

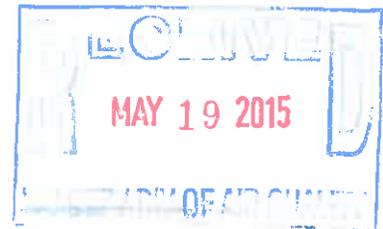


200 N. La Salle, Suite 2100
Chicago, IL 60601
(312) 291-4364
archer@ussilica.com

Via UPS

May 18, 2015

Beverly McKeone, Program Manager NSR Permitting
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304



RE: U.S. Silica Company – Berkeley Springs Plant
Permit Determination Request
Magnetic Separator Installation

Dear Ms. McKeone:

Enclosed you will find a Permit Determination Request application and supporting materials for the installation of a new magnetic drum separator at U.S. Silica Company's (U.S. Silica's) Berkeley Springs Plant in Morgan County, WV. As described below, U.S. Silica believes the new separator is not subject to the construction permitting requirements of 45 Code of State Regulations (CSR) Series 13.

U.S. Silica is proposing to install the magnetic drum separator to replace existing ferro filter process equipment. The equipment to be removed is included in the facility's Title V Operating Permit No. R30-06500001-2014 as the unit ID "FERRO1", and has a design throughput of 200 tons of material per hour (tph). The proposed new unit is an Eriez Magnetic Separator, which will also have a design throughput of 200 tph. The replacement of the existing equipment will result in a very small increase in particulate matter emissions only, as shown in Attachment E to this application. However, this increase of emissions is not over the permitting thresholds of 6 pounds per hour (pph) and 10 tons per year (tpy) or 144 pounds per day (ppd) from 45 CSR 13-2.17. In addition, the new unit will not result in any emissions of Hazardous Air Pollutants or Toxic Air Pollutants (HAP/TAP), nor will it trigger any substantive requirement of any State or Federal regulation. Please note, that to be conservative, emissions decreases from the removal of the ferro filters were not accounted for when calculating emissions.

The new magnetic separator will not be subject to any substantive requirement of any State or Federal regulation. The only potentially applicable regulation is 40 Code of Federal regulations (CFR) Part 60, Subpart OOO *Standards of Performance for Nonmetallic Mineral Processing Plants*

(NSPS 000). However, the proposed new magnetic separator is not an affected facility under NSPS 000, and therefore not subject to the regulation.

Please contact me at (312) 291-4364 or via email at archer@ussilica.com if you have any questions regarding the enclosed application.

Sincerely,



Tina Archer
Environmental Project Manager
U.S. Silica Company

Attachments

cc: Pete Graham, Berkeley Plant, via email
Mike Danielson, Trinity Consultants, via email



WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

**PERMIT DETERMINATION FORM
(PDF)**

FOR AGENCY USE ONLY: PLANT I.D. # _____
PDF # _____ PERMIT WRITER: _____

1. NAME OF APPLICANT (AS REGISTERED WITH THE WV SECRETARY OF STATE'S OFFICE):
U.S. Silica Company

2. NAME OF FACILITY (IF DIFFERENT FROM ABOVE):
Berkeley Springs Plant

3. NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (NAICS) CODE:
212322

4A. MAILING ADDRESS:
**P.O. Box 187
Berkeley Springs, WV 25411**

4B. PHYSICAL ADDRESS:
**2496 Hancock Road
Berkeley Springs, WV 25411**

5A. DIRECTIONS TO FACILITY (PLEASE PROVIDE MAP AS ATTACHMENT A):
Three miles north of Berkeley Springs, WV east of Route 522.

5B. NEAREST ROAD:
Route 522

5C. NEAREST CITY OR TOWN:
Berkeley Springs

5D. COUNTY:
Morgan

5E. UTM NORTHING (KM):
4393.47

5F. UTM EASTING (KM):
739.64

5G. UTM ZONE:
17

6A. INDIVIDUAL TO CONTACT IF MORE INFORMATION IS REQUIRED:
Tina Archer

6B. TITLE:
Environmental Project Manager

6C. TELEPHONE:
312-291-4364

6D. FAX:

6E. E-MAIL:
archer@ussilica.com

7A. DAQ PLANT I.D. NO. (FOR AN EXISTING FACILITY ONLY):
065 - 00001

7B. PLEASE LIST ALL CURRENT 45CSR13, 45CSR14, 45CSR19 AND/OR TITLE V (45CSR30) PERMIT NUMBERS ASSOCIATED WITH THIS PROCESS (FOR AN EXISTING FACILITY ONLY):
Facility Title V Permit No. R30-06500001-2014

7C. IS THIS PDF BEING SUBMITTED AS THE RESULT OF AN ENFORCEMENT ACTION? IF YES, PLEASE LIST: **No**

8A. TYPE OF EMISSION SOURCE (CHECK ONE):
 NEW SOURCE ADMINISTRATIVE UPDATE
 MODIFICATION OTHER (PLEASE EXPLAIN IN 11B)

8B. IF ADMINISTRATIVE UPDATE, DOES DAQ HAVE THE APPLICANT'S CONSENT TO UPDATE THE EXISTING PERMIT WITH THE INFORMATION CONTAINED HEREIN?
 YES NO

9. IS DEMOLITION OR PHYSICAL RENOVATION AT AN EXISTING FACILITY INVOLVED? YES NO

10A. DATE OF ANTICIPATED INSTALLATION OR CHANGE:
06/15/2015.

