Protection meeting. First, more ozone decreases the yield of soybeans. Second, the ozone emitted by a Rockwool factory increases the ozone levels downwind. When you put them together, the yield soybeans will be decreased substantially.

My calculations are likely to be an underestimate because I did not include any increase in ozone due to the higher average temperature, 87 degrees in Jefferson County versus 71 degrees in Wales. Higher temperature means more ozone and fewer soybeans. Second, since ozone is heavier than most air, it settles, and the Blue Ridge will block its escape, setting up summer ozone smog, further decreasing the amount of soybeans.

Although the Rockwool emissions are within EPA limits, EPA limits are designed to measure acute (one time, short term) exposure, and the limits do not attempt to measure chronic exposure. The classic example of acute versus chronic exposure is cigarettes one time has no effect and is not regulated, but daily use of cigarettes leads to higher rates of cancer, stroke and heart attacks. Rockwool is the very definition of chronic exposure, 24 hours a day, 7 days a week, 365 days a year of exposure. Chronic exposure to us and our soybeans. The effect will have significant detrimental economic impact on farmers in Jefferson County.

Sincerely,

Colin Stine
7633 Flowing Springs Road
Shepherdstown, WV 25443.

FROM: CONFIDENTIAL

Pursley, Steven R

From: Patrick E. Ward <PEWard@potesta.com>
Sent: Wednesday, October 10, 2018 8:49 AM
To: Pursley, Steven R
Cc: Tonj Ciotti; Joe Knechtel
Subject: Comments on TeMa Draft Permit

We reviewed the permit and fact sheet and have a couple minor comments.

1. Engineering Evaluation/Fact Sheet

   Page 6 of 9

   Formaldehyde emission values have been rounded off to 0.01 lb/hr for each extruder, therefore the total emissions for the three extruders should be 0.03 lb/hr.

2. Draft Permit

   Section 4.1.5

   Formaldehyde total lb/hr for the three extrusion lines should be 0.03

Let me know if you have any questions on these comments.

Regards,
Patrick Ward
Potesta & Associates, Inc.
7012 MacCorkle Avenue, S.E.
Charleston, West Virginia 25304
Ph: (304) 342-1400
Direct: (304) 414-4751
Fax: (304) 343-9031

This electronic communication and its attachments contain confidential information. The recommendations and/or design data included herein are provided as a matter of convenience and should not be used for final design or ultimate decision making. Rely only on the final hardcopy materials bearing the consultant's original signature and seal. If you have received this information in error, please notify the sender immediately.

Pursley, Steven R

From: hlambert13@aol.com
Sent: Tuesday, October 9, 2018 12:33 PM
To: Pursley, Steven R
Subject: TeMa North America LLC and the Like

To: WV DEP, Division of Air Quality

I speak for my family of 5; 3 children, 1 of whom is asthmatic when I protest the permitting of any company, especially a foreign company, that will emit toxins into the air in and around my home in Jefferson County, WV. Let it go on record that I formally oppose any future permitting of air polluting factories. Our lives currently have been disrupted enough as we have to fight for clean air for our kids after Rockwool was issued a permit by your office to pollute the air across from an elementary school, within miles of other schools where my children attend, and the little league complex where my kids play ball. If you tell me that the emitted pollution levels are safe, I do not believe that. As a mother of an asthmatic child, I know that little changes in the air quality make a big impact on his ability to breathe. As an elementary physical education teacher of 17 years I know that it isn't just my child that suffers with this problem. We ask that you consider the people you serve first, and big, foreign business last in the decision making.

Holly and Tim Lambert
Gavin, Zane & Brooke Lambert

Harpers Ferry, WV

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Pursley, Steven R

From: Pursley, Steven R
Sent: Tuesday, October 9, 2018 9:55 AM
To: 'David Tabb'
Subject: RE: TeMa U.S. LLC AQ-Permit request of termination (attached)

Mr. Tabb,

We have received you comments. They will be included along with DAQs response in our Response to Comments document. You will be emailed a copy of this document once DAQ has completed it at the end of the public comment period.

Thank You
Steve Pursley

From: David Tabb <sssi27@yahoo.com>
Sent: Saturday, October 6, 2018 3:07 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TeMa U.S. LLC AQ-Permit request of termination (attached)

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Pursley, Steven R

From: Pursley, Steven R
Sent: Tuesday, October 9, 2018 9:50 AM
To: 'Emily'
Subject: RE: TeMa Questions

Emily,

Total PM emissions from the facility are 34.04 tons per year. Of that, 14.49 tons per year are from haul roads (dust kicked up from tires traveling on the plant roads). 0.07 tons per year is PM from the combustion of natural gas/propane in the building heaters. 1.61 tons per year come from the extruders. 17.55 tons per year come from physical movement of the plastic pellets. The remaining 0.32 tons per year comes from physically blending the raw material and shredding the waste material that is trimmed from the final product.

Your questions and DAQs response (including your question regarding PM composition) will be included in our Response to Comments document which will be emailed to you once the public comment period is over.

Steve

From: Emily <emmilely@gmail.com>
Sent: Monday, October 8, 2018 10:42 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: Re: TeMa Questions

Thank you so much for your response! I would love to see the exact breakdown. I was speaking with some folks and they were asserting that the PM "ground dust" would be mostly made of plastics, as opposed to the PM from the mulching company near Shepherdstown in your slides. Are you able to tell me what the material composition of the PM would be? I think the main worry with plastic particulates is that they would get washed into our water systems :(

Thank you again for all of your help :)
-Emily

On Mon, Oct 8, 2018 at 8:48 AM Pursley, Steven R <Steven.R.Pursley@wv.gov> wrote:

> Emily,
>
> I'm out of the office until tomorrow so I can't give you the exact breakdown until then but in general you are correct. The vast majority of PM will come from the material handling. In other words, the trucks and movement of the plastic pellets.
>
> You're also correct that the bottles, waste plastic etc will be reclaimed and recycled offsite and purchased by TeMa. What they will receive onsite is clean plastic. They then turn that into usable products.
>
> Let me know if you have any other questions.
>
> Steve

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From: Emily <emmilely@gmail.com>
Sent: Friday, October 5, 2018 11:43:24 AM
To: Pursley, Steven R
Subject: TeMa Questions

Hi Mr. Pursley,

Thank you so much for coming out to Jefferson County last night. I really found your presentation to be valuable and it really helped me wrap my head around what TeMa will be. I came away with a few impressions about the plant that I'm hoping you can verify for me, as we ran over the time limit last night so I couldn't ask them in person :)

From the presentation and brief conversation after the comments, it seemed like vast majority of the PM emissions would be from the ground, from trucks moving and bags dropping, etc. Is that the case, or would the majority of the PM emissions be produced from the manufacturing process?

Also, when I read the articles about this plant it seemed like they would be recycling the materials on-site, but from the presentation it appeared that they would be bringing in pellets from elsewhere. Can you verify that they will not be actually recycling on site?

Thank you so much again! I realize that this is a tough situation, and I really appreciate that you all came out and weathered the storm to give us a chance to speak to you in person.

- Emily Dragon

In regards to TeMa North America LLC, 13-3414

NON-CONFIDENTIAL

Pursley, Steven R

From: jennifer ward <jlafearward@comcast.net>
Sent: Tuesday, October 9, 2018 9:33 AM
To: Pursley, Steven R
Subject: TeMa air permitting in Jefferson County

Jennifer LaFear Ward

502 South Samuel Street, Charles Town, WV 25414

PHONE: 304-728-7805 E-MAIL: jlafearward@comcast.net

October 8, 2018

Steven Pursley

WVDEP-DAQ

601 57th St. SE

Charleston, WV 25304

Dear Mr. Pursley,

I write as a lifelong citizen of West Virginia and resident of Jefferson County to express my concerns regarding the permits the State is giving to new industries in Jefferson County that will significantly affect the air in our community.

The WVDEP is offering permitting to polluting industries in Jefferson County, including new major and new minor source emitters with little regard for the cumulative and total amount of hazardous pollutants that citizens will be exposed to. I call for a moratorium on all new air permitting in Jefferson County, WV.

Specifically, I call on you to reject permit 13-3414 to the TEMA North America LLC which proposes to emit acetaldehyde and formaldehyde, both probable human carcinogens, as well as hexane and toluene – all regarded to be hazardous air pollutants.

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Among other reasons, the company has nearly completed construction of its proposed facility before a Permit to Construct was even issued by WV DEP, and certainly before the Jefferson County public had an opportunity to be heard regarding our opposition to this project and its air impacts. How can you construct a polluting facility without getting a permit to construct from WV DEP first?

Further, TEMA will be located within ½ mile of a day care center and within one mile of an elementary school, each which are already under threat for exposure from a major source of hazardous air pollutants from the Rockwool facility.

The U.S. Environmental Protection Agency has crafted School Sitting Guidelines that localities avoid building schools that are in close proximity to pollution sources, especially multiple sources. I suggest that polluting industries that emit toxics and carcinogens avoid building near existing schools.

The citizens of Jefferson County, WV, demand safe schools and clean air for our children. The State of West Virginia must not issue pollution permits with such little regard for the location of our schools or the health of children and families in our Jefferson County community.

Sincerely,

Jennifer LaFear Ward

cc: Governor Jim Justice, Senator Capito, Senator Manchin, Superintendent Steve Paine, Secretary Caperton, Director Durham

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Pursley, Steven R

From: Emily <emmilely@gmail.com>
Sent: Monday, October 8, 2018 10:42 PM
To: Pursley, Steven R
Subject: Re: TeMa Questions

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You're also correct that the bottles, waste plastic etc will be reclaimed and recycled offsite and purchased by TeMa. What they will receive onsite is clean plastic. They then turn that into usable products.

Let me know if you have any other questions.

Steve

From: Emily <emmilely@gmail.com>
Sent: Friday, October 5, 2018 11:43:24 AM
To: Pursley, Steven R
Subject: TeMa Questions

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Thank you so much again! I realize that this is a tough situation, and I really appreciate that you all came out and weathered the storm to give us a chance to speak to you in person.

- Emily Dragon

In regards to TeMa North America LLC, 13-3414

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Pursley, Steven R

From: Comcast <pep4223@comcast.net>
Sent: Sunday, October 7, 2018 3:06 PM
To: Pursley, Steven R
Subject: Millville Quarry, TEMA North America LLC and Rockwool

Mr. Pursley,

I as well as the local community have major concerns with air quality permits being issued for multiple industries in Jefferson County. With Rockwool being approved already without an opportunity to offer public comment, I oppose the issuance of more air quality permits, which will take Jefferson County out of an attainment area.

The EPA has been scaled down to bare bones due to the budget cuts by the current administration, and cannot be expected to do any monitoring or enforcement. The WV DEQ has been understaffed for many years, and will not conduct monitoring or enforcement.

This is not acceptable for the fastest growing county of WV, and will hurt our health, view shed and our tourism industry.

My family and I oppose Rockwool, TeMA and the Millville Quarry being issued air quality permits.

Sincerely,

Joette Borzik and Richard Parker
Shenandoah Junction, WV. 25442

Sent from my iPhone

NON-CONFIDENTIAL

Pursley, Steven R

From: David Tabb <sssi27@yahoo.com>
Sent: Saturday, October 6, 2018 3:07 PM
To: Pursley, Steven R
Subject: TeMa U.S. LLC AQ-Permit request of termination (attached)
Attachments: TEMA permit DEP-DAQ request termination-Pursley.docx

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October 6, 2018

David Tabb
107 Tabb Lane
Harpers Ferry, WV 25425
sssi27@yahoo.com
304-676=5976

Steven R. Pursley
West Virginia Department of Environmental Protection
Division of Air Quality
601m 57th Street, S.E.
Charleston, WV 25304

RE: Permit #R13-3414 TeMa North America, LLC
Plant #037-00110

Dear Mr. Pursley,

I appreciate your time spent with the residents/taxpayers of Jefferson County. I have separated my questions from which I believe is a violation of the permit to wit:

(1) The permit states the usage of natural gas. You informed the audience that natural gas is not on site yet and propane was going to be the alternative until natural gas is available. The usage of the propane requires storage tanks, that is not listed on the permit nor has the safety protocol been addressed or positioned in relation to the manufacturing site. I believe this is in direct violation of the permit itself and should terminate the existing permit. My argument is justified by the statement within their permit listed, **future** building of storage silos for raw materials, with size and all the safety protocols.

If TeMa U.S., LLC wishes to resubmit for an air quality permit that's ok. What's not okay is if the WVDEP/WVDAQ allows a partial request change of permit, remember the term complete, non-complete. Non-complete means terminate. This request is regarding rule 45CSR-13.

(2) The permit states the usage of a street sweeper to clean around the property. Where is the cleaning process of the roofs and sidewalks to reduce stormwater contamination of particulate matter? Since there are no stacks to dissipate the particulate matter one would assume the 50 plus tons per year will be right on site. Since their permit does not address the particulate matter on the rest of the property/grounds and/or surface water contact with the accumulation, this permit should be terminated. Remember the term complete/non-complete. This permit is not complete.

If TeMa U.S., LLC wishes to resubmit for an air quality permit that's ok. This request is regarding rule 45CSR-7.

(3) The WVDEP/WVDAQ is required to monitor a moderate pollution permitted facility. Within your presentation at the Ranson Civic Center, the monitoring from WVDEP/WVDAQ was not going to occur which is a violation within your own rules once a permit is approved.

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I, David Tabb request WVDEP/WVDAQ to delay any permitting until which time the DEP/DAQ can construct and monitor the ambient air prior to permit being issued. Which will insure the monitoring will occur prior to start up.

I will also be sending this to EPA Region III for review as well. I would appreciate a response of receiving this complaint request.

Respectfully submitted,

David Tabb

P.S. Does TeMa U.S. LLC required to have a liability insurance policy pertaining to the air quality permit, in case of a possible incident that would cause damage to the public and surrounding areas?

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Pursley, Steven R

From: Bev <bjross7@comcast.net>
Sent: Saturday, October 6, 2018 11:15 AM
To: Pursley, Steven R
Subject: TEMA Air permit comments

Mr. Pursley,

These are my written comments from my statement at the Meeting on Thursday, October 4. We need the WVDAQ to stand for the citizens. Please help us.

I would also appreciate a response from you acknowledging receipt of the email.

Thank you,
Beverly Ross

I object to any new air permits issued in Jefferson County.
With one major pollution source, the Rockwool PSD permit changes Jefferson County from an attainment county to a non-attainment county. Right now, Jefferson County is an attainment county in West Virginia. I'm glad WVDEP is here tonight. I have read the Rockwool permit and there are several alarming facts that make the permit even more alarming.
The emissions calculations only cover the operations of the plant, it does not include substantial emissions from start up, shutdown and malfunctions events.
EPA advises the WVDAQ to change their modeling analysis to ensure compliance. Here are quotes from the EPA's letter to you, WVDAQ.
"Using 99% average by hour of day versus a design value will reduce the background concentration by 6-9 ppb."
"Typically, longer term limits are granted for sources known to have significantly varying hourly emission rates. This provides the source with flexibility to average out fluctuations in the hourly emission rates for compliance purposes."

It's as if you know, the numbers are going to change, and not for the better. Will there be revised permitting after the Rockwool facility is built? What about TEMA?

EPA also points out that the WVDEP must follow Federal rules that require, the permitting authority (WV) do it's own independent analysis. What was your response?
"Since this was a large project and we agreed with the applicants analysis we thought it not worth it to regurgitate the language from the application."
This is laziness, dishonesty and an ethical breach from our government officials that illustrates why the stereotype of incompetent government workers breed distrust from the public.
So, now here we are with another permit issued for TEMA.
Was this permit issued with the estimated Rockwool emissions numbers? Are you telling Jefferson County that it doesn't matter how much pollution will be emitted? How can you approve another business, no matter how small if the Rockwool permit already puts Jefferson County in a non-attainment status? How could this be possible? You've already destroyed our county with one approved permit. It's

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one and done.
I was a trusting citizen before I really understood what was going on. I actually thought the EPA and the WVDAQ was protecting the public by limiting the harmful pollutants to an area. I thought non-attainment meant that you're in violation of the health standards and that no further pollution would be permitted.
The cumulative effects of the Rockwool permit and now the TEMA permit is a violation of everything our government is supposed to protect us from. I object to Rockwool, I object to TEMA and I object to any future permits issued in Jefferson County.

