



---

west virginia department of environmental protection

---

Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304-2345  
Phone: 304 926 0475 • Fax: 304 926 0479

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

**MEMORANDUM**

**To:** Beverly McKeone  
**From:** Thornton E. Martin Jr.  
**Date:** May 27, 2015  
**Subject:** U.S. Silica Company – Berkeley Springs Facility – Morgan County, WV  
**ID #:** 065-00001  
**APP #:** PD15-045

**BACKGROUND INFORMATION:**

On May 19, 2015, U.S. Silica Company submitted a request for a permit determination regarding the replacement of an existing wet screen (Metso 8 x 20 double-deck model IS402, listed as “SCREN1” in the facility’s Title V Operating Permit No. R30-06500001-2014) with a Metso 8 x 20 single-deck screen.

U.S. Silica Company states that both the existing and proposed replacement screen will be used for processing saturated silica sand from the facility’s wet rod mill process. The replacement screen will be fully enclosed, located inside a building, have the same designed throughput as the existing screen (200 tons of material per hour) and will not result in an emissions increase.

Although the replacement screen would be considered a new affected facility under 40 CFR 60, Subpart OOO, the new screen meets the exemption under 40 CFR 60.670 (d)(1), which states:

When an existing facility is replaced by a piece of equipment of equal or smaller size, as defined in §60.671, having the same function as the existing facility, and there is no increase in the amount of emissions, the new facility is exempt from the provisions of §§60.672, 60.674, and 60.675 except as provided for in paragraph (d)(3) of this section.

Furthermore, by submitting this Permit Determination, U.S. Silica Company has satisfied the information required in 40 CFR 60.676(a), which states:

For a screening operation:

- (i) The total surface area of the top screen of the existing screening operation being replaced and
- (ii) The total surface area of the top screen of the replacement screening operation.

Promoting a healthy environment.

The policy implemented by DAQ on March 10, 2011, "CLARIFICATION OF PERMITTING REQUIREMENTS FOR SOURCES SUBJECT TO NSPS SUBPART Y OR SUBPART OOO", does not apply in this particular case. Specifically the policy states that:

"Any existing coal preparation and processing plant or non-metallic minerals processing plant that has a Rule 13 permit or general permit registration that includes the provisions of Rule 5 and Subpart Y, or Rule 7 and Subpart OOO, and proposes the addition of a crusher, screen or conveyor belt or open storage pile (for coal facilities only) must apply for a modification permit or general permit modification registration. The new equipment is subject to Rule 5 and revised Subpart Y for coal facilities or Rule 7 and revised Subpart OOO for non-metallic mineral processing plants."