

A7757  
MANILA

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

A775749076

<b>FACILITY:</b> U S SILICA CO		<b>SRN / ID:</b> A7757
<b>LOCATION:</b> 20837 N HURON RIVER DR, ROCKWOOD		<b>DISTRICT:</b> Detroit
<b>CITY:</b> ROCKWOOD		<b>COUNTY:</b> WAYNE
<b>CONTACT:</b> John Robinson , Environmental Health & Safety Coordinator		<b>ACTIVITY DATE:</b> 06/06/2019
<b>STAFF:</b> Todd Zynda	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Scheduled Inspection		
<b>RESOLVED COMPLAINTS:</b>		

**REASON FOR INSPECTION:** Scheduled Inspection  
**INSPECTED BY:** Todd Zynda, AQD  
**PERSONNEL PRESENT:** John Robinson, EHS Coordinator  
**FACILITY PHONE NUMBER:** 734-379-9672, Ext 20  
**FACILITY FAX NUMBER:** 734-379-4990  
**FACILITY WEBSITE:** www.ussilica.com

### **FACILITY BACKGROUND**

U.S. Silica (USS) produces whole grain silica that is used in end markets for glass production or building products. The site has been in operation under various company names, since 1904. USS property encompasses approximately 750 acres, of which only 5 to 10 acres are operating for silica production. The facility currently has 27 employees and operates 24 hours a day, 5 days a week. Weekends are added as needed.

USS receives raw material from the Sylvania Mine located in Monroe County. USS's quarry last produced raw material in the late 1990's.

Facility operations are permitted under Permit to Install (PTI) 150-08E. The sand dryer at the facility is subject to 40 Code of Federal Regulations (CFR) Part 60, Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries.

### **OUTSTANDING CONSENT ORDERS**

None

### **OUTSTANDING VNs**

None

### **INSPECTION NARRATIVE**

On June 6, 2019, AQD staff, Todd Zynda, conducted an inspection of USS located at 20837 North Huron River Drive in Rockwood, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (EGLE -AQD) Rules; and the conditions of PTI 150-08E.

During the inspection, Mr. John Robinson, EHS Coordinator, provided information and a tour of facility operations.

During the opening meeting, the current status of PTI subject equipment and record keeping requirements were discussed. It was agreed that the facility would email records within two weeks of the inspection date. Required records were received via email on June 21, 2019 and July 11, 2019.

During the opening meeting it was discussed that the additional modules to cartridge dust collector (DC-01) permitted under PTI 150-08E were installed. The installation was completed in November 2017. Under PTI 150-08E, EUSANDPROCESS, SC IV. 3, an alarm is to sound if the pressure drop exceeds 10 inches water. The facility now operates the dust collector using a 6 inches pressure drop alarm.

During the opening meeting the fugitive dust plan was discussed. The AQD provided a mark up (track changes) on the facility fugitive dust plan provided in 2017. Mr. Robinson stated that he could not give commitment to the changes but would run them by U.S. Silica management and reply with requested inspection records. Mr. Robinson stated that the facility has reduced the raw material inventory (ore storage) to approximately 40% of what was received during 2017. This reduces the storage pile height significantly. The facility is also now using a dust suppressant (BioSoil) on the raw material storage piles.

Additionally, during the opening meeting, the pressure drop deviations for the sand dryer scrubber was discussed. On February 1, 2019, the AQD received a letter from U.S. Silica, dated January 28, 2019 regarding pressure drop requirements for EUSANDDRYER. The letter states that from November 27 through 30, 2018 the two-hour daily arithmetic average wet scrubber pressure drop was below 90% of 7.72 inches of water (or 6.95 inches water) per the previous stack testing demonstrating compliance. According to Mr. Robinson, the pressure drop deviations occurred in the past and that the scrubber now appears to meet the pressure drop requirement.

The tour began with observation of the wash plant ("wet plant"). The wash plant consists of equipment used for washing, screening, flotation, desliming, classification and dewatering of sand. The wash plant is a completely wet process and is in an enclosed building up to the 30.0 million British thermal units (MMBTU) fluidized bed sand dryer (EUSANDDRYER). The sand dryer blows heated air upward through the sand to dry it. Exhaust from the sand dryer is fed to a wet scrubber which controls PM emissions. During the inspection, the wet scrubber flow rate (148.85 gallons per minute [gpm]) and the pressure drop (8.32 inches water) was recorded in the wet plant control room. During the inspection visible emissions from the wet scrubber (SVWETSCRUBBER) were zero opacity. Other equipment listed in Appendix A of PTI 150-08E (sand scrubbers, hydrosizer, flotation tanks, etc.) located in the enclosed portion of the wash plant had no visible emissions.