10B. DATE OF ANTICIPATED START-UP:
06/30/2015.

11A. PLEASE PROVIDE A DETAILED PROCESS FLOW DIAGRAM SHOWING EACH PROPOSED OR MODIFIED PROCESS EMISSION POINT AS ATTACHMENT B.

11B. PLEASE PROVIDE A DETAILED PROCESS DESCRIPTION AS ATTACHMENT C.

12. PLEASE PROVIDE MATERIAL SAFETY DATA SHEETS (MSDS) FOR ALL MATERIALS PROCESSED, USED OR PRODUCED AS ATTACHMENT D. FOR CHEMICAL PROCESSES, PLEASE PROVIDE A MSDS FOR EACH COMPOUND EMITTED TO AIR.

13A. REGULATED AIR POLLUTANT EMISSIONS:

⇒ FOR A NEW FACILITY, PLEASE PROVIDE PLANT WIDE EMISSIONS BASED ON THE POTENTIAL TO EMIT (PTE) FOR THE FOLLOWING AIR POLLUTANTS INCLUDING ALL PROCESSES.

⇒ FOR AN EXISTING FACILITY, PLEASE PROVIDE THE PROPOSED CHANGE IN EMISSIONS BASED ON THE PTE OF ALL PROCESS CHANGES FOR THE FOLLOWING AIR POLLUTANTS.

PTE FOR A GIVEN POLLUTANT IS TYPICALLY BEFORE AIR POLLUTION CONTROL DEVICES AND IS COLLECTED BASED ON THE MAXIMUM DESIGN CAPACITY OF PROCESS EQUIPMENT.

POLLUTANT	HOURLY PTE (LB/HR)	YEARLY PTE (TON/YR) (HOURLY PTE MULTIPLIED BY 8760 HR/YR) DIVIDED BY 2000 LB/TON
PM	0.006	0.026
PM ₁₀	0.002	0.0096
VOCs	0	0
CO	0	0
NO _x	0	0
SO ₂	0	0
Pb	0	0
HAPs (AGGREGATE AMOUNT)	0	0
TAPs (INDIVIDUALLY)*	0	0
OTHER (INDIVIDUALLY)*		

* ATTACH ADDITIONAL PAGES AS NEEDED

13B. PLEASE PROVIDE ALL SUPPORTING CALCULATIONS AS ATTACHMENT E.

CALCULATE AN HOURLY AND YEARLY PTE OF EACH PROCESS EMISSION POINT (SHOWN IN YOUR DETAILED PROCESS FLOW DIAGRAM) FOR ALL AIR POLLUTANTS LISTED ABOVE INCLUDING INDIVIDUAL HAP'S (LISTED IN SECTION 112(b) OF THE 1990 CAAA), TAP'S (LISTED IN 45CSR27), AND OTHER AIR POLLUTANTS (E.G. POLLUTANTS LISTED IN TABLE 45-13A OF 45CSR13, MINERAL ACIDS PER 45CSR7, ETC.).

14. CERTIFICATION OF DATA

I, **Michael L. Winkler** (TYPE NAME) ATTEST THAT ALL THE REPRESENTATIONS CONTAINED IN THIS APPLICATION, OR APPENDED HERETO, ARE TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE BASED ON INFORMATION AND BELIEF AFTER REASONABLE INQUIRY, AND THAT I AM A RESPONSIBLE OFFICIAL** (PRESIDENT, VICE PRESIDENT, SECRETARY OR TREASURER, GENERAL PARTNER OR SOLE PROPRIETOR) OF THE APPLICANT.

SIGNATURE OF RESPONSIBLE OFFICIAL:



TITLE: **Vice President/Chief Operating Officer**

DATE: **5, 18, 15**

**THE DEFINITION OF THE PHRASE 'RESPONSIBLE OFFICIAL' CAN BE FOUND AT 45CSR13, SECTION 2.23.

NOTE: PLEASE CHECK ENCLOSED ATTACHMENTS

ATTACHMENT A ATTACHMENT B ATTACHMENT C ATTACHMENT D ATTACHMENT E

RECORDS ON ALL CHANGES ARE REQUIRED TO BE KEPT AND MAINTAINED ON-SITE FOR TWO (2) YEARS.

