DAILY INSPECTION LOG - OUTDOOR SMALL PARTICLE STORAGE PILES - MOIST

Moist

S.H. BELL COMPANY CHICAGO, ILLINOIS

MATERIAL IN STORAGE PILES:

Date	Time	Initials	Storage Pile Location(s)	Pile Moist? (Y/N)	Pile Tarped? (Y/N)	Pile Sprayed? (Y/N)	Pile Fused? (Y/N)	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(water or chemical stabilizer not applied, etc.)*
2-20-14	1 PM	JmL	508, 623, 500 Area	Y	N	N	Y	N	Piles Crusted
2-23-14	10 AM	JmL	508, 623, 500 Area	Y	N	N	Y	N	Piles Crusted

If VE is noted, see operating procedures for course of action and increase frequency of VE readings

DAILY INSPECTION LOG - OUTDOOR SMALL PARTICLE STORAGE PILES - MOIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

MOIST

MATERIAL IN STORAGE PILES:

Date	Time	Initials	Storage Pile Location(s)	Pile Moist? (Y/N)	Pile Tarped? (Y/N)	Pile Sprayed? (Y/N)	Pile Fused? (Y/N)	VE at nearest property line*? (Y/N)	Comments or Corrective Measures (water or chemical stabilizer not applied, etc.)
1-14-15	9AM	JmL	623, 500 Area 508	Y	N	N	Y	N	Piles Crusted
1-15-15	11AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-16-15	9AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-19-15	11 AM	JmL	623, 500 Area 508	Y	N	N	Y	N	Piles Crusted
1-20-15	2 PM	JmL	623, 500 Area 508	Y	N	N	Y	N	Piles Crusted
1-21-15	11 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-22-15	2 PM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-23-15	10 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-26-15	NOON	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-27-15	NOON	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-28-15	NOON	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-29-15	NOON	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-30-15	NOON	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
2-2-15	NOON	JmL	623, 500 Area, 508	Y	N	N	Y	N	Snow Covered
2-3-15	2 PM	JmL	623, 500 AREA, 508	Y	N	N	Y	N	Snow Covered/Fused
2-4-15	9AM	JmL	623, 500 Area 508	Y	N	N	Y	N	Snowing
2-5-15	3PM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Snow Covered
2-6-15	9AM	JmL	623, 500 Area 508	Y	N	N	Y	N	Snow Covered
2-9-15	1PM	JmL	623, 500 Area 508	Y	N	N	Y	N	Piles Crusted
2-10-15	1PM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
2-11-15	10AM	JmL	623 500 Area, 508	Y	N	N	Y	N	Piles Crusted
2-12-15	10AM	JmL	623 500 Area, 508	Y	N	N	Y	N	Snow Covered
2-13-15	10 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
2-16-15	10 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Snow Covered
2-17-15	11 AM	JmL	623, 500 Area 508	Y	N	N	Y	N	Snow Covered
2-18-15	2PM	JmL	623, 500 Area 508	Y	N	N	Y	N	Snow Covered
2-19-15	10 AM	JmL	623, 500 Area 508	Y	N	N	Y	N	Snow Covered

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

DAILY INSPECTION LOG - OUTDOOR SMALL PARTICLE STORAGE PILES - MOIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

Moist

MATERIAL IN STORAGE PILES:

Date	Time	Initials	Storage Pile Location(s)	Pile Moist? (Y/N)	Pile Tarped? (Y/N)	Pile Sprayed? (Y/N)	Pile Fused? (Y/N)	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(water or chemical stabilizer not applied, etc.)*
12-3-14	Noon	JmL	623, 500 Area / 508	Y	N	N	Y	N	Piles Crusted/wet
12-4-14	10 AM	JmL	623, 500 Area / 508	Y	N	N	Y	N	Piles Crusted/wet
12-5-14	Noon	JmL	623, 500 Area / 508	Y	N	N	Y	N	Piles Crusted/wet
12-8-14	1 PM	JmL	623, 500 Area / 508	Y	N	N	Y	N	Piles Crusted/wet
12-9-14	1 PM	JmL	623, 500 Area / 508	Y	N	N	Y	N	Piles Crusted/wet
12-10-14	9 AM	JmL	623, 500 Area / 508	Y	N	N	Y	N	Piles Crusted/wet
12-11-14	Noon	JmL	623, 500 Area / 508	Y	N	N	Y	N	Piles Crusted/wet
12-12-14	Noon	JmL	623, 500 Area / 508	Y	N	N	Y	N	Piles Crusted/wet
12-15-14	Noon	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted/wet
12-16-14	9 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted/wet
12-17-14	9 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted/wet
12-18-14	Noon	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted/wet
12-19-14	10 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted/wet
12-22-14	11 AM	JmL	623 500 Area, 508	Y	N	N	Y	N	Piles Crusted/wet
12-23-14	10 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	piles Crusted/wet
12-26-14	Noon	JmL	623, 500 Area 508	Y	N	N	Y	N	piles Crusted
12-29-14	Noon	JmL	623, 500 Area 508	Y	N	N	Y	N	piles Crusted
12-30-14	Noon	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
12-31-14	Noon	JmL	623, 500 Area 508	Y	N	N	Y	N	piles Crusted
1-2-14	1 PM	JmL	623, 500 Area 508	Y	N	N	Y	N	piles Crusted
1-5-14	2 PM	JmL	623, 500 Area 508	Y	N	N	Y	N	piles Crusted
1-6-14	1 PM	JmL	623, 500 Area 508	Y	N	N	Y	N	piles Crusted
1-7-14	11 AM	JmL	623 500 Area 508	Y	N	N	Y	N	piles Crusted
1-8-14	10 AM	JmL	623 500 Area 508	Y	N	N	Y	N	piles Crusted
1-9-14	Noon	JmL	623, 500 Area 508	Y	N	N	Y	N	Piles Crusted
1-12-14	11 AM	JmL	623, 500 Area, 508	Y	N	N	Y	N	Piles Crusted
1-13-14	10 AM	JmL	623, 500 Area 508	Y	N	N	Y	N	Piles Crusted