Following observation of the wet plant and associated sand dryer and wet scrubber, the "dry plant" was observed. The dry plant houses final product and equipment consists of hoppers, truck and rail loading, conveyors, elevators, screens, storage bins used for material handling, sorting/blending of the silica into various product types. A dust collector (two filter banks) controls emissions from screens and associated transfer points. The pressure drop for each dust collector bank monitored separately. During the inspection, the dust collector pressure drop gauges read approximately 2.32 inches and 2.7 inches. The facility also operates a "HiVac" industrial vacuum cleaning system used to clean up spilled sand in the screen house. During the inspection, the dry plant had no visible emissions. Duct work controlling emissions from screens and transfer points appeared to be in good operating condition and were ducted to the dust collector as appropriate.

During the inspection, a solvent based cold cleaner was observed in the facility garage/maintenance building. At the time of inspection, the cold cleaner lid was closed and appeared to meet Rule 707 requirements. Cold cleaner instructions were posted in a conspicuous location. A copy of the safety data sheet (SDS) for the material used was provided.

The tour concluded with observation of the facility property (raw material storage area), mill pond, Huron River, former mine (now lake), and bone yard. During observation of the property zero opacity was observed from roads and storage piles.

## **APPLICABLE RULES/PERMIT CONDITIONS**

### **PTI 150-08E**

Permit conditions have been paraphrased for brevity. Please see PTI 150-08E for conditions in their entirety.

### **EUSANDDRYER**

SC I. **COMPLIANCE.** PM emissions shall not exceed 0.025 grains per dry standard cubic foot (gr/dscf) and PM10 emissions shall not exceed 7.01 pounds per hour (pph). The 0.025 gr/dscf limit is established by 40 CFR 60.732(a) for dryers. On November 10, 2010, a stack test was conducted to demonstrate compliance with the permitted emission limits and 40 CFR Part 60, Subpart UUU. Test results indicate a PM emission rate of 0.0019 gr/dscf and 0.40 pph (see file for stack test report). According to the December 9, 2010 test report, the sampling

time and volume for each test run was at least 120 minutes and had a minimum sample volume of 60 dscf (1.7 dry standard cubic meter [dscm]) meeting the requirements of §60.736(b)(1).

SC I. 3 and SC V. 1. **COMPLIANCE.** Visible emission not to exceed 10 percent opacity except as specified in 40 CFR Part 60, Subpart UUU. Subpart UUU (§60.732(b) requires that no emissions be discharged into the atmosphere greater than 10% opacity unless the emissions are discharged from an affected facility using a wet scrubbing device. The sand dryer is equipped at the facility is equipped with a wet scrubber, therefore the opacity standard does not appear to be applicable. However, on November 10, 2010, visible emission measurements were conducted in conjunction with a stack test. While visible emission testing is not required, per §60.732(b), during the November 10, 2010 stack test, visible emissions were reported as zero. During the inspection visible emissions from the wet scrubber were zero opacity.

SC II. 1, SC IV. 4, and SC VI. 2. **COMPLIANCE.** Shall not process more than 2,800 tons of material per day nor 1,000,000 tons of material per 12-month rolling time period. Belt scale shall be installed and maintained. Records are to be maintained. The facility records material processed as required. The highest daily throughput for May 1, 2017 through May 31, 2019 occurred on July 18, 2018 at 2,064 tons. The highest 12-month rolling throughput occurred during July 2018 at 438,329 tons.

SC II. 2 and 3. **COMPLIANCE.** Shall only burn natural gas or propane. Shall not process asbestos tailings or asbestos containing material (ACM). EUSANDDRYER operates exclusively on natural gas. ACM is not processed at the facility. Raw material is received from the Sylvania Mine located in Monroe County.

SC III. 1. **COMPLIANCE.** Shall not operate EUSANDDRYER unless the nuisance minimization plan for fugitive dust is implemented and maintained. Please see fugitive dust discussion below.