THE PERMIT DETERMINATION FORM WITH THE INSTRUCTIONS CAN BE FOUND ON DAQ'S PERMITTING SECTION WEB SITE

www.dep.wv.gov/daq

ATTACHMENT A: MAP

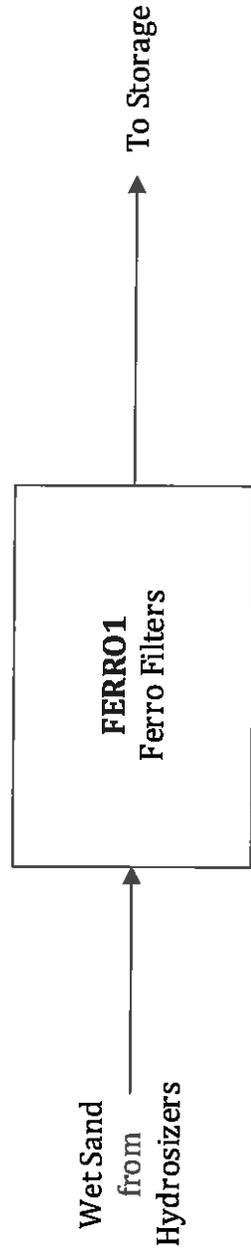
Figure A-1. Berkeley Springs Plant Area Site Map



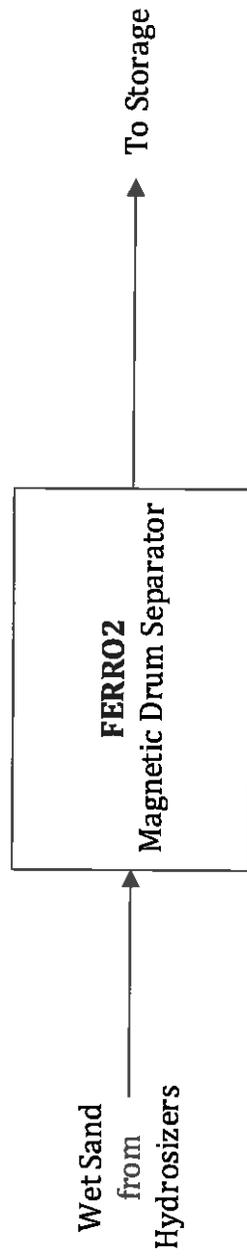
ATTACHMENT B: PROCESS FLOW DIAGRAM

U.S. Silica Company
Berkeley Springs Plant Magnetic Drum Separator Installation
Detailed Process Flow Diagram

Existing Equipment



Replacement Equipment



ATTACHMENT C: PROCESS DESCRIPTION

PROCESS DESCRIPTION

U.S. Silica is proposing to replace existing ferro filter processing equipment, listed as "FERRO1" in the facility's Title V Permit, with an Eriez magnetic drum separator. The new separator will be listed as "FERRO2". Both the existing and proposed equipment process saturated silica sand from the facility's hydrosizers, and separate ferrous material from the bulk sand. Because both the existing filters and proposed magnetic separator process saturated sand, the fugitive particulate matter emissions from the units are negligible. The proposed magnetic drum separator operates by passing the saturated sand over a spinning magnetic drum, which attracts ferrous materials and separates them from the bulk sand. The maximum design material throughput of the proposed magnetic separator will be 200 tons per hour (tph), the same as the existing ferro filters.

ATTACHMENT D: MATERIAL SAFETY DATA SHEET (MSDS)

U.S. SILICA COMPANY

Material Safety Data Sheet

Page 1 of 12

Product Name: Silica Sand and Ground Silica

Product Description: Crystalline Silica

1. Identification of the substance/preparation and of the company/undertaking

1.1. Identification of the substance or preparation

Product Name/Trade Names:

Sand and Ground Silica Sand (sold under various names: ASTM TESTING SANDS • GLASS SAND • FILPRO® • FLINT SILICA • DM-SERIES • F-SERIES • FOUNDRY SANDS • FJ-SERIES • H-SERIES • L-SERIES • N-SERIES • NJ SERIES • OK-SERIES • P-SERIES • T-SERIES • hydraulic fracturing sand, all sizes • frac sand, all sizes • MIN-U-SIL® Fine Ground Silica • MYSTIC WHITE® • #1 DRY • #1 SPECIAL • PENN SAND® • PRO WHITE® • SILURIAN® • Q-ROK® • SIL-CO-SIL® Ground Silica • MICROSIL® • SUPERSIL® • MASON SAND • GS SERIES • PER-SPEC • proppant, all sizes • SHALE FRAC® - SERIES • KOSSE WHITE® • OTTAWA WHITE® • OPTIJUMP®.

Chemical Name or Synonym:

Crystalline Silica (Quartz), Sand, Silica Sand, Flint, Ground Silica, Silica Flour.
White or tan sand or ground silica with no odor.

1.2. Use of the Substance/Preparation

Main Applications (non-exhaustive list): brick, ceramics, foundry castings, glass, grout, hydraulic fracturing sand, frac sand, proppant, mortar, paint and coatings, silicate chemistry, silicone rubber, thermoset plastics.

DO NOT USE U.S. SILICA COMPANY SAND OR GROUND SILICA FOR SAND BLASTING.

1.3. Company / Producer

U.S. Silica Company
8490 Progress Drive, Suite 300
Frederick, MD 21701
U.S.A.

Phone: 800-243-7500
Emergency Phone: 301-682-0600
Fax: 301-682-0690

2. Hazards Identification

2.1. EMERGENCY OVERVIEW:

The material is white or tan sand, or ground sand; the ground sand looks like white powder. It has no odor and is not flammable, combustible or explosive. It does not cause burns or severe skin or eye irritation. A single exposure will not result in serious adverse health effects. Crystalline silica is not known to be an environmental hazard.

Personal protective equipment – respirator – is not required unless the concentration of respirable silica dust exceeds applicable occupational exposure levels.

