



west virginia department of environmental protection

Division of Air Quality
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Charleston, WV 25304-2345
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Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

September 18, 2017

Mr. Billy Cairns
Plant Manager
Koppers, Inc.
P.O. Box 665
Follansbee, WV 26037

Re: Permit Applicability Determination
Koppers, Inc.
Determination No. PD17-054
Plant ID No. 009-00001

Dear Mr. Cairns:

It has been determined that a permit will not be required under 45 CSR 13 for the proposed pilot trials of sodium cresylate manufacturing at the Follansbee Facility. This determination is based on information included in your permit determination request submitted on September 5, 2017, which indicates that the project meets the definition of “Research and Development Activities” (R&D) under 45 CSR 13-4.1. and increase in emissions will not exceed two (2) lbs/hr OR five (5) tons/year of total Hazardous Air Pollutants (HAPs); six (6) lbs/hour AND ten (10) TPY of any regulated pollutant; or, trigger a substantive requirement of any State or Federal air quality regulation.

Under 45 CSR 13A-4.2., you are required to maintain records on-site for at least two years which shall be made to the Director upon request shall include the following:

- Description of the research and development activity;
- The operating data to support methods, procedures and/or techniques used to control emissions;
- The estimated actual emissions of regulated pollutants and supporting calculations; and
- The date and duration of regulated pollutant emissions.

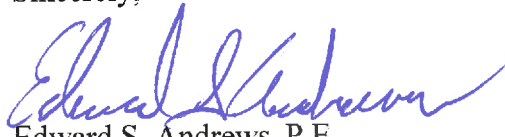
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Please bear in mind, however, that any additional changes to the proposed facility may require a permit under 45CSR13. Furthermore, pursuant to 45CSR13-5.14, records briefly describing the proposed change, the pollutants involved, the potential to emit for each pollutant increased or added shall be maintained by the owner or operator for at least two years and made available to the Director upon request.

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

Sincerely,



Edward S. Andrews, P.E.

Engineer

cc: Billy Cairns, cairnsbj@koppers.com
Mark Alan, Alanmc@koppers.com