SC IV. 1, 2, 3, and SC VI. 1. **NOT IN COMPLIANCE.** Wet scrubber to be installed, maintained, and operated in a satisfactory manner. Pressure drop and liquid flowrate to be recorded and measuring device to be calibrated. Shall record an arithmetic average over a 2-hour period of both pressure drop and liquid flowrate once on a daily basis. According to §60.735(c)(2), the pressure drop is considered in compliance if the average value is not less than 90 % of the pressure drop measured during the November 10, 2010 stack test (measured pressure drop 7.7 inches water). This would equate to a minimum pressure drop of approximately 6.93 inches water. According to §60.735(c)(3), the daily scrubber flow rate should be  $\pm 20$  % of the measured flow rate from the stack test. This equates to approximately 105 gpm to 157.2 gpm. During the inspection, the wet scrubber flow rate (132.09 gallons per minute [gpm]) and the pressure drop (10.32 inches water) was recorded in the wet plant control room. The facility monitors flow rate and pressure drop on a continuous basis and maintains records as appropriate. According to Mr. Robinson, a computer program wonderwear is set up to calculate a 2 hour arithmetic average. The facility 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:

1/7/18 – 6.10 inches  
1/10/18 – 6.06 inches  
1/11/18 – 6.18 inches  
1/13/18 – 6.19 inches  
1/17/18 – 6.52 inches  
1/20/18 – 6.77 inches

2/3/18 – 6.21 inches  
2/8/18 – 6.84 inches  
2/15/18 – 6.16 inches  
2/16/18 – 6.56 inches  
2/17/18 – 6.59 inches  
2/20/18 – 5.39 inches  
2/21/18 – 6.80 inches  
2/28/18 – 5.64 inches

3/1/18 – 5.51 inches  
3/2/18 – 5.52 inches  
3/3/18 – 5.66 inches  
3/4/18 – 5.59 inches  
3/5/18 – 5.58 inches

3/6/18 – 5.51 inches  
3/7/18 – 5.40 inches  
3/8/18 – 5.76 inches  
3/9/18 – 5.40 inches  
3/10/18 – 5.38 inches  
3/11/18 – 5.98 inches  
3/12/18 – 5.52 inches  
3/13/18 – 5.52 inches  
3/14/18 – 5.46 inches  
3/15/18 – 6.28 inches  
3/16/18 – 6.16 inches  
3/18/18 – 6.29 inches  
3/19/18 – 6.14 inches  
3/20/18 – 6.22 inches  
3/21/18 – 6.05 inches  
3/22/18 – 6.15 inches  
3/23/18 – 6.42 inches  
3/24/18 – 6.06 inches  
3/25/18 – 6.20 inches  
3/26/18 – 6.21 inches  
3/27/18 – 6.05 inches  
3/28/18 – 6.05 inches  
3/29/18 – 6.08 inches  
3/30/18 – 6.14 inches  
3/31/18 – 6.13 inches

4/2/18 – 6.07 inches  
4/3/18 – 6.11 inches  
4/4/18 – 6.13 inches  
4/5/18 – 6.28 inches  
4/6/18 – 6.20 inches  
4/7/18 – 6.11 inches  
4/9/18 – 6.29 inches  
4/10/18 – 6.11 inches  
4/11/18 – 6.07 inches  
4/12/18 – 6.35 inches  
4/13/18 – 6.22 inches  
4/14/18 – 6.42 inches  
4/15/18 – 6.63 inches  
4/16/18 – 6.15 inches  
4/18/18 – 6.15 inches  
4/19/18 – 6.19 inches  
4/20/18 – 6.25 inches  
4/21/18 – 6.37 inches  
4/22/18 – 6.55 inches  
4/23/18 – 6.39 inches  
4/24/18 – 6.48 inches  
4/25/18 – 6.02 inches  
4/26/18 – 6.42 inches  
4/27/18 – 6.21 inches  
4/30/18 – 6.44 inches

5/1/18 – 6.00 inches  
5/2/18 – 6.36 inches  
5/3/18 – 5.74 inches  
5/7/18 – 6.07 inches  
5/8/18 – 5.94 inches  
5/9/18 – 6.42 inches  
5/10/18 – 5.71 inches  
5/11/18 – 5.81 inches  
5/14/18 – 6.36 inches

5/16/18 – 5.86 inches  
5/17/18 – 5.98 inches  
5/18/18 – 6.19 inches  
5/19/18 – 6.22 inches  
5/20/18 – 5.13 inches  
5/21/18 – 5.81 inches  
5/22/18 – 6.32 inches  
5/23/18 – 5.81 inches  
5/24/18 – 6.51 inches  
5/25/18 – 6.21 inches  
5/26/18 – 6.11 inches  
5/29/18 – 5.83 inches  
5/30/18 – 5.97 inches  
5/31/18 – 5.73 inches

