

Singleton, Mareesa

From: Craig Kennedy <craigkennedy.kcs@gmail.com>
Sent: Friday, August 18, 2017 2:26 PM
To: Singleton, Mareesa
Cc: Clark Wooten; Matthew Wike
Subject: RDA's Air Construction Permit Application
Attachments: Request to DHEC BAQ to Suspend time schedule for permitting RDA.pdf

Ms Singleton,
Please find attached a letter agreeing to suspending the permit
clock for RDA's Air Construction Permit.
Craig Kennedy

--

Craig Kennedy, P.G.
Kennedy Consulting Services, LLC
P.O. Box 364
Irmo, SC 29063
Telephone: 803.399.1133
Cell: 803.960.2562
e-mail: craigkennedy.KCS@gmail.com

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Kennedy
Consulting KCS Services, LLC

*P.O. Box 364
Irmo, SC 29063
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*403 Seaside Ct
Lexington, SC 29072
Cell 803.960.2562*

craigkennedy.KCS@gmail.com

August 18, 2017

Ms. Maresa Singleton,
SC Department of Health and Env. Control
Bureau of Air Quality
Engineering Services Division
2600 Bull Street
Columbia, SC 29201

RE: RDA, LLC's Application for Air Construction Permit

Dear Ms. Singleton:

On behalf of RDA, LLC, RDA agrees to temporarily suspending the 90 day time schedule as the regulations require for the review and issuance of the Air Construction Permit for the RDA Quarry. This temporary suspension in the time schedule was previously discussed and is to allow BAQ to coordinate with the Mining and Reclamation program for the upcoming public hearing for the RDA Quarry.

Sincerely,



Craig Kennedy
KCS Principal

cc Clark Wooten, RDA, LLC
Matt Wike, GEL Engineering

Singleton, Mareesa

From: Matthew Wike <matthew.wike@gel.com>
Sent: Wednesday, August 16, 2017 11:28 AM
To: Singleton, Mareesa
Cc: Clark Wooten; Craig Kennedy; Rich Moses
Subject: RE: RDA Draft Equipment List
Attachments: RDA equip list - response.docx

Mareesa:

Please find attached our responses to your questions.

Please confirm receipt of this email.

Please call if you have any more questions.

Thanks,

Matt

--

Matthew W. Wike, P.E.



2040 Savage Road, Charleston, SC 29407 | P.O. Box 30712, Charleston, SC 29417

Cell: 843.697.2205 | Office: 843.769.7378 x4489

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From: Singleton, Mareesa [mailto:singlemj@dhec.sc.gov]
Sent: Wednesday, August 9, 2017 11:59 AM
To: Matthew Wike <matthew.wike@gel.com>
Subject: RDA Draft Equipment List

Attached is the draft equipment list. Please review and provide the information requested in the document. Insert the information and make any changes using the track changes by cob Wednesday, August 23, 2017. Let me know if you have any questions. Thanks.

Mareesa Singleton
SCDHEC BAQ Engineering
803-898-4113

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B.1 - EQUIPMENT FOR EMISSION UNIT 01 - STONE CRUSHING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
CR1	Primary Crusher #1	500	Yes	WS	V1
CR2	Secondary Crusher #2	400	Yes	WS	V20
CR3	Tertiary Crusher #3	400	Yes	WS	V31

B.2 - CONTROL DEVICES FOR EMISSION UNIT 01 - STONE CRUSHING

Control Device ID	Control Device Description	Pollutants Controlled
WS	Wet Suppression	PM, PM ₁₀ , PM _{2.5}

