



200 N. La Salle, Suite 2100  
Chicago, IL 60601  
(312) 589-7549

Via UPS

March 16, 2016

Jay Fedczak, Assistant Director for Permitting  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

RE: U.S. Silica Company – Berkeley Springs Plant, Plant ID R065-00001  
Permit R13-2595A  
Class I Administrative Amendment Request

Dear Mr. Fedczak:

U.S. Silica Company (U.S. Silica) is submitting this letter to serve as a Class I Administrative Amendment Request to Permit R13-2595A 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 then requested a Class I Administrative Amendment for two (2) updates related to that permit, one of which requested that the new conditions be removed from Permit R13-2145D and added to another existing R13 permit for the Berkeley Springs plant (Permit R13-2595). Permit R13-2595 contains equipment more closely related to the proposed air classifier and supporting equipment and as such, U.S. Silica requested these conditions be moved to Permit R13-2595 for consistency and ease of recordkeeping purposes. The Department issued an updated Permit R13-2595A on January 12, 2016 based on these amendment requests.

U.S. Silica is now requesting an additional Class I Administrative Amendment for Permit R13-2595A for 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 Code of Federal regulation (CFR) Part 60, Subpart OOO *Standards of Performance for Nonmetallic Mineral Processing Plants* (NSPS OOO) is 0.05 grams per dry standard cubic meter. 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 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 emissions 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 the requirement 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 40 CFR 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.

Please contact Kayla Bucheimer at (304) 258-2500 x2231 or via email at 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 OOO PM Emission Limit Update**

Permit R13-2595A contains PM emission limitations for Stack (1e) from 40 CFR 60.672(a) and Table 2 of NSPS OOO. However, this limitation appears to have been applied with the incorrect units of measure, based on the equipment's classification under NSPS OOO. U.S. Silica is requesting that these permit conditions be updated to accurately reflect the applicable NSPS OOO limits, as described below.

*Table 2 of Subpart OOO indicates that the emissions limit is 0.05 grams per dry standard cubic meter (g/dscm). Therefore, U.S. Silica respectfully requests the Department update the following conditions in permit R13-2145D as indicated:*

### Current Condition 4.1.2(f)

*PM emissions from Stack (1e) shall not exhibit PM greater than 0.05 grains per dry standard cubic foot of exhaust. [40CFR§60.672(a) & Table 2 of Subpart OOO]*

### Requested updated Condition 4.1.2(f)

*PM emissions from Stack (1e) shall not exhibit PM greater than 0.05 grains per dry standard cubic meter of exhaust. [40CFR§60.672(a) & Table 2 of Subpart OOO]*

**Attachment B: Add Condition for Quarterly Method 22 Observations from NSPS 000**

U.S. Silica requests that the following condition be added to Permit R13-2595A:

*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 #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 in 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 a 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 when it is in compliance with the PM limit of Condition 4.1.1.f. This revised visible emissions satisfactory (success) level must be incorporated into the Facility's Title V Operating Permit. [40 CFR 60.674(c)]*