6/1/18 – 6.04 inches  
6/2/18 - 5.74 inches

11/27/18 - 6.05 inches  
11/28/18 – 6.03 inches  
11/29/18 – 5.84 inches  
11/30/18 – 5.97 inches

On January 28, 2019, USS submitted a letter reporting the deviations from the pressure drop requirement for the dates of November 27 through 30, 2018. According to Mr. Robinson, the pressure drop issue has been fixed since the incidents during November 2018. Records indicate that pressure drops are greater than 6.93 inches for the period following November 2018. The pressure drop excursions for January 2018 through June 2018 were not previously reported. A semiannual report (as required per §60.735(c)) was not submitted for the pressure drop exceedances during January through June 2018.

Records indicate that indicate that the flowrate is typically maintained between 105 gpm to 157.2 gpm, with values typically in the “130’s to 140’s”. The facility reports flow rates greater than 157.2 gpm on the following days.

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

A semiannual report (as required per §60.735(c)) was not submitted for the water scrubber flow rate exceedances that occurred during September 2017, October 2017, December 2017, and February 2018.

According to Mr. Robinson, the monitoring devices are calibrated annually, usually in October each year. Calibration records were provided.

A violation notice will be issued regarding the pressure drop and flow rate deviations listed above and for failure to submit semiannual reports reporting the deviations.

SC VIII. 1. **COMPLIANCE.** Exhaust diameter not to exceed 42 inches. Stack height to be a minimum of 60 feet above ground surface. During the inspection stack dimensions appeared to meet permit conditions. Measurements of the stack were not collected.

SC IX. 1. **NOT IN COMPLIANCE.** Shall comply with 40 CFR Part 60, Subparts A and UUU as applicable. As described above the facility has failed to meet pressure drop and scrubber flow rate requirements of Subpart UUU. Additionally semiannual reports were not received for the majority of the deviations.

### **EUSANDPROCESS**

EUSANDPROCESS consists of both the wash plant process up to the EUSANDDRYER, and the dry plant operations. Dry plant operations are in an enclosed building with transfer points being controlled by a dust collector (SVCOLLECTOR).

SC I. 1, 2, and 3. **NOT EVALUATED.** PM, PM10, and PM2.5 emission limits were not evaluated. The emission limits reference General Condition 13, where the Department may require the permittee to conduct performance tests. At this time, the AQD has not required that tests be performed to evaluate PM, PM10, and PM2.5 emission limit compliance. The facility is likely in compliance with the emission limits through proper operation of the dust collector as described below under SC IV. 1, 2, 3, and SC VI. 1. However, PTI 150-08E does not specifically cite those special conditions as testing/monitoring methods for SC I. 1, 2, and 3.

SC I. 4. **COMPLIANCE.** Visible emissions from drop points and transfer points not to exceed 10 percent opacity. During the inspection visible emissions from drop points and transfer point were zero opacity.

SC II. 1. **COMPLIANCE.** Shall not process asbestos tailings or asbestos containing material (ACM). ACM is not processed at the facility. Raw material is received from the Sylvania Mine located in Monroe County.

SC III. 1. **COMPLIANCE.** Shall not operate any portion of EUSANDPROCESS unless opacity limit listed in Appendix A is met. During the inspection visible emissions from observed equipment was zero opacity.

SC III. 2. **COMPLIANCE.** Shall not operate EUSANDPROCESS unless the nuisance minimization plan for fugitive dust is implemented and maintained. Please see fugitive dust discussion below.

SC IV. 1, 2, 3, and SC VI. 1. **COMPLIANCE.** Equipment control device shall be installed and maintained. Dust collector (fabric filter) shall be installed and maintained. Pressure drop monitored with an alarm sounding when pressure drop exceeds 10 inches water. Pressure drop monitored and recorded on a daily basis. During the inspection the dust collector and other controls (enclosure, partial enclosure, saturated material, etc.) appear to be installed and operating as required. During the inspection the two baghouse banks registered a pressure drop of 2.32 inches and 2.7 inches. The facility provided pressure drop records for May 2019. All pressure drop readings are less than 3.0 inches water.

