



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

December 22, 2017

Kim R. Walberg
TAFT STETTINIUS & HOLLISTER LLP
111 East Wacker, Suite 2800
Chicago, IL 60601

Re: S. H. Bell Company, 10218 South Avenue O
Approval of Revised Fugitive Dust Plan

Dear Ms. Walberg,

The Chicago Department of Public Health ("CDPH") has reviewed S. H. Bell Company's ("S.H. Bell's") revised Fugitive Dust Plan, submitted September 13, 2017, for S.H. Bell's facility located at 10218 South Avenue O in Chicago. The revised plan was submitted pursuant to CDPH's Rules and Regulations for Control of Emissions from the Handling and Storage of Bulk Material Piles ("Bulk Material Regulations"), and in response to comments by CDPH, as well as local community organizations. As you know, over the last several months, CDPH has been engaged in discussions with S.H. Bell and with community members regarding ways to maximize environmental controls at the facility.

At this time, CDPH finds that the revised dust plan meets the requirements of the Bulk Material Regulations. Accordingly, CDPH hereby approves the September 2017 Fugitive Dust Plan. Please note that the Fugitive Dust Plan must be updated on an annual basis, and in the event of a change to any facility component described in the plan.

To summarize, under the revised plan, S.H. Bell will undertake a number of aggressive proactive dust mitigation measures. These measures include, but are not limited to, the following:

- No longer store any manganese-containing materials outdoors
- Automatically suspend barge loading and unloading of manganese-containing materials during high wind conditions
- Leave barge lids down on the areas not directly being unloaded and use mobile misting and dry fogging devices to suppress any dust

- Transport super sacks directly from barge to storage, no longer opening them outdoors at the dock
- Apply chemical dust suppressants to roadways at least monthly and conduct a daily sweep at the end of each day as requested
- Inspect all trucks upon departure to ensure no track-out
- Conduct an increased number of dust surveillance and visible monitoring inspections using objective standards and real-time correction/mitigation measures when dust is observed

In addition, S.H. Bell has committed to construct and operate additional new dust control equipment including:

- A new loader tunnel with duct work and a dust collector system at the box filling station
- A new three-sided, roofed enclosure attached to a dust collector for truck unloading
- Full enclosure of the roofed stall bins
- A new dust collector for use with the portable covered rail conveyor
- Installation of a new dust collector at the box car dock enclosure

Monitoring data indicates that since the implementation of these measures, average monthly manganese levels have declined. CDPH will continue to review the monitoring results, as well as your monthly progress reports, and will continue to conduct periodic inspections. We expect that S.H. Bell will continue to cooperate with the City and the U.S EPA on air monitoring, and will continue to cooperate with the City's manganese study.

Please contact Assistant Commissioner Dave Graham at (312) 745-4034 if you have any questions regarding this letter.

Sincerely,



Julie Morita, M.D.
Commissioner

cc: Mort Ames, DOL