



315 West 3<sup>rd</sup> Street  
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June 12, 2018

Department of Public Health  
Attn: Environmental Permitting and Inspections  
333 South State Street, Room 200  
Chicago, IL 60604

Re: CDPH Proposed Amendments to Rules and Regulations for Control of Emissions from  
the Handling and Storage of Bulk Material Piles

Dear Sir/Madam:

Watco Terminal and Port Services, Chicago Ferro Terminal (Chicago Ferro) is writing in regards to the City of Chicago Department of Public Health (CDPH) Proposed Amendments to the Rules and Regulations for the Control of Emissions from the Handling and Storage of Bulk Material Piles.

**Comment 1:**

Chicago Ferro respectfully requests that the requirements to provide an amended Fugitive Dust Plan be reviewed and revised accordingly.

In March 2018, Chicago Ferro submitted a Fugitive Dust Plan for review and approval to the CDPH. As of June 2018, there has been not feedback from the CDPH. Once the rules and regulation are promulgated into the federal registry, the Fugitive Dust Plan will need to be revised, however, the initial plan has not yet been approved.

According to Part B: Bulk Material Facilities, Paragraph 3.0(3), an amended Fugitive Dust Plan is required to be submitted to the Department for review and approval at least thirty (30) days prior to such change, modification, or addition.

As a result of the proposed rules and regulations, Chicago Ferro will be required to install, operate, and maintain a Federal Reference Method (FRM) PM10 monitor, therefore resulting in the current Fugitive Dust Plan to be amended. Is Chicago Ferro required to submit an amended Fugitive Dust Plan since the initial plan has been previously submitted, or should the facility submit a new Fugitive Dust Plan within 30 days of the installation of the FRM PM10 monitor?

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**Comment 2:**

Chicago Ferro respectfully requests that the requirements to install, operate and maintain a FRM PM10 monitor be reviewed and revised accordingly.

According to Part B: Bulk Material Facilities, Paragraph 30.(5), it is stated that “In circumstances where PM10 monitoring described in Section 3.0(4), does not provide sufficient information regarding fugitive dust for the Commissioner to adequately assess health impacts of such emissions, the Department may require the Facility Owner to install, operate, and maintain, according to manufacturer’s specifications, one (1) Federal Reference Method (FRM) PM10 filter-based monitoring site at the Facility in accordance with the requirements specified below:...”.

It is requested that the CDPH provide clarification on what is deemed “not sufficient” and how this determination is made. If a facility is currently under review and recently began PM10 monitoring, how can this requirement be implemented to warrant the placement of the FRM PM10 monitor? Chicago Ferro installed four (4) PM10 monitors in March 2018 and have not completed the minimum monitoring period of one (1) year to determine if the monitoring efforts are sufficient. During the last 4 months, the monitoring results indicate PM10 levels significantly lower than the specified thresholds noted in the Fugitive Dust Plan.

**Comment 3:**

Chicago Ferro respectfully requests that the requirements to install, operate and maintain a FRM PM10 monitor be reviewed and revised accordingly.

The requirement to install a FRM monitor specified in Part B: Bulk Material Facilities, Paragraph 3.0(5) contradicts the requirements outlined in Part D: Manganese Bearing Bulk Material Facility Operations, Paragraph 6.0 Filter-Based Metals Monitoring in Lieu of Enclosure.

Chicago Ferro requests that the requirement to install a FRM PM10 monitor be reviewed and adjusted to incorporate a timeline of successful versus unsuccessful PM10 monitoring. Under what stipulations are the decisions made to install the FRM PM10 monitor? If there has been no feedback from the CDPH regarding the Fugitive Dust Plan the measures taken to prevent and reduce fugitive dust emissions, how can this conclusion be drawn to install the additional monitor?

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**Comment 4:**

Chicago Ferro requests that the definition of “fully enclosed structures” as stated in Part D: Manganese Bearing Bulk Material Facility Operations, Paragraph 5.0 be reviewed and revised accordingly.

Based on the operations at Chicago Ferro constitute the continuous entering/exiting of the warehouse that stores the Manganese-Bearing Bulk Material, the amount of time that is required to close a door, another truck load would be entering into the warehouse.

It is requested that clarification is provided on the Enclosure Requirements noted in 5.0(2)(f). Vehicles at the site move in a 3-5 second interval and the ability to install overlapping flaps or sliding doors, or other equivalent air pollution controls is not practical and prevents a high safety hazard. It is requested that a specified operating time frame be placed on the requirement to fully enclose the structures used to handle, store, or transfer Manganese-Bearing Bulk Material. Additionally, it is requested that clarification is provided on what is in operation versus not in operation.

**Comment 5:**

Chicago Ferro respectfully requests that the monitoring schedule requirements be reviewed and revised accordingly

According to Part D: Manganese Bearing Bulk Material Facility Operations, Paragraph 6.0, the 3-day EPA Monitoring Schedule requirement reflects an outdated schedule for 2015.

It is requested that this item reflect the current and most recent version of the EPA’s monitoring schedule.

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