SC VIII. 1. **COMPLIANCE.** Exhaust diameter not to exceed 36 inches. Stack height to be a minimum of 56 feet above ground surface. During the inspection stack dimensions appeared to meet permit conditions. Measurements of the stack were not collected.

SC IX 1. **COMPLIANCE.** Shall label all equipment using the company ID Numbers in Appendix A. During the inspection, equipment ID numbers appeared to be in place.

### **EUTRUCKTRAFFIC & EUSTORAGE**

Conditions for the EUTRUCKTRAFFIC and EUSTORAGE are combined as conditions are similar for both emission units.

SC I. 1. **COMPLIANCE.** Visible emissions from EUTRUCKTRAFFIC (wheel loaders and all truck traffic) and EUSTORAGE (material storage piles) shall not exceed 5 percent opacity. During the inspection visible emissions from EUTRUCKTRAFFIC equipment and storage piles were zero opacity.

SC III. 1. **COMPLIANCE.** Shall not operate EUTRUCKTRAFFIC or EUSTORAGE unless the nuisance minimization plan for fugitive dust is implemented and maintained. Please see fugitive dust discussion below.

### **NUISANCE MINIMIZATION PLAN: FUGITIVE DUST**

During the June 6, 2019 inspection, the AQD provided comments on the Nuisance Minimization Plan. The company is reviewing the comments and will provide a response. For the purposes of the June 6, 2019, the Nuisance Minimization Plan associated with PTI 150-08E is evaluated below.

#### Site Roadways/Plant Yard

SC I. A.B. and C. **COMPLIANCE**. Dust shall be controlled by applications of water, calcium chloride or other approved compound. All paved roadways and plant yards shall be swept as appropriate. Material spillage shall be cleaned up immediately. A record of dust suppressant applications shall be kept on file. The facility maintains fugitive dust at the plant through watering and road sweeping. Records were provided (see attached).

#### Plant

SC II. **COMPLIANCE**. Drop distance at each transfer point shall be reduced to minimum that equipment can achieve. During the inspection this requirement appeared to be met.

#### Storage Piles

SC III. A and B. **COMPLIANCE**. Shall minimize drop distance and water on as needed basis. During the inspection the water truck was observed onsite. The facility maintains records of water application.

#### Truck Traffic

SC IV. **NOT EVALUATED**. Vehicles to be loaded to prevent their contents from dropping, leaking, blowing, etc. This condition was not evaluated during the inspection.

#### AQD Inspection

SC V. **COMPLIANCE**. Plan is subject to adjustment if fugitive dust requirements are not being met and/or permitted emission limits are not being met. At the time of inspection, USS appeared to be meeting fugitive dust requirements. However, based on the incident that occurred during April 2017 that resulted in a violation notice dated July 17, 2017, the AQD has requested some modification to the proposed nuisance minimization plan. Comments were provided to the company during the inspection on June 6, 2019.

### **NEW SOURCE PERFORMANCE STANDARDS (NSPS)**

#### **40 CFR Part 60, Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries**

The fluidized bed and dryer is subject to 40 CFR Part 60, Subpart UUU. Applicable portions of Subpart UUU were included in the special conditions under EUSANDDRYER. The facility demonstrated compliance with the PM standard for dryers (§60.732(a)) during stack testing conducted on November 10, 2010. The facility maintains a monitoring device to that continuously measures pressure drop and liquid flow rate per §60.734 (d). As described above under EUSANDDRYER, SC IV. 1, 2, 3, and SC VI. 1, the facility has not met the pressure drop and scrubber flow rate requirements for many dates. Additionally, the facility did not submit semiannual reports for the pressure drop and scrubber flow rate deviations as required under §60.735(c) for the 2<sup>nd</sup> half of 2017 (flow rate) and 1<sup>st</sup> half of 2018 (pressure drop). A violation notice will be issued.

### **NESHAP/MACT**

#### **40 CFR Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning**

According to 40 CFR 63.460(a), this standard applies to units that use solvents with concentrations of 5% or more by weight of halogenated compounds (methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform). The SDS provided indicates that material used does not contain the above listed halogenated compounds. Therefore, this standard does not apply.

### **EXEMPT EQUIPMENT**

#### Cold Cleaner

The cold cleaners at the facility are exempt from PTI requirements under the following rule.

R336.1281(2)(h): "The requirement to obtain a PTI does not apply to cold cleaners that have an air/vapor interface of not more than 10 square feet."