B.3 - EQUIPMENT FOR EMISSION UNIT 02 - STONE CONVEYING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
C1	42" Conveyor #1 (Width 42")	500	Yes	WS	V2
C2	Conveyor #2 (Width 42")	150	Yes	WS	V5
C3	Conveyor #3 (Width 42")	150	Yes	WS	V6
C4	Conveyor #4 (Width 36")	400	Yes	WS	V8
C5	Conveyor #5 (Width 48")	400	Yes	WS	V10
C6	Conveyor #6 (Width 36")	400	Yes	WS	V11
C7	Conveyor #7 (Width 36")	50	Yes	WS	V14
C8	Conveyor #8 (Width 36")	50	Yes	WS	V15
C9	Conveyor #9 (Width 26")	50	Yes	WS	V17
C10	Conveyor #10 (Width 42")	50	Yes	WS	V18
C11	Conveyor #11 (Width 36")	400	Yes	WS	V21
C12	Conveyor #12 (Width 36")	400	Yes	WS	V22
C13	Conveyor #13 (Width 36")	75	Yes	WS	V25
C14	Conveyor #14 (Width 36")	75	Yes	WS	V26
C15	Conveyor #15 (Width 36")	75	Yes	WS	V28
C16	Conveyor #16 (Width 36")	75	Yes	WS	V29
C17	Conveyor #17 (Width 36")	290	Yes	WS	V32
C18	Conveyor #18 (Width 36")	290	Yes	WS	V33
C19	Conveyor #19 (Width 66")	90	Yes	WS	V36
C20	Conveyor #20 (Width 36")	90	Yes	WS	V37
C21	Conveyor #21 (Width 36")	80	Yes	WS	V39
C22	Conveyor #22 (Width 36")	80	Yes	WS	V40

Commented [SM1]: Please provide the conveyors width. The width is need for Subpart OOO like replacement determination.

Commented [m2R1]: The width of each conveyor are provided in the equipment descriptions

B.3 - EQUIPMENT FOR EMISSION UNIT 02 - STONE CONVEYING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart 000	Control Device ID	Emission Point ID
C23	Conveyor #23 (Width 36")	75	Yes	WS	V42
C24	Conveyor #24 (Width 48")	75	Yes	WS	V43

Commented [SM1]: Please provide the conveyors width. The width is need for Subpart 000 like replacement determination.

Commented [m2R1]: The width of each conveyor are provided in the equipment descriptions

B.4 - CONTROL DEVICES FOR EMISSION UNIT 02 - STONE CONVEYING

Control Device ID	Control Device Description	Pollutants Controlled
WS	Wet Suppression	PM, PM ₁₀ , PM _{2.5}
WCO	Water Carryover from Upstream Water Sprays	PM, PM ₁₀ , PM _{2.5}

Commented [SM3]: Please verify that none of the equipment (conveying or screening), will use water carry over as its control device.

B.5 - EQUIPMENT FOR EMISSION UNIT 03 - STONE SCREENING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart 000	Control Device ID	Emission Point ID
S1	Scalping Screen #1	500	Yes	WS	V4
S2	Secondary Screen #2	400	Yes	WS	V13
S4	Quaternary Screen #4 (Fines)	290	Yes	WS	V35

Commented [m4R3]: RDA verifies that none of the equipment will use water carry over.

Commented [SM5]: Please provide the total surface area of the top of the screens (typically provided as x by y). This is need for Subpart 000 like replacement determination.

Commented [m6R5]: The total surface areas are:
 -S1 (Scalping Screen #1) – 96 ft²
 -S2 (Secondary Screen #2) – 120 ft²
 -S4 (Quaternary Screen #4) – 120 ft²

B.6 - CONTROL DEVICES FOR EMISSION UNIT 03 - STONE SCREENING

Control Device ID	Control Device Description	Pollutants Controlled
WS	Wet Suppression	PM, PM ₁₀ , PM _{2.5}

B.7 - EQUIPMENT FOR EMISSION UNIT 04 - STONE WASHING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart 000	Control Device ID	Emission Point ID
SS1	Sand Screw		No	None	SS1
S3	Tertiary Screen #3	400	No	None	V24

Commented [SM7]: Subpart 000 states Wet screening operation means a screening operation at a nonmetallic mineral processing plant which removes unwanted material or which separates marketable fines from the product by a washing process which is designed and operated at all times such that the product is saturated with water. Please all applicable equipment in this section. Equipment meeting this definition are not subject to Subpart 000.

Commented [m8R7]: Both the Sand Screw (SS1) and the Tertiary Screen #3 (S3) will be wet processing.

Commented [SM9]: Please provide the capacity for the screw

Commented [m10R9]: The capacity of the sand screw is 150 tons per hour.

