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Via UPS

December 1, 2015

West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

2015  
DECEMBER 1

Attention: Jay Fedczak, Assistant Director for Permitting

RE: U.S. Silica Company – Berkeley Springs Plant, Plant ID R065-00001  
Permits R13-2145D and R13-2595  
Class I Administrative Amendment Request

Dear Mr. Fedczak:

The U.S. Silica Company (U.S. Silica) is submitting this letter to serve as a Class I Administrative Amendment Request to Permits R13-2145D and R13-2595 for equipment at U.S. Silica's Berkeley Springs Plant in Morgan County, WV. U.S. Silica submitted an R13 permit application on June 29, 2015 for the installation of a new air classifier and other material handling equipment as part of the milling operations at the plant. The proposed new material handling equipment includes a feed hopper, a bucket elevator, two (2) feed bins, two (2) feed conveyor belts, a screen and a pneumatic conveyor. The West Virginia Department of Environmental Protection (the Department) issued modified permit number R13-2145D authorizing the installation and containing the applicable requirements for the new equipment on September 2, 2015. U.S. Silica is requesting a Class I Administrative Amendment for two (2) updates related to this permit, as described below:

- 1) Permit R13-2145D included emission limitations for the new equipment from 40 Code of Federal regulations (CFR) Part 60, Subpart OOO *Standards of Performance for Nonmetallic Mineral Processing Plants* (NSPS OOO). However, these emission limitations appear to have been applied incorrectly to several of the proposed emission units. U.S. Silica is requesting updates to the permit conditions containing these limits, as discussed in detail in Attachment A to this letter.
- 2) The applicable conditions for the proposed equipment were included in modified Permit R13-2145D. However, U.S. Silica requests that the new conditions be removed from this Permit and added to another existing R13 permit for the Berkeley Springs plant (Permit R13-2595). Permit R13-2595 contains equipment more closely related

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to the proposed air classifier and supporting equipment. U.S. Silica is requesting the conditions be moved to R13-2595 for consistency and ease of recordkeeping purposes. A summary of the applicable conditions to be moved as part of this request are discussed in Attachment B to this letter.

Please contact Kayla Bucheimer at (304) 258-2500 x2231 or via email at [bucheimer@ussilica.com](mailto:bucheimer@ussilica.com) if you have any questions regarding these amendment requests.

*I, the undersigned Responsible Official, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry. I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.*

Sincerely,



Michael L. Winkler  
Chief Operating Officer  
U.S. Silica Company

## Attachment A: NSPS 000 Emission Limit Update

Permit R13-2145D contains emission limitations for the new equipment from 40 CFR 60.672(a) and Table 2 of NSPS 000. However, several of these limitations appear to have been applied incorrectly to the proposed equipment, based on the equipment's classifications under NSPS 000. U.S. Silica is requesting that these permit conditions be updated to accurately reflect the applicable NSPS 000 limits, as described below. As this is a request to correct references to established applicable federal requirements, U.S. Silica is submitting the request as a Class I Administrative Amendment.<sup>1</sup>

In the June 29 permit application submitted by U.S. Silica (specifically in the process description in Attachment G and the Emission Points Data Summary Sheet in Attachment J), the proposed new equipment was listed and described as shown in the following table. The table also includes the classification of each emission unit under NSPS 000 and the NSPS 000 emission limit, if applicable.

Emission Point	Emission Units	Emission Unit Description	NSPS 000 Affected Source Classification	NSPS 000 Emission Limit
Stack #15	ELEV25	Bucket elevator	Bucket Elevator	0.014 gr/dscf PM
	FEEDB25	Feed belt conveyor	Belt conveyor	
	FEEDB26	Feed belt conveyor	Belt conveyor	
	SCREN25	Screen	Screening operation	
	BIN25	Enclosed storage bin	Storage bin	
	PNEU25	Pneumatic conveyor	N/A	
Stack #45	AIRSE25	Air classifier	Air classifier <sup>2</sup>	0.014 gr/dscf PM
Stack #46	HOPPR25	Feed hopper	N/A	None
Stack #47	TANK25	Enclosed storage bin	Storage bin	7% opacity

<sup>2</sup>Air classifiers are included as affected sources in NSPS 000 under the definition of Grinding mills in 40 CFR 60.671.

The applicable emission limits for sources with capture systems are contained in Table 2 of NSPS 000. For affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008, there is a particulate matter (PM) emission limit of 0.014 grains per dry standard cubic foot (gr/dscf). However, this limit does not apply to individual enclosed storage bins, per the exception in 40 CFR 60.672(f). Instead, individual enclosed storage bins need to meet an opacity limitations of 7%. The opacity limit applies only to individual enclosed storage bins.

Based on the classification of each proposed equipment shown in the table above, the PM limit in Table 2 of NSPS 000 only applies to the sources captured and emitted to Stacks #15 and #45. The opacity limit only applies to Stack #47, as this stack controls emissions only from an individual enclosed storage bin. In addition, no PM nor opacity emission limits from NSPS 000 should apply to Stack #46, as this stack controls an emission unit that is not an affected source under NSPS 000. Therefore, U.S. Silica respectfully requests the Department update the following conditions in permit R13-2145D as indicated:

<sup>1</sup> On a call on October 27, 2015, Thornton Martin of the WV DEP advised that this request would meet the requirements of a Class I Administrative Amendment.

