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M E M O R A N D U M

To: Beverly D. McKeone

From: Thornton E. Martin Jr., Permit Engineer

Date: April 12, 2016

Subject: Class I Administrative Update to Permit Registration (R13-2595A)

BACKGROUND

Originally, the DAQ received an application on June 29, 2015 to install a new air classifier and other material handling equipment at their Berkeley Springs Quarry, Morgan County, West Virginia. The application was submitted as a modification and Permit R13-2145C was identified by the Applicant as the appropriate permit to modify.

Once the Draft Permit (R13-2145D) was completed and the Notice of Intent to Approve was published, the Applicant realized that the modification should have been to existing Permit R13-2595. U.S. Silica representatives contacted myself in regards as to how to correct the situation since the modification to Permit R13-2145C would be very cumbersome for them to maintain and implement internal to their organization.

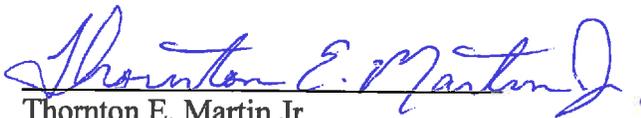
It was decided that a Class I Administrative Update for Permits R13-2595 and R13-2145D could be utilized to correct the error. In effect, R13-2595A now includes the new air classifier and associated equipment. The Class I Administrative Update (R13-2595A) has been converted to the NSR Permit, Revision 2-1-13, boilerplate language and Permit R13-2145D was reverted back to Permit R13-2145C language with the Class I Administrative Update reflected as R13-2145E. These actions were completed on January 07, 2016.

CURRENT REQUEST

On March 17, 2016, U.S. Silica Company submitted a request for a Class I Administrative

Update to their existing Permit R13-2595A to include four (4) updates to this permit, as described below:

1. Condition 4.1.2(f) in Permit R13-2595A refers to stack 1e, from the previous R13-2595. It includes an emission limit of 0.05 grains per dry standard cubic foot. However, the emission limit in Table 2 of 40 CFR Part 60, Subpart OOO Standards of Performance for Nonmetallic Mineral Processing Plants (NSPS OOO) is 0.05 grams per dry standard cubic meters. U.S. Silica is requesting that this condition be updated to reflect the correct units as discussed in detail in Attachment A to this letter.
2. Permit R13-2595A includes Conditions 4.1.1.(a) and (b), which limits the process throughput, as well as hourly and annual PM emissions for the new Ecu-tech equipment. However, these limits were not included for this equipment in R13-2145D when it was issued last year. U.S. Silica is requesting the throughput, hourly and annual PM emission limits from Conditions 4.1.1(a) and (b) be removed from Permit R13-2595A, to match the conditions that were originally included in Permit R13-2145D.
3. Permit R13-2595A does not include requirements for quarterly 30 minute Method 22 observations that was included as Condition 4.2.2 in Permit R13-2145D. The citation for this requirement is 40CFR 60.674(c) from NSPS OOO. U.S. Silica is requesting this condition be added to Permit R13-2595A as described in Attachment B to this letter.
4. Condition 4.2.2 of Permit R13-2595A includes a requirement to report the results of performance tests within 45 days of the test. U.S. Silica is requesting that this requirement be updated to match the reporting requirement in Condition 4.5.2 of Permit R13-2595A, which requires the results of performance tests be submitted within 60 days of the testing.


Thornton E. Martin Jr.
Permit Engineer