STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT

RICK SNYDER
GOVERNOR

C. HEIDI GRETHER
DIRECTOR

July 17, 2017

Mr. Chris Coppens, Plant Manager
US Silica
20837 North Huron River Dr.
Rockwood, Michigan 48173

SRN: A7757, Wayne County

Dear Mr. Coppens:

VIOLATION NOTICE

On April 19 and April 26, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted investigations in response to eight (8) citizen complaints regarding fallout incidents in the Crystal Crossings Subdivision located in the Charter Township of Brownstown. The scope of the investigations included the operations at US Silica located at 20837 North Huron River Dr., Rockwood, Michigan. The purpose of the investigations was to determine US 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 administrative rules; and Permit to Install (PTI) number 150-08E.

During the investigations, samples of the fallout were obtained and sent to a laboratory for analysis. Lab results show both samples contain a substantial amount of quartz sand, which is consistent with materials handled during sand processing at US Silica.

Based on the investigations, the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
Sand processing facility	R336.1901(b), PTI No. 150-08E, General Condition 6	Detection of fallout beyond the facility's property line, attributable to the facility, of sufficient magnitude as to constitute an unreasonable interference with the comfortable enjoyment of life and property.

Based on the analysis of the fallout samples, the proximity of your facility to the complainants' homes, and prevailing wind direction on the dates the incident occurred (April 15 and April 16, 2017), AQD staff has determined US Silica is the most likely source of the fallout incidents which prompted these investigations. In the professional judgment of AQD staff, the fallout observed during these investigations was sufficient

enough as to constitute a violation of General Condition 6 of PTI number 150-08E and R 336.1901(b): an "unreasonable interference with the comfortable enjoyment of life and property." A copy of the lab report is enclosed.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 7, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

In addition, AQD staff is requesting US Silica provide an updated Fugitive Dust Plan. The current plan found in PTI number 150-08E, Appendix B is found to be inadequate.

If US 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Gerald J. Krawiec

Gerald J Krawiec
Senior Environmental Engineer
Air Quality Division
313-456-4682

Enclosure
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