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west virginia department of environmental protection

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Division of Air Quality  
601 57<sup>th</sup> Street, S.E.  
Charleston, WV 25304

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

November 12, 2015

David Robinson  
Plant Manager  
SimEx, Inc.  
181 Pleasants Industrial Center  
St. Marys, WV 26170

Re: Permit Applicability Determination  
Waverly Facility  
Pleasants County, WV  
Determination No. PD15-085  
Plant ID No. 073-00021

Dear Mr. Robinson:

It has been determined that a permit will not be required under 45CSR13 for the addition of a router/milling machine, a corner fold machine, and an orbital wrapper/packing machine at the above referenced facility. This determination is based on information included with your Permit Determination Form (PDF) received on October 5, 2015, which indicates that although the 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, there is an emissions increase. This Division recommends that the applicant complete the forms necessary for a Class II Administrative Update of Permit R13-2357F in order to incorporate the new additions in the permit.

The appropriate application forms which need to be completed can be obtained from the WVDEP website at <http://www.dep.wv.gov>. Submit the completed forms, \$300.00 permit application fee, and any other applicable fees to the above address. If you should have questions concerning which forms are needed, or have trouble downloading, please call the Permitting Secretary at (304) 926-0499 Ext 1227. Please address this matter as soon as possible to ensure expediency of the permit review process.

Should you have any questions, please contact the undersigned engineer at (304) 926-0499 Ext. 1211.

Sincerely,

William T. Rothwell II, P.E.  
Engineer