Sent from my iPad

NON-CONFIDENTIAL

Pursley, Steven R

From: Emily <emmilely@gmail.com>
Sent: Friday, October 5, 2018 11:43 AM
To: Pursley, Steven R
Subject: TeMa Questions

Hi Mr. Pursley,

Thank you so much for coming out to Jefferson County last night. I really found your presentation to be valuable and it really helped me wrap my head around what TeMa will be. I came away with a few impressions about the plant that I'm hoping you can verify for me, as we ran over the time limit last night so I couldn't ask them in person :)

From the presentation and brief conversation after the comments, it seemed like vast majority of the PM emissions would be from the ground, from trucks moving and bags dropping, etc. Is that the case, or would the majority of the PM emissions be produced from the manufacturing process?

Also, when I read the articles about this plant it seemed like they would be recycling the materials on-site, but from the presentation it appeared that they would be bringing in pellets from elsewhere. Can you verify that they will not be actually recycling on site?

Thank you so much again! I realize that this is a tough situation, and I really appreciate that you all came out and weathered the storm to give us a chance to speak to you in person.

- Emily Dragon

In regards to TeMa North America LLC, 13-3414

NON-CONFIDENTIAL

Pursley, Steven R

From: Tim Ross <redross44@yahoo.com>
Sent: Friday, October 5, 2018 8:36 AM
To: Pursley, Steven R
Subject: Comments on TeMa NA, LLC #R13-3414

Here are my comments on subject permit. Times are changing Mr. Pursley. The days of copying and pasting and figuring that nobody is going to read what you produce are gone. In addition to considering my comments, you, your coworkers and boss should consider what your mission truly is. Is your mission simply approving permits because you have to, or are you really supposed to be protecting the environment of WV? Is what you are doing protecting our environment? Is there anything in the TeMa permit that has to do with protecting the environment? For what they are worth my comments are below.

The DEP should not even consider permitting another plant until the state has installed and made operational a robust environmental monitoring system. It's like setting fishing limits and not hiring any game wardens. As it is, TeMa is no small fry when it comes to polluting. Over 34 tons a year. As an agency you need to let your bosses, the legislature know that you cannot do your job and they should either fund you fully or do away with you.

You can pretend that you don't know that TeMa plans to double in size. Don't try to pretend that we won't be there to review the next permit with a fine tooth comb. This permit we were supposed to evaluate is sloppily written and appears to be the result of a cut and paste party. Why even include the stack emissions if there is no stack? Why the Italian? You must have thought it important. So, unless you can show an affidavit that shows you can read, write and speak Italian, this permit should be turned down due to your inability to comprehend it. The stack emission report says "Informal test of Atmosphere Emissions, not valid as Official Law limits compliance check." I don't know what it means but you included it in the permit so you must. Please explain what that statement means, why you included it and how it bears towards approving or not approving the permit. If you can't find it, it's on the bottom of the first page on the stack emissions report, or as you might say, Rapporta Di Prova N.

Speaking of emissions, Here is a quote from the Engineering fact sheet under Material Handling Emissions:

"This factor came from a permit application previously approved by WVDAQ (Flying W Plastics, R13-2243D). Although application R13-2243D did not give a source for this emission factor, it was accepted because it was more than twice as large as the emission factor used in Flying W's first permit (R13-2243)...".

I think I heard you say this is the fault of Mr. Scholl. Perhaps in ten years someone will blame you for the silly things done by you on this permit, but I prefer to stay in the here and now. The above is what you wrote and it is nonsense. Please explain in writing the timeline and reasoning for the acceptance of this factor.

I think you heard the crowd's reaction to the statement below. It is also troubling that the permit to construct reads:

4.1.14 Due to unavoidable malfunction of equipment, emissions exceeding those set forth in this rule may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. **In cases**

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of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.

You took the above clause out of the Flying W permit, why is it back in for TeMa? This clause is unacceptable. If they malfunction or experience failure, they need to shut down. And over 10540 trucks a day, soon to double? How do you count the trucks? Is each trip in counted as well as a trip out, or is it just one truck? Any idle times?

Do not issue this permit. Start over. Pick some units, Metric or English, pick a language, English would be nice and make Te Ma permit for everything at once. Don't do any more permitting until you have a way to monitor in place. You all need to stand up and say, "We can't do our job. We cannot protect West Virginia until we get the resources we need." We will back you up. I appreciate the opportunity to comment, I hope even more that I will be listened to.

Tim Ross,
1853 Flowing Springs Road, Charles Town WV.
Redross44@yahoo.com

NON-CONFIDENTIAL

Pursley, Steven R

From: Michael and Susan Glenn <chester4@comcast.net>
Sent: Thursday, October 4, 2018 8:39 PM
To: Pursley, Steven R
Subject: comment 13-3414 TeMa permit

Mr. Pursley, I am a retired plant physiologist and former director of the USDA-ARS-Appalachian Fruit Research Station in Kearneysville, WV. As part of my research program I examined the effect of ambient ozone levels in Jefferson county on apple productivity. I found that ozone levels as low a 30 ppb were reducing apple yield and quality (Glenn, 2016 and citations therein). Jefferson county is the second largest producer of soybeans in WV and soybeans are an essential component of sustainable crop rotations in the region. Soybeans are particularly sensitive to ozone and for the ambient daylight levels in the county of 40-60 ppb, yields are reduced 10-15% at the present time (Ashmore , 2002). Damage to soybean and plants in general increases linearly with higher concentrations of background ozone (Mills et al. (2000).

A permit was issued by the WVDEP for the Rockwool facility in Jefferson county (R14-0037). This facility will be the second largest emitter of VOC's in the state. No matter what air pollution models WVDEP chooses to use, ozone levels will rise in the county, particularly on the hot, sultry summer days, frequent in the area.

I am opposed to the TeMa facility (13-3414) for the simple reason that it further contributes to an increasing ozone pollution potential in the county and will result in increased chronic ozone damage to agriculture crops further reducing their yield and quality for the foreseeable future. This is an economic burden the agricultural community should not shoulder.

Sincerely,

David Michael Glenn PhD

406 Glen Road

Shepherdstown, WV 25443

304-876-3505

References:

Ashmore M.R. (2002) Effects of oxidants at the whole plant and community level. In Air Pollution and Plants (ed. M. Treshow), pp. 89–118. John Wiley, London, UK.

Glenn, D.M. 2016. Effect of highly processed calcined kaolin residues on apple productivity and quality. Scientia Horticulturae 201: 101-108

Mills G., Hayes F., Buse A. & Reynolds B. (2000) Air pollution and vegetation. In Annual Report 1999/2000 of UN/ECE ICP Vegetation. Centre for Ecology and Hydrology, Bangor, UK.

NON-CONFIDENTIAL

To: WV DEP

Oct 4, 2018

SIERRA CLUB

Eastern Panhandle Committee
65 Bradford Court
Charles Town, WV 25414
(304) 725-0223

I am here tonight to advise that WVDEP should not issue another permit which will add to the pollution load Jefferson County is already scheduled to receive. TeMa Air Quality Permit Number 13-3424 should NOT be granted for the following reasons:

The most pressing and important reason is the health issues being introduced into our County. In 2009 I left the Kanawha Valley where I was born because I became very concerned about the particulate matter and chemical pollution I was breathing. In my family of 8, 6 have had cancer and 2 have died. I plan to do everything I can to assure that my fellow Jefferson County residents don't have to deal with sitting by the bedside of relatives dying from cancer or deal with children who have been poisoned by neurotoxins and have had their potential intellect and health destroyed in the name of "economic development."

Poisons pumped into our air and seeping into our water table will harm many of our clean and healthy tourist attractions such as our horse breeding and horse racing concerns. Other of our tourism attractions such as River Riders will be harmed. We will lose visitors to our National Park in Harper's Ferry. Additional pollution in this valley will be harmful to our farmers, our bee keepers, and our real estate values.

Incomes are decent in the Eastern Panhandle and the State of WV depends on our tax revenues to pay for remediation in the coal fields where the pollution has stayed while profits have gone out of state. The acidic water breaking out of abandoned mines and running off mountaintop removal sites requires treatment in perpetuity. Charleston needs our tax dollars to clean up the environment. Let's not drive WV taxpayers with good paying jobs out of the Eastern Panhandle and over into MD or VA.

The State of WV depends on our Eastern Panhandle tax revenues to help finance the State's part of the Medicaid expansion. The cancer clusters so common in Prenter Hollow, Logan, Blair, Matewan and other coalfield communities have devastated local citizens. They need and deserve our support.

Citizens of Jefferson County are not desperate for jobs. As a matter of fact, our unemployment rate is the lowest in WV. We can and should hold out for cleaner economic development, something which will not endanger the health of our neighbors or change the character of our county.

Regina Hendrix

NON-CONFIDENTIAL

My name is Katie Meckstroth and I live in Harpers Ferry. Thank you for holding this hearing. I have a number of questions before this permit is issued.

From my reading, it seems like a lot of information is left out that we should have before this permit is granted. If it has any bearing on the permitting process please note that most Jefferson County residents do NOT want industries like TeMa in our community. This plant will emit too many pollutants to be so near schools and residences and we do not want our children breathing air that contains carcinogens and particulate matter.

A troubling omission from this permit is in the sections about monitoring. In one part the permit says none or not yet selected when asked about the monitoring process. However, the permit does say that the monitoring estimates 98% efficiency control. In another part it says that TeMa North America, LLC plans to follow the monitoring, recordkeeping, reporting, and testing required by the issued permit. No details are given as to how TeMa will be able to monitor with 98% efficiency. You should NOT issue any permit that does not have a way listed for monitoring to make sure it is abiding by the standards. It is actually amazing to me that a permit could be submitted and reach a point where we are having a hearing about it when there is nothing listed for how it will be monitored.

One of my main concerns is how many pollutants are allowed in a particular area?
We already know that the Rockwool factory is set to be the #2 polluter of emissions in the entire state. How much more can our county sustain? Especially since Rockwool and TeMa both have plans to expand and pollute more than their initial permits suggest. Is there a point where the WV DEP says that Jefferson County has reached their limit and cannot have anymore pollutants?

Finally I would like to know from the DEP how often air permits are denied and what criteria must be met for a permit to be denied? I'm a little concerned with the research I've done that it seems like few permits are denied, even though there are serious environmental concerns in our state.

Thank you for your time and please do not issue this air permit.

Katie Meckstroth
353 Walling Dr.
Harpers Ferry, WV
25425

NON-CONFIDENTIAL

Aileen Curfman
1067 Comstock Drive
Shepherdstown, WV 25443
October 4, 2018

RE: Permit Number 13-3414

Thank you for the opportunity to provide my comments on Air Quality Permit Number 13-3414, concerning the plastic extrusion facility proposed by TeMa North America for the Burr Business Park in Kearneysville, WV.

WV Department of Environmental Protection should NOT issue this permit.

Air pollution from this facility may meet standards, but this is one of multiple new industrial projects, existing and planned. Each will add a few more pollutants to our air, and the total is unacceptable.

Jefferson County is a rural area. It is one of the few areas in West Virginia that offers pristine landscapes and clean air. As a result, the county has a vibrant tourist industry and a thriving real estate market.

The Charles Town Race Track is a large component of our tourist industry. Horses are much more sensitive to dirty air than humans. Those that live locally will have difficulty competing with horses that live in places that have cleaner air, resulting in a loss of income to owners who have invested in these horses.

Our farms depend on clean air, especially our organic farms, which much meet strict standards. We also have many apiaries. Bees are especially susceptible to air pollution, and these small cottage industries will be challenged to keep their production workers—the bees themselves—alive.

We are all familiar with the respiratory issues and high cancer rates in the more industrialized parts of our state. Our residents and our local healthcare system are free of these challenges. We want to keep it that way.

Burr Business Park is a BUSINESS park, not an INDUSTRIAL park. Residents have understood that as it grew, it would attract additional non-polluting tenants like the State Police barracks and U.S. Coast Guard. This facility is not in keeping with the nature of its location.

In addition, over 14 tons of dust from haul roads each year will mean that residents of areas along the road will also be afflicted, not just residents near the TeMa factory.

For these reasons, I urge the West Virginia Department of Environmental Protection not to approve Permit Number 13-3414, requested by TeMa North America, LLC. Thank you.

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(1) Will Recyle Be done off site?
(2) What Studies have been done?
(3) Any other Companies in United States
(4) Effects on Animals (Bald Eagles-

10. Members of WVDEP
Please STOP including Businesses to our community and the county of Jefferson That continously adds pollut If this is Not stopped and they companies are placed in the same condensed area the air quality will become toxic and extremely bad for everyon health.

Burr Park is listed as a Light Industry business park. If you keep adding the pollution like that of:
TEMA North America LLC 13-3414

the next one that builds beside it now doubles and we then will have the snowball effect.

Respectfully

Sharon Wilt
152 Anvil Rd
Kearneysville WV 25430
(304) 582-2201

Sharon Wilt

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Was there a study's done with the other company with mix of chemicals in Air

Why are we always told the permit has to be issued

What is the cut off limit that we enough chemicals in the Air.

Why is there building up and Almost Ready to go before we are given a hearing on Air

(4) How did construction get so far ahead before meeting
(5) Effect on Kids, Elderly & Sick

1. Truck Traffic
2. Smell
3. Noise
Amount of Truc.

WVDEP

Continuously adding business's that adds pollutants into our crisp clean air of Jefferson County W.V. it will become a air quality disaster from our children to our farm animals. The air will become unhealthy for all of us. Bring clean business to our county. Tema North America LLC 13-3484. is not the right company for Jefferson County.

Thank You

Charles D Wilt
152 Arvil Rd
Kearneysville W.V. 25430
304 582-2728

Charles D. Wilt

NON-CONFIDENTIAL

How many companies will be built before permits.

Written By: Emily Dragon
Address: 187 Steeple Chase Dr., Shenandoah Junction WV 25442
Daytime Phone: 443-474-8444

Regarding TeMa North America, LLC 13-3414

I have significant concerns regarding the DEP's understanding of this document, the health, traffic, and environmental impacts of the TeMa facility as well its violation of county restrictions.

My first concern is with the application itself. I was shocked when I saw that a large portion of it was in a foreign language, with translation only being provided for the majority of the text but portions were left untranslated. But beyond that, I am appalled that this document is even being considered when it directly and unapologetically states on page 95:

> Language Translations
>
> The information presented in this document has been translated from English by a vendor LyondellBasell believes to be reliable. LyondellBasell and its vendor have made a good-faith effort to verify the accuracy of the translation, **but assume no liability or other responsibility for any errors that may have occurred**.

This should end the discussion right here. If nobody is willing to stand behind a translation, then another translation must be done before any action is taken. How in the world is it legal to permit a document that contains a significant amount of information that is based on and caveated as a "good-faith effort" from an unspecified "vendor" that the company "believes to be reliable", but not reliable enough to assume liability for?

A major concern of mine also lies with the health of our most vulnerable citizens that will be breathing in the pollution this factory is outputting. In the exact same business park there are two child care businesses (Cookies n Milk Childcare and Children First Child Development Center) that are around 2,500 feet or less from the site. Within a mile (or less) of the site are North Jefferson Elementary and TA Lowery Elementary Schools. As EPA and WV don't *specifically* state a distance that would be scientifically safe (though there are numerous statements in the EPA's school siting guidelines that suggest that they would have many concerns with siting a school as close to this facility as the two Elementary Schools are), I will refer to the WHO guidelines which clearly state "do not build schools within two miles of facilities that release toxic chemicals into the air or land."

The location of the facility is also alarming because of items specifically stated in the facilities permits. For example, in section 4.1.14 of the Construction Permit R13-3414 it states:

> Due to unavoidable malfunction of equipment, emissions exceeding those set forth in this rule may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. §45-7-9.1

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So for up to ten days they can completely ignore emissions in a valley with a location in incredibly close proximity to daycare facilities that care for infants daily. If they have an approved corrective program they can extend that for as long as the Director allows them to.

On page 9 of the Engineering Evaluation/Fact Sheet it states that no air modeling was even done for this facility, despite its close proximity to schools and childcare centers, and despite the fact that the nearest air monitoring station we have is in Martinsburg:

> AIR QUALITY IMPACT ANALYSIS
>
> Because this application addresses the construction of a facility that is not defined as major under 45CSR14, no modeling was performed.