Crystalline silica (quartz) is incompatible with hydrofluoric acid, fluorine, chlorine trifluoride or oxygen difluoride.

2.2. OSHA REGULATORY STATUS

This material is considered hazardous under the OSHA Hazard Communications Standard (29 CFR 1910.1200).

2.3. POTENTIAL HEALTH EFFECTS: The potential health effects are CHRONIC; the route of exposure is INHALATION; the hazards described are associated with respirable crystalline silica dust – respirable dust particles are less than 10 microns in aerodynamic diameter.

2.3.1. Inhalation:

a. Silicosis: The prolonged repeated inhalation of respirable crystalline silica can cause silicosis, a fibrosis (scarring) of the lungs.

Silicosis may be progressive; it may lead to disability and death.

b. Lung Cancer: Crystalline silica is classified as carcinogenic to humans.

c. Tuberculosis: Silicosis increases the risk of tuberculosis.

d. Autoimmune and Chronic Kidney Diseases: Some studies show excess numbers of cases of scleroderma, connective tissue disorders, lupus, rheumatoid arthritis, chronic kidney diseases and end-stage kidney disease in workers exposed to respirable crystalline silica.

e. Non-Malignant Respiratory Diseases (other than silicosis): Some studies show an increased incidence in chronic bronchitis and emphysema in workers exposed to respirable crystalline silica.

2.3.2. Eye Contact:

Crystalline silica (sand or ground silica) may cause abrasion of the cornea.

2.3.3. Skin Contact:

Not applicable.

2.3.4. Ingestion:

Not applicable.

2.3.5. Chronic Effects:

The adverse health effects -- silicosis, lung cancer, autoimmune and chronic kidney diseases, tuberculosis, and non-malignant respiratory diseases -- are chronic effects.

2.3.6. Signs and Symptoms of Exposure:

Generally, there are no signs or symptoms of exposure to crystalline silica; silicosis may result in shortness of breath, especially upon exertion. See Section 11 for additional information.

2.3.7. Medical Conditions Generally Aggravated by Exposure:

The condition of individuals with lung disease (e.g., bronchitis, emphysema, chronic obstructive pulmonary disease) can be aggravated by exposure.

2.3.8. Potential Environmental Effects

None known.

See Section 11, Toxicological Information, for additional detail on potential adverse health effects.

3. Composition / Information on Ingredients

Component / CAS #	%	Hazardous under OSHA Haz Comm Standard?
Crystalline Silica (quartz) 14808-60-7	99.0 – 99.9	Yes
Aluminum Oxide 1344-28-1	<1.0	No
Iron Oxide 1309-37-1	<0.1	No
Titanium Oxide 13463-67-7	<0.1	No

4. First Aid Measures

- 4.1. Eye Exposure:**
Wash immediately with plenty of water. If irritation persists, seek medical attention.
- 4.2. Skin Exposure:**
Not applicable
- 4.3. Inhalation:**
No specific first-aid is necessary since the adverse health effects associated with inhalation of respirable crystalline silica result from chronic exposures. If there is a gross inhalation of crystalline silica, remove the person immediately to fresh air, give artificial respiration as needed, seek medical attention as needed.
- 4.4. Ingestion:**
Not applicable

5. Fire Fighting Measures

- 5.1. Fire Hazard Data:**
- Auto ignition:** Not Applicable
- Flash Point:** Not Applicable
- Flammability Limits (vol/vol%):** **Lower:** Not Applicable **Upper:** Not Applicable
- Extinguishing Media:**
Product is not flammable, combustible or explosive. Use extinguishing media appropriate for surrounding fire.
- Special Fire Fighting Procedures:**
Not applicable.
- Unusual Fire and Explosion Hazards:**
None

6. Accidental Release Measures

6.1. Personal precautions:

Avoid generating dust. If the concentration of respirable silica dust exceeds the OSHA PEL or other applicable limit (if lower than the PEL), wear respirator specified in Section 8 of this Safety Data Sheet.

Environmental precautions: No specific precautions. Discard any product, residue, disposable container or liner in compliance with regulatory requirements.

Methods for cleaning up: Avoid dry sweeping. Do not use compressed air to clean spilled sand or ground silica. Use water spraying/flushing or ventilated or HEPA filtered vacuum cleaning system. Dispose of in closed containers.

7. Handling and Storage

7.1. Handling:

Avoid generating dust. Do not breathe dust. Do not rely on your sight to determine if dust is in the air. Respirable crystalline silica dust may be in the air without a visible dust cloud.

Use adequate exhaust ventilation and dust collection. Maintain and test ventilation and dust collection equipment. Use all available work practices to control dust exposures, such as water sprays. Practice good housekeeping. Do not permit dust to collect on walls, floors, sills, ledges, machinery, or equipment. Keep airborne dust concentrations below permissible exposure limits.

Where necessary to reduce exposures below the PEL or other applicable limit (if lower than the PEL), wear a respirator approved for silica containing dust when using, handling, storing or disposing of this product or bag. See Section 8, for further information on respirators. Do not alter the respirator. Do not wear a tight-fitting respirator with facial hair such as a beard or mustache that prevents a good face to face piece seal between the respirator and face. Maintain, clean, and fit test respirators in accordance with applicable standards. Wash or vacuum clothing that has become dusty.

