

limits moving forward. I explained all of the options with the facility. I also shared a link to the permit information on the DEQ website. I also explained the MAERS process and what would be expected from the facility to complete MAERS. The former plant contact person recently left the company, and Mr. Robbins was unsure what his environmental requirements were. I also gave Mr. Robbins a copy of the Rule 208 A letter that was sent to the company in June 2014 explaining the options available to the company, as Mr. Robbins was unaware of this letter.

The company is required under the current Wayne County Permit, the facility is required to keep records of the hours that the dryer operates and the amount of material dried in the natural gas fired dryer. The facility completes a daily log which includes material type, moisture percentage, state time, stop time, run time, burner start time, burner stop time, burner run time, wet feed start time, wet feed stop time, wet feed run time, total buckets used, fuel start readings, fuel stop readings, and total fuel used. Each bucket holds 3000 pounds of sand. These records were reviewed during the onsite inspection. During the day of August 31, 2015 the burner had operated for about 3 hours and 21 buckets, or about 31.5 tons, of sand had passed through the dryer.

After discussing the process, the records, and other requirements of the facility, we performed a facility walk through. There are about seven buildings on site, though most of the buildings are used for storing product. One building is used for office space. The dryer is located in building 5. The inside line and the C-line is also located in building 5. The outside line is located just outside of building 5. The outside line is not used as often now because the loading robot has been removed from the facility, leaving this line to be loaded manually. During the onsite walkthrough, no equipment was operating, so no visible emissions were observed.

The facility has a fugitive dust plan, which includes watering the roadways to limit dust. The facility has a vacuum truck that waters all of the roadways about once a day, as needed. As I was leaving the facility, I did not observe large clouds of dust as cars passed along Schaffer Highway. I also did not observe much trackout from the facility.

APPLICABLE RULES/PERMIT CONDITIONS

The facility is currently operating under Wayne County Permits C-11033, C-11034 and C-11035 for the installation of a wet scrubber for calcium chloride bagging stations and the installation of a sand dryer with a baghouse dust collector. These permits were issued on March 18, 1996. The special conditions for these permits are:

Calcium Chloride Bagging Stations

The facility no longer performs calcium chloride bagging at this location. This equipment has not been used in more than two years and there are no plans to use this equipment in the future.

Sand Dryer

25. Compliance – The MAERS report, the facility reported less than 1 tons of NO_x during 2014. The permit limit is 5.78 tons per year.

26. NA – No visible emissions were observed during the onsite inspection. The equipment was not operating during the onsite inspection.

27. Compliance – The dust collector was installed and operating properly during the onsite inspection. The baghouse is regularly inspected and bags are changed as needed.

28. Compliance – No modifications have been made to the stack.
29. Compliance – Daily dryer operation records are collected and were reviewed onsite. During 2014 the facility operated the dryer about 3500 hours, which is less than the permit limit of 3640 hours.
30. Compliance – Daily sand loading records for the dryer are maintained. During 2014 the facility processed 69, 057.4 tons of sand, which is less than 156, 520 tons per year, which is the permit limit.
31. NA – During the onsite inspection, no VE were observed from the hopper, although this equipment was not operating during the onsite inspection.
32. Compliance – The facility emitted about a ton of PM during 2014, which is less than the permit limit of 2.34 tons per year.
33. NA – No stack tested is needed at this time.
34. Compliance – No VE from the roadway were observed during the onsite inspection.
35. Compliance – The fugitive dust plan appears to be followed properly. The roadways area watered and maintained on a regular basis.
36. Compliance – Fugitive dust records are maintained onsite and were reviewed during the onsite inspection.

MAERS REPORT REVIEW

The MAERS for 2014 were submitted and reviewed. The MAERS was received on March 16, 2015. I reviewed the report on June 26, 2015. All emission calculations appear to be accurate.

FINAL COMPLIANCE DETERMINATION

Gibraltar National Corporation appears to be operating in compliance with all state and federal regulations as well as all permit conditions. The facility is currently operating with legally enforceable limits under Rule 208A. The facility is researching their options for legally enforceable limits when this rule is rescinded.

Gibraltar National Corporation Quikete may be subject to the requirements within 40 CFR 60 Subpart UUU for the dryer and 40 CFR 60 Subpart OOO, which is for nonmetallic mineral processing plants. The potential applicability of these NSPS standards will be evaluated during the during the next year while the facility pursues the permitting option which best suits this facility when Rule 208A is rescinded.

NAME Jill Zimmerman

DATE 9/29/15

SUPERVISOR JK