



August 26, 2020

Mr. Todd Zynda, P.E.
Senior Environmental Engineer
Air Quality Division
EGLE, Air Quality Division, Detroit District
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

Re: US Silica - Rockwood Plant Notice of Violation August 7, 2020

Dear Mr. Zynda,

This letter is in response to a Violation Notice (VN) received from the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) dated August 7, 2020, in reference to investigations conducted on April 20, May 5, May 8, and June 5th regarding citizen complaints. The VN states that an R336.1901(b), PTI No. 150-08E, General Condition 6 violation was observed, and that this violation is based on the analysis of the fallout samples, the proximity of our facility to the complainants' homes, and prevailing wind direction.

US Silica takes each of these investigations very seriously and we began our own internal review to determine what actions could be taken to address these concerns immediately following the April 20, 2020 interaction with AQD staff. It should be noted that all of the dates that EGLE reported citizen complaints correlated to periods when high winds were seen in the region with several days showing extended periods of wind speeds above 25 mph, with same days showing gusts as high as 48 mph (source: Detroit, MI National Oceanic and Atmospheric Administration historical weather archives <https://w2.weather.gov/climate/>). Also it should be noted that AQD staff did not observe any dust blowing off the site while investigating, and as you know, we are not the only industrial operation in the area and truck traffic from other businesses often results in dust, particularly during high wind periods. Even with these challenges the Rockwood plant identified the following opportunities to improve their fugitive dust management.

Following the April 20, 2020 interaction with AQD staff the US Silica - Rockwood Plant (USS) developed an enhanced maintenance strategy for transfer points, chutes, gates and hoppers that were at the highest point in the plant to ensure that any small leaks or buildup was addressed. This required capital expenses for replacement parts, fabrication of parts, materials, and overtime to complete improvements over the period of April 22 to June 18, 2020 totaling 160 manhours.

On April 24, 2020 the USS started looking at implementing a project to improve the suppression ability within the stockpile area, plant area, and placed a sprinkling system on the site's water truck to reach deeper into stockpile area. Specifically, USS undertook the following tasks:

- 4/27/20 – Installed sprinkler outside of silo area for area suppression

- 5/8/20 – Sprayed Biosoyl on stockpile area
- 5/14/20 – Installed sprinkler on US Silica – Rockwood Plant water truck
- 6/2/20 – Installed second sprinkler on water truck to reach deeper into stockpile area
- 6/8/20 – Installed sprinkler system along curb entry roadway
- 6/12/20 – Sprayed Biosoyl on stockpile area
- 6/19/20 – Calcium Chloride applied on roads
- 6/22/20 – Began installing a sprinkler system atop of the stacker near the processing plant to apply to stockpiles in area


USS also identified opportunities to shut down customers/contractors who were using the storage areas and dirt roadways within the facility requiring all three (3) to remove all vehicles and equipment. This was completed by all the customers/contractors by June 9, 2020. This allowed the Rockwood Plant to eliminate truck traffic on the roads, limiting it only to US Silica employees as needed, minimizing possible dust generation.

USS is currently working with the dredge contractor to ensure that dredging activities maintain a “wet” stockpile area after already removing previously dry stockpiled material to areas that can be suppressed.

It should be noted that during these complaint periods the exceptionally high winds, especially gusts up to 48 mph would cause particles from external limestone/gravel roadways, roadway shoulders, and other operations in the area to travel great distances, but as you can see from the large amount of work, expenses totaling \$72,950 in these efforts, the US Silica – Rockwood Plant is committed to improving our operations where possible. We believe that this answers your questions and resolves this matter, thank you for your cooperation.

If you have any questions please contact me at Dorsey@ussilica.com or by phone at (318) 771-2099.

Respectfully,



Michael Dorsey
Plant Manager
U.S. Silica
Rockwood Plant

Enclosure

cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor
EGLE, Air Quality Division
P.O. Box 30260
Lansing, MI 48909-7760

cc/via email: Mr. Al Gwizdala, VP of Operations Specialty Minerals, U.S. Silica
Ms. Carrie Dynis, Director of Operations Specialty Minerals, U.S. Silica
Mr. Jason Bish, Director EHS, U.S. Silica
Mr. David Olchawa, Sr. Manager, Environmental Programs, U.S. Silica