



November 16, 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 October 30, 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 October 30, 2020, in reference to an investigation conducted on September 4, 2020 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 after meeting with you on September 4<sup>th</sup> began our internal review to determine what actions could be taken to address these concerns. It should be noted that the date that EGLE reported citizen complaints correlated to periods when high winds were seen in the region with extended periods of wind speeds above 25 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 September 4<sup>th</sup> interaction with AQD staff the US Silica - Rockwood Plant (USS) purchased a water truck on a lease/purchase option totaling \$395,168 that has provided an upgrade over the previous water truck to reach further into stockpile areas and provide better roadway coverage.

USS also applied the following treatments to roadway and stockpile areas:


- 10/3/20 – Sprayed Biosoyl on stockpile area
- 10/5/20 – Sprayed Biosoyl on stockpile area
- 11/10/20 – Calcium Chloride applied on roads

USS is currently working on improving the site's stockpile management techniques, creating lower profile areas that the new water truck can access from the top to more effectively apply suppressant as needed and eliminating unnecessary stockpile areas to minimize areas needed for control.

It should be noted that during the complaint period the exceptionally high winds, especially gusts up to 33 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 continued dedication of resources including the purchase of a water truck totaling \$395,168 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](mailto: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