Singleton, Mareesa

From: Matthew Wike <matthew.wike@gel.com>
Sent: Wednesday, August 09, 2017 12:03 PM
To: Singleton, Mareesa
Cc: Clark Wooten
Subject: RE: RDA Draft Equipment List

Mareesa

We will get right on this.

Thanks,

Matt

--

Matthew W. Wike, P.E.



2040 Savage Road, Charleston, SC 29407 | P.O. Box 30712, Charleston, SC 29417

Cell: 843.697.2205 | Office: 843.769.7378 x4489

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From: Singleton, Mareesa [mailto:singlemj@dhec.sc.gov]
Sent: Wednesday, August 9, 2017 11:59 AM
To: Matthew Wike <matthew.wike@gel.com>
Subject: RDA Draft Equipment List

Attached is the draft equipment list. Please review and provide the information requested in the document. Insert the information and make any changes using the track changes by cob Wednesday, August 23, 2017. Let me know if you have any questions. Thanks.

Mareesa Singleton
SCDHEC BAQ Engineering
803-898-4113

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B.1 - EQUIPMENT FOR EMISSION UNIT 01 - STONE CRUSHING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
CR1	Primary Crusher #1	500	Yes	WS	V1
CR2	Secondary Crusher #2	400	Yes	WS	V20
CR3	Tertiary Crusher #3	400	Yes	WS	V31

B.2 - CONTROL DEVICES FOR EMISSION UNIT 01 - STONE CRUSHING

Control Device ID	Control Device Description	Pollutants Controlled
WS	Wet Suppression	PM, PM ₁₀ , PM _{2.5}

B.3 - EQUIPMENT FOR EMISSION UNIT 02 - STONE CONVEYING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
C1	Conveyor #1	500	Yes	WS	V2
C2	Conveyor #2	150	Yes	WS	V5
C3	Conveyor #3	150	Yes	WS	V6
C4	Conveyor #4	400	Yes	WS	V8
C5	Conveyor #5	400	Yes	WS	V10
C6	Conveyor #6	400	Yes	WS	V11
C7	Conveyor #7	50	Yes	WS	V14
C8	Conveyor #8	50	Yes	WS	V15
C9	Conveyor #9	50	Yes	WS	V17
C10	Conveyor #10	50	Yes	WS	V18
C11	Conveyor #11	400	Yes	WS	V21
C12	Conveyor #12	400	Yes	WS	V22
C13	Conveyor #13	75	Yes	WS	V25
C14	Conveyor #14	75	Yes	WS	V26
C15	Conveyor #15	75	Yes	WS	V28
C16	Conveyor #16	75	Yes	WS	V29
C17	Conveyor #17	290	Yes	WS	V32
C18	Conveyor #18	290	Yes	WS	V33
C19	Conveyor #19	90	Yes	WS	V36
C20	Conveyor #20	90	Yes	WS	V37
C21	Conveyor #21	80	Yes	WS	V39
C22	Conveyor #22	80	Yes	WS	V40

Commented [SM1]: Please provide the conveyors width. The width is need for Subpart OOO like replacement determination.

B.3 - EQUIPMENT FOR EMISSION UNIT 02 - STONE CONVEYING

Commented [SM1]: Please provide the conveyors width. The width is need for Subpart 000 like replacement determination.

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart 000	Control Device ID	Emission Point ID
C23	Conveyor #23	75	Yes	WS	V42
C24	Conveyor #24	75	Yes	WS	V43

B.4 - CONTROL DEVICES FOR EMISSION UNIT 02 - STONE CONVEYING

Control Device ID	Control Device Description	Pollutants Controlled
WS	Wet Suppression	PM, PM ₁₀ , PM _{2.5}
WCO	Water Carryover from Upstream Water Sprays	PM, PM ₁₀ , PM _{2.5}

Commented [SM2]: Please verify that none of the equipment (conveying or screening), will use water carry over as its control device.

B.5 - EQUIPMENT FOR EMISSION UNIT 03 - STONE SCREENING

Commented [SM3]: Please provide the total surface area of the top of the screens (typically provided as x by y). This is need for Subpart 000 like replacement determination.