The facility provided the SDS for the cold cleaner. The cold cleaner is not heated during use and has a vapor pressure of less than 2 millimeters mercury (mmHg) or 0.039 pounds per square inch [psi]. During the inspection the cold cleaner appeared to be in compliance with the applicable requirements of R336.1707.

### **POTENTIAL TO EMIT EVALUATION**

The below discussion is included in this report similar to the 2016 inspection. During the June 6, 2019 inspection the recommendation that U.S. Silica pursue a true Title V opt-out permit limiting PM10/PM2.5 emissions to less than 100 tons per year (i.e. 90 tpy) was discussed. Mr. Robinson acknowledged the recommendation, but did not state whether a PTI application would be submitted.

On July 24, 2014, USS provided a letter in regard to the action on rescinding Rule 208a. Within the correspondence the facility chose to demonstrate that the potential to emit (PTE) does not exceed any major source emission threshold. Facility calculations indicate a PTE of 77.77 tons per year. Within the PTE calculations, the facility included fugitive emissions, which are not required per Rule 116. Facility operations are not considered to meet one of the categories listed in Rule 116(i) through (xxxiv) and therefore fugitive emissions do not need to be included in PTE.

According to the July 24, 2014 letter, the primary sources of PM10 emissions are from the wash plant sand dryer (EUSANDDRYER) controlled by a wet scrubber and the dry plant dust collector (SVCOLLECTOR). PM10 emissions for the sand dryer are calculated using the permitted emission limit of 7.01 pph (EUSANDDRYER, SC I.2) times 8760 hours divided by 2000 pounds/ton ( $7.01 \text{ pph} \times 8760 \text{ hrs} / 2000 \text{ pound/ton} = 30.70 \text{ tpy}$ ). PM10 emissions from the dry plant dust collector are calculated using the permitted emission limit of 4.61 pph (EUSANDPROCESS, SC I.2) times 8760 hours divided by 2000 pounds/ton ( $4.61 \text{ pph} \times 8760 \text{ hrs} / 2000 \text{ pound/ton} = 20.19 \text{ tpy}$ ). It is important to note that EUSANDPROCESS includes conditions for both the wash plant (minus the sand dry and wet scrubber) and the dry plant. The permitted emission limits under EUSANDPROCESS SC I apply only to the dust collector at the dry plant.

At the time PTI 150-08 was issued (March 24, 2009), the allowable PM10 emissions were 11 pph and 45.3 tpy (see PTI 150-08 permit evaluation form). Assuming PTI 150-08E is similar, the allowable PM10 emissions would be 50.89 tpy ( $30.70 + 20.19 = 50.89 \text{ tpy}$ ), essentially acting as a Title V opt-out permit. In addition, several conditions within PTI 150-08E have a Rule 205 underlying applicable requirement (UAR), indicating that the permit is an opt-out permit.

During the PTE evaluation, the AQD reviewed the flow diagram IDs included in the July 24, 2014 and estimated PTE calculations. Based on review of current facility operations, permitted emission limits, and facility PTE calculations, the AQD believes the facility is not a major source with current permitted controls in place. However, it is recommended that the facility obtain a standard Title V opt-out permit limiting PM10/PM2.5 emissions to less than 100 tons per year (i.e. 90 tpy).

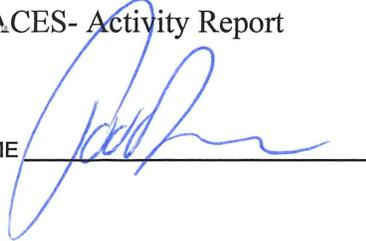
### **MAERS REPORT REVIEW**

Reporting year 2018 MAERS was submitted in a timely manner and was reviewed by AQD staff. The MAERS audit was passed. See facility file.

### **FINAL COMPLIANCE DETERMINATION**

At this time, USS appears to be in noncompliance with EUSANDDRYER, SC IV. 1, SC VI. 1, SC IX.1, and §60.735(c). The facility has not met the pressure drop and scrubber flow rate requirements for many dates. Additionally, the facility did not submit semiannual reports for the pressure drop and scrubber flow rate deviations as required under §60.735(c) for the 2<sup>nd</sup> half of 2017 (flow rate) and 1<sup>st</sup> half of 2018 (pressure drop). A violation notice will be issued.

NAME



DATE

7/16/19

SUPERVISOR

JK