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

DAILY INSPECTION LOG - OUTDOOR SMALL PARTICLE STORAGE PILES - MOIST

S.H. BELL COMPANY CHICAGO, ILLINOIS

Moist

MATERIAL IN STORAGE PILES:

Date	Time	Initials	Storage Pile Location(s)	Pile Moist? (Y/N)	Pile Tarped? (Y/N)	Pile Sprayed? (Y/N)	Pile Fused? (Y/N)	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(water or chemical stabilizer not applied, etc.)*
10-24-14	10AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles CRUSTED
10-27-14	10AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
10-28-14	10 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
10-29-14	NOON	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
10-30-14	NOON	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
10-31-14	2 PM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-3-14	11 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-4-14	11 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-5-14	NOON	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-6-14	11 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-7-14	9AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-10-14	NOON	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-11-14	NOON	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-12-14	10AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-13-14	10AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-14-14	NOON	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-17-14	11 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-18-14	1 PM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-19-14	10 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-20-14	NOON	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-21-14	7AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-24-14	10AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-25-14	11 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-26-14	1 PM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
11-28-14	10 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
12-1-14	11 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted
12-2-14	7 AM	JmL	500 Area / 508	Y	N	N	Y	N	Piles Crusted

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

ACTIVE STORAGE PILES CHECKLIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

Date	Time	Initials	Material	Material watered? (Y/N)	Mobile misters used? (Y/N)	Weather Conditions: Temp	Weather Conditions: Wind (none, avg., high or observed mph)	Operations Suspended* ? (Y/N)	Weather Conditions: Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
2-10-15	1 PM	JWL	Pig fe	N	N	28	Lite	N	N/A	Y	N	material wet
2-11-15	10 AM	JWL	Pig fe	N	N	30	AVG	N	N/A	Y	N	material wet
2-12-15	10 AM	JWL	NO Active Piles									
2-13-15	10 AM	JWL	Pig fe	N	N	18	AVG	N	N/A	Y	N	Pile froze
2-16-15	10 AM	JWL	Pig fe	N	N	9	Low	N	N/A	Y	N	Snow Covered
2-17-15	11 AM	JWL	Pig fe	N	N	21	Low	N	N/A	Y	N	Snow Covered
2-18-15	2 PM	JWL	Pig fe	N	N	10	AVG	N	N/A	Y	N	Snow Covered
2-19-15	10 AM	JWL	NO	Active	Piles							
2-20-15	1 PM	JWL	Pig fe	N	N	10	AVG	N	N/A	Y	N	Snow Covered
2-23-15	10 AM	JWL	Pig fe	N	N	3°	AVG	N	N/A	Y	N	frozen

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line
**If Y, see operating procedures for course of action and increase frequency of VE readings

ACTIVE STORAGE PILES CHECKLIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

						Weather Conditions						
Date	Time	Initials	Material	Material watered? (Y/N)	Mobile misters used? (Y/N)	Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
1-7-15	11AM	JmL	Pig fe	N	N	30	High	N	N/A	Y	N	Snow & Ice on pile
1-8-15	10 AM	JmL	NO Active Piles									
1-9-15	Noon	JmL	NO Active Piles									
1-12-15	11AM	JmL	Pig/SiC	N	N	27	Avg	N	N/A	Y	N	Snow & Ice on pile
1-13-15	10AM	JmL	Pig/SiC HBI	N	N	10	Avg	N	N/A	Y	N	Snow & Ice on pile
1-14-15	9AM	JmL	Pig/SiC HBI	N	N	7	Low	N	N/A	Y	N	Snow & Ice on pile
1-15-15	11AM	JmL	Pig/HBI	N	N	23	Avg	N	N/A	Y	N	Snow & Ice on pile
1-16-15	9AM	JmL	Pig/HBI SiC	N	N	28	Lite	N	N/A	Y	N	Snow & Ice on pile
1-19-15	11AM	JmL	Pig fe	N	N	36	Lite	N	N/A	Y	N	Snow & Ice on pile
1-20-15	2PM	JmL	Pig fe	N	N	40	Lite	N	N/A	Y	N	Snow & Ice on pile
1-21-15	11AM	JmL	NO Active Piles									
1-22-15	2PM	JmL	Pig fe	N	N	35	Lite	N	N/A	Y	N	material wet
1-23-15	10 AM	JmL	NO Active Piles									
1-26-15	Noon	JmL	Pig fe	N	N	28	Lite	N	N/A	Y	N	material wet
1-27-15	Noon	JmL	Pig fe	N	N	26	Avg	N	N/A	Y	N	material wet
1-28-15	Noon	JmL	Pig fe	N	N	28	Avg	N	N/A	Y	N	material wet
1-29-15	Noon	JmL	Pig fe	N	N	33	Avg	N	N/A	Y	N	material wet
1-30-15	Noon	JmL	Pig fe	N	N	26	Avg	N	N/A	Y	N	material wet
2-2-15	Noon	JmL	Pig fe	No Active Piles								
2-3-15	2PM	JmL	Pig fe	N	N	28	Avg	N	N/A	Y	N	material wet
2-4-15	9AM	JmL	Pig fe	N	N	30	Avg	N	N/A	Y	N	Snowing
2-5-15	3PM	JmL	Pig fe	N	N	12	Avg	N	N/A	Y	N	material wet
2-6-15	9AM	JmL	Pig fe	N	N	19	Avg	N	N/A	Y	N	material wet
2-9-15	1PM	JmL	Pig fe	N	N	29	Avg	N	N/A	Y	N	material wet

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line
**If Y, see operating procedures for course of action and increase frequency of VE readings

ACTIVE STORAGE PILES CHECKLIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