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart 000	Control Device ID	Emission Point ID
S1	Scalping Screen #1	500	Yes	WS	V4
S2	Secondary Screen #2	400	Yes	WS	V13
S4	Quaternary Screen #4 (Fines)	290	Yes	WS	V35

B.6 - CONTROL DEVICES FOR EMISSION UNIT 03 - STONE SCREENING

Control Device ID	Control Device Description	Pollutants Controlled
WS	Wet Suppression	PM, PM ₁₀ , PM _{2.5}

B.7 - EQUIPMENT FOR EMISSION UNIT 04 - STONE WASHING

Commented [SM4]: Subpart 000 states Wet screening operation means a screening operation at a nonmetallic mineral processing plant which removes unwanted material or which separates marketable fines from the product by a washing process which is designed and operated at all times such that the product is saturated with water. Please all applicable equipment in this section. Equipment meeting this definition are not subject to Subpart 000.

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart 000	Control Device ID	Emission Point ID
SS1	Sand Screw		No	None	SS1
S3	Tertiary Screen #3	400	No	None	V24

Commented [SM5]: Please provide the capacity for the screw

Singleton, Mareesa

From: Price, Tracy
Sent: Wednesday, July 26, 2017 8:27 AM
To: Singleton, Mareesa
Subject: RDA mine
Attachments: 0049-2017-07-20.docx

Mareesa,

I couldn't remember if I told you the modeling was complete for this facility. The summary is on the network and a copy attached.

Tracy Price
SCDHEC/BAQ/Modeling
2600 Bull St.
Columbia, SC 29201
803-685-5520 telecommute
priceto@dhec.sc.gov

Singleton, Mareesa

From: Matthew Wike <matthew.wike@gel.com>
Sent: Thursday, July 27, 2017 2:59 PM
To: Singleton, Mareesa
Subject: RE: RDA Andrew Quarry (2380-0049) Additional Information Request

Thanks

--

Matthew W. Wike, P.E.

GEL Engineering LLC

2040 Savage Road, Charleston, SC 29407 | P.O. Box 30712, Charleston, SC 29417

Cell: 843.697.2205 | Office: 843.769.7378 x4489

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From: Singleton, Mareesa [mailto:singlemj@dhec.sc.gov]
Sent: Thursday, July 27, 2017 2:58 PM
To: Matthew Wike <matthew.wike@gel.com>
Subject: Re: RDA Andrew Quarry (2380-0049) Additional Information Request

Matt at this time we are good for permitting and modeling. I will let you know if anything changes. Thanks.

Mareesa Singleton
SCDHEC BAQ Engineering
803-898-4113

From: Singleton, Mareesa
Sent: Tuesday, July 18, 2017 1:06 PM
To: Matthew Wike
Cc: cwooten@buysod.com; Craig Kennedy; Rich Moses
Subject: RE: RDA Andrew Quarry (2380-0049) Additional Information Request

Thanks for the response. I will review and let you know if I have any questions.

From: Matthew Wike [mailto:matthew.wike@gel.com]
Sent: Tuesday, July 18, 2017 12:57 PM
To: Singleton, Mareesa <singlemj@dhec.sc.gov>

Cc: cwooten@buysod.com; Craig Kennedy <craigkennedy.kcs@gmail.com>; Rich Moses <Rich.Moses@americanmaterialsco.com>

Subject: RE: RDA Andrew Quarry (2380-0049) Additional Information Request

Mareesa:

Please find attached, our responses to your questions.

Please confirm receipt of this email.

Please call if you have any more questions.

Thanks,

Matt

--

Matthew W. Wike, P.E.

GEL Engineering LLC

2040 Savage Road, Charleston, SC 29407 | P.O. Box 30712, Charleston, SC 29417

Cell: 843.697.2205 | Office: 843.769.7378 x4489

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From: Singleton, Mareesa [<mailto:singlemj@dhec.sc.gov>]

Sent: Monday, July 3, 2017 3:46 PM

To: Matthew Wike <matthew.wike@gel.com>

Cc: cwooten@buysod.com

Subject: RDA Andrew Quarry (2380-0049) Additional Information Request

Matt,

Would you please provide the following information by cob, Wednesday, July 19, 2017:

