

Proposed Petcoke / Bulk Solid Material Rules

John Henriksen [iaap@hansoninfosys.com]

Sent: Monday, January 13, 2014 10:18 AM

To: PetCokeComments

Cc: Quinn Josh [quinnj@vmcmail.com]

Dear Mr. Marante:

I am contacting you on behalf of the Illinois Association of Aggregate Producers (IAAP), the trade association representing companies that mine and produce crushed stone, sand, gravel and silica sand. Although no aggregate mines are currently operating within the city limits of Chicago, IAAP members do operate ready mix yards and recycling facilities within the City. For that reason I was asked to take a look at your agency's pending rules for the handling and storage of bulk material piles. The particular rule of most interest is the following definition of Bulk Solid Material:

BULK SOLID MATERIAL means any solid substance or material which can be used as a fuel or as an ingredient in a manufacturing process that may become airborne or be scattered by the wind, including but not limited to ores, coal, and coke, including petcoke and metcoke, but shall not include construction and demolition materials or materials that are handled or stored pursuant to a recycling, reprocessing, or waste handling facility permit under Chapter 11-4 of the Code.

As I read this proposed definition, IAAP members that operate recycling facilities are not subject to these new rules for handling and storage of bulk material piles given that such facilities are currently under permit by the City. The proposed definition also provides that aggregate mines, ready mix concrete plants and hot mix asphalt plants are exempt from these new rules for handling and storage of bulk material piles given that such facilities manufacture and store "construction" materials (crushed stone, sand and gravel). Given that aggregate mines, ready mix concrete plants and hot mix asphalt plants are already subject to IEPA air pollution permits such exemption makes perfect sense.

I would appreciate you confirming that my understanding of the applicability of these proposed rules is correct. Please contact me if you have any questions.

Respectfully,

John Henriksen, Executive Director
Illinois Association of Aggregate Producers
217.241.1639
217.899.7389 (cell)