Participate in training, exposure monitoring, and health surveillance programs to monitor any potential adverse health effects that may be caused by breathing respirable crystalline silica.

The OSHA Hazard Communication Standard, 29 CFR Sections 1910.1200, 1915.1200, 1917.28, 1918.90, 1926.59 and 1928.21, and state and local worker or community "right-to-know" laws and regulations should be strictly followed.

DO NOT USE U.S. SILICA COMPANY SAND OR GROUND SILICA FOR SAND BLASTING.

7.2. Storage

Use dust collection to trap dust produced during loading and unloading. Keep containers closed and store bags to avoid accidental tearing, breaking, or bursting.

7.3. Specific uses

Apply safe handling recommendations in Section 7.1.

8. Exposure Controls / Personal Protection

8.1. Local Exhaust Ventilation:

Use sufficient local exhaust ventilation to reduce the level of respirable crystalline silica to below the OSHA PEL or other applicable limit (if lower than PEL). See ACGIH "Industrial Ventilation, A Manual of Recommended Practice" (latest edition).

8.2. Respiratory Protection:

If it is not possible to reduce airborne exposure levels to below the OSHA PEL or other applicable limit with ventilation, use the table below to assist you in selecting respirators that will reduce personal exposures to below the OSHA PEL. This table is part of the NIOSH Respirator Selection Logic, 2004, Chapter III, Table 1, "Particulate Respirators". The full document can be found at www.cdc.gov/niosh/npptl/topics/respirators; the user of this MSDS is directed to that site for information concerning respirator selection and use. The assigned protection factor (APF) is the minimum anticipated level of protection provided by each type of respirator worn in accordance with an adequate respiratory protection program. For example, an APF of 10 means that the respirator should reduce the airborne concentration of a particulate by a factor of 10, so that if the workplace concentration of a particulate was 150 ug/m³, then a respirator with an APF of 10 should reduce the concentration of particulate to 15 ug/m³.

Assigned protection factor ¹	Type of Respirator (Use only NIOSH-certified respirators)
10	Any air-purifying elastomeric half-mask respirator equipped with appropriate type of particulate filter. ² Appropriate filtering facepiece respirator. ^{2,3} Any air-purifying full facepiece respirator equipped with appropriate type of particulate filter. ² Any negative pressure (demand) supplied-air respirator equipped with a half-mask.
25	Any powered air-purifying respirator equipped with a hood or helmet and a high efficiency (HEPA) filter. Any continuous flow supplied-air respirator equipped with a hood or helmet.
50	Any air-purifying full facepiece respirator equipped with N-100, R-100, or P-100 filter(s). Any powered air-purifying respirator equipped with a tight-fitting facepiece (half or full facepiece) and a high-efficiency filter. Any negative pressure (demand) supplied-air respirator equipped with a full facepiece. Any continuous flow supplied-air respirator equipped with a tight-fitting facepiece (half or full facepiece). Any negative pressure (demand) self-contained respirator equipped with a full facepiece.
1,000	Any pressure-demand supplied-air respirator equipped with a half-mask.

1. The protection offered by a given respirator is contingent upon (1) the respirator user adhering to complete program requirements (such as the ones required by OSHA in 29CFR1910.134), (2) the use of NIOSH-certified respirators in their approved configuration, and (3) individual fit testing to rule out those respirators that cannot achieve a good fit on individual workers.
 2. Appropriate means that the filter medium will provide protection against the particulate in question.
 3. An APF of 10 can only be achieved if the respirator is qualitatively or quantitatively fit tested on individual workers.

8.3. Exposure controls

8.3.1. Occupational exposure controls / guidelines

Component	CAS No.	OSHA PEL		ACGIH TLV		NIOSH REL		Unit
		TWA	STEL	TWA	STEL	TWA	STEL	
Crystalline Silica (quartz)	14808-60-7	10 % SiO ₂ +2	None	0.025	None	0.05	None	mg / m ³

If crystalline silica (quartz) is heated to more than 870°C, quartz can change to a form of crystalline silica known as tridymite; if crystalline silica (quartz) is heated to more than 1470°C, quartz can change to a form of crystalline silica known as cristobalite. Its OSHA PEL for crystalline silica as tridymite or cristobalite is one-half of the OSHA PEL for crystalline silica (quartz).

Engineering Controls:

Ventilation must be adequate to maintain the crystalline silica concentrations in the workplace air below the exposure limit(s) outlined in Section 8.3.1 of this Safety Data Sheet.

Respiratory Protection

In case of exposure to dust, and in any case if such exposure is above regulatory limits (see above), wear a personal respirator as outlined in Section 8.2 above.

Eye / Face Protection:

If eye contact while using product may be anticipated, wear appropriate safety glasses with side shields or chemical goggles [as described by European Standard EN 166].

Skin Protection

Maintain good industrial hygiene. Protection recommended for workers suffering from dermatitis or sensitive skin.

8.3.2. Environmental Exposure Controls

No special requirements. There is no reported ecotoxicity for silica, a naturally occurring substance abundantly present in nature.