If no modeling is done, then how do you know how well the pollutants will disperse, and how safe it is for the schools and daycares that are so close?

Also, on a broader note, how would we even know if they were violating the air permit? What alerts would the schools and daycares have if the facility was malfunctioning and/or exceeding their permit? If this facility violates their permit, do those buildings have to shut down until they are in compliance again? If not, then how can you ensure that our children will remain safe in those conditions? Does this facility have to report their emissions during startup/shutdown events, or will that be another way the childcare facilities would be unaware of increased emissions at a certain time?

Another concern lies in the amount of traffic that this facility will be adding to the roads around the area. Attachment L of the Regulation 13 Application For An Extrusion Manufacturing Facility Jefferson County, West Virginia states that there will be a maximum of 10,540 10-18 wheel delivery truck trips per year, with a maximum of 10 trips per hour, and they will be driving an average of .38 miles per trip. This is a huge problem if those trucks are doing their 10 trips right as school lets out in an already dangerous intersection. The fact that they are not driving very far seems to indicate that they will not be using major highways, which drastically increases the danger that this volume of traffic would bring to that area. These trucks also have a mean weight of 30 tons and will be frequently driving over an area that has existing sinkholes (Burr Park Sinkhole – found in June 2017, after which a second sinkhole has also opened up).

Yet another concern is of the environmental impact of the facility. This facility is pre-approved by the JCDA to expand, so I am incredibly worried that this permit will be allowed, the building will be constructed, and then immediately another permit will be requested that significantly increases their output of carcinogens, specifically particulate matter. As the application currently states, it would allow PM of 34.03 tons per year (tpy) including fugitive emissions of 14.49, PM10 of 23.81 tpy including fugitive emissions of 4.27 tpy, PM2.5 of 19.96 tpy including fugitive emissions of 0.42 tpy. When combined with Rockwool's permitted numbers, this is an unacceptable amount of VOCs and particulate matter than will be blanketing the schools, organic farms, horse farms, outdoor trails, apiaries, and other businesses and activities that exist between the two sites and depend on having as high air quality as possible to produce excellent products.

Lastly, this Business Park is zoned light industrial, and the county specifically designates recycling plants as being heavy industry. That alone should also be a reason to reject the air permit as violating county restrictions. It is being placed in a location that it is not allowed to be in. I am also concerned that the

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pollution numbers, specifically for PM, exceed the county restrictions, but cannot find a proper way to convert tpy to ug/m at this time. Can you provide the air permit numbers against the county's Ambient Air Quality Standard?

I have not had the necessary time to fully look into this facility and its impact on our county, but there is already plenty of extremely concerning information. Please do not issue this permit.

Thank you for your time,

Emily Dragon

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October 4th, 2018

To whom it may concern within the WVDEP,

I oppose the permitting of the TeMa North America, LLC 13-3414. Air pollution from this facility may meet standards, but this is one of multiple industrial projects proposed or in some phase of permitting, that would add pollutants to our air, and the total is a grave concern for residents in a county where no heavy industry now exists. This sort of polluting business is counter to the green industry, tourism, and tech bedroom community that is currently thriving in Jefferson County, and is likely to cost way more than the 30 jobs the factory promises.

* Burr Business Park is a ***BUSINESS*** park, not an ***INDUSTRIAL*** park. It abuts Peter Burr house, a historic home with educational programs, the site of county festivals, and frequent school tours. Residents were told the business park would attract additional non-polluting tenants like the State Police barracks and U.S. Coast Guard, which is unlikely if heavy industry moves in.

Particulate matter and VOCs will harm nearby farms, including many organic and biodynamic locations, pasture raised meat farms, vegetable gardens, fruit orchards, and aviaries, as well as cause damage to the health of nearby residents. The EPA has indicated the PM 2.4 and PM 10 cause numerous illnesses, including heart and lung issues and certain cancers.

14.49 tons of dust from haul roads each year means that residents of areas along the road will also be afflicted, not just residents near the TeMa factory.

For these reasons and many others I oppose this and all heavy industry in Jefferson County

Sincerely,

Donna Westbrook

87 Kings Nest Drive, Kearneysville, WV 25430
Ph 410.980. 2066

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October 4th, 2018

To whom it may concern within the WVDEP,

I oppose the permitting of the TeMa North America, LLC 13-3414. While the air pollution from this facility may meet standards, this is only one of multiple industrial projects proposed, that would pollute our air. We are in a county where no heavy industry now exists. This sort of polluting business is counter to the green industry, tourism, and tech bedroom community that is currently thriving in Jefferson County. The side effects from the pollution and any clean up costs are likely to cost way more than the 30 jobs the factory promises.

The Burr Business Park is a ***BUSINESS*** park, not an ***INDUSTRIAL*** park. It abuts Peter Burr house, a historic home with educational programs, the site of county festivals, and frequent school tours. Residents were told the business park would attract additional non-polluting tenants like the State Police barracks and U.S. Coast Guard, which is unlikely if heavy industry moves in.

The pollution from this factory will harm nearby farms, including many organic and biodynamic locations, pasture raised meat farms, vegetable gardens, fruit orchards, and aviaries, as well as cause harm to the health of nearby residents. The EPA has indicated the PM 2.5 and PM 10 (which will be released by this plant) cause numerous illnesses, including heart and lung issues and certain cancers.

14.49 tons of dust will be produced from the haul roads to and from the plant each year which means that residents of areas along the road will also be afflicted, not just residents near the TeMa factory itself.

For these reasons and many others I oppose this and all heavy industry in Jefferson County

Sincerely,

Charles Westbrook

87 Kings Nest Drive, Kearneysville, WV 25430
Ph 703.969.2775

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West Virginia
Department of Environmental Protection
Division of Air Quality

R13-3414
TeMa North America, LLC
95 Steeley Way, Kearneysville

Ranson Civic Center, 431 W. 2nd Avenue, Ranson, West Virginia
Thursday, October 4 • 7:00 to 8:30 p.m.

Sign-In

Page 1 of ____

The Department of Environmental Protection asks for the information below so that agency staff may provide responses and information about decisions to you. The information you voluntarily provide on this sheet becomes part of the public record related to this topic and may be released if requested under the Freedom of Information Act.

Name	Address	Organization	Email	Comment? (Yes/No)
James Gregory	423 E. Liberty St Charles Town, WV		userfriendley@therapy@gmail.com	no
Nancy Gregory	423 E. Liberty CT		nsgorgioso@gmail.com	yes
Regina Hendrix	65 Bradford Court Charlestown WV 25414	Sierra Club	REGINA.HENDRIX@comcast.net	Yes
Cathryn Polonchak	234 Deer Mountain Dr Harpers Ferry, WV		CPOLO4@COMCAST.NET	no
Paul Harris	121 Don Quixote Dr Charlestown WV 25414		weatherman714@yahoo.com	Yes
Katie Meckstroth	353 Walling Dr. Harpers Ferry 25425		katherine.meckstroth@gmail.com	Yes
Dana Andes	PO Box 1020		dandbus@aol.com	No
David Tabb	107 Tabb Lane	Me	555127.Yahoo.Com	Yes

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West Virginia
Department of Environmental Protection
Division of Air Quality

R13-3414
TeMa North America, LLC
95 Steeley Way, Kearneysville

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Name	Address	Organization	Email	Comment? (Yes/No)
Aileen Curfman	1067 Comstock Dr. Shepherdstown, WV 25443		acurfmane@gmail.com	Yes
GAIL Kohlhorst	3153 Engle Molers Harpers Ferry	Sierra Club	kohlhorst@comcast.net	NO
Kathy Kosby Teeter	214 Ridge Rd. Shepherdstown		Kathy8150@gmail.com	NO
Elizabeth Shirley	1285 Bloomery Rd Charles Town WV 25414		jyshirk@frontiernet.net	NO
Beverly Ross	82 Trotting Way Charles Town		bjross7@comcast.net	YES
Karen Free	P.O. Box 453 Ranson WV 25438		Knfree11@gmail.com	NO
Mark Wilson	357 Lady Bug Ln Kearneysville WV 25430		Mountaineer33@gmail.com	Yes
Audra Walch	500 Brooke St Charles Town WV 25414		Audrawalch@aol	NO
SHARON & Charles Wilt	152 ANVIL Ct KEARNEYSVILLE		SW25442@AOL	YES
Jennifer King		Concerned Citizen		YES

West Virginia
Department of Environmental Protection
Division of Air Quality

R13-3414
TeMa North America, LLC
95 Steeley Way, Kearneysville

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Name	Address	Organization	Email	Comment? (Yes/No)
Tim Ross	185 Flowing Springs	Band	Redross544@yahoo.com	Yes
Jill Guempel	35 Grant Rd CT		jill.guempel@gmail.com	no
Edy Cummings	P.O Box 172 Shenandoah Junct 25442		edycummingsemc.coop.com	
Emily Dragon	187 Steeple Chase Dr. Shenandoah Junction, WV	None	emmileley@gmail.com	Yes
Kendra Clark	211 Devonshire DR Charles Town WV	Jeff Cty Schools	Kendrarsc@hotmail.com	No
Bill Gillett	47 Jasmine Pl., Harpers Ferry WV		wkgille@gmail.com	Yes

West Virginia
Department of Environmental Protection
Division of Air Quality

R13-3414
TeMa North America, LLC
95 Steeley Way, Kearneysville

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Name	Address	Organization	Email	Comment? (Yes/No)
Lori Maloney	46 Shannon Ln Kearneysville WV 25430		ladavias@gmail.com	
Mike Donnelly	274 Duncan Field Lane Charles Town WV 25414	Shilon HOA	mike@donnellyclan.com	Yes
CHARLES WESTERCOOK	87 KINGS CREST DR KEARNEYSVILLE WV 25430			NO
Denise Ryan	22 Karen Lane Shenandoah Jct WV 25442	Resident	DRyan.mph@gmail.com	NO

West Virginia
Department of Environmental Protection
Division of Air Quality

R13-3414
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95 Steeley Way, Kearneysville

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Name	Address	Organization	Email	Comment? (Yes/No)
Joe Jurand	6154 Shep Pk Shen Junc		jjurand@frontiernet.net	
Robin DePietro Jurand	"		rpietro@frontiernet.net	
Diana Walch	634 S. Samuel St		diwalch@aol.com	No
James Lugby-Treber	264 Rudder Rd Shepherdstown WV 25443		jlusbytreber@gmail.com	No
Grant Prillaman	1665 Persimmon Ln. S'town 25443			No
Jerry Franklin	228 Cassilis Lane	n/a	Jfranklin@frontiernet.net	no
Christine Wimer	3546 Old Leetown Pike Ranson	Citizen	clwimer1@yahoo.com	Yes

West Virginia
Department of Environmental Protection
Division of Air Quality

R13-3414
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Name	Address	Organization	Email	Comment? *(Yes/No)*
Carolyn Franklin	228 Cassilis Lane Charle Town, WV	–	franklin.carolyn@gmail.com	–

Pursley, Steven R

From: Laura Levesque <unextinguished@gmail.com>
Sent: Thursday, October 4, 2018 1:30 PM
To: Pursley, Steven R
Subject: TeMa North America LLC, 13-3414
Attachments: image001.gif

Letter of objection to be entered into the public record

Steven Pursley, WVDEP-DAQ, 601 57th St. S.E., Charleston, WV 25304

Dear Mr. Pursley,

I want to talk to you about the potential impact of TeMa on my family, as a resident of Jefferson County, our economy, property values, community, future health and economic viability.

JCDA and Rockwool withheld information from the JCC, rushed the approval process and took actions to purposefully limit public input. It has become very clear that the JCDA was advised to approve a PILOT agreement without disclosing the full extent of the damage it would do to the environment and to the health of citizens of our county. That is shameful and despicable. TeMa North America LLC's proposal to construct a plastics-extrusion facility in Kearneysville, W.Va. will only add to the heavy industry in our area, which is ill-suited to our community, geology, environment, and economy. It is the role of the WV DEP to protect the citizens of West Virginia, not enable corporations to take advantage of weak regulatory loopholes to exploit and destroy our communities.

The enormity of this plant cannot be understated. With TeMa coming in on the heels of Rockwool, it will add more toxic HAP's to the currently clean air and waterways. The sheer size and amounts of Hazardous Air Pollutants, including literally tons of Formaldehyde and other known carcinogens, are not common to this area of the country. This is akin to an oil refinery, a WV coal plant. It is much more than everyday smog, and the estimated tons of HAPs are staggering, and they are not regulated by the West Virginia DEP. You are relying on plants to self-monitor, and self-report.

The potential for water contamination is graver than the threat of air pollution. Especially considering Jefferson's karst geology. Rockwool, and TeMa behind it, have chosen to site their plants near huge sinkhole hotspots, at the headwaters of many county streams. Groundwater contamination would be a nightmare, polluting the aquafer, drinking wells, and rapidly moving to the Potomac and Shenandoah, where 5 million people draw drinking water downstream. This will affect the Chesapeake Bay watershed.

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There are over 11,500 citizens who have signed the petition against Rockwool and joined Concerned Citizens against Rockwool/ Ranson who oppose heavy industry. I am among them. I oppose TeMa for the same reasons. We do not want heavy industry in our region, full stop. Our rural, agricultural community has a culture that has vastly different needs for smart economic development, and this is not part of that plan in any way, shape, or form. If you approve this, you will be going against the will of the citizens, against the will of the people.

TeMa North America LLC, 13-3414

steven.r.pursley@wv.gov

Sincerely,

Laura Levesque

154 High St.

Charles Town, WV 25414

304-240-1648

NON-CONFIDENTIAL

Pursley, Steven R

From: PAUL ROCHEFORT <ballata@comcast.net>
Sent: Thursday, October 4, 2018 11:35 AM
To: Pursley, Steven R
Subject: RE: TEMA Public meeting

Dear Mr. Pursley,

I had hoped to attend the meeting tonight regarding the draft air permit for TeMa North America, LLC, but I am unable to attend. I do want to register my concerns regarding potential air pollution from this factory, especially given that the location is very near an elementary school (TA Lowery) and several places supporting children's activities exist within the confines of the Burr Industrial Park, namely 'Flip & Cheer', a dance studio, and the historic Peter Burr house itself, where we often host educational opportunities for children and adults alike. Increased air pollution would also be harmful to the people who work in the office buildings of the Burr Industrial Park, and might well lead to people closing up their businesses at this location and moving to a less polluted area. This would do considerable harm to the economics of Jefferson County, and would not be offset by a small factory and its corresponding small job opportunities.

I believe there is a rule that schools should not be built next to factories. Since a school exists in easy walking distance, and at least two regular after-school businesses serving children are on site of the Burr Industrial Park, these should be disqualifiers for the construction of a factory emitting significant air pollution. Even if that pollution is lower than that of Rockwool, my understanding is that it would become a significant polluter in Jefferson County, where right now, our primary polluter is the Halltown papermill. Our air quality is very good, something that makes me pleased to be a Jefferson County resident. I would sincerely wish to keep it that way.

As a longtime volunteer serving the historic Peter Burr House, I am also especially concerned about the impact air pollution, water pollution (and truck traffic - though that is a separate issue) will have on this site. The 1751 house, the oldest extant wood-frame house in the state of WV, exists in a dip in the land fed with numerous springs. Because of this 'dip', any air pollution will linger within (a state true of much of the Burr Industrial Park as well). This not only impacts the people working and visiting the historic site, but also the bird sanctuary and the natural land around the site, a site where an arboretum of native plants is currently undergoing the initial stages. Even in its present state, the Burr House site is rich in bird species (for instance, I just saw a Northern Goshawk the other day). Pollution would negatively impact the wildlife at the Peter Burr House. Pollution might also significantly damage the historic house, as the beautiful stone chimney stacks of the house and the early 19th spring-house are made of limestone, easily eroded by acidic air pollutants. Pollution will certainly turn away people who otherwise might be interested in visiting the historic house and the activities and events we offer.

Thank you for giving me the opportunity to air my concerns. I hope they elicit thoughtful consideration, and I look forward to hearing more information as the opportunity presents itself.

