To: Cantello, Nicole[cantello.nicole@epa.gov]; Ames, Mort[Mort.Ames@cityofchicago.org]; Smith, Molly[Smith.Molly@epa.gov]; Miller, Patrick[miller.patrick@epa.gov]
Cc: Graham, Dave[Dave.Graham@cityofchicago.org]
From: Hesse, Jennifer
Sent: Fri 8/11/2017 10:07:39 PM
Subject: RE: CDPH Draft Letter to SH Bell

Got it. Thanks!

From: Cantello, Nicole [mailto:cantello.nicole@epa.gov]
Sent: Friday, August 11, 2017 5:06 PM
To: Hesse, Jennifer; Ames, Mort; Smith, Molly; Miller, Patrick
Cc: Graham, Dave
Subject: RE: CDPH Draft Letter to SH Bell

Looks good- I would put "average" after hourly and daily when discussing 300 and 150 in line 4- i.e. hourly average levels lower than…

Thanks!

Best,

Nicole Cantello

Attorney/Advisor

U.S. Environmental Protection Agency

77 West Jackson Boulevard

Chicago, Illinois 60604

312/886-2870

cantello.nicole@epa.gov

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Then delete it. Thank you.

From: Hesse, Jennifer [mailto:Jennifer.Hesse@cityofchicago.org]
Sent: Friday, August 11, 2017 4:07 PM
To: Cantello, Nicole <cantello.nicole@epa.gov>; Ames, Mort <Mort.Ames@cityofchicago.org>; Smith, Molly <Smith.Molly@epa.gov>; Miller, Patrick <miller.patrick@epa.gov>
Cc: Graham, Dave <Dave.Graham@cityofchicago.org>
Subject: RE: CDPH Draft Letter to SH Bell

Hi Nicole, Molly, & Patrick,

We incorporated EPA's comments in our letter to SH Bell, but have one more question. Would you mind taking a look at this section and letting us know if it makes sense to you and correctly represents your recommendation?

1. A meaningful Reportable Action Level that will trigger specific, proactive response activities when monitors indicate elevated levels of particulate matter. These levels should be stricter than those currently proposed by S.H Bell and stricter than the federal National Ambient Air Quality Standard, so that action can be taken to prevent a violation before it occurs. It is important to include strict hourly level triggers, in addition to daily levels, to ensure timely and effective response actions. CDPH recommends hourly levels lower than 300 ug/m^3 and daily levels lower than 150 ug/m^3. In addition, the required dust monitoring contingency plan must include a range of increasingly aggressive measures (including, but not limited to, Method 9 readings, dust control, and ceasing activity) appropriate to different levels of exceedance. Thus, actions should be planned for multiple levels, ranging from low and medium, to high and very high monitor readings.

Thanks!

Jennifer

From: Cantello, Nicole [mailto:cantello.nicole@epa.gov]
Sent: Friday, August 11, 2017 1:46 PM

To: Ames, Mort; Smith, Molly; Miller, Patrick; Hesse, Jennifer
Cc: Graham, Dave
Subject: RE: CDPH Draft Letter to SH Bell

SH Bell Fugitive Dust Plan Follow-Up Items:

- As discussed yesterday, one large area of concern for EPA is the loading/unloading of barges along the Calumet River. EPA would suggest that the facility develop additional control options for all material types, including specific measures for materials that cannot be watered.

- Multiple RALs (low, medium, high, and high high) should be established at a lower averaging timeframes to ensure compliance. Waiting for the 24-hour average to hit 150 before action takes place is reactive. The monitors should be used proactively.

- Another area of concern for EPA is the outdoor storage and activities of piles. EPA would encourage that no small particles (1/2 inch or smaller) should be allowed to be stored outdoors at any time. It is clear that the current practices are not sufficient (i.e. watering when needed or tarping). If space is unavailable, EPA would prefer the material to stay on an enclosed barge until space becomes available. A three-sided bin may not be sufficient. EPA would encourage the City to comment on SHB's use of "temporary outdoor storage piles" in general.

- EPA is also very concerned about the process for unloading and managing super sacks at the northern dock (American Ships Building dock). EPA would strongly suggest that the current practices be adjusted. "The sack material is first released to a pile at the dock" with only mobile misting units operating. The material is then moved from the pile to a truck, which is hooked up to a portable dust collector. EPA would encourage the City to explore an option where the sacks are opened and released directly into the truck, with the baghouse operating – eliminating the middle step of releasing all the materials to the ground.

- SHB also describes leaving piles with larger diameter (1/2 inch or greater) outside if they are covered.

- EPA would also suggest that for Section IV.A., Transfer Points, that the company limit the transfer of material they believe if moist (Option D), and encourage the uses of Options A, B, and C.