						Weather Conditions						
Date	Time	Initials	Material	Material watered? (Y/N)	Mobile misters used? (Y/N)	Temp	Wind (none, avg., high or observed mph)	Operations Suspended* ? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(if proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
11-28-14	10AM	JmL	Pig fe	NO ACTIVE	Piles							
12-1-14	11AM	JmL	Pig fe	Y	N	25	AVG	N	N/A	Y	N	Bucket Loader
12-2-14	7AM	JmL	Pigfe	No Active Piles								
12-3-14	NOON	JmL	Pigfe	Y	N	36	AVG	N	N/A	Y	N	BL
12-4-14	10AM	JmL	Pigfe	Y	N	34	Low	N	N/A	Y	N	BL
12-5-14	NOON	JmL	Pigfe	N	N	37	Low	N	N/A	Y	N	Rain
12-8-14	1PM	JmL	Pigfe	N	N	36	AVG	N	N/A	Y	N	Rain
12-9-14	1PM	JmL	Pigfe	N	N	39	AVG	N	N/A	Y	N	Rain
12-10-14	9AM	JmL	Pigfe	N	N	35	AVG	N	N/A	Y	N	Rain
12-11-14	NOON	JmL	Pigfe	Y	N	28	AVG	N	N/A	Y	N	BL
12-12-14	NOON	JmL	Pigfe	Y	N	32	AVG	N	N/A	Y	N	BL
12-15-14	10AM	JmL	Pigfe	Y	N	47	AVG	N	N/A	Y	N	Rain
12-16-14	9AM	JmL	Pigfe	Y	N	45	AVG	N	N/A	Y	N	Rain
12-17-14	9AM	JmL	Pigfe	Wet	N	30	AVG	N	N/A	Y	N	frozen/wet
12-18-14	NOON	JmL	Pigfe	Y	N	31	AVG	N	N/A	Y	N	BL
12-19-14	10AM	JmL	Pigfe	Y	N	33	Lite	N	N/A	Y	N	BL
12-22-14	11AM	JmL	Pigfe	Y	N	36	Lite	N	N/A	Y	N	BL
12-23-14	10AM	JmL	Pigfe	Y	N	47	AVG	N	N/A	Y	N	wet from Rain
12-26-14	NOON	JmL	DRE Pigfe	Y	N	46	AVG	N	N/A	Y	N	BL
12-29-14	NOON	JmL	DRE Pigfe	Moist	N	30	AVG	N	N/A	Y	N	BL
12-30-14	1PM	JmL	No Active Piles									
12-31-14	10AM	JmL	No Active Piles									
1-2-14	1PM	JmL	No Active Piles									
1-5-14	2PM	JmL	Pigfe	N	N	0	AVG	N	N/A	Y	N	Snow
1-6-14	1PM	JmL	Pigfe	N	N	10	AVG	N	N/A	Y	N	Snow

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

ACTIVE STORAGE PILES CHECKLIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

						Weather Conditions						
Date	Time	Initials	Material	Material watered? (Y/N)	Mobile misters used? (Y/N)	Temp	Wind (none, avg., high or observed mph)	Operations Suspended* ? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
10-27-14	10AM	JmL	Pig fe	Y	N	55	Low	N	N/A	Y	N	
10-27-14	10AM	JmL	Pig fe	Y	N	63	AVG	N	N/A	Y	N	
10-28-14	10AM	JmL	Pig fe	Y	N	55	AVG/High	N	N/A	Y	N	
10-29	Noon	JmL	Pig fe	Y	N	51	AVG	N	N/A	Y	N	
10-30-14	Noon	JmL	Pig fe	Y	N	51	AVG	N	N/A	Y	N	
10-31-14	2PM	JmL	Pig fe	Y	N	41	High	N	N/A	Y	N	Rain
11-3-14	11AM	JmL	Pig fe	Y	N	57	~~High~~AVG	N	N/A	Y	N	
11-4-14	11AM	JmL	Pig fe	Y	N	55	AVG	N	N/A	Y	N	Site Rain
11-5	No	Active Piles										
11-6	No	Active Piles										
11-7-14	9AM	JmL	Pig fe	Y	N	40	AVG	N	N/A	Y	N	
11-10-14	Noon	JmL	Pig fe	Y	N	58	AVG/High	N	N/A	Y	N	
11-11-14	No	Active	Piles									
11-12-14	10AM	JmL	Pig fe	Y	N	30	AVG	N	N/A	Y	N	
11-13-14	10AM	JmL	Pig fe	Y	N	29	AVG	N	N/A	Y	N	
11-14-14	Noon	JmL	Pig fe	N	N	26	AVG	N	N/A	Y	N	Load Indoors
11-17-14	11AM	JmL	Pig fe	N	N	18	AVG	N	N/A	Y	N	Load Indoors
11-18-14	1PM	JmL	No Active Piles									
11-19-14	10AM	JmL	Pig fe	N	N	26	AVG	N	N/A	Y	N	Loaded Indoors
11-20	Noon	JmL	Pig fe	No Active Piles								
11-21	7AM	JmL	Pig fe	N	N	10	AVG	N	N/A	Y	N	Loaded Indoors
11-24	10AM	JmL	Pig fe	Y	N	41	High	N	N/A	Y	N	Raining
11-25	11AM	JmL	Pig fe	N	N	26	AVG	N	N/A	Y	N	Material wet from Rain
11-26	1PM	JmL	Pig fe	N	N	25	Lite	N	N/A	Y	N	Material wet from Rain

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line
**If Y, see operating procedures for course of action and increase frequency of VE readings

BARGE UNLOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY CHICAGO, ILLINOIS