9. Physical and Chemical Properties

9.1. General Information

Physical State: White or tan sand: granular, crushed or ground to a powder.
Odor: None

9.2. Important Health, Safety and Environmental Information

pH: 6 - 8
Specific Gravity: 2.65 g/cc
Melting Point: 3110°F/1710°C
Freezing Point: Not Applicable
Boiling Point: 4046°F/2230°C
Flashpoint: Not Applicable
Flammability: Not Applicable
Explosive properties: Not Applicable
Oxidizing properties: contact with powerful oxidizing agents such as fluorine, chlorine trifluoride, and oxygen difluoride may cause fires.
Vapor Pressure: None
Relative Density: Not Applicable
Solubility: Silica will dissolve in hydrofluoric acid and produce a corrosive gas, silicon tetrafluoride
Water Solubility: Insoluble
Percent Volatiles by Volume: Not Applicable
Viscosity: Not Applicable

Vapor density:	Not Applicable
Molecular Weight:	60.08
Evaporation rate:	Not Applicable

10. Stability and Reactivity

- 10.1. Chemical Stability:**
Stable
- 10.2. Conditions to Avoid:**
Contact with powerful oxidizing agents such as fluorine, chlorine trifluoride, and oxygen difluoride may cause fires.
- 10.3. Materials / Chemicals to Be Avoided:**
Contact with powerful oxidizing agents, such as fluorine, chlorine trifluoride and oxygen difluoride, may cause fires.
- 10.4. Hazardous Decomposition Products:**
Will not occur.
- 10.5. Hazardous Polymerization:**
Will not occur.

11. Toxicological Information

The method of exposure that can lead to the adverse health effects described below is inhalation.

A. SILICOSIS

The major concern is silicosis, caused by the inhalation of respirable crystalline silica dust. Silicosis can exist in several forms, chronic (or ordinary), accelerated, or acute.

Chronic or Ordinary Silicosis is the most common form of silicosis, and can occur after many years (15 to 20 or more) of prolonged repeated inhalation of relatively low levels of airborne respirable crystalline silica dust. It is further defined as either simple or complicated silicosis. Simple silicosis is characterized by lung lesions (shown as radiographic opacities) less than 1 centimeter in diameter, primarily in the upper lung zones. Often, simple silicosis is not associated with symptoms, detectable changes in lung function or disability. Simple silicosis may be progressive and may develop into complicated silicosis or progressive massive fibrosis (PMF). Complicated silicosis or PMF is characterized by lung lesions (shown as radiographic opacities) greater than 1 centimeter in diameter. Although there may be no symptoms associated with complicated silicosis or PMF, the symptoms, if present, are shortness of breath and cough. Complicated silicosis or PMF may be associated with decreased lung function and may be disabling. Advanced complicated silicosis or PMF may lead to death. Advanced complicated silicosis or PMF can result in heart disease secondary to the lung disease (cor pulmonale).

Accelerated Silicosis can occur with prolonged repeated inhalation of high concentrations of respirable crystalline silica over a relatively short period; the lung lesions can appear within five (5) years of initial exposure. Progression can be rapid. Accelerated silicosis is similar to chronic or ordinary silicosis, except that lung lesions appear earlier and progression is more rapid.

Acute Silicosis can occur after the repeated inhalation of very high concentrations of respirable crystalline silica over a short time period, sometimes as short as a few months. The symptoms of acute silicosis include progressive shortness of breath, fever, cough, weakness and weight loss. Acute silicosis is fatal.

B. CANCER

IARC - The International Agency for Research on Cancer ("IARC") concluded that "crystalline silica in the form of quartz or cristobalite dust is carcinogenic to humans (Group 1)". For further information on the IARC evaluation, see IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Volume 100C, "A Review of Human Carcinogens: Arsenic, Metals, Fibres and Dusts " (2011).

The American College of Occupational and Environmental Medicine ("ACOEM") notes: "In 1996, [IARC] re-classified silica as a Class I human lung carcinogen, based on sufficient animal and human data. Although the degree of increased risk varies (with relative risks ranging from 1.3 to 6.9), the risk appears to be greatest in workers with silicosis who smoke. The cancer risk to silica-exposed workers without silicosis (especially if they are not smokers) is less clear despite continuing research, some of which has yielded disparate results." ACOEM, "Medical Surveillance of Workers Exposed to Crystalline Silica", June 2005.

The EU Scientific Committee for Occupational Exposure Limits (SCOEL) concluded in June 2002 (SCOEL Sum Doc. 94-final): "The main effect in humans of inhalation of respirable silica dust is silicosis. There is sufficient information to conclude that the relative risk of lung cancer is increased in persons with silicosis (and apparently, not in employees without silicosis exposed to silica dust in quarries and in the ceramic industry). Therefore preventing the onset of silicosis will also reduce the cancer risk."

C. AUTOIMMUNE DISEASES

Several studies have reported excess cases of several autoimmune disorders, -- scleroderma, systemic lupus erythematosus, rheumatoid arthritis -- among silica-exposed workers.)

D. TUBERCULOSIS

Individuals with silicosis are at increased risk to develop pulmonary tuberculosis, if exposed to tuberculosis bacteria. Individuals with chronic silicosis have a three-fold higher risk of contracting tuberculosis than similar individuals without silicosis.