Sincerely,

Dr. Deborah Rochefort

On September 24, 2018 at 1:47 PM "Pursley, Steven R" <Steven.R.Pursley@wv.gov> wrote:

Dr. Rochefort

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: PAUL ROCHEFORT <ballata@comcast.net>
Sent: Friday, September 14, 2018 11:03 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA Public meeting

Dear sir,

I am a resident of Jefferson County, and I am also long time volunteer and director of educational programs for the 1751 Peter Burr House, situated right next to the Burr Industrial Park. (This house is of significant historical worth, and is the oldest wood-frame house still extant in West Virginia. with all the attendant fragility of its venerable age) The first I heard of the TEMA operation, it seemed like a small, 'green' industry, but I have heard increasing information that may not be the case.

As you know, we are struggling with the Rockwool debacle, for which a public meeting was not held. To avoid the problems now ingrained with Rockwool, I respectfully request a public meeting to address citizen concerns regarding TEMA. Thank you.

Sincerely,

Dr. Deborah Rochefort

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, October 1, 2018 8:05 AM
To: 'Megan Flinn'
Subject: RE: TeMA Public Comment Permit Number 13-3414
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. Flinn

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 30, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings ran in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Megan Flinn <meganflinn77@yahoo.com>
Sent: Sunday, September 30, 2018 9:19 PM
To: Martin, Thornton E <Thornton.E.Martin@wv.gov>; Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TeMA Public Comment Permit Number 13-3414

Dear Mr. Thornton and Mr. Pursley,

Please find the attached submission of public comment regarding TeMA, North America. For your convenience, the content of the letter can be read below.

Dear Mr. Martin and Mr. Pursley,

This letter is in reference to the public comment period concerning a TeMA North America LLC's (permit number 13-3414) plastics factory proposed in Jefferson County, West Virginia.

We purchased our first home in Harpers Ferry about two years ago. We chose to settle in this area because of the

availability of good jobs and a clean environment. It has come to our attention, and the attention of many others, that the Jefferson County Development Authority (JCDA) has been working to bring foreign-owned chemical factories to Jefferson County. Among those factories is the Danish-owned Rockwool factory and now, the Italian-owned TeMA plastics factory.

By far and large, the citizenry of Jefferson County do not want heavy industry here. Only recently, a local nonprofit has been formed to keep heavy industry out of Jefferson County. It already has over 11,000 followers on social media. Jefferson County residents already enjoy a more prosperous economy than other parts of West Virginia. Much of that prosperity -- based real estate and tourism -- would be undermined by the introduction of TeMA and the other chemical plants that could likely follow.

We love West Virginia and do not want to leave. However, we will not live in the shadow of heavy industry.

Thank you for your consideration.

Sincerely,

Mr. and Mrs. Reed and Megan Flinn
23 Windsong Road
Harpers Ferry, WV 25425

Pursley, Steven R

From:	Megan Flinn <meganflinn77@yahoo.com>
Sent:	Sunday, September 30, 2018 9:19 PM
To:	Martin, Thornton E; Pursley, Steven R
Subject:	TeMA Public Comment Permit Number 13-3414
Attachments:	TeMA public comment Sept 30 2018.docx

Dear Mr. Thornton and Mr. Pursley,

Please find the attached submission of public comment regarding TeMA, North America. For your convenience, the content of the letter can be read below.

Dear Mr. Martin and Mr. Pursley,

This letter is in reference to the public comment period concerning a TeMA North America LLC's (permit number 13-3414) plastics factory proposed in Jefferson County, West Virginia.

We purchased our first home in Harpers Ferry about two years ago. We chose to settle in this area because of the availability of good jobs and a clean environment. It has come to our attention, and the attention of many others, that the Jefferson County Development Authority (JCDA) has been working to bring foreign-owned chemical factories to Jefferson County. Among those factories is the Danish-owned Rockwool factory and now, the Italian-owned TeMA plastics factory.

By far and large, the citizenry of Jefferson County do not want heavy industry here. Only recently, a local nonprofit has been formed to keep heavy industry out of Jefferson County. It already has over 11,000 followers on social media. Jefferson County residents already enjoy a more prosperous economy than other parts of West Virginia. Much of that prosperity -- based real estate and tourism -- would be undermined by the introduction of TeMA and the other chemical plants that could likely follow.

We love West Virginia and do not want to leave. However, we will not live in the shadow of heavy industry.

Thank you for your consideration.

Sincerely,

Mr. and Mrs. Reed and Megan Flinn
23 Windsong Road
Harpers Ferry, WV 25425

DEP to Hold Public Meetings

The West Virginia Department of Environmental Protection's Division of Air Quality (DAQ) will hold two (2) separate public meetings on Thursday, October 4, at the Ranson Civic Center located at 431 W. 2nd Avenue, Ranson, West Virginia.

The first public meeting will be held from 5:00 to 6:30 p.m. to provide information regarding Bardon, Inc.'s proposal to modify their current General Permit Registration G40-C003G by installing replacement conveyors at their Millville Quarry located at 57 Blair Road, Harpers Ferry, Jefferson County.

In addition to comments being accepted at the public meeting (please bring written comments to be read into the record), written comments on the Bardon application will be accepted until 5:00 p.m. on Friday, October 12, 2018. All written comments should be addressed to Thornton Martin, WVDEP – DAQ, 601 57th Street, SE, Charleston, WV 25304; or Thornton.E.Martin@wv.gov. Please include the applicant's name and permit application number — Bardon, Inc., G40-C003H — along with your name, return address and daytime telephone number. Please also indicate any organization on behalf of which your comments are submitted.

The second public meeting will be held from 7:00 to 8:30 p.m. to provide information regarding TeMa North America, LLC's proposal to construct a plastics extrusion facility at 395 Steeley Way, Kearneysville, Jefferson County.

In addition to comments being accepted at the public meeting (please bring written comments to be read into the record), written comments on the TeMa North America, LLC's application will be accepted until 5:00 p.m. on Monday, October 15, 2018. All written comments should be addressed to Steven Pursley, WVDEP – DAQ, 601 57th Street, SE, Charleston, WV 25304; or Steven.R.Pursley@wv.gov.

Please include the applicant's name and permit application number — TeMa North America, LLC, 13-3414 — along with your name, return address and daytime telephone number. Please also indicate any organization on behalf of which your comments are submitted.

Representatives from the DAQ will conduct both public meetings. Instructions on viewing applications, interim permit review documents, engineering evaluations/fact sheets and draft permits, where available, can be found on DAQ's NSR Permits for Review (Current) website: ***https://dep.wv.gov/daq/Pages/NSRPermitsforReviewCurrent.aspx***

Copies are also available for public inspection during normal business hours at the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304; telephone 304/926-0499, extension 1250.

Certificate of Publication

This is to certify the annexed advertisement

WV DEP/DIV Air Quality

appeared for 1 consecutive days/weeks

in the Shepherdstown Chronicle, a newspaper

published in the City of Shepherdstown, WV

in its issue beginning:

28 Sept 2018

and ending:

28 Sept 2018

The Shepherdstown

Chronicle

P.O. Box 2088

Shepherdstown, WV 25443-2088

Fee $ 71.42

THE STATE OF WEST VIRGINIA

COUNTY OF JEFFERSON

The foregoing instrument was acknowledged before me this 28 Sept 2018 by

JCampbell

My commission expires April 29 2023

Notary Public Carol Bush

OFFICIAL SEAL
NOTARY PUBLIC
STATE OF WEST VIRGINIA
Carol Bush
23 Armstrong Way
Martinsburg, WV 25403
My Commission Expires April 29, 2023

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

September 27, 2018

Robert E. Barrat
308 S Queen St.
Martinsburg, WV 25401

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Mr Barrat

The West Virginia Division of Air Quality (WVDAQ) has received your letter dated September 19, 2018 regarding the draft air permit for TeMa North America, LLC. Enclosed is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the enclosed public notice for further details.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

September 27, 2018

Danielle Fleming
63 Silverleaf Dr.
Charles Town, WV 25414

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Ms Fleming

The West Virginia Division of Air Quality (WVDAQ) has received your letter dated September 19, 2018 regarding the draft air permit for TeMa North America, LLC. Enclosed is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the enclosed public notice for further details.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

FIRST CONFIDE

Pursley, Steven R

From: Pursley, Steven R
Sent: Thursday, September 27, 2018 9:02 AM
To: 'Regina Hendrix'
Subject: TeMa Air permit information
Attachments: draft permit.pdf; fact sheet.pdf; Regulation 13 Application for Extrusion Manufacturing Facility - TeMa (0103-17-0435-100).pdf

Ms. Hendrix

Per your request please see the attached documents.

If you have any questions feel free to contact me at 304 926-0499 x. 1218 or by replying to this email.

Steven R. Pursley, PE
WV Division of Air Quality

Pursley, Steven R

From: Regina Hendrix <regina.hendrix@comcast.net>
Sent: Wednesday, September 26, 2018 1:59 PM
To: Pursley, Steven R
Subject: TeMa Permit R13-3414

Hi Steve:

I'm having trouble getting into the database and locating this permit. Will you email the info to me, please.

Regina Hendrix

304-725-0223

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

September 24, 2018

Jason McNeill
289 Acorn Circle
Harpers Ferry, WV 25425

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Mr McNeill

The West Virginia Division of Air Quality (WVDAQ) received your fax on September 13, 2018 regarding the draft air permit for TeMa North America, LLC. Enclosed is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the enclosed public notice for further details.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

dep

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

September 24, 2018

Steven Alenskis
129 Hummingbird
Shepherdstown, WV 25443

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Mr Alenskis

The West Virginia Division of Air Quality (WVDAQ) has received your letter dated September 13, 2018 regarding the draft air permit for TeMa North America, LLC. Enclosed is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the enclosed public notice for further details.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:54 PM
To: 'David Tabb'
Subject: RE: Permit# R13-3414 TEMA North America, LLC
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Mr. Tabb

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 20, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: David Tabb <sssi27@yahoo.com>
Sent: Thursday, September 20, 2018 1:56 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: Fw: Permit# R13-3414 TEMA North America, LLC

----- Forwarded Message -----
From: David Tabb <sssi27@yahoo.com>
To: srogers@charlestownwv.us <srogers@charlestownwv.us>; jimauxer@yahoo.com <jimauxer@yahoo.com>; mayor@harpersferrywv.us <mayor@harpersferrywv.us>; Matthew Umstead <mumstead@herald-mail.com>; rbarrat@earthlink.net <rbarrat@earthlink.net>; jake.zuckerman@wvgazettemail.com <jake.zuckerman@wvgazettemail.com>
Sent: Wednesday, September 19, 2018 11:39:47 AM EDT
Subject: Fw: Permit# R13-3414 TEMA North America, LLC

----- Forwarded Message -----
From: David Tabb <sssi27@yahoo.com>
To: Steve.R.Pursley@WV.gov <Steve.R.Pursley@WV.gov>
Sent: Wednesday, September 19, 2018 11:14:32 AM EDT
Subject: Permit# R13-3414 TEMA North America, LLC

David Tabb

107 Tabb Lane
Harpers Ferry, WV 25425
SSSI27@Yahoo.com
(304) 676-5976

Steven R. Pursley
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, WV 25304
Steve.R.Pursley@WV.gov

September 19, 2018

RE: Permit# R13-3414 TEMA North America, LLC

Dear Mr. Pursley,

I, David Tabb, a life long resident of the county of Jefferson with family to the Virginias since 1636 is asking for a public hearing on Permit # R13-3414 TEMA North America, LLC, Burr Industrial Park, Jefferson County.

As a lifelong farmer and business owner, I am deeply concerned when any pollution is released in the air or water. My farming operation is mainly hay production with organic entitlements with no sprays or commercial fertilizers used. The organic farming industry is vast and growing in the Appalachian region. Any pollution is detrimental to the products and livelihood of this renewable industry that produces our food with a by-product of oxygen.

As part of the record, where there any school or daycare facilities listed of their proximity to Burr Industrial Park? If not, then I would like to make mention of a daycare center two blocks from the site. North Jefferson and T.A. Lowery Elementary Schools are less than one-half of a mile on either side.

It also appears that there as been no determination of sewer or solid waste disposal that maybe a contributing pollution factor.

Wherefor, with all the reasons above, I once again ask, for a public hearing before any air or other permits be approved by either the WVDEP and/or the EPA.

Sincerely,

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:54 PM
To: 'Mary Fortuna'
Subject: RE: TEMA project
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. Fortuna

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 18, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Mary Fortuna <maryfortuna@att.net>
Sent: Tuesday, September 18, 2018 11:40 AM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA project

Hi Steve,
Thanks for your info yesterday. Would appreciate being added to the update list. Thanks!
-Mary

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:51 PM
To: 'David Pratt'
Subject: RE: TEMA factory
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Mr. Pratt

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 15, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: David Pratt <pratt.david@gmail.com>
Sent: Saturday, September 15, 2018 9:34 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA factory

We own a home in Jefferson County, and have just learned about the proposed TEMA factory. I request a public meeting to address our environmental concerns, since as you are no doubt aware 11,000 people have been concerned about how Rockwool as approved without holding a public meeting.

--
David Pratt pratt.david@gmail.com
Cell: 304-279-2807

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:51 PM
To: 'M Climis'
Subject: RE: Te-Ma permits
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. Climis

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 15, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: M Climis <mpubst5@gmail.com>
Sent: Saturday, September 15, 2018 9:00 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: Te-Ma permits

As a resident of Berkeley County who is 7 miles as the crow flies from the TeMa site, I have concerns about air quality and other issues that will arise from their factory. No further action should be taken or allowed regarding TeMa without a public meeting. Please make sure that the citizens of Jefferson and Berkeley Counties, as well as others who will be impacted, have a chance to make their concerns known and have their questions answered.
Thank you.

Melanie Climis
Martinsburg, WV

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:50 PM
To: 'danielle.patterson8284@gmail.com'
Subject: RE: TEMA's air permit
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. Patterson

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 15, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the Spirit of Jefferson on September 26, 2018 and the Sheperdstown Chronicle on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

-----Original Message-----
From: danielle.patterson8284@gmail.com <danielle.patterson8284@gmail.com>
Sent: Saturday, September 15, 2018 12:56 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA's air permit

As a citizen of Jefferson County, I have significant concerns about the proposed TEMA factory. This permitting process is coming right after Rockwool's air permit was approved WITHOUT any public input. I hope that you now consider the health of the people, especially the children's, in Jefferson County. If both of these facilities are operational at the same time, what does the air quality look like? Also, has there been consideration in how this pollution effects children (not just adults) since it's proximity is so close to so many schools and day cares?

Thank you in advance for your consideration in this matter.
Respectfully,
Danielle Patterson
Kearneysville, WV

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:49 PM
To: 'kathleen taylor'
Subject: RE: TEMA factory -Public Meeting Request
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. Taylor

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 15, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: kathleen taylor <nightowldiva@gmail.com>
Sent: Saturday, September 15, 2018 12:09 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA factory -Public Meeting Request

As a citizen of Jefferson County, I have significant concerns about the proposed TEMA Factory.

Following on the heels of the concerns about Rockwool, for which a public meeting was not held, I hereby request a public meeting to address citizen concerns regarding TEMA.

These types of factories are WRONG for Jefferson County.

Sincerely

NON-CONFIDENTIAL

Kathleen Taylor
304-283-6740

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

September 24, 2018

Kyle Wiebold
PO Box 239
Shepherdstown, WV 25443

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Mr Wiebold

The West Virginia Division of Air Quality (WVDAQ) received your letter dated September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Enclosed is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the enclosed public notice for further details.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:48 PM
To: 'Mary McClelland'
Subject: RE: TEMA Factory In Jefferson County
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. McClelland

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Mary McClelland <mcclelland.mary@gmail.com>
Sent: Friday, September 14, 2018 11:59 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA Factory In Jefferson County

Dear Mr. Pursley,

As a citizen of Jefferson County I am extremely concerned about the planned TEMA Factory. Pollution of that magnitude is detrimental to our farming and ecological industries, including tourism and horse breeding!

Since a public meeting was not held before approving Rockwool, which I find unconscionable, I hereby request a public meeting be held to address citizen's concerns regarding the safety of TEMA.

Thank you so much!

Mary McClelland

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:48 PM
To: 'PAUL ROCHEFORT'
Subject: RE: TEMA Public meeting
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Dr. Rochefort

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: PAUL ROCHEFORT <ballata@comcast.net>
Sent: Friday, September 14, 2018 11:03 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA Public meeting

Dear sir,

I am a resident of Jefferson County, and I am also long time volunteer and director of educational programs for the 1751 Peter Burr House, situated right next to the Burr Industrial Park. (This house is of significant historical worth, and is the oldest wood-frame house still extant in West Virginia. with all the attendant fragility of its venerable age) The first I heard of the TEMA operation, it seemed like a small, 'green' industry, but I have heard increasing information that may not be the case.

