From:	Lori McCloud
To:	*EQB_Silica Sand
Subject:	frac sand handbook
Date:	Wednesday, January 22, 2014 7:17:07 AM

I have a comment for the draft (Dec 13th 2013) of the ”frac sand handbook” known as the “EQB tools for local governments; planning for and regulating silica sand project”.

Referring to the bottom of page 26 (A.2 Dust control), where the bullet starts as “Periodic monitoring and recordkeeping”; The guidance stated is to use a continuous parameter monitoring system to monitor pressure drop after bag house or other method.

However, the US EPA has the ”fabric filter bag leak detection guidance” document that asks for use of triboelectric dust monitors. These triboelectric monitors measure actual dust/particulate and not simply flow/pressure that could change from something as simple as fan speed variation. Another concern is If the improper filter (not HEPA) is used, the system may appear to be working. This is any easy way to cheat, among many other ways. Without third party inspections, I am concerned a pressure drop type CPMS would fall severely short of public health protection.
If there is a concern about silica charging, you may want to refer to the EPA “Portland Cement NESHAP and NSPS” that has the option of CPMS (a major portion of cement being silica). The other option is for a more advanced particulate “PM” monitor using light scattering technology. I understand this may be argued as overkill, but monitoring silica dust should be similar to cement or similar industries with appropriate particulate monitoring regulations.

I do not believe the frac sand guidance booklet has chosen the best, or most appropriate type of CPMS system to suggest for use on bag houses (most typical) or other method of dust control. Pressure drop CPMS should be a minimal control, if used at all, especially in large operations. I would like the EQB to reconsider their suggested pressure drop CPMS and include more appropriate monitoring of actual dust amounts by means of triboelectric or more advanced PM monitoring technology.

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