- EPA would encourage more frequent use of the dry fogging system, not just to freezing weather conditions.

- EPA would suggest that in addition to waiting one minute after a truck was loaded before

leaving the Ryerson or Norcon buildings, that the trucks also be required to cover the material prior to exiting the building. EPA has seen trucks exiting the building, then stopping immediately outside the buildings or near the facility exit to close the lids.

- EPA supports the City's position on SHB's heavy reliance on the use of "as needed" for watering and other measures. There must be prescriptive and quantifiable language moving forward.

- EPA would also be interested in the timeline for the installation and operation of all dust collection control devices discussed in the FDP.

- EPA believes there would be value in requiring SHB comply with the wheel wash requirements of Section 3.0(8) of the City's Regulation. It is clear from the pollution roses developed by EPA that particulate matter is in high levels on the main exit road from the facility.

- EPA is concerned about roadways when the SHB facility closes at 3pm. The facility's operations cease in the early to mid-afternoon (3 pm), and the roadways are no longer watered or swept. Any residual material left on the roadways at the facility are uncontrolled until the facility resumes operations the next morning around 7 am. EPA understands the way the current Regulation is written; however it may be beneficial to have one final sweep to remove debris at the end of the day or a third party "clean" the roadways each evening.

- While EPA understands that piles can "crust" over, EPA has seen on a number of piles that a large portion of a pile can be crusted over, with other areas generating fugitive dust. EPA would suggest that in the Outdoor Storage Pile section of the FDP SHB increase inspections and water at outdoor storage piles.

- Has SHB committed to a minimum use of the chemical dust suppressant for the roadways? At least once a month and additionally as needed, for example?

- EPA would also strongly encourage the City to address the insufficient reportable action levels proposal put forth by the company, including a lower action level and an increase in action (including Method 9 readings).

Nicole Cantello

Attorney/Advisor

U.S. Environmental Protection Agency

77 West Jackson Boulevard

Chicago, Illinois 60604

312/886-2870

cantello.nicole@epa.gov

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From: Ames, Mort [mailto:Mort.Ames@cityofchicago.org]
Sent: Friday, August 11, 2017 1:41 PM
To: Cantello, Nicole <cantello.nicole@epa.gov>; Smith, Molly <Smith.Molly@epa.gov>; Miller, Patrick <miller.patrick@epa.gov>; Hesse, Jennifer <Jennifer.Hesse@cityofchicago.org>
Cc: Graham, Dave <Dave.Graham@cityofchicago.org>
Subject: RE: CDPH Draft Letter to SH Bell

I am tied up, so via e-mail would be preferable for me—although perhaps Jennifer Hesse and Dave Graham might want to give you a call. They are trying to get the letter out today.

From: Cantello, Nicole [mailto:cantello.nicole@epa.gov]
Sent: Friday, August 11, 2017 11:59 AM
To: Ames, Mort; Smith, Molly; Miller, Patrick
Cc: Graham, Dave
Subject: RE: CDPH Draft Letter to SH Bell

Hi Mort:

We have some additional comments for you. Would you like them via conference call or email?

Thanks!

Best,

Nicole Cantello

Attorney/Advisor

U.S. Environmental Protection Agency

77 West Jackson Boulevard

Chicago, Illinois 60604

312/886-2870

cantello.nicole@epa.gov

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From: Cantello, Nicole
Sent: Thursday, August 10, 2017 3:05 PM
To: 'Ames, Mort' <Mort.Ames@cityofchicago.org>; Smith, Molly <Smith.Molly@epa.gov>; Miller, Patrick <miller.patrick@epa.gov>
Cc: Graham, Dave <Dave.Graham@cityofchicago.org>
Subject: RE: CDPH Draft Letter to SH Bell

Hello Mort:

Can we talk at 3:30pm?

Thanks!

Best,

Nicole Cantello

Attorney/Advisor

U.S. Environmental Protection Agency

77 West Jackson Boulevard

Chicago, Illinois 60604

312/886-2870

cantello.nicole@epa.gov

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From: Ames, Mort [mailto:Mort.Ames@cityofchicago.org]
Sent: Thursday, August 10, 2017 1:20 PM
To: Cantello, Nicole <cantello.nicole@epa.gov>; Smith, Molly <Smith.Molly@epa.gov>
Subject: CDPH Draft Letter to SH Bell

Nicole and Molly:

Attached is a draft letter from CDPH to SH Bell regarding their proposed fugitive dust plan. We would like to get any comments you may have—in particular, we are interested in suggestions/additions for the various items the City is requesting to improve public heath protections. My impression is that the City intends to send the letter out shortly, so please let me know as soon as you are able to discuss this, and I will loop in Jennifer Hesse.

Thanks,

Mort

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