As you know, we are struggling with the Rockwool debacle, for which a public meeting was not held. To avoid the problems now ingrained with Rockwool, I respectfully request a public meeting to address citizen concerns regarding TEMA. Thank you.

Sincerely,

Dr. Deborah Rochefort

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:46 PM
To: 'Terri Ramos'
Subject: RE: TEMA
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. Ramos

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Terri Ramos <ramostm@frontiernet.net>
Sent: Friday, September 14, 2018 8:52 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA

As a citizen of Jefferson County, I have significant concerns about the proposed TEMA Factory. Following on the heels of the concerns about Rockwool, for which a public meeting was not held, I hereby request a public meeting to address citizen concerns regarding TEMA.

Sincerely,

Virus-free. www.avast.com

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:45 PM
To: 'Paula Tremba'
Subject: RE: TEMA factory in Jefferson Co.
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. Tremba

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Paula Tremba <p.tremba@icloud.com>
Sent: Friday, September 14, 2018 4:20 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA factory in Jefferson Co.

Dear Mr. Pursley,
I am a citizen and long time resident of Jefferson County, and I have concerns about the proposed TEMA Factory. This proposed factory is following on the heels of the concerns about Rockwool, for which a public meeting was not held. I hereby request a public meeting to address citizen concerns regarding TEMA.

Sincerely,
Mrs. Paula Tremba

NON-CONFIDENTIAL

Please note that my email has been changed to:

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:45 PM
To: 'Mary O'Connor'
Subject: RE: TEMA
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. O'Connor

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Mary O'Connor <mfh.oconnor@gmail.com>
Sent: Friday, September 14, 2018 4:19 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TEMA

Good afternoon,

I am a citizen of Jefferson County, WV, and I am writing to express my concerns regarding the proposed TEMA factory.

As this county is currently embattled due to the Rockwool plant not facing adequate scrutiny and public input, I request a public meeting to address the concerns of county citizens regarding TEMA.

Thank you,

Mary O'Connor

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:44 PM
To: 'Emily'
Subject: RE: TeMa Air Permit Concerns
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. Dragon

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Emily <emmilely@gmail.com>
Sent: Friday, September 14, 2018 4:18 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: TeMa Air Permit Concerns

As a citizen of Jefferson County, I have significant concerns about the proposed TEMA Factory. Following on the heels of the concerns about Rockwool, for which a public meeting was not held, I hereby request a public meeting to address citizen concerns regarding TEMA.

Thank you,
Emily Dragon

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:42 PM
To: 'nick.bajada@myvetmail.com'
Subject: RE: Public Hearing TeMa North America LLC
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Mr. Bajada

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 13, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Nick Bajada <nick.bajada@myvetmail.com>
Sent: Thursday, September 13, 2018 10:57 AM
To: Hammonds, Stephanie E <Stephanie.E.Hammonds@wv.gov>
Subject: Public Hearing TeMa North America LLC

Hello,
I would like to voice my opinion that a public hearing from you on the air quality permit for TeMa in Jefferson county be scheduled.

In light of the current outrage expressed by more than 10,000 families of Jefferson county and neighboring municipalities over Rockwool, considering a public hearing rather than just scheduling one is beyond comprehension of someone having a rational thought.

Please forward my letter to whom it needs to reach.

Very respectfully,

Pursley, Steven R

From: Pursley, Steven R
Sent: Monday, September 24, 2018 1:40 PM
To: 'Janie K'
Subject: RE: Tema permit
Attachments: draft permit.pdf; fact sheet.pdf; Meeting Notice.pdf

Ms. King

The West Virginia Division of Air Quality (WVDAQ) has received your email of September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Attached is a copy of the fact sheet and draft permit for the proposed project. The WVDAQ will accept public comments on this permitting action until 5:00 PM on October 15, 2018.

Additionally, please be aware that WVDAQ has scheduled two public meetings in the area. The first is related to permitting actions for Bardon Inc's Millville Quarry. That meeting will be held from 5:00-6:30 PM on October 4, 2018 at the Ranson Civic Center located at 431 W 2nd Ave, Ranson, WV. The second public meeting is related to permitting actions for TeMa North America, LLC's Jefferson County Plant. This meeting will also be held at the Ranson Civic Center on October 4, 2018. It will run from 7:00-8:30 PM. These meetings will give the public an opportunity to provide comments on said permitting actions. The WVDAQ recommends that if you wish to provide such comments that you also bring them in writing to ensure that they are made part of the public record. Notice for these public meetings will run in the *Spirit of Jefferson* on September 26, 2018 and the *Sheperdstown Chronicle* on September 28, 2018.

Please see the attached public notice for further details.

If you have any additional questions or comments please feel free to contact me at 304 926-0499 ext. 1218 or by replying to this email.

Sincerely,

Steven R. Pursley, PE

From: Janie K <plane_jane_22@hotmail.com>
Sent: Friday, September 14, 2018 4:10 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Subject: Tema permit

Hello Mr. Pursley,

As a citizen of Jefferson County I have significant concerns about the proposed TEMA factory. After what has happened with Rockwool, for which a public hearing was NOT held, I am requesting a public hearing to address our concerns about TEMA.

Thanks,
Jane King

Pursley, Steven R

From: David Tabb <sssi27@yahoo.com>
Sent: Thursday, September 20, 2018 1:56 PM
To: Pursley, Steven R
Subject: Fw: Permit# R13-3414 TEMA North America, LLC

----- Forwarded Message -----
From: David Tabb <sssi27@yahoo.com>
To: srogers@charlestownwv.us <srogers@charlestownwv.us>; jimauxer@yahoo.com <jimauxer@yahoo.com>; mayor@harpersferrywv.us <mayor@harpersferrywv.us>; Matthew Umstead <mumstead@herald-mail.com>; rbarrat@earthlink.net <rbarrat@earthlink.net>; jake.zuckerman@wvgazettemail.com <jake.zuckerman@wvgazettemail.com>
Sent: Wednesday, September 19, 2018 11:39:47 AM EDT
Subject: Fw: Permit# R13-3414 TEMA North America, LLC

----- Forwarded Message -----
From: David Tabb <sssi27@yahoo.com>
To: Steve.R.Pursley@WV.gov <Steve.R.Pursley@WV.gov>
Sent: Wednesday, September 19, 2018 11:14:32 AM EDT
Subject: Permit# R13-3414 TEMA North America, LLC

David Tabb

107 Tabb Lane
Harpers Ferry, WV 25425
SSSI27@Yahoo.com
(304) 676-5976

Steven R. Pursley
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, WV 25304
Steve.R.Pursley@WV.gov

September 19, 2018

RE: Permit# R13-3414 TEMA North America, LLC

Dear Mr. Pursley,

I, David Tabb, a life long resident of the county of Jefferson with family to the Virginias since 1636 is asking for a public hearing on Permit # R13-3414 TEMA North America, LLC, Burr Industrial Park, Jefferson County.

As a lifelong farmer and business owner, I am deeply concerned when any pollution is released in the air or water. My farming operation is mainly hay production with organic entitlements with no sprays or commercial fertilizers used. The organic farming industry is vast and growing in the Appalachian region. Any pollution is detrimental to the products and livelihood of this renewable industry that produces our food with a by-product of oxygen.

As part of the record, where there any school or daycare facilities listed of their proximity to Burr Industrial Park? If not, then I would like to make mention of a daycare center two blocks from the site. North Jefferson and T.A. Lowery Elementary Schools are less than one-half of a mile on either side.

It also appears that there as been no determination of sewer or solid waste disposal that maybe a contributing pollution factor.

Wherefor, with all the reasons above, I once again ask, for a public hearing before any air or other permits be approved by either the WVDEP and/or the EPA.

Sincerely,

David Tabb

RECEIVED
SEP 24 2018
WV DEP / DIV OF AIR QUALITY

Steven R. Pursley
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, WV 25304
Steve.R.Pursley@WV.gov
(304) 926-0499 ext. 1218
(304) 926-0478 fax

September 19, 2018

RE: Permit# R13-3414 TEMA North America, LLC

Dear Mr. Pursley,

I, Danielle Fleming, a resident of the county of Jefferson for 21 years am asking for a public hearing on Permit # R13-3414 TEMA North America, LLC, Burr Industrial Park, Jefferson County.

As a mother and concerned citizen, I am deeply concerned when any pollution is released in the air or water. I am careful to use no pesticides or herbicides on my property, try to plant bee friendly flowers, recycle, and just in general reduce the damage on the environment. Our county has organic farms, apiaries, orchards, and cattle that all will be negatively affected by this. Any pollution is detrimental to the products and livelihood of this renewable industry that produces our food with a by-product of oxygen. We also have a thriving tourism industry. I really doubt if many people will want to hike for the view of smokestacks and the toxic smells in our beautiful valley.

As part of the record, were there any school or daycare facilities listed as being in close proximity to Burr Industrial Park? If not, then I would like to make mention of a daycare center two blocks from the site. North Jefferson and T.A. Lowery Elementary Schools are less than one-half of a mile on either side.

It also appears that there as been no determination of sewer or solid waste disposal that maybe a contributing pollution factor.

Wherefor, with all the reasons above, I once again ask, for a public hearing before any air or other permits be approved by either the WVDEP and/or the EPA.

Sincerely,
Danielle Fleming

RECEIVED
SEP 24 2018
WV DEP / DIV OF AIR QUALITY

ROBERT E. BARRAT
308 S QUEEN STREET
MARTINSBURG, W.VA. 25401-3232
Rbarrat@Earthlink.net
Tel 304 263 4315 Fax 304 260 0493

Steven R. Pursley
West Virginia Department of Environmental Protection
Division of Air Quality
601 57 th Street, S.E.
Charleston, WV 25304
Steve.R.Pursley@WV.gov

Sept 19 2018

RE: Permit# R13-3414 TeMa North America, LLC

Dear Mr. Pursley,

Please set request for Permit # R13-3414 (TeMa North America, LLC) at the Burr Industrial Park, Jefferson County, for a public hearing. There is a daycare center two or three city blocks from the site. North Jefferson Elementary and T.A. Lowery Elementary Schools are very close to this site. Also consider this facility may not be compatible with Jefferson County tourism, farmland, scenery, U.S. Park Service, historic designation etc. Please set for a public hearing before any air or other permits are approved. Let me know when the hearing is to be held. Thanks.

Sincerely,

Robert Barrat

Pursley, Steven R

From: Mary Fortuna <maryfortuna@att.net>
Sent: Tuesday, September 18, 2018 11:40 AM
To: Pursley, Steven R
Subject: TEMA project

Hi Steve,
Thanks for your info yesterday. Would appreciate being added to the update list. Thanks!
-Mary

Pursley, Steven R

From: David Pratt <pratt.david@gmail.com>
Sent: Saturday, September 15, 2018 9:34 PM
To: Pursley, Steven R
Subject: TEMA factory

We own a home in Jefferson County, and have just learned about the proposed TEMA factory. I request a public meeting to address our environmental concerns, since as you are no doubt aware 11,000 people have been concerned about how Rockwool as approved without holding a public meeting.

--
David Pratt pratt.david@gmail.com
Cell: 304-279-2807

Pursley, Steven R

From: M Climis <mpubst5@gmail.com>
Sent: Saturday, September 15, 2018 9:00 PM
To: Pursley, Steven R
Subject: Te-Ma permits

As a resident of Berkeley County who is 7 miles as the crow flies from the TeMa site, I have concerns about air quality and other issues that will arise from their factory. No further action should be taken or allowed regarding TeMa without a public meeting. Please make sure that the citizens of Jefferson and Berkeley Counties, as well as others who will be impacted, have a chance to make their concerns known and have their questions answered.
Thank you.

Melanie Climis
Martinsburg, WV

Pursley, Steven R

From: danielle.patterson8284@gmail.com
Sent: Saturday, September 15, 2018 12:56 PM
To: Pursley, Steven R
Subject: TEMA's air permit

As a citizen of Jefferson County, I have significant concerns about the proposed TEMA factory. This permitting process is coming right after Rockwool's air permit was approved WITHOUT any public input. I hope that you now consider the health of the people, especially the children's, in Jefferson County. If both of these facilities are operational at the same time, what does the air quality look like? Also, has there been consideration in how this pollution effects children (not just adults) since it's proximity is so close to so many schools and day cares?

Thank you in advance for your consideration in this matter.
Respectfully,
Danielle Patterson
Kearneysville, WV

Pursley, Steven R

From: kathleen taylor <nightowldiva@gmail.com>
Sent: Saturday, September 15, 2018 12:09 PM
To: Pursley, Steven R
Subject: TEMA factory -Public Meeting Request

As a citizen of Jefferson County, I have significant concerns about the proposed TEMA Factory.

Following on the heels of the concerns about Rockwool, for which a public meeting was not held, I hereby request a public meeting to address citizen concerns regarding TEMA.

These types of factories are WRONG for Jefferson County.

Sincerely

Kathleen Taylor
304-283-6740

--
Kathleen Taylor
304-283-6740
nightowldiva@gmail.com

my.doterra.com/KathleenChickTaylor
https://www.facebook.com/kathleen.c.taylor.7

RECEIVED
SEP 17 2018
WV DEP / DIV OF AIR QUALITY

September 14, 2018

Steven R. Pursley
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th St. S.E.
Charleston, WV 25304.

Mr. Pursley,

I am writing as a resident of Shepherdstown, WV, to express my extreme concern over the TeMa plant "air-quality" permit. Prior to any decision making regarding this project, PLEASE hold a public meeting in Jefferson County about this project before issuing this permit. As you know, Jefferson County is a bedroom community of the Washington, DC metro area and is a attractive for agribusiness, high-tech jobs, green businesses, and tourism because of our many hiking and biking trails and scenic beauty. The many historical spots within the county only add to the charm and unique character of this very special place I call home.
The thought of ANY heavy industry being sited in the county would be quite destructive to the very nature of this region and contrary to the vision of the Jefferson County's future development guidelines. This project is proposed to be within sight of Historic Peter Burr house, at 176 E Burr Blvd, in Kearneysville, WV where school children regularly tour and community festivals are held.

The massive amount of particulate matter and hazardous air pollutants would cause irreparable harm to the environment, and is not a fit for the growth plan of our county.

Please come visit our Jefferson County yourself to experience what wonderful amenities we offer. I'm sure that you'll agree that ANY heavy industry located here would be completely inappropriate.

Regards,

Kyle Wiebold
P.O. BOX 239
Shepherdstown, WV 25443

Pursley, Steven R

From: Mary McClelland <mcclelland.mary@gmail.com>
Sent: Friday, September 14, 2018 11:59 PM
To: Pursley, Steven R
Subject: TEMA Factory In Jefferson County

Dear Mr. Pursley,

As a citizen of Jefferson County I am extremely concerned about the planned TEMA Factory. Pollution of that magnitude is detrimental to our farming and ecological industries, including tourism and horse breeding!

Since a public meeting was not held before approving Rockwool, which I find unconscionable, I hereby request a public meeting be held to address citizen's concerns regarding the safety of TEMA.

Thank you so much!

Mary McClelland

Pursley, Steven R

From: PAUL ROCHEFORT <ballata@comcast.net>
Sent: Friday, September 14, 2018 11:03 PM
To: Pursley, Steven R
Subject: TEMA Public meeting

Dear sir,

I am a resident of Jefferson County, and I am also long time volunteer and director of educational programs for the 1751 Peter Burr House, situated right next to the Burr Industrial Park. (This house is of significant historical worth, and is the oldest wood-frame house still extant in West Virginia. with all the attendant fragility of its venerable age) The first I heard of the TEMA operation, it seemed like a small, 'green' industry, but I have heard increasing information that may not be the case.

As you know, we are struggling with the Rockwool debacle, for which a public meeting was not held. To avoid the problems now ingrained with Rockwool, I respectfully request a public meeting to address citizen concerns regarding TEMA. Thank you.

Sincerely,

Dr. Deborah Rochefort

Pursley, Steven R

From: Terri Ramos <ramostm@frontiernet.net>
Sent: Friday, September 14, 2018 8:52 PM
To: Pursley, Steven R
Subject: TEMA

As a citizen of Jefferson County, I have significant concerns about the proposed TEMA Factory. Following on the heels of the concerns about Rockwool, for which a public meeting was not held, I hereby request a public meeting to address citizen concerns regarding TEMA.