DRY

Date	Time	Initials	Was material sprayed with water? (Y/N)	Water appl. suspended ? (Y/N)	Date/Time if water appl. suspended	Mobile misters or portable DC used? (Y/N)	Weather Conditions				Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(if proper handling methods were not followed, ops not suspeded, etc.)*
							Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time If Operations Suspended			
11-5-14	Noon	JmL	N	N	N/A	Yes -2M	55	Low	N	N/A	Y	N	T13928
11-18-14	10AM	JmL	N	N	N/A	No	26	Avg	N	N/A	Y	N	ING 7584 - SuperSacks
11-20-14	Noon	JmL	N	N	N/A	No	29	High	N	N/A	Y	N	ING 7584 - SuperSacks
11-25-14	11AM	JmL	N	N	N/A	No	26	Avg	N	N/A	Y	N	IN135498 - SuperSacks
11-26-14	1PM	JmL	N	N	N/A	NO	25	Lite	N	N/A	Y	N	IN135498 - SuperSacks
11-28-14	10AM	JmL	Y	N	N/A	NO	23	Avg	N	N/A	Y	N	IN075113
12-1-14	11AM	JmL	Y	N	N/A	NO	25	Avg	N	N/A	Y	N	ACL 01716
12-10-14	9AM	JmL	Y	N	N/A	NO	35	Avg	N	N/A	Y	N	IN07935
12-23-14	10AM	JmL	Y	N	N/A	NO	47	Avg	N	N/A	Y	N	IN126498B
12-29-14	Noon	JmL	Y	N	N/A	NO	32	Avg	N	N/A	Y	N	ING 668
12-30-14	1PM	JmL	Y	N	N/A	NO	20	Avg	N	N/A	Y	N	IN085224
12-31-14	10AM	JmL	Y	N	N/A	NO	9	Avg	N	N/A	Y	N	ACL 23400
1-2-14	1PM	JmL	Y	N	N/A	NO	34	Lite	N	N/A	Y	N	OR6310
1-5-15	2PM	JmL	N	N	N/A	NO	0	Avg	N	N/A	Y	N	IN04917 - Baghouse
1-6-15	1PM	JmL	N	N	N/A	NO	10	Avg	N	N/A	Y	N	IN04917 - Baghouse
1-12-15	11AM	JmL	N	N	N/A	NO	27	Avg	N	N/A	Y	N	NBT-2004 - Baghouse
1-13-15	10AM	JmL	N	N	N/A	N	10	Avg	N	N/A	Y	N	IN085466 stone SS
1-14-15	9AM	JmL	Y	N	N/A	N	7	Lite	N	N/A	Y	N	IN085496
1-15-15	11AM	JmL	Y	N	N/A	N	23	Avg	N	N/A	Y	N	IN085469
1-16-15	9AM	JmL	Y	N	N/A	N	28	Lite	N	N/A	Y	N	AEP 4043
1-19-15	11AM	JmL	Y	N	N/A	N	36	Lite	N	N/A	Y	N	AEP 7138
1-20-15	2PM	JmL	N	N	N/A	N	40	Lite	N	N/A	Y	N	ACL 9962B - Baghouse
1-21-15	11AM	JmL	N	N	N/A	N	34	Avg	N	N/A	Y	N	ACL 9962B - Baghouse
1-22-15	Noon	JmL	Y	N	N/A	N	33	Avg	N	N/A	Y	N	IN085465
1-26-15	1PM	JmL	Y	N	N/A	N	28	Lite	N	N/A	Y	N	IN075128
1-29-15	10AM	JmL	Y	N	N/A	N	-3	Avg	N	N/A	Y	N	ACL 06116
1-23-15	10AM	JmL	Y	N	N/A	N	3	Avg	N	N/A	Y	N	CBX 2022

*Operations are only performed when windspeeds are 20 mph or less unless water is applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

DRY

BARGE UNLOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY CHICAGO, ILLINOIS

Date	Time	Initials	Is material able to sprayed with water? (Y/N)	Was material sprayed with water? (Y/N)	Water appl. suspended ? (Y/N)	Date/Time if water appl. suspended	Mobile misters or portable DC used? (Y/N)	Weather Conditions: Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper handling methods were not followed, ops not suspeded, etc.)*
10-24	10AM	JimL	Y	Y	N	N/A	N	55	Low	N	N/A	Y	N	Ing 1659, ORS480
10-27	0AM	JimL	N	N	N	N/A	N	63	AVG	N	N/A	Y	N	ACL00224 Steels/Sbc
10-28	10AM	JimL	N	N	N	N/A	yes-2M	55	AVG/High	Y	1:00PM	Y	N	T13988 95° wind
10-29	Noon	JimL	N	N	N	N/A	yes-2M	51	AVG	N	N/A	Y	N	T13978
10-30	Noon	JimL	N	N	N	N/A	yes-2M	51	AVG	N	N/A	Y	N	NBI2001B
10-31-14	2PM	JimL	Y	Y	N	N/A	N	40	High	N	N/A	Y	N	VLB 9186 Dig feed
11-3-14	11AM	JimL	N	N	N	N/A	N	57	~~High~~ AVG	N	N/A	Y	N	NBI 2001B - Slabs To Site
11-4-14	11AM	JimL	N	N	N	N/A	yes-2M	55	AVG	N	N/A	Y	N	T13928
11-5-14	Noon	JimL	N	N	N	N/A	yes-2M	55	Low	N	N/A	Y	N	T13928
		11-7-2014 Changed Log Sheets												

*Operations are only performed when windspeeds are 20 mph or less unless water is applied and/or no VE is observed at the property line
** If Y, see operating procedures for course of action and increase frequency of VE readings

BARGE UNLOADING OPERATIONS CHECKLIST - MOIST
S.H. BELL COMPANY - CHICAGO, ILLINOIS

MOIST

Date	Time	Initials	Is material moist? (Y/N) *(if Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Mobile misters or portable DC used? (Y/N)	Date/Time if water appl. suspended	Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(if proper loading / unloading methods were not followed)*
	NO	Barges until further NOTICE								
12-26-14	NOON	TmL	Y					Y	N	Pig
12-27-14	NOON	TmL	Y					Y	N	Pig
12-29-14	NOON	TmL	Y					Y	N	Pig
2-23-15	10 AM	TmL	Y					Y	N	Pig CBX 2022

