



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 13, 2012

Steve Dittoe, Plant Manager
Premier Silica LLC- Millwood Plant
26900 Coshocton Road
Howard, OH 43028

**Re: Premier Silica LLC - Millwood Plant
NPDES Permit 4IJ00100/ OH0033201
Reconnaissance Inspection
Knox County**

Dear Mr. Dittoe:

On October 17, 2012, a Reconnaissance Inspection was conducted at the Premier Silica LLC - Millwood Plant in Knox County. Present for the inspection were yourself and Tim Schwendemen from Affinity Consultants representing Premier Silica LLC, and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance practices at the plant. This facility was in Significant Non-Compliance (SNC) from April 2010 – June 2012 for total suspended solids violations at Outfall 002. These issues were successfully resolved in March 2012 when this outfall was eliminated. I appreciate the corrective actions you have undertaken to resolve issues of non-compliance and to eliminate or substantially reduce the volume of water discharged to the Kokosing River.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at mike.sapp@epa.ohio.gov.

Sincerely,

Michael E. Sapp
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

c: Tim Schwendemen. Affinity Consultants

ec: Mike Sapp

MES/nsm Premier Silica LLC 12

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
41J00100	OH0033201	RI	S	Industrial
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
10/17/2012	9:30 AM	11:00 AM	No	No

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Premier Silica, LLC - Millwood Plant 26900 Coshocton Road Howard, Ohio 43028	7/1/2012
	Permit Expiration Date
	6/30/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Steve Dittoe – Plant Manager	(740) 599-7773
Tim Schwendemen – Affinity Consultants	(330) 854-9066
Name and Title of Responsible Official	Phone Number
Steve Dittoe, Plant Manager	(740) 599-7773

SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S	NPDES Compliance	
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
M	Receiving Waters	Previously in SNC for suspended solids at outfall 002
S	Laboratory	

Comments:

Signatures

	11/7/12		11/8/12
Michael Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

ADDITIONAL INFORMATION
Premier Silica LLC
4IJ00100*GD – OH0033201

General

Premier Silica operates a sand quarry which is involved with the mining of sandstone and the processing of stone into sand. The processing operations involve drilling, blasting, crushing, screening, washing, drying and storage. Sand production at the quarry averages approximately 120,000 tons/year. The facility is comprised of approximately 300 acres; 90 of which are actively used for mining and processing. Fresh water, which is used for processing operations, is pumped from the Kokosing River into fresh water holding ponds. The facility has approximately 60 years of sandstone reserves remaining in the quarry. Sand produced at the Millwood quarry is used primarily in the oil and gas industries.

The effective NPDES permit contains the following outfalls:

Outfall 001 – This outfall receives process wastewater (wash water) from the dryer and mud pond as well as high level gravity overflows from the fresh water pond and the former neutralization pond #2. Flows from these operations are first directed to a large quarry pond. Discharges from the quarry pond, to outfall 001, are manually controlled by a quarry pond pump which is located in a new pumphouse. The quarry pond pump discharges first to a settling pond before overflowing, by gravity, to the Kokosing River. The pump from the quarry pond is manually controlled and a time-elapsd meter on the pump is used to estimate the volume discharged. Since the previous inspection, the plant installed a line from the pumphouse to neutralization impoundment #3 which allows them to reuse a significant amount of water. This has also reduced the frequency and volume of discharges to the Kokosing River at outfall 001. The plant has also modified the quarry pond by installing a dike to preclude short circuiting and enhance settling in the pond. Flows at this outfall range from 10,000 – 1,300,000 gpd.

Outfall 003 – This outfall receives a portion of the process flows from the rod mill and stormwater drainage along the main entrance road to the plant. These flows first enter a long narrow settling basin, equipped with a riser, before entering the Kokosing River. The settling basin had sufficient freeboard to hold the water and allow for infiltration. Consequently, discharges at this outfall rarely occur. The outfall is checked daily during rain events to document discharges. Flows at this outfall are estimated using a bucket and stopwatch.

1. Outfall 002 was eliminated in March 2012 following the rerouting of the gravity overflow line on the old neutralized water impoundment #2. In addition, the stormwater runoff from a roadway on the south side of the plant, that was tributary to outfall 002, was redirected to the quarry pond for recycling. At the time of the inspection, a 6-8" diameter pipe was observed along the roadway near the bagger building. This pipe was removed shortly after the inspection.
2. The frequency and magnitude of suspended solids violations (40% exceedance) at outfall 002 resulted in the placement of this facility on US EPA's Significant Non-Compliance List. The facility was removed from the SNC list in June 2012 when compliance with suspended solids limits was maintained for two successive quarters following the elimination of outfall 002.
3. The facility is currently evaluating the closure of the old tailings pond (neutralized water impoundment #2).
4. TCCI labs is contracted to perform analyses for pH and suspended solids.

Compliance Data for Carmeuse Industrial Sands - Millwood Plant between 8/1/2010 to 9/30/2012

Summary

- Permit Effluent Limit Violations: 9
- Permit Effluent Code Violations: 0
- Permit Effluent Frequency Violations: 0
- Compliance Schedule Violations: 0

Limit Violations						
Month	Code	Parameter	Limit	Actual	Value	Date
February 2011	001	Total Suspended Solids	30D Conc	30	113.	2/1/2011
February 2011	002	Total Suspended Solids	30D Conc	30	157.	2/1/2011
February 2011	003	Total Suspended Solids	30D Conc	30	361.	2/1/2011
February 2011	001	Total Suspended Solids	1D Conc	45	113.	2/28/2011
February 2011	002	Total Suspended Solids	1D Conc	45	157.	2/28/2011
February 2011	003	Total Suspended Solids	1D Conc	45	361.	2/28/2011
December 2011	002	Total Suspended Solids	30D Conc	30	51.	12/1/2011
December 2011	002	Total Suspended Solids	1D Conc	45	51.	12/5/2011
January 2012	002	Total Suspended Solids	30D Conc	30	44.	1/1/2012