



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, West Virginia 25304
304 926 0475

Harold D. Ward, Cabinet Secretary
dep.wv.gov

May 20, 2024

Corey Lynn
Environmental Technician II
The Thrasher Group
300 Association Drive
Charleston, WV 25311

RE: Town of Alderson
Water Treatment Plant Flood Mitigation
Greenbrier County, West Virginia

Dear Corey Lynn:

This letter responds to your correspondence of March 22, 2024, concerning the project referenced above. The West Virginia Division of Air Quality (WVDAQ) will only provide feedback on issues relating to air quality. If you determine that your project activity may have other environmental impacts, then you should consult with the appropriate environmental agency for that issue (e.g. the Division of Water and Waste Management should be consulted on potential water quality issues, for instance, if over one (1) acre will be disturbed, a construction stormwater general permit is required).

Based upon current regulatory requirements, the project referenced above as outlined in your letter does not appear to require any pre-construction permits, authorizations, or air quality analyses by WVDAQ except to the extent any of the following apply:

1. The project entails the renovation, remodeling, or demolition, either partially or totally, of a structure, building, or installation, irrespective of the presence or absence of asbestos-containing materials and is subject to 45CSR34 (the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) at 40CFR61, Subpart M) or 64CSR63 (Asbestos Abatement Licensing Rule). **If such is the case, a formal Notification of Abatement, Demolition, or Renovation must be completed and timely filed with the WVDEP Secretary's authorized representative and approval received before commencement of the activities addressed in the Notification. Please contact Jacob**

Rhodes, DAQ's Asbestos Coordinator at 304-414-1116 or Herb Hilleary, WV Department of Health and Human Resources, Office of Environmental Health Services, Asbestos Program Chief at Herb.J.Hilleary@wv.gov or 304 352-5011.

2. Backup or emergency electrical generators may be subject to federal and state requirements and may require an air permit in accordance with 45CSR13.
3. It is necessary to burn land clearing debris to complete the project; in which case, approval by the WVDEP Secretary or his or her authorized representative is required to conduct such burning (see 45CSR6). Please refer to DAQ's Compliance and Enforcement's site at: <https://dep.wv.gov/daq/CandE/OpenBurningBrochure/Pages/default.aspx> for information on the Open Burning of Land Clearing Debris:

If the project involves demolition, and/or excavation and transportation of soil/aggregates or the handling of materials that can cause problems such as nuisance dust emissions or entrainment or creation of objectionable odors, adequate air pollution control measures must be applied to prevent statutory air pollution problems as addressed by 45CSR4 and 45CSR17. Copies of all the WVDAQ rules cited in this letter may be reviewed on the agency's website at <http://www.dep.wv.gov/daq>. To review the rules, click on "Summary of Rules" after accessing the website.

You may obtain the latest published air quality data summaries and statistics for the WV Division of Air Quality's ambient air monitoring sites on our website (shown above). Simply click on the image for the Air Quality Annual Report. You may also find a document summarizing, in some detail, the attainment status of the 55 counties in West Virginia relative to National Ambient Air Quality Standards (NAAQS) on our website by clicking on the link for "Publications".

As of May 1, 2024, Greenbrier County is considered an attainment area for all criteria pollutants.

If you have any questions or need further assistance or information, please contact this office at (304) 926-0475.

Sincerely,

Sandra Adkins

Sandra Adkins
Administrative Secretary

c: Jacob Rhodes, DAQ
Compliance and Enforcement

Herb Hilleary, DHHR
Office of Environmental Health Services