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

INSPECTION SHEET - CRUSHING/SCREENING OPERATIONS
S.H. BELL COMPANY - CHICAGO, ILLINOIS

Date	Time	Initials	Are all doors, windows, and other openings securely sealed? (Y/N)	Is dust suppression in operation at exit of process? (Y/N)	Any deficiencies noted in dust control procedures? (Y/N)	VE at nearest property line*? (Y/N)	Comments or Corrective Measures for Deficiencies *(areas not sealed, water spray not in operation, etc.)*
8-14-14	2PM	JmL	Y	Y	N	N	
11-14-14	Noon	JmL	Y	Y	N	N	
11-17-14	11AM	JmL	Y	Y	N	N	
11-25-14	11AM	JmL	Y	Y	N	N	
12-2-14	7AM	JmL	Y	Y	N	N	
12-3-14	Noon	JmL	Y	Y	N	N	
12-5-14	Noon	JmL	Y	Y	N	N	
12-8-14	1PM	JmL	Y	Y	N	N	
12-9-14	1PM	JmL	Y	Y	N	N	
12-10-14	9AM	JmL	Y	Y	N	N	
12-11-14	Noon	JmL	Y	Y	N	N	
12-12-14	Noon	JmL	Y	Y	N	N	
12-17-14	9AM	JmL	Y	Y	N	N	
12-18-14	Noon	JmL	Y	Y	N	N	
12-19-14	10AM	JmL	Y	Y	N	N	
12-22-14	11AM	JmL	Y	Y	N	N	
12-23-14	10AM	JmL	Y	Y	N	N	
12-30-14	1PM	JmL	Y	Y	N	N	
1-8-15	10AM	JmL	Y	N*	N	N	* material wet from snow (outside storage)
1-23-15	10AM	JmL	Y	N*	N	N	* material wet from snow
1-26-15	Noon	JmL	Y	N*	N	N	* material wet from snow
1-27-15	Noon	JmL	Y	N*	N	N	* material wet from snow
1-28-15	Noon	JmL	Y	N*	N	N	* Material wet from snow
1-29-15	Noon	JmL	Y	N*	N	N	* Material wet from snow
1-30-15	Noon	JmL	Y	N*	N	N	* Material wet from snow
2-5-15	3PM	JmL	Y	N*	N	N	* material wet from snow
2-9-15	1PM	JmL	Y	N*	N	N	* material wet from snow
2-10-15	1PM	JmL	Y	N*	N	N	* material wet from snow

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

TRUCK LOADING OPERATIONS CHECKLIST - DRY

S.H. BELL COMPANY, CHICAGO, ILLINOIS

Dry

Date	Time	Initials	Was loadout completed within a building or shed? (Y/N) *(If Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Weather Conditions: Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
2-4-15	9AM	JmL	Y									Y	N	
2-5-15	3PM	JmL	Y									Y	N	
2-6-15	9AM	JmL	Y									Y	N	
2-9-15	1PM	JmL	Y									Y	N	
2-10-15	1PM	JmL	Y									Y	N	
2-11-15	10AM	JmL	Y									Y	N	
2-12-15	10AM	JmL	Y									Y	N	
2-13-15	10AM	JmL	Y									Y	N	
2-16-15	10AM	JmL	Y									Y	N	
2-17-15	11AM	JmL	Y									Y	N	
2-18-15	2PM	JmL	Y									Y	N	
2-19-15	10AM	JmL	Y									Y	N	
2-20-15	1PM	JmL	Y									Y	N	
2-23-15	10AM	JmL	Y									Y	N	

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

TRUCK LOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY CHICAGO, ILLINOIS

DRY

								Weather Conditions							
Date	Time	Initials	Was loadout completed within a building or shed? (Y/N) *(If Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
12-22-14	11AM	JimL	Y									Y	N	
12-23-14	10 AM	JimL	Y									Y	N	
12-26-14	NOON	JimL	Y									Y	N	
12-29-14	NOON	JimL	Y									Y	N	
12-30-14	1 PM	JimL	Y									Y	N	
12-31-14	10AM	JimL	Y									Y	N	
1-2-15	1 PM	JimL	Y									Y	N	
1-5-15	2 PM	JimL	Y									Y	N	
1-6-15	1 PM	JimL	Y									Y	N	
1-7-15	11 AM	JimL	Y									Y	N	
1-8-15	10AM	JimL	Y									Y	N	
1-9-15	NOON	JimL	Y									Y	N	
1-12-15	11 AM	JimL	Y									Y	N	
1-13-15	10 AM	JimL	Y									Y	N	
1-14-15	9AM	JimL	Y									Y	N	
1-15-15	11 AM	JimL	Y									Y	N	
1-16-15	9AM	JimL	Y									Y	N	
1-19-15	11AM	JimL	Y									Y	N	
1-20-15	2 PM	JimL	Y									Y	N	
1-21-15	11 AM	JimL	Y									Y	N	
1-22-15	2 PM	JimL	Y									Y	N	
1-23-15	10 AM	JimL	Y									Y	N	
1-26-15	NOON	JimL	Y									Y	N	
1-27-15	NOON	JimL	Y									Y	N	
1-28-15	NOON	JimL	Y									Y	N	
1-29-15	NOON	JimL	Y									Y	N	
1-30-15	NOON	JimL	Y									Y	N	
2-2-15	NOON	JimL	Y									Y	N	
2-3-15	2PM	JimL	Y									Y	N	
2-4-15	9AM	JimL	Y									Y	N	

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

TRUCK LOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY, CHICAGO, ILLINOIS