Sincerely,

Virus-free. www.avast.com

Pursley, Steven R

From: Paula Tremba <p.tremba@icloud.com>
Sent: Friday, September 14, 2018 4:20 PM
To: Pursley, Steven R
Subject: TEMA factory in Jefferson Co.

Dear Mr. Pursley,
I am a citizen and long time resident of Jefferson County, and I have concerns about the proposed TEMA Factory. This proposed factory is following on the heels of the concerns about Rockwool, for which a public meeting was not held. I hereby request a public meeting to address citizen concerns regarding TEMA.

Sincerely,
Mrs. Paula Tremba

Please note that my email has been changed to:
p.tremba@icloud.com

Pursley, Steven R

From: Mary O'Connor <mfh.oconnor@gmail.com>
Sent: Friday, September 14, 2018 4:19 PM
To: Pursley, Steven R
Subject: TEMA

Good afternoon,

I am a citizen of Jefferson County, WV, and I am writing to express my concerns regarding the proposed TEMA factory.

As this county is currently embattled due to the Rockwool plant not facing adequate scrutiny and public input, I request a public meeting to address the concerns of county citizens regarding TEMA.

Thank you,

Mary O'Connor

Pursley, Steven R

From: Emily <emmilely@gmail.com>
Sent: Friday, September 14, 2018 4:18 PM
To: Pursley, Steven R
Subject: TeMa Air Permit Concerns

As a citizen of Jefferson County, I have significant concerns about the proposed TEMA Factory. Following on the heels of the concerns about Rockwool, for which a public meeting was not held, I hereby request a public meeting to address citizen concerns regarding TEMA.

Thank you,
Emily Dragon

Pursley, Steven R

From: Janie K <plane_jane_22@hotmail.com>
Sent: Friday, September 14, 2018 4:10 PM
To: Pursley, Steven R
Subject: Tema permit

Hello Mr. Pursley,

As a citizen of Jefferson County I have significant concerns about the proposed TEMA factory. After what has happened with Rockwool, for which a public hearing was NOT held, I am requesting a public hearing to address our concerns about TEMA.

Thanks,
Jane King

To: Mr. Steven R. Pursley

WVDEP, Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

From: Jason McNeill

289 Acorn Circle

Harpers Ferry, WV 25425

Re: **TeMa North American LLC – Air Quality Permit**

Jefferson County, WV

Via Facsimile: (304) 926-0478

Dear Mr. Pursley,

I am writing to express my opposition to TeMa North American LLC's Air Quality Permit for potential annual emissions in the Burr Business Park of Jefferson County, WV. In light of recent events surrounding Air Quality Permitting in the Jefferson County, WV region of West Virginia, I request a temporary stop on all new Corporate Air Quality Permits for potential annual emissions until the full impact of current permits can be analyzed and assessed. I furthermore request that Public Hearings be held to allow public comments for any new or future Air Quality Permits in Jefferson County, WV. The permit for Rockwool to omit hundreds/thousands of TONS of emissions, pollutants, and particulate matter is unprecedented in the Jefferson County Region, levels of which we have never seen, and the full impacts must be thoroughly analyzed prior to allowing addition degrading air quality emissions for additional manufacturing corporations and operations.

Thank you,

Jason McNeill

Sep. 13. 2018 4:02PM No. 2900 P. 1

RECEIVED
SEP 18 2018
WV DEP / DIV OF AIR QUALITY

September 13th, 2018

Steven R. Pursley

West Virginia Department of Environmental Protection

Division of Air Quality

601 57th St. S.E

Charleston, WV 25304

Steven Alenskis

129 Hummingbird Dr.

Shepherdstown, WV 25443

Dear Sir,

I have serious concerns about the WVDEP issuing an Air disposal permit for TaMa Corporation North America involving their proposed development in the Burr Industrial Park in Jefferson County West Virginia. I am concerned about the projected amount of airborne particulate being discharged into the local environment during our frequent inversion layer weather. We live in a valley and during certain times of the year we experience stagnant surface air due to a thermal inversion. This will trap the particulates close to the ground and prevent their dilution into the air column.

I would like to see a public meeting being held in our location, Jefferson County, to include all stakeholders so these questions, and others, can be addressed.

Thank you,

Steven Alenskis

NON-CONFIDENTIAL

Pursley, Steven R

From: Hammonds, Stephanie E
Sent: Thursday, September 13, 2018 11:27 AM
To: Pursley, Steven R; Durham, William F; McKeone, Beverly D; Glance, Jacob P
Subject: FW: Public Hearing TeMa North America LLC

Please see the email below.

From: Nick Bajada <nick.bajada@myvetmail.com>
Sent: Thursday, September 13, 2018 10:57 AM
To: Hammonds, Stephanie E <Stephanie.E.Hammonds@wv.gov>
Subject: Public Hearing TeMa North America LLC

Hello,
I would like to voice my opinion that a public hearing from you on the air quality permit for TeMa in Jefferson county be scheduled.

In light of the current outrage expressed by more than 10,000 families of Jefferson county and neighboring municipalities over Rockwool, considering a public hearing rather than just scheduling one is beyond comprehension of someone having a rational thought.

Please forward my letter to whom it needs to reach.

Very respectfully,
Nick Bajada
Harpers Ferry WV

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On July 24, 2018, TeMa North America, LLC applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to construct a plastics extrusion facility located at 2 Steeley Way, in the Burr Business Park, Kearneysville, Jefferson County, WV at latitude 39.3568 and longitude -77.8715. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-3414.

The following potential emissions will be authorized by this permit action: Particulate Matter less than 10 microns, 23.82 tons per year (TPY); Particulate Matter, 34.04 TPY (of which, 14.49 tons per year are from haul roads) ; Sulfur Dioxide, 0.01 TPY; Oxides of Nitrogen, 0.95 TPY; Carbon Monoxide, 0.80 TPY; Volatile Organic Compounds, 5.54 TPY; Total Hazardous Air Pollutants (HAPs), 4.36 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on Monday, October 15, 2018. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed construction will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Steven R. Pursley, PE
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

Telephone: 304/926-0499, ext. 1218
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReviewCurrent.aspx

Certificate of Publication

This is to certify the annexed advertisement

WV DEP/ Div Air Quality

appeared for 1 consecutive days/weeks

in the Shepherdstown Chronicle, a newspaper

published in the City of Shepherdstown, WV

in its issue beginning:

13 Sept 2018

and ending:

13 Sept 2018

The Shepherdstown

Chronicle

P.O. Box 2088

Shepherdstown, WV 25443-2088

Fee $ 64.01

THE STATE OF WEST VIRGINIA

COUNTY OF JEFFERSON

The foregoing instrument was acknowledged before me this 24 Sept 2018 by

JCampbell

My commission expires Feb 7 2021

Notary Public Jeri L Wines

OFFICIAL SEAL
NOTARY PUBLIC
STATE OF WEST VIRGINIA
Jeri L. Wines
203 Grove Springs Lane
Harpers Ferry, WV 25425
My Commission Expires Feb. 7, 2021

Certificate of Publication

JEFFERSON PUBLISHING COMPANY, INC., Publisher

SPIRIT OF JEFFERSON ADVOCATE

Charles Town, W. Va. September 12 20 18

I hereby certify that the annexed Air Quality Permit Notice; Notice of Intent to Approve

in the case of TeMa North America, LLC

has been published once a week for one successive weeks, in the Spirit of Jefferson Advocate, a newspaper published in Charles Town, Jefferson County, West Virginia, in the issues of

September 12, 20 18,

as required by law.

Robert Snyder

Editor/Manager, Spirit of Jefferson Advocate

State of West Virginia
County of Jefferson

Personally appeared before me, Robert Snyder, Editor/Manager of the Spirit of Jefferson Advocate, and made oath that the above certificate is true and correct.

Cara D. Young

Commission expires

OFFICIAL SEAL
NOTARY PUBLIC
STATE OF WEST VIRGINIA
CARA D. YOUNG
JEFFERSON PUBLISHING CO., INC.
P.O. BOX 966
CHARLES TOWN, WV 25414
My Commission Expires January 27, 2019

Notary Public

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

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Steven R. Pursley, PE
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1218
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:
www.dep.wv.gov/daq/Pages/NSRPermitsforReviewCurrent.aspx

9/12/1t

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name TeMa

Permitting Action Number 13-3414 Total Days 44 DAQ Days 13

Permitting Action:

- ❍ Permit Determination
- ❍ General Permit
- ❍ Administrative Update
- ❍ Temporary
- ❍ Relocation
- ● Construction
- ❍ Modification
- ❍ PSD (Rule 14)
- ❍ NNSR (Rule 19)

Documents Attached:

- ● Engineering Evaluation/Memo
- ● Draft Permit
- ● Notice
- ❍ Denial
- ❍ Final Permit/General Permit Registration
- ❍ Completed Database Sheet
- ❍ Withdrawal
- ❍ Letter
- ❍ Other *(specify)*

Date	From	To	Action Requested
9-5-18	Steven Pursley	Bev	Please Review
9/6	Bev	Steve	See comments - Address - Go to Notice
			NON-CONFIDENTIAL

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3414
Plant ID No.:	037-00110
Applicant:	TeMa North America, LLC
Facility Name:	Jefferson County Operations
Location:	Kearneysville, WV
NAICS Code:	326199
Application Type:	Construction
Received Date:	July 23, 2018
Engineer Assigned:	Steven R. Pursley, PE
Fee Amount:	$1,000.00
Date Received:	July 24, 2018
Complete Date:	August 23, 2018
Due Date:	November 21, 2018
Applicant Ad Date:	July 27, 2018
Newspaper:	*The Shepherdstown Chronicle*
UTM's:	Easting: 252.63 Northing: 4,360.28 Zone: 18
Description:	Construction of a plastics extrusion facility.

Entire Document
NON-CONFIDENTIAL

DESCRIPTION OF PROCESS

TeMa North America LLC is a proposing to install an extrusion process in the Burr Business Park in Jefferson County, West Virginia. The facility will utilize polypropylene (PP) and polyethylene (PE), including high density polyethylene (HDPE). The facility will have three extrusion lines identified as Line 2000, Line 3000, and Line 4000 for the extrusion of the following types of products:

* Monofilaments spacer, anticorrosion and anticondensation layer on roofing and wall siding products, acoustic products as sound mat under gypsum concrete.

* Uncoupling products such as dimple membrane to be used in ceramic floors.

* Dampproofing and drainage membrane for foundations and wall protection and drainage.

Additions to the PE, PP, and HDPE include flame retardants, fluidizers and colorants.

Material will be delivered in bulk sacks (super sacks) via trucks which will be unloaded by forklift and placed in storage. The bulk sacks will then be handled again by the forklift to move the super sacks to the unloading stations and then the contents conveyed either pneumatically or via screw conveyors to the blending system. After blending, the materials are transferred to the hoppers that feed to the extruder. The three extrusion lines are equipped with electrical resistances heating which can reach the melting temperature of the materials to be extruded (typically in the area of about 250° Centigrade/480° Fahrenheit). The extruders will then extrude the product onto water cooled roller. The material is towed/pulled to the membrane trimmer which contains knife trimming systems to cut the width of the product and square off the edges. The material can then be cut to the required length. Additionally, if the extruded material is to be laminated with a fabric, then the material is not cooled and the laminate is applied to the extruded product prior to the product cooling. This allows the lamination to occur without the use of any adhesives. The final product (laminated or not) is then placed in storage. Additional cutting occurs to meet the final product dimensions and then the products are labeled and packaged.

Pieces of the material that are cut off for proper sizing of the product are sent to the shredder and placed in a super sack or returned to the process. There are two external Shredders that will also feed back to the process via super sacks.

There are four silos that are proposed for possible future installation. These silos will be filled pneumatically from trucks and then the material will be pneumatically transferred to the extrusion lines. The silos will have a dust collector for the filling process. The transfer of the material to the inside of the facility will be controlled by the existing line dust collection system. If the silos are used to store the plastics, then bulk sack deliveries would not be used. Therefore, the only additional emission point created for the use of the silos is silo filling.

There are several building heaters. These are comfort heaters which will burn propane until natural gas is available at the site.

SITE INSPECTION

A site inspection of the proposed facility was performed on September 4, 2018 by the writer who was accompanied by TeMa's CEO, Mr. Tonj Ciotti. The facility is currently under construction. The shell building is nearly completed and the first extrusion line is currently being stored onsite. According to Mr. Ciotti, the second extrusion line should arrive mid October and the third approximately 3 weeks after that. The parking lot was being prepared for paving on the day of the inspection.

The facility will be located in the Burr Business Park near Ranson. The vast majority of surrounding buildings are commercial/industrial. The nearest non commercial/industrial building to the facility is a day care center located approximately ½ mile from TeMa's site. Additionally, an elementary school is located approximately 1 mile from the site.

To get to the facility from Martinsburg take I-81 South to exit 12. Turn left on State Route 9 and go approximately 9.9 miles before taking the Bardane exit. At the end of the off ramp turn right on Wiltshire Road and go approximately 0.3 miles and turn left on W. Burr Blvd. Then go approximately 0.3 miles and turn right on McGary Blvd. Next, go approximately 0.2 miles and turn right on Steeley Way. Proceed approximately 0.2 miles and the facility is on the left.

The following pictures were taken by the writer on the day of the site inspection. The first picture is a photograph of extrusion line 1 currently being stored on site. The second picture is of a portion of the building that will be used for warehousing the raw material and finished product and for offices. The third picture is of the outside of the building.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions from the facility can be broken down into the following categories:

* Material Handling emissions
* Extruder Emissions
* Natural gas combustion emissions (building heat only)
* Haul Road Emissions

Material Handling Emissions

Transfer point emissions were based on an emission factor of 0.80 pounds of PM per ton of material. This factor came from a permit application previously approved by WVDAQ (Flying W Plastics, R13-2243D). Although application R13-2243D did not give a source for this emission factor, it was accepted because it was more than twice as large as the emissions factor used in Flying W's first permit (R13-2243). Specifically, the original permit used an emission factor of 0.33 lb/ton based on the AP-42 Chapter 6 emission factor for the storage of PET. All transfer point PM is conservatively assumed to be $PM_{2.5}$. Blenders, and Silos were calculated in the same manner with the same emission factor.

Extruder Emissions

Emissions from the extruders were based on stack testing on a combined discharge stack from Line 4000 and Line 4800 at a TeMa facility in Italy. A copy of the stack test report was included as an appendix to the permit application. All extruder PM is conservatively assumed to be $PM_{2.5}$.

Natural Gas Combustion Emissions

All natural gas combustion at the facility will be due to building heaters. Emissions from the natural gas combustion were based on AP-42 Chapter 1.4. There will be 10 building heaters with a total combined BTU rating of 2.22 MM BTU/hr. Annual emissions were based on all heaters operating 8,760 hours per year. This is obviously an overly conservative estimate.

Haul Road Emissions

Haul Road Emissions were based on AP-42 Chapter 13.2.2. Annual emissions were based on 10,540 trucks per year (based on total throughput of the plant delivered and

removed and multiplied by 1.5 to account for any other miscellaneous trucking.) Hourly emissions were based on an estimated maximum of 10 trucks per hour. This again seems conservative since even if all trucking is confined to an 8 hour workday, the average would be less than 4 trucks per hour.