1. Will the facility have any dewatering pumps (typically used in the pit)? If so, please provide emission estimates, regulatory review, and a modeling review.
2. Please provide 40 CFR 60 Subpart OOO applicably for each source.
3. Will the facility include a wash process? If so, please specify the wash process equipment.
4. Typically, facilities operate a portable/temporary plant during the development of the pit. Is this the planned operation for this facility? If so, a condition will be added to the permit allowing the portable/temporary plant and the facility will not need to submit a separate request for it. If not, please provide information on the planned start-up operations.
5. Some of the cells on Table 3 (PM2.5 Emissions) of the application are displaying zeros. Please increase the number of visible decimal places and resubmit.
6. The PSD avoidance limit for this facility is 250 TPY. Therefore, for accuracy and completeness the facility will need to request a PSD avoidance limit of 250 TPY for PM and PM10 in addition to the PM10 TV avoidance limit of 100 TPY.

Please let me know if you have any questions. Thanks.

M Treasa Singleton
BAQ - Engineering Services Division
S.C. Dept. of Health & Environmental Control
Office: 803-898-4113
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



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Responses to DHEC BAQ RDA Andrews Quarry (2380-0049) Additional Information Request

Question No. 1:

Will the facility have any dewatering pumps (typically used in the pit)? If so, please provide emission estimates, regulatory review, and a modeling review.

Response No. 1

The RDA facility will start out with one 200 HP electric vertical turbine pump, but after the pit grows the facility could utilize up to 3. Since the pumps will be electric, there are no emissions to permit and modeling.

Question No. 2:

Please provide 40 CFR 60 Subpart OOO applicably for each source.

Response No. 2

The RDA facility is subject to 40 CFR Part 60 Subpart OOO. Each crusher, screen, and conveyor is subject to the rule. Based on our review of the rule, Subpart OOO does not apply to drilling, non-enclosed truck loading, or storage piles as those sources are not listed in §60.670(a). Since the facility is comprised entirely of fugitive emissions, only the fugitive particulate matter emission limits and compliance requirements of Table 3 and §60.672(b) apply. Table 3 of Subpart OOO lists the following requirements that are applicable to a facility that will commence construction after April 22, 2008.

- 7 percent opacity for conveyor transfer points and screens
- 12 percent opacity for crushers.
- Initial Performance Test
- Periodic inspections of water sprays per §60.674 (b)
- Reporting and recordkeeping requirements of water sprays under §60.676

Question No. 3:

Will the facility include a wash process? If so, please specify the wash process equipment.

Response No. 3

The RDA facility will include a wash process. The 2 screens in the tertiary will both have spray bars and there will be a screw to handle the fines. The entire plant will have dust suppression with spray nozzles on all the transfer points and crushers.

Question No. 4:

Typically, facilities operate a portable/temporary plant during the development of the pit. Is this the planned operation for this facility? If so, a condition will be added to the permit allowing the portable/temporary plant and the facility will not need to submit a separate request for it. If not, please provide information on the planned start-up operations.

Table 3
Emission Assumptions and Calculation I: PM2.5 Emissions from Drilling and Material Handling
RDA, LLC
Andrews, South Carolina