DRY

								Weather Conditions						
Date	Time	Initials	Was loadout completed within a building or shed? (Y/N) *(if Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(if proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
11-7-14	9AM	JmL	Y	N	N	N/A	N	40	AVG	N	N/A	Y	N	
11-10-14	NOON	JmL	Y									Y	N	
11-11-14	NOON	JmL	Y									Y	N	
11-12-14	10 AM	JmL	Y									Y	N	
11-13-14	10 AM	JmL	Y									Y	N	
11-14-14	NOON	JmL	Y									Y	N	
11-17-14	11 AM	JmL	Y									Y	N	
11-18-14	1 PM	JmL	Y									Y	N	
11-19-14	10 AM	JmL	Y									Y	N	
11-20-14	7 AM	JmL	Y									Y	N	
11-21-14	7 AM	JmL	Y									Y	N	
11-24-14	10 AM	JmL	Y									Y	N	
11-25-14	11 AM	JmL	Y									Y	N	
11-26-14	1 PM	JmL	Y									Y	N	
11-28-14	10 AM	JmL	Y									Y	N	
12-1-14	11 AM	JmL	Y									Y	N	
12-2-14	7 AM	JmL	Y									Y	N	
12-3-14	NOON	JmL	Y									Y	N	
12-4-14	10 AM	JmL	Y									Y	N	
12-5-14	NOON	JmL	Y									Y	N	
12-8-14	1 PM	JmL	Y									Y	N	
12-9-14	1 PM	JmL	Y									Y	N	
12-10-14	9 AM	JmL	Y									Y	N	
12-11-14	NOON	JmL	Y									Y	N	
12-12-14	NOON	JmL	Y									Y	N	
12-15-14	10 AM	JmL	Y									Y	N	
12-16-14	9 AM	JmL	Y									Y	N	
12-17-14	9 AM	JmL	Y									Y	N	
12-18-14	NOON	JmL	Y									Y	N	
12-19-14	10 AM	JmL	Y									Y	N	

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

Dry

TRUCK LOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY CHICAGO, ILLINOIS

ALL Dry LOADED INDOOR LOAD OUT SHED

									Weather Conditions						
Date	Time	Initials	Was loadout completed within a building or shed? (Y/N) *(If Y skip to "Proper...")*	Is material able to sprayed with water? (Y/N)	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time If Operations Suspended	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
10-24-14	10AM	JWL	Y	N	N	N/A	N/A	N	55	Low	N	N/A	Y	N	
10-27-14	10AM	JWL	Y	N	N	N/A	N/A	N	63	AVG	N	N/A	Y	N	
10-28	10AM	JWL	Y	N	N	N/A	N/A	N	55	AVG/High	N	N/A	Y	N	
10-29	NOON	JWL	Y	N	N	N/A	N/A	N	51	AVG	N	N/A	Y	N	
10-30	NOON	JWL	Y	N	N	N/A	N/A	N	51	AVG	N	N/A	Y	N	
10-31	2PM	JWL	Y	N	N	N/A	N/A	N	40	High	N	N/A	Y	N	
11-3-14	1 PM	JWL	Y	N	N	N/A	N/A	N	57	~~High~~ AVG	N	N/A	Y	N	
11-4-14	11 AM	JWL	Y	N	N	N/A	N/A	N	55	AVG	N	N/A	Y	N	
11-5-14	NOON	JWL	Y	N	N	N/A	N/A	N	55	Low	N	N/A	Y	N	
11-6-14	11AM	JWL	Y	N	N	N/A	N/A	N	46	High	N	N/A	Y	N	
			~~N~~ 11-7-14	Switched	To	New	FORM								

Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line
If Y, see operating procedures for course of action and increase frequency of VE readings

TRUCK LOADING OPERATIONS CHECKLIST - MOIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

Moist

Date	Time	Initials	Is material moist? (Y/N) (*If Y skip to "Proper..."*)	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed)*
2-4-15	9AM	JmL	Y					Y	N	
2-5-15	3PM	JmL	Y					Y	N	
2-6-15	9AM	JmL	Y					Y	N	
2-9-15	1PM	JmL	Y					Y	N	
2-10-15	1PM	JmL	Y					Y	N	
2-11-15	10AM	JmL	Y					Y	N	
2-12-15	10AM	JmL	NO MOIST TRUCKS							
2-13-15	10AM	JmL	Y					Y	N	
2-16-15	10AM	JmL	Y					Y	N	
2-17-15	10AM	JmL	Y					Y	N	
2-18-15	2PM	JmL	Y					Y	N	
2-19-15	10AM	JmL	NO MOIST TRUCKS							
2-20-15	1PM	JmL	Y					Y	N	
2-23-15	10AM	JmL	Y					Y	N	

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

TRUCK LOADING OPERATIONS CHECKLIST - MOIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

Moist

Date	Time	Initials	Is material moist? (Y/N) (*If Y skip to "Proper..."*)	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed)*
12-19-14	10AM	JmL	Y					Y	N	
12-22-14	11AM	JmL	Y					Y	N	
12-23-14	10AM	JmL	Y					Y	N	
12-26-14	NOON	JmL	Y					Y	N	
12-29-14	NOON	JmL	Y					Y	N	
12-30-14	1PM	JmL	NO TRUCKS							
12-31-14	10AM	JmL	NO TRUCKS							
1-2-15	1PM	JmL	NO TRUCKS							
1-5-15	2PM	JmL	Y					Y	N	
1-6-15	1PM	JmL	Y					Y	N	
1-7-15	11AM	JmL	Y					Y	N	
1-8-15	10AM	JmL	NO TRUCKS							
1-9-15	NOON	JmL	NO TRUCKS							
1-12-15	11AM	JmL	Y					Y	N	
1-13-15	10AM	JmL	Y					Y	N	
1-14-15	9AM	JmL	Y					Y	N	
1-15-15	11AM	JmL	Y					Y	N	
1-16-15	9AM	JmL	Y					Y	N	
1-19-15	11AM	JmL	Y					Y	N	
1-20-15	2PM	JmL	Y					Y	N	
1-21-15	11AM	JmL	NO MOIST TRUCKS							
1-22-15	2PM	JmL	Y					Y	N	
1-23-15	10AM	JmL	NO MOIST TRUCKS							
1-26-15	NOON	JmL	Y					Y	N	
1-27-15	NOON	JmL	Y					Y	N	
1-28-15	NOON	JmL	Y					Y	N	
1-29-15	NOON	JmL	Y					Y	N	
1-30-15	NOON	JmL	Y					Y	N	
2-2-15	NOON	JmL	NO MOIST TRUCKS							
2-3-15	2PM	JmL	Y					Y	N	

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

TRUCK LOADING OPERATIONS CHECKLIST - MOIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