Criteria emissions from the facility should be as follows:

	PM		PM_{10}		$PM_{2.5}$		NO_x		CO		SO_2		VOCs	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Line 2000 Extruder	0.08	0.33	0.08	0.33	0.08	0.33	--	--	--	--	--	--	0.25	1.11
Line 2000 TPs	0.98	4.31	0.98	4.31	0.98	4.31	--	--	--	--	--	--	--	--
Line 2000 Blender	0.01	0.03	0.01	0.03	0.01	0.03	--	--	--	--	--	--	--	--
Line 2000 Shredder	0.01	0.03	0.01	0.03	0.01	0.03	--	--	--	--	--	--	--	--
Line 3000 Extruder	0.11	0.48	0.11	0.48	0.11	0.48	--	--	--	--	--	--	0.38	1.65
Line 3000 TPs	0.80	3.52	0.80	3.52	0.80	3.52	--	--	--	--	--	--	--	--
Line 3000 Blender	0.01	0.05	0.01	0.05	0.01	0.05	--	--	--	--	--	--	--	--
Line 3000 Shredder	0.01	0.05	0.01	0.05	0.01	0.05	--	--	--	--	--	--	--	--
Line 4000 Extruder	0.18	0.80	0.18	0.80	0.18	0.80	--	--	--	--	--	--	0.63	2.73
Line 4000 TPs	2.22	9.72	2.22	9.72	2.22	9.72	--	--	--	--	--	--	--	--
Line 4000 Blender	0.02	0.08	0.02	0.08	0.02	0.08	--	--	--	--	--	--	--	--
Line 4000 Shredder	0.02	0.08	0.02	0.08	0.02	0.08	--	--	--	--	--	--	--	--
Building Heaters	0.02	0.07	0.02	0.07	0.02	0.07	0.22	0.95	0.18	0.80	0.01	0.01	0.01	0.05
Haul Roads	27.49	14.49	8.10	4.27	0.80	0.42	--	--	--	--	--	--	--	--
Total	**31.96**	**34.04**	**12.57**	**23.82**	**5.27**	**19.97**	**0.22**	**0.95**	**0.18**	**0.80**	**0.01**	**0.01**	**1.27**	**5.54**

Hazardous Air Pollutant emissions from the facility should be as follows:

	Toluene		Hexane		Acetaldehyde		Formaldehyde		Total HAPs	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Line 2000 Extruder	0.01	0.05	0.17	0.75	0.01	0.06	0.01	0.01	0.20	0.88
Line 3000 Extruder	0.02	0.07	0.26	1.12	0.02	0.09	0.01	0.02	0.30	1.30
Line 4000 Extruder	0.03	0.12	0.42	1.85	0.03	0.15	0.01	0.03	0.49	2.16
Building Heaters	--	--	--	--	--	--	--	--	0.01	0.02
Total	**0.06**	**0.24**	**0.85**	**3.72**	**0.07**	**0.30**	**0.02**	**0.06**	**1.00**	**4.36**

REGULATORY APPLICABILITY

The proposed facility will be subject to the following state rules (no federal rules apply):

STATE REGULATIONS: The following regulations apply to this facility:

45CSR2 To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.

The building heaters meet the definition of "fuel burning units" under 45CSR2 and are, subject to the applicable requirements therein.

45CSR2 Opacity Standard - Section 3.1

Pursuant to 45CSR2, Section 3.1, the fuel burning units are subject to an opacity limit of 10%. Proper maintenance and operation of the natural gas fired units should keep the opacity of the units well below 10% during normal operations.

45CSR2 Weight Emission Standard - Section 4.1.b

The heat inputs of the proposed heaters are below 10 mmbtu/hr. Therefore, these units are exempt from the aforementioned sections of 45CSR2.

45CSR7 To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations.

The extruders are subject to the process weight rate based emission limitations of 45CSR7. The rule 7 emission limitation for Extruder 2E (based on a type 'a' source and a maximum process weight rate of 900 lb/hr) is 1.08 pounds per hour. Actual controlled emissions from Extruder 2E are expected to be 0.07 pounds per hour. Therefore, the requirements of 45CSR7 should be met.

The rule 7 emission limitation for Extruder 7E (based on a type 'a' source and a maximum process weight rate of 1400 lb/hr) is 1.608 pounds per hour. Actual controlled emissions from Extruder 7E are expected to be 0.11 pounds per hour. Therefore, the requirements of 45CSR7 should be met.

The rule 7 emission limitation for Extruder 8E (based on a type 'a' source and a maximum process weight rate of 2,200 lb/hr) is 2.64 pounds per hour. Actual controlled emissions from Extruder 8E are expected to be 0.18 pounds per hour. Therefore, the requirements of 45CSR7 should be met.

45CSR13 Permits for Construction, Modification, Relocation And Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation.

Potential (uncontrolled) emissions from the construction of the proposed TeMa North America, LLC facility would exceed 6 pounds per hour and 10 tons per year of PM. Therefore, a permit is required. As required under §45-13-8.3 ("Notice Level A"), TeMa placed a Class I legal advertisement in a "newspaper of general circulation in the area where the source is . . . located." The ad ran on July 27, 2018 in the *Shepardstown Chronicle* and the affidavit of publication for this legal advertisement was submitted on August 14, 2018.

45CSR22 Air Quality Management Fee Program

The facility is not subject to any NSPS, MACT or NESHAP. Additionally, the facility is defined as a minor source under 45CSR30. Therefore the facility is not subject to 45CSR30 and will pay its annual fees through the Rule 22 program.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

This section provides general toxicity information for those pollutants not classified as "criteria pollutants." Criteria pollutants are defined as Carbon Monoxide (CO), Lead (Pb), Oxides of Nitrogen (NO_x), Ozone, Particulate Matter (PM), and Sulfur Dioxide (SO_2). These pollutants have National Ambient Air Quality Standards (NAAQS) set for each that are designed to protect the public health and welfare. Other pollutants of concern, although designated as non-criteria and without national concentration standards, are regulated through various federal and state programs designed to limit their emissions and public exposure. These programs include federal source-specific HAP limits promulgated under 40 CFR 61 (NESHAPS) and 40 CFR 63 (MACT).

The majority of non-criteria regulated pollutants fall under the definition of Hazardous Air Pollutants (HAPs). All non-criteria regulated pollutants proposed to be emitted by this facility are defined as Hazardous Air Pollutants (HAPs).

HAPs

Section 112(b) of the Clean Air Act (CAA) identifies 188 compounds as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. However, the potential HAP emissions from the facility are well below the levels that define a major HAP source. Therefore, the facility is considered a minor (or area) HAP source, and no source-specific major source NESHAP or MACT

standards apply. The following table lists each HAP potentially emitted by the facility in excess of 20 pounds/year (0.01 tons/year) and the carcinogenic risk associated thereto (as based on analysis provided in the Integrated Risk Information System (IRIS)):

HAPs	Type	Known/Suspected Carcinogen	Classification
Acetaldehyde	VOC	Yes	B2 - Probable Human Carcinogen
Formaldehyde	VOC	Yes	B1 - Probable Human Carcinogen
Hexane	VOC	No	Inadequate Data
Toluene	VOC	No	Inadequate Data

AIR QUALITY IMPACT ANALYSIS

Because this application addresses the construction of a facility that is not defined as major under 45CSR14, no modeling was performed.

MONITORING OF OPERATIONS

The permit will require the following parameters to be monitored and recorded:

* Throughput of resin (polypropylene, polyethylene and high density polyethylene) to each extruder on a monthly basis.

RECOMMENDATION TO DIRECTOR

Information supplied in the application indicates that compliance with all applicable regulations will be achieved. Therefore it is the recommendation of the writer that permit R13-3414 be granted to TeMa North America, LLC for their Jefferson County Facility.

Steven R. Pursley, PE
Engineer

9-5-18
September 5, 2018

West Virginia Department of Environmental Protection
Austin Caperton
Cabinet Secretary

Construction Permit

R13-3414

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, Permission to Commence Construction, 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:
TeMa North America, LLC
Kearneysville, WV
037-00110

William F. Durham
Director, Division of Air Quality

Issued: DRAFT

Facility Location:	Kearneysville, WV, Jefferson County, West Virginia
Mailing Address:	395 Steeley Way Kearneysville, WV 25430
Facility Description:	Plastics Extrusion Facility
NAICS Codes:	326199
UTM Coordinates:	252.63 km Easting • 4,360.28 km Northing • Zone 17
Permit Type:	Construction
Description of Change:	Construction of a plastics extrusion facility

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.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	TP	Super Sack Unload Station 1	2018	400 kg/hr	N
2S	TP	Super Sack Unload Station 2	2018	400 kg/hr	N
3S	TP	Manual Bag Unload Station 1	2018	400 kg/hr	N
4S	TP	Screw Conveyor 1	2018	400 kg/hr	FE
5S	TP	Screw Conveyor 2	2018	400 kg/hr	FE
6S	TP	Screw Conveyor 3	2018	400 kg/hr	FE
7S	TP	Screw Conveyor 4	2018	400 kg/hr	FE
8S	1E	Blender	2018	400 kg/hr	DC
9S	TP	Screw Conveyor 5	2018	400 kg/hr	FE
10S	1E	Pneumatic Transfer System	2018	400 kg/hr	DC
11S	1E	Extruder Feed Hopper 1	2018	400 kg/hr	DC
12S	TP	Master Batch System	2018	400 kg/hr	N
13S	TP	Extruder Feed Hopper 2	2018	400 kg/hr	N
14S	2E	Extruder	2018	400 kg/hr	N
15S	1E	Shredder	2018	400 kg/hr	DC
16S	1E	Pneumatic System	2018	400 kg/hr	DC
17S	1E	Bulk Bag Loading Station	2018	400 kg/hr	DC
18S	1E	External Shredder 1	2018	1000 kg/hr	DC
19S	1E	External Shredder 2	2018	1000 kg/hr	DC
20S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
21S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
22S	1E	Bulk Bag Loading Station	2018	1000 kg/hr	DC
23S	3E	Silo 1	2018	1000 kg/hr	VF
24S	4E	Silo 2	2018	1000 kg/hr	VF
25S	5E	Silo 3	2018	1000 kg/hr	VF
26S	6E	Silo 4	2018	1000 kg/hr	VF
27S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
28S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC

1.0 Emission Units

29S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
30S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
31S	TP	Super Sack Unload Station 1	2018	600 kg/hr	N
32S	1E	Pneumatic Transfer System	2018	600 kg/hr	DC
33S	TP	Super Sack Unload Station 2	2018	600 kg/hr	N
34S	1E	Pneumatic Transfer System	2018	600 kg/hr	DC
35S	TP	Manual Bag Unload System	2018	600 kg/hr	N
36S	1E	Pneumatic Transfer System	2018	600 kg/hr	DC
37S	1E	Blender	2018	600 kg/hr	DC
38S	TP	Screw Conveyor No. 1	2018	600 kg/hr	N
39S	1E	Pneumatic Transfer System	2018	600 kg/hr	DC
40S	1E	Extuder Feed Hopper 1	2018	600 kg/hr	DC
41S	TP	Master Batch System	2018	600 kg/hr	N
42S	TP	Extruder Feed Hopper 2	2018	600 kg/hr	N
43S	7E	Extuder	2018	600 kg/hr	N
44S	1E	Shredder	2018	600 kg/hr	DC
45S	1E	Bulk Bag Loading	2018	600 kg/hr	DC
46S	1E	Pneumatic Transfer System	2018	600 kg/hr	DC
47S	TP	Super Sack Unload Station1	2018	1000 kg/hr	N
48S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
49S	1E	Extruder Feed Hopper 1A, 1B	2018	1000 kg/hr	DC
50S	TP	Super Sack Unload Station 2	2018	1000 kg/hr	N
51S	TP	Super Sack Unload Station 3	2018	1000 kg/hr	N
52S	TP	Manual Bag Unloading	2018	1000 kg/hr	N
53S	TP	Screw Conveyor 1	2018	1000 kg/hr	N
54S	TP	Screw Conveyor 2	2018	1000 kg/hr	N
55S	TP	Screw Conveyor 3	2018	1000 kg/hr	N
56S	TP	Screw Conveyor 4	2018	1000 kg/hr	N
57S	1E	Blender	2018	1000 kg/hr	DC

1.0 Emission Units

58S	TP	Screw Conveyor 5	2018	1000 kg/hr	N
59S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
60S	1E	Extruder Feed Hopper 2A, 2B	2018	1000 kg/hr	DC
61S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
62S	1E	Extruder Feed Hopper 3A, 3B	2018	1000 kg/hr	DC
63S	TP	Master Batch System	2018	1000 kg/hr	N
64S	TP	Extruder Feed Hopper 4A, 4B	2018	1000 kg/hr	N
65S	8E	Extruder	2018	1000 kg/hr	N
66S	1E	Shredder	2018	1000 kg/hr	DC
67S	1E	Bulk Bag Loading	2018	1000 kg/hr	DC
68S	1E	Pneumatic Transfer System	2018	1000 kg/hr	DC
69S	9E	10 Building Heaters	2018	2.22 mmbtu (total)	N

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NO_x**	Nitrogen Oxides
CBI	Confidential Business Information	**NSPS**	New Source Performance Standards
CEM	Continuous Emission Monitor	**PM**	Particulate Matter
CES	Certified Emission Statement	**$PM_{2.5}$**	Particulate Matter less than 2.5μm in diameter
C.F.R. *or* CFR	Code of Federal Regulations		
CO	Carbon Monoxide	**PM_{10}**	Particulate Matter less than 10μm in diameter
C.S.R. *or* CSR	Codes of State Rules		
DAQ	Division of Air Quality	**Ppb**	Pounds per Batch
DEP	Department of Environmental Protection	**pph**	Pounds per Hour
		ppm	Parts per Million
dscm	Dry Standard Cubic Meter	**Ppmv or ppmv**	Parts per million by volume
FOIA	Freedom of Information Act		
HAP	Hazardous Air Pollutant	**PSD**	Prevention of Significant Deterioration
HON	Hazardous Organic NESHAP		
HP	Horsepower	**psi**	Pounds per Square Inch
lbs/hr	Pounds per Hour	**SIC**	Standard Industrial Classification
LDAR	Leak Detection and Repair		
M	Thousand	**SIP**	State Implementation Plan
MACT	Maximum Achievable Control Technology	**SO_2**	Sulfur Dioxide
		TAP	Toxic Air Pollutant
MDHI	Maximum Design Heat Input	**TPY**	Tons per Year
MM	Million	**TRS**	Total Reduced Sulfur
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour	**TSP**	Total Suspended Particulate
		USEPA	United States Environmental Protection Agency
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour	**UTM**	Universal Transverse Mercator
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards	**VEE**	Visual Emissions Evaluation
		VOC	Volatile Organic Compounds
NESHAPS	National Emissions Standards for Hazardous Air Pollutants	**VOL**	Volatile Organic Liquids

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 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 Application R13-3414 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§§13-5.10 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.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action

to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,

d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1]**

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1. *State-Enforceable only.*]

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit

and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by email as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

DAQ Compliance and Enforcement[1]:
DEPAirQualityReports@wv.gov

US EPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

[1]For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status Reports, Initial Notifications, etc.

3.5.4. **Operating Fee.**

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.4.2. In accordance with 45CSR22 – Air Quality Management Fee Program, enclosed with this permit is an Application for Certificate to Operate (CTO). The CTO will cover the time period beginning with the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the CTO application.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1 The TeMa North America, LLC facility shall consist of only the pollutant-emitting equipment and processes identified under Section 1.0 of this permit and any other processes/units defined as De Minimis per 45CSR13. In accordance with the information filed in Permit Application R13-3414, the equipment shall be installed, maintained, and operated so as to minimize any fugitive escape of pollutants and the equipment/processes shall use the specified control devices.

4.1.2. The production rate of each extruder shall not exceed the following:

Line	Hourly Rate (kgs/hour)
2000	400
3000	600
4000	1,000

4.1.3. Total yearly production shall not exceed 17,520 metric tons (19, 316 short tons) of extruded product The resins permitted on these lines are Polypropylene (PP), and Polyethylene (PE) including High Density Polyethylene (HDPE). Compliance with this condition shall be based on a rolling twelve month total.

4.1.4. The use of any resin type not listed above, shall not be used without the prior approval of the Director.

4.1.5 Combined emissions from the extruders (2000, 3000 &4000) to the atmosphere from process vents shall not exceed the following hourly and annual emission rate limitations:

Pollutant Category	**Pollutant**	**Particulate (PM) Emissions Limits**	
		Hourly (lb/hr)	**Yearly (tons)**
Criteria Pollutants	PM	0.37	1.62
	VOC	1.26	5.49
Hazardous Air Pollutants	Hexane	0.85	3.72
	Acetaldehyde	0.07	0.30
	Toluene	0.06	0.24
	Formaldehyde	0.02	0.06

4.1.6 Emissions to the atmosphere from each baghouse/vent filter shall not exceed the following hourly and annual emission limitations:

Emission Point I.D.	Particulate (PM) Emissions Limits	
	Hourly (lb/hr)	Yearly (tpy)
1E	0.14	0.59
3E	0.02	0.08
4E	0.02	0.08
5E	0.02	0.08
6E	0.02	0.08

4.1.7 No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.
§45-7-3.1

4.1.8. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to subsection 5.1 is required to have a full enclosure and be equipped with a particulate matter control device.
§45-7-3.7

4.1.9. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.
§45-7-4.1

4.1.10. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
§45-7-5.1

4.1.11. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
§45-7-5.2

4.1.12. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate

matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.
§45-7-8.1

4.1.13. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.
§45-7-8.2

4.1.14. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in this rule may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
§45-7-9.1

4.1.15. At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Secretary thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or such other tests the Secretary may specify shall be conducted to determine compliance.
§45-13-6.1

4.1.16 The maximum heat rate of the combined building heaters shall not exceed 2.22 million btu/hr.

4.1.17. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.10.]