Emission Source ID	Emissions Source Description	Transfer From Equipment ID	Transfer To Equipment ID	A Design Capacity (tons/hr)	B Uncontrolled PM _{2.5} Emission Factor (lbs/ton)	C Uncontrolled PM _{2.5} Hourly Emissions (lbs/hr)	D Uncontrolled PM _{2.5} Annual Emissions (tpy)	E Controlled PM _{2.5} Emission Factor (lbs/ton)	F Controlled PM _{2.5} Hourly Emissions (lbs/hr)	G Controlled PM _{2.5} Annual Emissions (tpy)
CR1	Crusher No. 1 (Primary)	-	-	500	0.00036	0.18	0.80	0.0001	0.050	0.22
TP1	Transfer Point No. 1	CR1 (Figure ID 1)	C1 (Figure ID 2)	500	0.00017	0.08	0.36	0.000013	0.007	0.03
TP2	Transfer Point No. 2	C1 (Figure ID 2)	S1 (Figure ID 3)	500	0.00017	0.08	0.36	0.000013	0.007	0.03
S1	Screening Station #1 (Scalping)	-	-	500	0.0013	0.66	2.89	0.00005	0.025	0.11
TP3	Transfer Point No. 3	S1 (Figure ID 3)	C2 (Figure ID 4)	150	0.00017	0.02	0.11	0.000013	0.002	0.01
TP4	Transfer Point No. 4	C2 (Figure ID 4)	C3 (Figure ID 5)	150	0.00017	0.02	0.11	0.000013	0.002	0.01
TP5	Transfer Point No. 5	C3 (Figure ID 5)	STP1 (Figure ID 6)	150	0.00017	0.02	0.11	0.000013	0.002	0.01
TP6	Transfer Point No. 6	S1 (Figure ID 3)	C4 (Figure ID 7)	400	0.00017	0.07	0.29	0.000013	0.005	0.02
TP7	Transfer Point No. 7	C4 (Figure ID 7)	STP2 (Figure ID 8)	400	0.00017	0.07	0.29	0.000013	0.005	0.02
TP8	Transfer Point No. 8	STP2 (Figure 8)	C5 (Figure ID 9)	400	0.00017	0.07	0.29	0.000013	0.005	0.02
TP9	Transfer Point No. 9	C5 (Figure ID 9)	C6 (Figure ID 10)	400	0.00017	0.07	0.29	0.000013	0.005	0.02
TP10	Transfer Point No. 10	C6 (Figure ID 10)	S2 (Figure ID 11)	400	0.00017	0.07	0.29	0.000013	0.005	0.02
S2	Screening Station #2 (Secondary)	-	-	400	0.0013	0.53	2.31	0.00005	0.020	0.09
TP11	Transfer Point No. 11	S2 (Figure ID 11)	C7 (Figure ID 12)	50	0.00017	0.01	0.04	0.000013	0.001	0.003
TP12	Transfer Point No. 12	C7 (Figure ID 12)	C8 (Figure ID 13)	50	0.00017	0.01	0.04	0.000013	0.001	0.003
TP13	Transfer Point No. 13	C8 (Figure ID 13)	STP3 (Figure ID 14)	50	0.00017	0.01	0.04	0.000013	0.001	0.003
TP14	Transfer Point No. 14	S2 (Figure ID 11)	C9 (Figure ID 15)	50	0.00017	0.01	0.04	0.000013	0.001	0.003
TP15	Transfer Point No. 15	C9 (Figure ID 15)	C10 (Figure ID 16)	50	0.00017	0.008	0.04	0.000013	0.0007	0.0028
TP16	Transfer Point No. 16	C10 (Figure ID 16)	STP4 (Figure ID 17)	50	0.00017	0.008	0.04	0.000013	0.0007	0.0028
CR2	Crusher No. 2 (Secondary)	-	-	400	0.00036	0.15	0.64	0.0001	0.040	0.18
TP17	Transfer Point No. 17	CR2 (Figure ID 18)	C11 (Figure ID 19)	400	0.00017	0.07	0.29	0.000013	0.005	0.02
TP18	Transfer Point No. 18	C11 (Figure ID 19)	C12 (Figure ID 20)	400	0.00017	0.07	0.29	0.000013	0.005	0.02
TP19	Transfer Point No. 19	C12 (Figure ID 20)	S3 (Figure ID 21)	400	0.00017	0.07	0.29	0.000013	0.005	0.02
S3	Screening Station #3 (Tertiary)	-	-	400	0.00132	0.53	2.31	0.00005	0.020	0.09
TP20	Transfer Point No. 20	S3 (Figure ID 21)	C13 (Figure ID 22)	75	0.00017	0.01	0.05	0.000013	0.001	0.004
TP21	Transfer Point No. 21	C13 (Figure ID 22)	C14 (Figure ID 23)	75	0.00017	0.01	0.05	0.000013	0.001	0.004
TP22	Transfer Point No. 22	C14 (Figure ID 23)	STP5 (Figure ID 24)	75	0.00017	0.012	0.05	0.000013	0.0010	0.0043
TP23	Transfer Point No. 23	S3 (Figure ID 21)	C15 (Figure ID 25)	75	0.00017	0.01	0.05	0.000013	0.001	0.004
TP24	Transfer Point No. 24	C15 (Figure ID 25)	C16 (Figure ID 26)	75	0.00017	0.01	0.05	0.000013	0.001	0.004
TP25	Transfer Point No. 25	C16 (Figure ID 26)	STP6 (Figure 27)	75	0.00017	0.012	0.05	0.000013	0.0010	0.0043
CR3	Crusher No. 3 (Tertiary)	-	-	400	0.00036	0.15	0.64	0.0001	0.040	0.18
TP26	Transfer Point No. 26	CR3 (Figure ID 28)	C17 (Figure ID 29)	290	0.00017	0.048	0.21	0.000013	0.0038	0.0165
TP27	Transfer Point No. 27	C17 (Figure ID 29)	C18 (Figure ID 30)	290	0.00017	0.048	0.21	0.000013	0.0038	0.0165
TP28	Transfer Point No. 28	C18 (Figure ID 30)	S4 (Figure ID 31)	290	0.00017	0.048	0.21	0.000013	0.0038	0.0165
S4	Screening Station #4 (Fines)	-	-	290	0.011	3.16	13.85	0.00033	0.097	0.42
TP29	Transfer Point No. 29	S4 (Figure ID 31)	C19 (Figure ID 32)	90	0.00017	0.01	0.07	0.000013	0.001	0.01
TP30	Transfer Point No. 30	C19 (Figure ID 32)	C20 (Figure ID 33)	90	0.00017	0.01	0.07	0.000013	0.001	0.005
TP31	Transfer Point No. 31	C20 (Figure ID 33)	STP7 (Figure ID 34)	90	0.00017	0.015	0.07	0.000013	0.0012	0.0051
TP32	Transfer Point No. 32	S4 (Figure ID 31)	C21 (Figure ID 35)	80	0.00017	0.01	0.06	0.000013	0.001	0.005
TP33	Transfer Point No. 33	C21 (Figure ID 35)	C22 (Figure ID 35)	80	0.00017	0.01	0.06	0.000013	0.001	0.005
TP34	Transfer Point No. 34	C22 (Figure ID 35)	STP8 (Figure ID 36)	80	0.00017	0.013	0.06	0.000013	0.0010	0.0046
TP35	Transfer Point No. 35	S4 (Figure ID 31)	C23 (Figure ID 38)	75	0.00017	0.01	0.05	0.000013	0.001	0.004
TP36	Transfer Point No. 36	C23 (Figure ID 38)	C24 (Figure ID 39)	75	0.00017	0.01	0.05	0.000013	0.001	0.004
TP37	Transfer Point No. 37	C24 (Figure ID 39)	STP9 (Figure ID 40)	75	0.00017	0.012	0.05	0.000013	0.0010	0.0043
Tload	Final Product Truck Loading	-	-	500	0.000015	0.01	0.03	0.000015	0.008	0.03
Drill	Drilling inside the Quarry	-	-	500	0.000012	0.01	0.03	0.000012	0.006	0.03
HaulLoad	Truck Loading at the Quarry	-	-	500	0.000002	0.00	0.01	0.000002	0.001	0.01
Total	-	-	-	-	-	6.53	28.60	-	0.40	1.74