E. KIDNEY DISEASE

Several studies have reported excess cases of kidney diseases, including end stage renal disease, among silica-exposed workers. For additional information on the subject, the following may be consulted: "Kidney Disease and Silicosis", Nephron, Volume 85, pp. 14-19 (2000).

F. NON-MALIGNANT RESPIRATORY DISEASES

The reader is referred to Section 3.5 of the NIOSH Special Hazard Review cited below, for information concerning the association between exposure to crystalline silica and chronic bronchitis, emphysema and small airways disease. There are studies that disclose an association between dusts found in various mining occupations and non-malignant respiratory diseases, particularly among smokers. It is unclear whether the observed associations exist only with underlying silicosis, only among smokers, or result from exposure to mineral dusts generally (independent of the presence or absence of crystalline silica, or the level of crystalline silica in the dust).

Sources of information:

The *NIOSH Hazard Review - Occupational Effects of Occupational Exposure to Respirable Crystalline Silica* published in April 2002 summarizes and discusses the medical and epidemiological literature on the health risks and diseases associated with occupational exposures to respirable crystalline silica. The *NIOSH Hazard Review* should be consulted for additional information, and citations to published studies on health risks and diseases associated with occupational exposure to respirable crystalline silica. The *NIOSH Hazard Review* is available from NIOSH - Publications Dissemination, 4676 Columbia Parkway, Cincinnati, OH 45226, or through the NIOSH web site, www.cdc.gov/niosh/topics/silica, then click on the link "NIOSH Hazard Review: Health Effects of Occupational Exposure to Respirable Crystalline Silica".

For a more recent review of the health effects of respirable crystalline silica, the reader may consult *Fishman's Pulmonary Diseases and Disorders*, Fourth Edition, Chapter 57. "Coal Workers' Lung Diseases and Silicosis".

12. Ecological Information

12.1. Ecotoxicological Information:

Crystalline silica (quartz) is not known to be ecotoxic; i.e., no data suggests that crystalline silica (quartz) is toxic to birds, fish, invertebrates, microorganisms or plants.

13. Disposal Considerations

13.1. Waste Disposal Method:

Discard any product, residue, disposable container or liner in full compliance with national regulations.

13.2. Container Handling and Disposal:

Dispose of container and unused contents in accordance with national regulations.

14. Transportation Information

Shipping Name:

ADR/RID/IMO/ICAO /US DOT	Proper Shipping Name	Not Regulated
	Hazard Class	Not Regulated
	ID Number	Not Regulated
	Packaging Group	Not Regulated

Crystalline silica (quartz) is not a hazardous material for purposes of transportation under the U. S. Department of Transportation Table of Hazardous Materials, 49 CFR §172.101.

15. Regulatory Information

Silica sand has no harmonized classification & labeling under Directives 67/548/EEC and 1999/45/EC. Because the respirable fraction is high (10% and more) in ground silica (flour), the preparation is self-classified as Xn (harmful). In such case, the following risk and safety phrases are applicable.

Risk Phrases:

R 48/20: Harmful: danger of serious damage to health by prolonged exposure through inhalation.

Safety Phrases:

S 22: Do not breathe dust.

S 38: In case of insufficient ventilation, wear suitable respiratory equipment.

UNITED STATES (FEDERAL AND STATE)

TSCA No.: Crystalline silica (quartz) appears on the EPA TSCA inventory under the CAS No. 14808-60-7.

RCRA: Crystalline silica (quartz) is not classified as a hazardous waste under the Resource Conservation and Recovery Act, or its regulations, 40 CFR §261 et seq.

CERCLA: Crystalline silica (quartz) is not classified as a hazardous substance under regulations of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 40 CFR §302.

Emergency Planning and Community Right to Know Act (SARA Title III): Crystalline silica (quartz) is not an extremely hazardous substance under Section 302 and is not a toxic chemical subject to the requirements of Section 313.

Clean Air Act: Crystalline silica (quartz) mined and processed by U.S. Silica Company is not processed with or does not contain any Class I or Class II ozone depleting substances.

FDA: Silica is included in the list of substances that may be included in coatings used in food contact surfaces, 21 CFR §175.300(b)(3)(xxvi).

NTP: Silica, crystalline (respirable size) is classified as Known to be a Human Carcinogen.

OSHA Carcinogen: Crystalline silica (quartz) is not listed.

California Proposition 65: Crystalline silica (airborne particles of respirable size) is classified as a substance known to the State of California to be a carcinogen.

California Inhalation Reference Exposure Level (REL): California established a chronic REL of 3 µg for silica (crystalline, respirable). A chronic REL is an airborne level of a substance at or below which no adverse health effects are anticipated in individuals indefinitely exposed to the substance at that level.

Massachusetts Toxic Use Reduction Act: Silica, crystalline (respirable size, <10 microns) is "toxic" for purposes of the Massachusetts Toxic Use Reduction Act.

Pennsylvania Worker and Community Right to Know Act: Quartz is a hazardous substance under the Act, but it is not a special hazardous substance or an environmental hazardous substance.

CANADA

Domestic Substances List: U. S. Silica Company products, as naturally occurring substances, are on the Canadian DSL.