4.2. Monitoring Requirements

4.2.1. The permittee shall monitor and maintain a certified record of the total amount of resins processed by the extrusion lines on a monthly basis. These records shall be properly maintained on site for a period not less than five (5) years and be made available to the Director, or the Director's designated representative, upon request.

4.2.2. The permittee shall maintain all baghouses/vent filters in accordance with the manufacturer's specification to ensure they remain in good operating condition.

4.3. Testing Requirements

[Reserved]

4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. To determine compliance with 4.1.5, any and all malfunctions of the control devices shall be documented in writing, and maintained on-site. The following information must be documented for each malfunction:

a. The equipment involved in the malfunction and the associated cause.

b. Steps taken to correct the malfunction.
c. The steps taken to minimize the emissions during the malfunction.
d. The duration of the malfunction.
e. The increase in emissions during the malfunction.
f. Steps taken to prevent a similar malfunction in the future.

These records shall be maintained on-site for a period of five (5) years and certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] _____ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name and Title _____ _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

---

[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

(ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.

Pursley, Steven R

From:	Pursley, Steven R
Sent:	Thursday, August 23, 2018 10:57 AM
To:	'tonj.ciotti@temanorthamerica.com'
Cc:	Patrick E. Ward (PEWard@potesta.com)
Subject:	WV DAQ NSR Permit Application Complete for TeMa North America, LLC

RE: Application Status: Complete
TeMa North America, LLC Jefferson County Operations
Permit Application R13-3414
Plant ID No. 037-00110

Mr. Ciotti

Your application for a Construction Permit for your Jefferson County Operations was received by this Division on July 23, 2018 and assigned to the writer for review. It has been determined that the application is now complete with the submittal of additional information on August 14, 2018 and, therefore, the statutory review period commenced on August 23, 2018.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Steven R. Pursley, PE at (304) 926-0499 ext. 1218 or reply to this email.

POTESTA
Engineers and Environmental Consultants

TRANSMITTAL MEMO

7012 MacCorkle Avenue, SE, Charleston, WV 25304 ▪ Phone: (304) 342-1400 ▪ Fax: (304) 343-9031

To: Mr. Steve Pursley
Division of Air Quality
WV Department of Environmental Protection
601 57th Street, SE
Charleston, West Virginia 25304

Date: August 13, 2018

Project No.: 0103-17-0435-100

RECEIVED
AUG 14 2018
WV DEP / DIV OF AIR QUALITY

Sent Via: ☐ Mail ☐ Federal Express ☐ United Parcel Service
☒ Hand Carried ☐ Other: _____

Quantity	Description
1	Affidavit of Publication for Air Quality Permit Notice for a Construction Permit for an Extrusion Manufacturing Facility, Jefferson County, West Virginia – TeMa North America, LLC

Remarks:

By: Patrick E. Ward/rlh

c: Tonj Ciotti, TeMa North America, LLC

NON-CONFIDENTIAL

RECEIVED
AUG 14 2018
WV DEP / DIV OF AIR QUALITY

LEGAL ADVERTISEMENT

AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that TeMa North America, LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Construction permit for an extrusion manufacturing facility located in the Burr Business Park, 2 Steeley Way, Kearneysville, Jefferson County, West Virginia. The latitude and longitude coordinates are: 39.356546 and -77.870943.

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be: PM of 34.03 tons per year (tpy) including fugitive emissions of 14.49, PM10 of 23.81 tpy including fugitive emissions of 4.27 tpy, PM2.5 of 19.96 tpy including fugitive emissions of 0.42 tpy, VOC of 4.99 tpy, Toluene of 0.24 tpy, N-Hexane of 3.72 tpy, Acetaldehyde of 0.30 tpy, Acrolein of 0.006 tpy, Formaldehyde of 0.06 tpy, and Propionaldehyde of 0.024 tpy with a total HAPs of 4.36 (including natural gas combustion HAPs.

The facility will begin operation under the permit on or about September 15, 2018. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926- 0499, Extension 1250, during normal business hours.

Dated this the 27th day of July 2018.

By: TeMa North America, LLC
Tonj Ciotti
Chief Executive Officer
395 Steeley Way
Kearneysville, West Virginia 25430

7:27
(1t)

Certificate of Publication

This is to certify the annexed advertisement

Potesta+ Associates

appeared for 1 consecutive days/weeks in the Shepherdstown Chronicle, a newspaper published in the City of Shepherdstown, WV in its issue beginning:

27 Jul. 2018

and ending:

27 Jul. 2018

The Shepherdstown Chronicle
P.O. Box 2088
Shepherdstown, WV 25443-2088

Fee $ 44.97

THE STATE OF WEST VIRGINIA
COUNTY OF JEFFERSON

The foregoing instrument was acknowledged before me this 6 Aug 2018 by

Campbell.

My commission expires Feb 7 2021

Notary Public Jeri L Wines

OFFICIAL SEAL
NOTARY PUBLIC
STATE OF WEST VIRGINIA
Jeri L. Wines
203 Grove Springs Lane
Harpers Ferry, WV 25425
My Commission Expires Feb. 7, 2021

NON-CONFIDENTIAL

Pursley, Steven R

From: Scott, Kimberly A (DEP)
Sent: Tuesday, July 24, 2018 12:14 PM
To: Pursley, Steven R
Subject: POTESTA & ASSOCIATES (TEMA NORTH AMERICA LLC / JEFERSON COUNTY OP) PERMIT APP FEE

This is the receipt of payment for:

Potesta & Associates Inc - #14245 – dated 07/20/18 - $1000

Tema North America LLC
Jefferson County Op

R13-3414 ID 037-00110

CR 1900007191 deposited 07/24/2018

Kim Scott
WV Dept. of Environmental Protection
BTO / Fiscal Services
601 57th Street SE
Charleston, WV 25304
Email: Kimberly.A.Scott@wv.gov
Telephone: 304-926-0499 ext 1846

NON-CONFIDENTIAL

Adkins, Sandra K

From:	Adkins, Sandra K
Sent:	Tuesday, July 24, 2018 10:43 AM
To:	'tonj.ciotti@temanorthamerica.com'; 'peward@potesta.com'
Cc:	McKeone, Beverly D; Pursley, Steven R
Subject:	WV DAQ Permit Application Status for TeMa North America, LLC; Jefferson County Op

RE: Application Status
TEMA NORTH AMERICA, LLC
Jefferson County Op
Facility ID No. 037-00110
Application No. R13-3414

Tonj Ciotti,

Your application for a construction permit for Jefferson County Operations was received by this Division on July 23, 2018, and was assigned to Steve Pursley. The following item was not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.

This item is necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Steve Pursley stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Steve Pursley, at 304-926-0499, extension 1218.

NON-CONFIDENTIAL

POTESTA
Engineers and Environmental Consultants

TRANSMITTAL MEMO

7012 MacCorkle Avenue, SE, Charleston, WV 25304 ▪ Phone: (304) 342-1400 ▪ Fax: (304) 343-9031

To: Director
Division of Air Quality
WV Department of Environmental Protection
601 57th Street, SE
Charleston, West Virginia 25304

Date: July 20, 2018

Project No.: 0103-17-0435-100

Sent Via: ☐ Mail ☐ Federal Express ☐ United Parcel Service
☒ Hand Carried ☐ Other: _____

Quantity	Description
1	Regulation 13 Application for an Extrusion Manufacturing Facility, Jefferson County, West Virginia – TeMa North America, LLC
2	CDs containing electronic copy of above application
1	Check No. 14245 of Potesta & Associates, Inc. in the amount of $1,000 covering filing fee

Remarks:

RECEIVED
JUL 23 2019
WV DEP DIVISION OF AIR QUALITY

By: Patrick E. Ward/rlh

c: Tonj Ciotti, TeMa North America, LLC

NON-CONFIDENTIAL

Pursley, Steven R

From: Pursley, Steven R
Sent: Wednesday, October 31, 2018 2:50 PM
To: 'Jason McNeill'; 'Janie K'; 'Emily'; 'Mary O'Connor'; 'Paula Tremba'; 'Terri Ramos'; 'PAUL ROCHEFORT'; 'Mary McClelland'; 'kathleen taylor'; 'danielle.patterson8284@gmail.com'; 'M Climis'; 'David Pratt'; 'Mary Fortuna'; 'rbarrat@earthlink.net'; 'danielle.fleming9 @gmail.com'; 'David Tabb'; 'Regina Hendrix'; 'Megan Flinn'; 'Laura Levesque'; 'userfriendlytherapy@gmail.com'; 'nsgorgioso@gmail.com'; 'cpolo4@comcast.net'; 'weatherman714@yahoo.com'; 'katherine.meckstroth@gmail.com'; 'dandbus@aol.com'; 'acurfman@gmail.com'; 'kohlhorst@comcast.net'; 'kathy8150@gmail.com'; 'jyshock@frontiernet.net'; 'Bev'; 'karenfreer11@gmail.com'; 'mountaineer33 @gmail.com'; 'audrawalch@aol.com'; 'sw25442@aol.com'; 'Tim Ross'; 'jill.guempel@gmail.com'; 'edycummingsemc@aol.com'; 'kendrarsc@hotmail.com'; 'wkgille@gmail.com'; 'Michael and Susan Glenn'; 'ladavias@gmail.com'; 'mike@donnellyclan.com'; 'dryan.mph@gmail.com'; 'franklin.carolyn@gmail.com'; 'jjurand@frontiernet.net'; 'rpietro@frontiernet.net'; 'diwalch@aol.com'; 'jlusbytreber@gmail.com'; 'jfranklin@frontiernet.net'; 'Chrissy Wimer'; 'pep4223 @comcast.net'; 'jlafearward@comcast.net'; 'hlambert13@aol.com'; 'O. Colin Stine'; 'info@eversweetapiaries.com'; 'sarahadams@fltg.net'; 'lizgc1@yahoo.com'; 'whadams@frontiernet.net'; 'zwobota@aol.com'; 'ksclark@k12.wv.us'; 'rnickerson@hagerstowncc.edu'; 'vastemple@yahoo.com'; 'paul@holzberger.com'; 'Chris & Heather'; 'Addison Reese'; 'CITIZENS CONCERNED ABOUT ROCKWOOL'; 'Susie Wimer'; 'Lynn Delles'; 'Matt Robinson'; 'Elizabeth Meehan'; 'Cheryl Pullen'; 'nick.bajada@myvetmail.com'
Subject: TeMa North America, LLC Response to Comments and Final Permit
Attachments: Signed Permit.pdf; Response to Comments.pdf

In response to your interest in the air quality permit application for TeMa North America, LLC, please see the attached documents.

Thank You

NON-CONFIDENTIAL

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

October 31, 2018

Charles and Donna Westbrook
87 Kings Nest Drive
Kearneysville, WV 25430

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Mr. and Mrs. Westbrook

The West Virginia Division of Air Quality (WVDAQ) received your letters on October 14, 2018 regarding the draft air permit for TeMa North America, LLC. Enclosed is a copy of the final permit and WVDAQs Response to Comments for the proposed project.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

October 31, 2018

Steven Alenskis
129 Hummingbird
Shepherdstown, WV 25443

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Mr Alenskis

The West Virginia Division of Air Quality (WVDAQ) has received your letter dated September 13, 2018 regarding the draft air permit for TeMa North America, LLC. Enclosed is a copy of the final permit and WVDAQs Response to Comments for the proposed project.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

October 31, 2018

Kyle Wiebold
PO Box 239
Shepherdstown, WV 25443

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Mr Wiebold

The West Virginia Division of Air Quality (WVDAQ) received your letter dated September 14, 2018 regarding the draft air permit for TeMa North America, LLC. Enclosed is a copy of the final permit and WVDAQs Response to Comments for the proposed project.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 • FAX: (304) 926-0479

Austin Caperton, Cabinet Secretary
www.dep.wv.gov

October 31, 2018

Grant Prillaman
16651 Persimmon Land
Shepherdstown, WV 25443

RE: Response to Comments
TeMa North America, LLC
Jefferson County Operations
Permit No. R13-3414
Plant ID No. 037-00110

Dear Mr Prillaman

You attended the West Virginia Division of Air Quality's public meeting regarding TeMa North America, LLC on October 4, 2018 in Ranson WV. Enclosed is a copy of the final permit and WVDAQs Response to Comments for the proposed project.

Should you have any questions or comments, please contact me at (304) 926-0499 ext. 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name TeMa North America, LLC

Permitting Action Number 13-34114 Total Days 100* DAQ Days 69*

*As of 10-31-18

Permitting Action:

- ○ Permit Determination
- ○ General Permit
- ○ Administrative Update
- ○ Temporary
- ○ Relocation
- ◉ Construction
- ○ Modification
- ○ PSD (Rule 14)
- ○ NNSR (Rule 19)

Documents Attached:

- ◉ Engineering Evaluation/Memo
- ○ Draft Permit
- ○ Notice
- ○ Denial
- ◉ Final Permit/General Permit Registration
- ◉ Completed Database Sheet
- ○ Withdrawal
- ◉ Letter
- ◉ Other *(specify)* Response to Comments

Date	From	To	Action Requested
10-29-18	Steven Pursley	BCU	Please review. If ok, ready for Directors Signature

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).

WV SEAL image removed

Permit / Application Information Sheet

Division of Environmental Protection
West Virginia Office of Air Quality

Company:	TEMA NORTH AMERICA, LLC			**Facility:**	Jefferson County Op
Region:	10	**Plant ID:**	037-00110	**Application #:**	13-3414
Engineer:	Pursley, Steve			**Category:**	
Physical Address:	395 Steeley Way Kearneysville WV 25430			**SIC:** [3089] RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS - PLASTICS PRODUCTS, NEC **NAICS:** [326199] All Other Plastics Product Manufacturing	
County:	Jefferson				
Other Parties:	C E O - Ciotti, Tonj 304-707-2290 Consultant - WARD, PATRICK (304)-342-1400				

Information Needed for Database and AIRS
1. Need valid physical West Virginia address with zip
2. Air Program
3. Inspection result
4. Pollutant and class

Regulated Pollutants

Summary from this Permit 13-3414

Air Programs	Applicable Regulations
SIP	

Fee Program	Fee	Application Type
9M	$1,000.00	CONSTRUCTION

Notes from Database

Activity Dates

APPLICATION RECIEVED	07/23/2018
APPLICATION FEE PAID	07/24/2018
ASSIGNED DATE	07/24/2018
APPLICANT PUBLISHED LEGAL AD	07/27/2018
APPLICATION DEEMED COMPLETE	08/23/2018
EPA LETTER SENT	09/12/2018
OAQ PUBLISHED LEGAL AD	09/12/2018
PERMIT APPROVED	10/31/2018

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 037-00110
Company: TEMA NORTH AMERICA, LLC
Printed: 10/29/2018
Engineer: Pursley, Steve

Action	Date	Days	Open	OAQ Status	
APPLICATION RECIEVED	07/23/2018	0	0	0	Open on Co Time
APPLICATION FEE PAID	07/24/2018	----	----	----	Entry ignored
ASSIGNED DATE	07/24/2018	----	----	----	Entry ignored
APPLICANT PUBLISHED LEGAL AD	07/27/2018	----	----	----	Entry ignored
APPLICATION DEEMED COMPLETE	08/23/2018	31	31	0	Open on OAQ time
EPA LETTER SENT	09/12/2018	----	----	----	Entry ignored
OAQ PUBLISHED LEGAL AD	09/12/2018	----	----	----	Entry ignored
PERMIT APPROVED	10/31/2018	0	100	69	Closed on OAQ time
Final Values	**10/29/2018**	**0**	**100**	**69**	**Closed on OAQ time**