MOIST

Date	Time	Initials	Is material moist? (Y/N) (*if Y skip to "Proper..."*)	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(if proper loading / unloading methods were not followed)*
11-7-14	9AM	JmL	Y	Y	N	N/A	N	Y	N	Pig
11-10-14	NOON		Y					Y	N	Pig
11-11-14	NO MOIST TRUCKS									
11-12-14	10 AM	JmL	Y					Y	N	Pig
11-13-14	10AM	JmL	Y			"		Y	N	Pig
11-14-14	NOON	JmL	Y					Y	N	Pig
11-17-14	11AM	JmL	N	N	Y	11/17 7AM	N	Y	N	LOAD INDOORS
11-18-14	NO MOIST TRUCKS									
11-19-14	10 AM	JmL	N	N	N	N/A	N	Y	N	Loaded Indoors
11-20-14	7AM	JmL	N	N	N	N/A	N	Y	N	Loaded Indoors
11-21-14	7AM	JmL	Y					Y	N	Rain
11-24-14	10AM	JmL	Y					Y	N	Wet from Rain
11-25-14	11AM	JmL	Y					Y	N	Frozen
11-26-14	1PM	JmL	Y					Y	N	frozen
11-28	10AM	JmL	NO MOIST TRUCKS							
12-1-14	11AM	JmL	Y					Y	N	Frozen
12-2-14	7AM	JmL	NO MOIST TRUCKS							
12-3-14	NOON	JmL	Y					Y	N	
12-4-14	10AM	JmL	Y					Y	N	
12-5-14	NOON	JmL	Y					Y	N	
12-8-14	1PM	JmL	Y					Y	N	
12-9-14	1PM	JmL	Y					Y	N	
12-10-14	9AM	JmL	Y					Y	N	
12-11-14	NOON	JmL	Y					Y	N	
12-12-14	NOON	JmL	Y					Y	N	
12-15-14	10AM	JmL	Y					Y	N	
12-16-14	9AM	JmL	Y					Y	N	
12-17-14	9AM	JmL	Y					Y	N	
12-18-14	NOON	JmL	Y					Y	N	

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

MOIST

TRUCK LOADING OPERATIONS CHECKLIST - MOIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

Date	Time	Initials	Is material moist? (Y/N) (*If Y skip to "Proper..."*)	Is material able to sprayed with water? (Y/N)	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed)*
10-24	10AM	JmL	NO MOIST	TRUCKS	until further	notice					
10-27	10AM	JmL	Y	Y	Y	N/A	N/A	N	Y	N	Pig fe
10-28	10 AM	JmL	Y	Y	Y	N/A	N/A	N	Y	N	Pig fe
10-29	NOON	JmL	Y	Y	Y	N/A	N/A	N	Y	N	Pig fe
10-30	NOON	JmL	Y	Y	Y	N/A	N/A	N	Y	N	Pig fe
11-3	11 AM	JmL	Y	Y	Y	N/A	N/A	N	Y	N	Pig fe
11-4	11AM	JmL	X	Y	Y	N/A	N/A	N	Y	N	Pig fe
11-5	NOON	JmL	NO MOIST	TRUCKS							
11-6	11AM	JmL	NO MOIST	TRUCKS							
				11-7-14 Switched to WAET FORM							

* If VE is noted, see operating procedures for course of action and Increase frequency of VE readings

RAIL LOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY CHICAGO, ILLINOIS

DRY

Date	Time	Initials	Was material sprayed with water? (Y/N)	Water appl. suspended ? (Y/N)	Date/Time if water appl. suspended	Weather Conditions				Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper handling methods were not followed, ops not suspeded, etc.)*
						Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended			
10-13-14	10:30 AM	JmL	N	N/A	N/A	65	Low	N	N/A	Y	N	misters-2
11-4-14	11 AM	JmL	N	N/A	N/A	55	AVG	N	N/A	Y	N	BOXCAR
11-7-14	9AM	JmL	N	N/A	N/A	40	AVG	N	N/A	Y	N	Boxcars
11-11-14	Noon	JmL	N	N/A	N/A	48	High	N	N/A	Y	N	Aluminum
11-12-14	10 AM	JmL	N	N/A	N/A	31	AVG	N	N/A	Y	N	Aluminum
11-19-14	10AM	JmL	N	N/A	N/A	26	AVG	N	N/A	Y	N	Aluminum
11-20-14	7AM	JmL	N	N/A	N/A	10	AVG	N	N/A	Y	N	Aluminum
12-2-14	7AM	JmL	N	N/A	N/A	35	AVG	N	N/A	Y	N	Aluminum
12-9-14	1PM	JmL	N	N/A	N/A	38	AVG	N	N/A	Y	N	Aluminum
12-10-14	9AM	JmL	N	N/A	N/A	35	AVG	N	N/A	Y	N	Aluminum
12-18	Noon	JmL	N	N/A	N/A	31	AVG	N	N/A	Y	N	Aluminum
1-5-15	2PM	JmL	N	N/A	N/A	0	AVG	N	N/A	Y	N	Aluminum
1-14-15	9AM	JmL	N	N/A	N/A	7	Lite	N	N/A	Y	N	Chop
2-9-15	1 PM	JmL	N	N/A	N/A	39	AVG	N	N/A	Y	N	Aluminum
2-11-15	10AM	JmL	N	N/A	N/A	30	AVG	N	N/A	Y	N	Aluminum
2-16-15	10AM	JmL	N	N/A	N/A	9	Lite	N	N/A	Y	N	Aluminum

Operations are only performed when windspeeds are 20 mph or less unless water is applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

RAIL LOADING OPERATIONS CHECKLIST - MOIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

MOIST

Date	Time	Initials	Is material moist? (Y/N) *(If Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile mister or portable DC used? (Y/N)	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed)*
10-2-14	10AM	JmL	N	Y	N	N/A	N	Y	N	open hopper cars
10-28-14	10AM	JmL	N	Y	N	N/A	N	Y	N	open hopper cars
11-1-14	NOON	JmL	Y					Y	N	open hopper
11-17-14	11 AM	JmL	Y					Y	N	open hopper
11-26-14	1 PM	JmL	Y					Y	N	open hoppers
12-4-14	10AM	JmL	Y					Y	N	open hoppers