Note:
1. Since all emissions from each source are below 1 pound per hour, no air dispersion modeling is required.

Singleton, Mareesa

From: Matthew Wike <matthew.wike@gel.com>
Sent: Thursday, June 29, 2017 11:57 AM
To: Singleton, Mareesa
Subject: RE: RDA Andrews Quarry 2320-0049

Mareesa

Per my voicemail yesterday, the facility would like the flexibility to mine both below (wet mining) and above (dry mining) the water table.

Therefore, we believe the uncontrolled and controlled emissions presented are both appropriate to determine potential to emit.

The guidance memo you sent me was interesting and appreciate the assistance.

Thanks,

Matt

--

Matthew W. Wike, P.E.

GEL | Engineering LLC

2040 Savage Road, Charleston, SC 29407 | P.O. Box 30712, Charleston, SC 29417
Cell: 843.697.2205 | Office: 843.769.7378 x4489
Environmental | Engineering | Surveying

From: Singleton, Mareesa [mailto:singlemj@dhec.sc.gov]
Sent: Tuesday, June 27, 2017 3:56 PM
To: Matthew Wike <matthew.wike@gel.com>
Subject: RDA Andrews Quarry 2320-0049

Matt,
Per our discussion, attached is the EPA document on mining below the water table. Please let me know if this is the case for the proposed Andrews quarry. Let me know if you have any questions. Thanks.

