



west virginia department of environmental protection

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MEMORANDUM

To: Beverly D. McKeone

From: Steven R. Pursley, PE *SRP*

Date: January 15, 2015

Subject: PD15-001

On December 31, 2014 Process Transloading Bridgeport LLC (PTB) submitted a request for a permit determination for their Bridgeport facility. PTB had already submitted a previous request for a permit determination, however, the calculations submitted with the request were insufficient for DAQ to render a decision. The calculations submitted with this request were corrected and are sufficient. The request addressed the construction and operations of a bulk “frac sand” rail car unloading, dry storage and truck load-out facility at the site of the former AFG Glass plant in Taylor County. Frac sand is a type of sand which has a higher percentage of silica (in the form of quartz) than other sands. The higher percentage of silica gives the sand grains a more uniform size and greater resistance to crushing, making it ideal for hydraulic fracturing.

The facility receives bulk sand via rail car, stores the unloaded sand in an enclosed building and transfers the sand to truck load-out silos for loading/off-site shipment. The sand must remain in a dry state in order to meet the quality control requirements of the customers and therefore has to be stored in an enclosure to protect it from precipitation. The railcars unload via gates on the bottom of the railcars to a system of three belt conveyors. The conveyor belts take the sand to the storage pile located in the sand storage building. From there a front end loader operating inside the building drops the sand in a hopper which drops the sand onto another belt conveyor which transfers the sand to a bucket elevator. The bucket elevator will transfer the sand to one of two silos. Truck can then pull under the silos to be directly loaded. The silos will be vented to a baghouse, though the baghouse was **not** included in the emissions calculations.

Uncontrolled emissions (only particulate will be emitted) from the process were calculated to be 5.14 pounds per hour and 22.6 tons per year of PM. Additionally, no substantive state or federal rule will be triggered by the construction of this facility. Specifically, since this is not a manufacturing source (sand is simply unloaded, stored and shipped) it is not subject to 45CSR7.

Therefore, no permit is required.