WHMIS Classification: D2A

OTHER

EINECS No.: 238-878-4

EEC Label (Risk/Safety Phrases): R 48/20, S22, S38

CLP Label (Hazard Class/Hazard Statement/Precaution Statements):
STOT RE 1/ H372/ P260, P285, P501

IARC: Crystalline silica (quartz) is classified in IARC Group 1.

Australian Inventory of Chemical Substances (AICS): All of the components of this product are listed on the AICS inventory or exempt from notification requirements.

Japan Ministry of International Trade and Industry (MITI): All of the components of this product are existing chemical substances as defined in the Chemical Substance Control Law Registry Number 1-548.

Korea Existing Chemicals Inventory (KECI) (set up under the Toxic Chemical Control Law):
Listed on the ECL with registry number 9212-5667.

Philippines Inventory of Chemicals and Chemical Substances (PICCS): Listed for PICCS.

National, state, provincial or local emergency planning, community right-to-know or other laws, regulations or ordinances may be applicable--consult applicable national, state, provincial or local laws.

16. Other Information

16.1 Hazardous Material Information System (HMIS):

Health	*
Flammability	0
Reactivity	0
Protective Equipment	E

* For further information on health effects, see Sections 2, 8 and 11 of this MSDS.

16.2 National Fire Protection Association (NFPA):

Health	0
Flammability	0
Reactivity	0

16.3 Web Sites with Information about Effects of Crystalline Silica Exposure:

The U. S. Silica Company web site will provide updated links to OSHA and NIOSH web sites addressing crystalline silica issues: www.ussilica.com, click on "Info Center", then click on "Health & Safety".

The U.S. National Institute for Occupational Safety and Health (NIOSH) and Occupational Safety and Health Administration (OSHA) maintain sites with information about crystalline silica and its potential health effects. For NIOSH, <http://www.cdc.gov/niosh/topics/silica>; for OSHA, <http://www.osha.gov/dsg/topics/silicacrystalline/index>.

The IARC Monograph concerning crystalline silica, Volume 100C, can be accessed in PDF form at the IARC web site, <http://monographs.iarc.fr/ENG/Monographs/PDFs/index.php>.

U. S. Silica Company Disclaimer

The information and recommendations contained herein are based upon data believed to be up-to-date and correct. However, no guarantee or warranty of any kind, express or implied, is made with respect to the information contained herein. We accept no responsibility and disclaim all liability for any harmful effects that may be caused by purchase, resale, use or exposure to our silica. Customers and users of silica must comply with all applicable health and safety laws, regulations, and orders. In particular, they are under an obligation to carry out a risk assessment for the particular work places and to take adequate risk management measures in accordance with the national implementation legislation of EU Directives 89/391 and 98/24.

Date: March 2012

ATTACHMENT E: SUPPORTING CALCULATIONS

Summary of Emissions

U.S. Silica
Berkeley Springs Magnetic Separator

Unit ID	Unit Description	Control Method N/A; processes saturated material	Control Factor ^A	Potential Throughput		Emission Factor ^{B,C} (lb/ton)			Emission Rate ^D (tpy)			Emission Rate ^E (pph)			
				(tons/hour)	(tons/year)	PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}	
FERRO2	Magnetic Drum Separator		0.01	200	8,760	1,752,000	0.00300	0.00110	0.00017	0.0263	0.0096	0.0015	0.006	0.002	0.0003

A. The separator processes only saturated material. Assuming an emissions control efficiency of 99% due to saturated material. Guidance from Texas Council on Environmental Quality (TCEQ) Air Permits Division, Rock Crushing Plants, Draft RG 058 (February 2002), Table 7, in a note that states "A 99% control efficiency may be allowed when a facility (emission point) operates under saturated conditions with no visible emissions."

B. Emission factors from U.S. EPA, AP-42 Section 11.19.2 - *Crushed Stone Processing and Pulverized Mineral Processing* (August 2004), Table 11.19.2-2.

C. PM_{2.5} emission factor is calculated by dividing the PM₁₀ emission factor by the ratio of PM₁₀ to PM_{2.5} particle size multipliers (K). The particle size multipliers are from U.S. EPA, AP-42 Section 13.2.4 - *Aggregate Handling and Storage Piles* (November 2006), table following Equation 1.

k for PM ₁₀	0.35
k for PM _{2.5}	0.053
Ratio of PM ₁₀ to PM _{2.5}	6.6

D. Emission Rate (tpy) = Control Factor * Emission Factor (lb/ton) * Actual Throughput (ton/yr) * (1 ton / 2,000 lb)

$$\text{FERRO2 PM Emission Rate (tpy)} = 0.01 \times 3.00\text{E-3 lb PM/ton} \times 1,752,000 \frac{\text{tons}}{\text{year}} \times \frac{1 \text{ ton}}{2,000 \text{ lb}} = 0.0263 \text{ tpy}$$

E. Emission Rate (pph) = Control Factor * Emission Factor (lb/ton) * Actual Throughput (ton/hour)

$$\text{FERRO2 PM Emission Rate (pph)} = 0.01 \times 3.00\text{E-3 lb PM/ton} \times 200 \frac{\text{tons}}{\text{hour}} = 0.0060 \text{ pph}$$