



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 1, 2019

Mr. John Robinson
U.S. Silica
P.O. Box 100
Rockwood, Michigan 48173

SRN: A7757, Wayne County

Dear Mr. Robinson:

This letter replaces the Violation Notice dated July 18, 2019.

VIOLATION NOTICE

On June 6, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of U.S. Silica located at 20837 North Huron River Drive, Rockwood, Michigan. The purpose of this inspection was to determine U.S Silica's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) 150-08E.

As a result of the inspection on June 6, 2019, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
EUSANDDRYER	PTI 150-08E, Special Conditions IV.1 and IX.1 R 336.1910 40 CFR §60.735(c)	2-hour arithmetic average pressure drop readings were less than 90% of the pressure drop measured during stack test for various dates. 2-hour arithmetic average scrubber flow rates were greater than 20% of the measured flow rate from stack testing for various dates. Failure to submit semiannual reports for the scrubber flow rate deviations during the 2 nd half of 2017 and the 1 st half of 2018.

EUSANDDRYER

PTI 150-08E, Special Condition (SC) IV. 1 requires that EUSANDDRYER not operate unless the wet scrubber is installed, maintained, and operated in a satisfactory manner. Similarly, R 336.1910 requires that an air-cleaning device be installed, maintained, and operated in a satisfactory manner. SC IX.1 requires compliance with all provisions of 40 CFR Subpart 60

Subpart A and Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries.

40 CFR §60.735(c) requires that the owner or operator submit written reports semiannually of exceedances of control device operating parameters required to be monitored by §60.734. The exceedances are defined as follows:

- Any daily 2-hour average of the wet scrubber pressure drop that is less than 90% of the average value recorded during the most recent performance test that demonstrated compliance with the particulate standard.
- Any daily 2-hour average of the wet scrubber flow rate that is less than 80% or greater than 120% of the average value recorded during the most recent performance test that demonstrated compliance with the particulate standard.

During the November 10, 2010 stack test the average measured pressure drop was 7.7 inches water. This would equate to a minimum pressure drop of approximately 6.93 inches water. The November 10, 2010 stack test average measured wet scrubber flow rate was 131 gallons per minute (gpm). This would equate to scrubber flow rates between 105 gpm to 157.2 gpm. U.S. Silica provided daily 2 hour average records of both flowrate and pressure drop for June 2018 through May 2019 (June 21, 2019 submittal) and June 2017 through May 2018 (July 11, 2019 submittal). Records indicate that pressure drop readings were less than 6.93 inches on the following dates (values given in inches):

1/7/18 – 6.10	3/12/18 – 5.52	4/9/18 – 6.29	5/10/18 – 5.71
1/10/18 – 6.06	3/13/18 – 5.52	4/10/18 – 6.11	5/11/18 – 5.81
1/11/18 – 6.18	3/14/18 – 5.46	4/11/18 – 6.07	5/14/18 – 6.36
1/13/18 – 6.19	3/15/18 – 6.28	4/12/18 – 6.35	5/16/18 – 5.86
1/17/18 – 6.52	3/16/18 – 6.16	4/13/18 – 6.22	5/17/18 – 5.98
1/20/18 – 6.77	3/18/18 – 6.29	4/14/18 – 6.42	5/18/18 – 6.19
2/3/18 – 6.21	3/19/18 – 6.14	4/15/18 – 6.63	5/19/18 – 6.22
2/8/18 – 6.84	3/20/18 – 6.22	4/16/18 – 6.15	5/20/18 – 5.13
2/15/18 – 6.16	3/21/18 – 6.05	4/18/18 – 6.15	5/21/18 – 5.81
2/16/18 – 6.56	3/22/18 – 6.15	4/19/18 – 6.19	5/22/18 – 6.32
2/17/18 – 6.59	3/23/18 – 6.42	4/20/18 – 6.25	5/23/18 – 5.81
2/20/18 – 5.39	3/24/18 – 6.06	4/21/18 – 6.37	5/24/18 – 6.51
2/21/18 – 6.80	3/25/18 – 6.20	4/22/18 – 6.55	5/25/18 – 6.21
2/28/18 – 5.64	3/26/18 – 6.21	4/23/18 – 6.39	5/26/18 – 6.11
3/1/18 – 5.51	3/27/18 – 6.05	4/24/18 – 6.48	5/29/18 – 5.83
3/2/18 – 5.52	3/28/18 – 6.05	4/25/18 – 6.02	5/30/18 – 5.97
3/3/18 – 5.66	3/29/18 – 6.08	4/26/18 – 6.42	5/31/18 – 5.73
3/4/18 – 5.59	3/30/18 – 6.14	4/27/18 – 6.21	6/1/18 – 6.04
3/5/18 – 5.58	3/31/18 – 6.13	4/30/18 – 6.44	6/2/18 - 5.74
3/6/18 – 5.51	4/2/18 – 6.07	5/1/18 – 6.00	11/27/18 - 6.05
3/7/18 – 5.40	4/3/18 – 6.11	5/2/18 – 6.36	11/28/18 – 6.03
3/8/18 – 5.76	4/4/18 – 6.13	5/3/18 – 5.74	11/29/18 – 5.84
3/9/18 – 5.40	4/5/18 – 6.28	5/7/18 – 6.07	11/30/18 – 5.97
3/10/18 – 5.38	4/6/18 – 6.20	5/8/18 – 5.94	
3/11/18 – 5.98	4/7/18 – 6.11	5/9/18 – 6.42	

Records indicate that the wet scrubber flow rates were greater than 157.2 gpm on the following dates:

9/23/17 – 164.95 gpm
9/25/17 – 183.53 gpm
10/2/17 – 165.59 gpm
10/4/17 – 179.65 gpm
10/5/17 – 175.74 gpm
10/26/17 – 177.71 gpm
10/27/17 – 186.73 gpm
12/2/17 – 174.19 gpm
12/21/17 – 173.53 gpm
2/8/18 – 160.0 gpm

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Based on the above pressure drop and wet scrubber readings, the AQD does not believe that U.S. Silica has demonstrated that the wet scrubber is installed, maintained, and operated in a satisfactory manner. This is a violation of PTI 150-08E, SC IV. 1 and R 336.1910. The wet scrubber has operated below the minimum pressure drop value and at flow rates greater than the maximum allowed under 40 CFR Part 60 Subpart UUU. U.S. Silica did not submit semiannual reports for the wet scrubber flow rate deviations as required under §60.735(c) for the 2nd half of 2017 and the 1st half of 2018. This is a violation of Subpart UUU, §60.735(c). The pressure drop deviations that occurred between January 7, 2018 and June 2, 2018 were reported by U.S. Silica via the letter dated July 12, 2018. The pressure drop deviations that occurred during November 2018 were reported by U.S. Silica via the letter dated January 28, 2019.

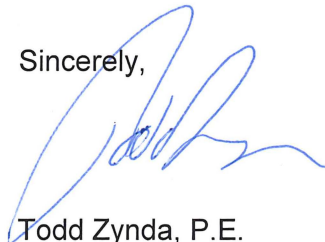
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 22, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If U.S. Silica believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of U.S. Silica. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Todd Zynda, P.E.
Senior Environmental Engineer
Air Quality Division
313-456-2761

cc: Mr. Chris Coppins, U.S. Silica
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jeff Korniski, EGLE