**Current Conditions:**

**Condition 4.1.1b**

*Visible emissions from Stacks (#15, #45, #46 & #47) shall not be greater than 7% opacity on a six minute average. [40 CFR§60.672(a) & Table 2 of Subpart 000]*

**Condition 4.1.1c**

*PM emissions from Stacks (#15, #45, #46 & #47) shall not exhibit PM greater than 0.014 grains per dry standard cubic foot of exhaust. [40 CFR§60.672(a) & Table 2 of Subpart 000]*

**Requested Updated Conditions:**

**Condition 4.1.1b**

*Visible emissions from Stack #47 shall not be greater than 7% opacity on a six minute average. [40 CFR§60.672(a) & Table 2 of Subpart 000]*

**Condition 4.1.1c**

*PM emissions from Stacks (#15, #45) shall not exhibit PM greater than 0.014 grains per dry standard cubic foot of exhaust. [40 CFR§60.672(a) & Table 2 of Subpart 000]*

**Attachment B: Move Conditions from Permit R13-2145D to Permit R13-2595**

U.S. Silica requests that the following conditions be removed from Permit R13-2145D and added to modified Permit R13-2595.<sup>2</sup>

**Condition 1.0 Emission Units**

*Please remove all references to Stacks #15, 45, 46 and 47 from the emissions units table and control devices table in Permit R13-2145D and add to the table in Permit R13-2595.*

**Condition 4.1.1<sup>3</sup>**

*The following conditions and requirements are specific to the Air Classifier (AIRSE25) and Cristobalite processing operations:*

- a. *The fugitive PM emissions due to the transferring of material from the feed bin (TANK25) to Mill #6 using the two feed conveyor belts (FEEDB25 & FEEDB26) shall be equipped with a capture and removal system (PM control device). Such PM control device shall utilize the fabric filter control technology or similar technology that has a design removal efficiency of 99.9% or better for PM. [45CSR§7-5.1]*
- b. *Visible emissions from Stack #47 shall not be greater than 7% opacity on a six minute average. [40 CFR§60.672(a) & Table 2 of Subpart 000]*
- c. *PM emissions from Stacks (#15, #45) shall not exhibit PM greater than 0.014 grains per dry standard cubic foot of exhaust. [40 CFR§60.672(a) & Table 2 of Subpart 000]*
- d. *Fugitive visible emissions from feed conveyor belts (FEEDB25 & FEEDB26) shall not be greater than 7% opacity on a six minute average. [40CFR§60.672(b) & Table 3 of Subpart 000]*

**Condition 4.2.1**

*Visible emissions shall be observed visually at least each calendar week during periods of facility operation for a sufficient time interval to determine if the unit (Stacks #15, #45, #46, and #47) has any visible emissions using 40CFR60 Appendix A, Method 22. If visible emissions are observed during these weekly observations, or at any other time, that appear to exceed the allowable visible emission requirement, visible emissions evaluations in accordance with 45CSR7 A shall be conducted as soon as practicable, but no later than 24 hours from the time of the observation. A visible emissions evaluation in accordance with 45CSR7A shall not be required under condition Section 4.2.1 if the visible emissions condition is corrected in a timely manner; the Process Source Operation is operating at normal operating conditions; and, the cause and corrective measures taken are recorded.*

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<sup>2</sup> In an August 19, 2015 email to Tina Archer of U.S. Silica, Thornton Martin of WV DEP indicated that the moving of these conditions from Permit R13-2145D to Permit R13-2595 could be done as a Class I Administrative Amendment to both Permits.

<sup>3</sup> Please note that these conditions as listed include the updated language in Conditions 4.1.1(b) and (c) as requested in Attachment A.

**Condition 4.2.2**

**Please remove the language indicated with bolded text from this condition in Permit R13-2145D, and add equivalent language for Stacks #15, 45 and 47 to Permit R13-2595.**

**Once a quarter (every three months), the permittee shall conduct 30 minute visible emission inspections using U.S. EPA Method 22 (Appendix A-7 of Part 60) of Stack #6, ~~#15, #45, and #47~~. The Method 22 observations shall be conducted while the dust collector (~~for Stacks #15, #45, and #47~~) is operating. Such monitoring is deemed satisfactory if no visible emissions are detected during the Method 22 observations. If any visible emissions are detected, then the permittee must initiate corrective actions within twenty-four hours of the observation to bring the dust collector to normal operation. The date and time of every Method 22 observation inspection shall be recorded in accordance with Condition 3.4.1. and in the logbook accordance with §60.674(c). These records shall include any corrective actions taken. The permittee may elect to establish a different satisfactory (success) level for the visible emissions observations inspections by conducting PM performance test according to §60.675(b) simultaneously with a Method 22 observation to determine what constitutes normal visible emission from ~~Stacks #15, #45, and #47 and Stack #6~~ when it is in compliance with the PM limit of Condition ~~4.1.1.c and 4.1.2.c~~, respectively. These revised visible emissions satisfactory (success) level must be incorporated into the Facility's Title V Operating Permit. [40CFR§60.674(c)]**

In addition to these changes, U.S. Silica requests that the testing requirements in Sections 4.3.1, 4.3.2 and 4.3.3 applicable to the new equipment be removed from Permit R13-2145D and added to Permit R13-2595. In addition, the reference to Section 4.1.1.d should be removed from Section 4.3.4 of Permit R13-2145D and added to Permit R13-2595.