



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

February 6, 2020

Steven Caudle, Terminal Manager
Watco Transloading LLC - Chicago Arrow Terminal
2926 E. 126th Street
Chicago, IL 60633

RE: Watco Terminal and Port Services, 2926 E. 126th Street
Request for Additional Information Regarding Variance Request
Chicago Bulk Material Rules

Dear Mr. Caudle,

The Chicago Department of Public Health ("CDPH") is in receipt of submissions from Watco Terminal and Port Services, Chicago Ferro Terminal ("Watco") requesting a variance from requirements of CDPH's Rules and Regulations for Control of Emissions from the Handling and Storage of Bulk Material Piles, effective January 25, 2019 ("Bulk Material Rules" or "Rules"). The variance request pertains to the enclosure requirement for manganese-bearing material as it relates to materials with a manganese content less than 2%.

At this time, CDPH requires additional information prior to making a determination on the variance request. Please provide answers to the following questions in boldface type below.

1. Page 5 of the variance request states: "It is estimated that the Terminal will handle approximately 600,000 to 450,000 net tons of steel, alloy, and associated materials annually following the phase out of manganese bearing material >2%." **To clarify, does this mean "450,000 to 600,000" tons, or is one of the numbers a typo?**

2. Page 3 of the request states: "At present, materials stored outside consist of approximately 85% pig iron and approximately 15% iron ore slag. The small amount of iron ore slag (6,000 to

7,000 tons) stored outside has been constant for several years and is not a material typically handled by the Terminal.” In addition, page 4 says: “As stated above, pig iron and a small amount of iron ore fines are currently the only manganese-bearing materials stored outdoors.”

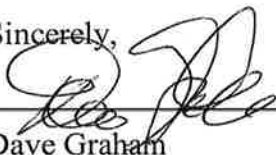
However, in Watco’s “List of Products Handled,” Attachment A of the variance request, where the last item listed is “Standard and Mini Prilled Sucra-Min Iron (Iron Ore Slag),” manganese is not listed in the composition information for this material. On page 5, it states that “for products listed in Attachment A that do not show any manganese content, these products should either not contain any manganese, or if any manganese is present, it would be in trace amounts that do not present any health hazards.” However, the other materials in the list containing manganese set forth amounts less than 2%. (See #3 below.)

Therefore, how does Watco know that this iron ore slag material contains up to 2% manganese? Please confirm the amount of this material that remains on site, as well as the manganese content of the material. Please also explain what is meant by the term “fines” above, and explain how dust is controlled during the storage and handling of this material.

3. Of the other items listed in Attachment A, there are two that mention manganese: Pig Iron, which the document states has “.01-1.0” percent manganese by weight; and Ferro-Phosphorus, which reportedly has “=<2%” manganese by weight. Ferro-Phosphorus was not mentioned in the discussion of manganese-bearing material in the variance request. **How much of this material does Watco have on site; what is its manganese content; where is it stored; and how are emissions from this material controlled?**

Please submit the above-requested information to my attention within fourteen (14) days. If you have any questions, please call me at (312) 745-4034.

Sincerely,



Dave Graham
Assistant Commissioner

cc: Mort Ames, DOL
Jennifer Hesse, CDPH