Mareesa Singleton
BAQ - Engineering Services Division
S.C. Dept. of Health & Environmental Control
Office: 803-898-4113
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

R. MED

4APT-AEB

APR 11 1995

APR 14 1995

Carl W. Richardson, P.E.
Director
Engineering Services Division
Bureau of Air Quality
South Carolina Department of Health and
Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

BUREAU OF AIR QUALITY

RE: USE OF CONTROLLED EMISSION FACTORS IN NONMETALLIC MINING
INDUSTRIES

Dear Mr. Richardson:

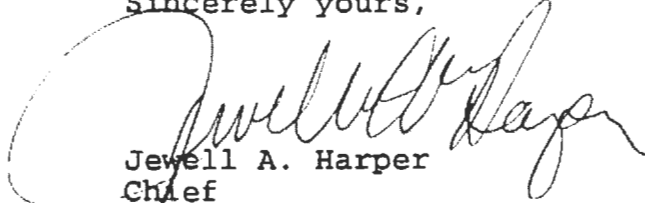
Your letter of February 24, 1995, to Scott Miller, requested that the Environmental Protection Agency (EPA) provide written concurrence on the use of controlled emission factors for nonmetallic mining industries that quarry and process material mined below the local water table elevation (i.e., higher naturally occurring moisture content). The letter stated that a small group of nonmetallic mining industries which are allowed to apply such factors as federally enforceable conditions may be excluded from Title V permitting requirements.

EPA concurs with your approach to use wet suppression factors (as found in Table 11.19.2-2 of AP-42, 5th ed., modified by SC BAQ) for material mined and processed without wet suppression control provided: 1) the nonmetallic mining plant only processes material which has been mined below the local water table elevation; 2) the moisture content of the mined material is verified to be above 1.5 percent; and 3) the facility meets all visible emission requirements of 40 CFR Part 60, Subpart 000. With respect to implementation, SC DHEC will have the responsibility to determine which nonmetallic mining plants qualify for use of wet suppression factors based upon the above provisions.

In order to create limitations for the purpose of avoiding Title V permitting requirements, the above provisions must be incorporated into a permit which has been deemed federally enforceable. The limiting condition(s) must also be enforceable as a practical matter (i.e., include necessary monitoring, recordkeeping and reporting requirements). For further details, please reference the memorandum entitled, "Options for Limiting the Potential to Emit (PTE) of a Stationary Source Under Section 112 and Title V of the Clean Air Act" (from J.S. Seitz, dated 1/25/95).

If you should have any questions regarding this letter,
please contact Mr. Alan Drake of my staff at 404/347-3555, x4151.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Jewell A. Harper". The signature is written in dark ink and is positioned above the typed name.

Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division

February 24, 1995

Mr. Scott Miller
U. S. Environmental Protection Agency
Region IV - Air Programs Branch
345 Courtland Street, NE
Atlanta, Georgia 30065

Re: Request for written permission to use controlled emission factors

Dear Mr. Miller:

As discussed in earlier telephone conversations, in South Carolina we have several non-metallic mining industries at which material is quarried and processed wet without the aid of wet suppression. Such operations include mining of material below the local water table elevation, thus negating the need for wet suppression. It appears acceptable to classify emissions from these processes by the use of wet suppression emission factors, as found in the most recent revision of Table 11.19.2-2 of AP-42. If we can use these factors for this small group of industries, as recognized federally enforceable conditions, these quarries may be excluded from Title V permitting requirements. Your concurrence on this approach is requested.

In addition to this request, in order to preclude future clarification from EPA, the following questions are offered:

- (1) Who will make the determination as to which quarries qualify for the use of these wet suppression factors? Will this authority belong to the state regulatory agency?
- (2) What evidence, if any, is required to make such a determination? Or is this at the discretion of the state regulatory agency?

We sincerely appreciate a timely response to the issues. Should you have any questions or concerns, please contact Brett M. Caswell of my staff at (803) 734-4488.

Sincerely,



Carl W. Richardson, P. E., Director
Engineering Services Division
Bureau of Air Quality