

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 25, 2014.

Permit Number: **R30-06500001-2014 (MM01 and MM02)**
Applications Received: **May 11, 2017 and May 22, 2017**
Plant Identification Number: **03-54-065-00001**
Permittee: **U.S. Silica Company**
Facility Name: **Berkeley Springs Plant**
Mailing Address: **P.O. Box 187, Berkeley Springs, WV 25411**

Permit Action Number: *MM01, MM02* Revised: *March 9, 2018*

Physical Location: Berkeley Springs, Morgan County, West Virginia
UTM Coordinates: 739.59 km Easting • 4,393.48 km Northing • Zone 17
Directions: Off of Route 522 approximately 3 miles north of Berkeley Springs

Facility Description

U.S. Silica Company is a sandstone mining, quarrying, and processing facility. SIC Code - 1446. This minor modification incorporates the changes authorized by Permits R13-2423B and R13-2145F.

Emissions Summary

Permit R13-2423B authorized the relocation of the #1 Rotex Screen (1S - Screen 17) and will not increase emissions. Permit R13-2145F authorized the installation of a bucket elevator, mobile conveyor, and storage silo and will increase emissions as follows: PM total - 3.00 pph and 7.99 tpy, PM₁₀ - 1.10 pph and 2.93 tpy, and PM_{2.5} - 1.10 pph and 2.93 tpy.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 1,039 tpy of PM₁₀ and 267 tons per year of SO₂. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, U.S. Silica is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	Control of PM from Manufacturing Sources
	45CSR13	Construction/Modification Permits
	45CSR16	Performance Standards for New Stationary Sources
	45CSR30	Operating permit requirement
	40 CFR 60, Subpart OOO	NSPS for non-metallic mineral processing

State Only: None

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 CFR Part 60 (NSPS), 40 CFR Part 61 (NESHAPs), and 40 CFR Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2145F	September 11, 2017	
R13-2423B	July 24, 2017	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This Title V modification is to update the permit requirements after two NSR permit revisions were approved. Minor Modification MM01 incorporates the changes made by R13-2145F, which authorizes the installation of a mobile conveyor (MOB-CONV), bucket elevator (BE-03) and silo (C Silo). Minor Modification MM02 incorporates the changes made by R13-2423B, which authorized moving the existing #1 Rotex screen to the Screening and Unground Sand Processing section.

The following changes were made:

Section 1.1. - Emission Units Table: Added the mobile conveyor, bucket elevator, Cristobalite silo, and #1 Rotex screen to equipment listed in the Screening and Unground Sand Processing section. Removed the #1 Rotex screen from the Wet Float Plant.

Section 1.2. - Updated the Table to the current versions and dates of issuance of R13-2145 and R13-2423.

Section 3.0 - Boilerplate changes to conditions 3.5.3., 3.5.5. and 3.5.6. to require submission of reports in electronic format.

Section 5.0. c) and g) heading - Updated to show six Rotex screens at the New Screen Tower and one Rotex screen at the Wet Float Plant.

Sections 5.1.8.3., 5.1.8.4., 5.1.8.5., and 5.4.2. - Updated to correspond with R13-2423B.

Section 7.0 - This section had been reserved. The new requirements for the mobile conveyor, bucket elevator, and Cristobalite Silo from R13-2145F were added to this section.

45CSR7 - To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations - The purpose of this rule is to prevent and control PM from manufacturing processes and associated operations. The facility is subject to the requirements of this rule because it meets the definition of "Manufacturing Process" found in Section 2.20 of this rule. Applicable subsections include: 3.7 - no visible emissions from any storage structure pursuant to subsection 5.1 which is required to have an enclosure, 4.1 - PM emissions shall not exceed those under Table 45-7A, 5.1 - manufacturing process and storage structures must be equipped with a system to minimize emissions, and 5.2 - minimize PM emissions from haul roads and plant premises.

40 CFR 60, Subpart III and 40 CFR 63, Subpart ZZZZ - In accordance with R13-2145F, the mobile conveyor will be used to unload material from railcars to other transfer operations. U.S. Silica requests the flexibility to use the mobile conveyor for any material at the plant. The mobile conveyor utilizes a 50 HP diesel engine to propel itself into location and once in place, the diesel engine provides power to operate the conveyor. U.S. Silica has cited the U.S. Environmental Protection Agency Applicability Determination Index (Control Number: M090038) which states that the diesel generator at the Hibbing Taconite Company qualifies as a non-road, non-stationary engine based on the fact that it will not be in one location at the facility for a period of more than 12 months. The mobile conveyor at U.S. Silica will also not be in one location at the facility for a period of more than 12 months. The permittee must document the movement/location of the mobile conveyor over the twelve-month period following start-up of mobile conveyor operations and annually thereafter, in accordance with Condition 7.2.2., as evidence the diesel engine is a non-road, non-stationary engine exempt from 45CSR13, 40 CFR 60 Subpart III and 40 CFR 63 Subpart ZZZZ.

40 CFR 60, Subpart OOO - *Standards of Performance for Nonmetallic Mineral Processing Plants*. The affected facilities are each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, and enclosed truck or railcar loading station. The mobile conveyor, bucket elevator, and silo authorized by R13-2145F are subject to the NSPS.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR17: To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter - Requirements for the prevention and control of fugitive particulate matter emissions from materials handling, preparation, storage and other sources are provided in 45CSR17. However, sources subject to 45CSR7 are exempt from the requirements of 45CSR17, per 45CSR§17-6.

45CSR27: To Prevent and Control the Emissions of Toxic Air Pollutants - 45CSR27 sets the requirements for the use of best available technology to prevent and control the discharge of toxic air pollutants. Due to the nature of material handled in the proposed emission sources, this regulation will not apply.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A

Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478
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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments

Not applicable.