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

RAIL UNLOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY CHICAGO, ILLINOIS

Dry

Date	Time	Initials	Was material sprayed with water? (Y/N)	Water appl. suspended ? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Weather Conditions				Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(if proper handling methods were not followed, ops not suspeded, etc.)*
							Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended			
10-16-14	NOON	JmL	N	N/A	N/A	N	55	AVG	N	N/A	Y	N	Box Car
11-4-14	11 AM	JmL	N	N/A	N/A	N	55	AVG	N	N/A	Y	N	Box CaR
11-10-14	NOON	JmL	N	N/A	N/A	N	58	AVG/High	N	N/A	Y	N	Box CaRS
11-12-14	NOON	JmL	N	N/A	N/A	N	30	AVG	N	N/A	Y	N	BoxCaR
11-21-14	7AM	JmL	N	N/A	N/A	N	10	AVG	N	N/A	Y	N	BoxCaR
11-26-14	1 PM	JmL	N	N/A	N/A	N	25	Lite	N	N/A	Y	N	BoxCaR
11-28	10 AM	JmL	N	N/A	N/A	N	23	AVG	N	N/A	Y	N	BoxCar
12-4-14	10 AM	JmL	N	N/A	N/A	N	34	Lite	N	N/A	Y	N	BoxCaR
1-7-15	11 AM	JmL	N	N/A	N/A	N	0	High	N	N/A	Y	N	BoxCaR
1-13-15	NOON	JmL	N	N/A	N/A	N	0	AVG	N	N/A	Y	N	BoxCar SS
1-22-15	2PM	JmL	N	N/A	N/A	N	35	Lite	N	N/A	Y	N	BoxCars SS
1-27-15	NOON	JmL	N	N/A	N/A	N	26	AVG	N	N/A	Y	N	BoxCar
1-29-15	NOON	JmL	N	N/A	N/A	N	33	AVG	N	N/A	Y	N	BoxCar
2-2-15	NOON	JmL	N	N/A	N/A	N	18	AVG	N	N/A	Y	N	BoxCaR
2-3-15	2PM	JmL	N	N/A	N/A	N	28	AVG	N	N/A	Y	N	BoxCaR
2-17-15	2PM	JmL	N	N/A	N/A	N	21	Lite	N	N/A	Y	N	BoxCarS

*Operations are only performed when windspeeds are 20 mph or less unless water is applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

TRUCK UNLOADING OPE[illegible]IONS CHECKLIST - DRY

S.H. BELL COMPAN[illegible] CHICAGO, ILLINOIS

DRY

Date	Time	Initials	Was unloading completed within a building or shed? (Y/N) *(If Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended ? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Weather Conditions: Temp	Weather Conditions: Wind (none, avg., high or observed mph)	Weather Conditions: Operations Suspended*? (Y/N)	Weather Conditions: Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(if proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
2-5-15	3PM	JmL	Y									Y	N	Containers
2-6-15	NO TRUCKS													
2-9-15	1PM	JmL	Y									Y	N	Containers
2-10-15	1PM	JmL	Y									Y	N	Containers
2-11-15	10AM	JmL	Y									Y	N	Containers
2-12-15	10AM	NO	In Bound	TRUCKS								Y	N	
2-13-15	10AM	JmL	Y									~~Y~~	~~N~~	Containers
2-16-15	10AM	JmL	Y									Y	N	Containers
2-17-15	11AM	JmL	Y									Y	N	Containers
12-18-15	2PM	JmL	Y									Y	N	Containers
2-19-15	10AM	JmL	Y									Y	N	Containers
2-20-15	1PM	JmL	Y									Y	N	Containers
2-23-15	10AM	JmL	Y									Y	N	Containers
												Y	N	VANS

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

TRUCK UNLOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY CHICAGO, ILLINOIS

DRY

								Weather Conditions							
Date	Time	Initials	Was unloading completed within a building or shed? (Y/N) *(If Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended ? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
12-22-14	11 AM	JmL	Y									Y	N	Container
12-23-14	NO TRUCKS													
12-26-14	NO TRUCKS													
12-29-14	NOON	JmL	Y									Y	N	Container
12-30-14	1 PM	JmL	NO TRUCKS											
12-31-14	10 AM	JmL	NO TRUCKS											
1-2-15	1 PM	JmL	NO TRUCKS											
1-5-15	2 PM	JmL	Y									Y	N	Containers
1-6-15	1 PM	JmL	Y									Y	N	Containers
1-7-15	11 AM	JmL	NO TRUCKS											
1-8-15	10 AM	JmL	NO TRUCKS											
1-9-15	NOON	JmL	Y									Y	N	Containers
1-12-15	11 AM	JmL	Y									Y	N	Containers
1-13-15	10 AM	JmL	Y									Y	N	Containers
1-14-15	9 AM	JmL	Y									Y	N	Containers
1-15-15	11 AM	JmL	Y									Y	N	Containers
1-16-15	9 AM	JmL	Y									Y	N	Containers
1-19-15	11 AM	JmL	Y									Y	N	Containers
1-20-15	2 PM	JmL	Y									Y	N	Containers
1-21-15	11 AM	JmL	Y									Y	N	Containers
1-22-15	2 PM	JmL	Y									Y	N	Containers
1-23-15	10 AM	JmL	Y									Y	N	Containers
1-26-15	NOON	JmL	Y									Y	N	Containers
1-27-15	NOON	JmL										Y	N	Container
1-28-15	NOON	JmL										Y	N	Container
1-29-15	NOON	JmL										Y	N	Container
1-30-15	NOON	JmL										Y	N	Container
2-2-15	NOON	JmL	NO TRUCKS											
2-3-15	2 PM	JmL	NO TRUCKS											
2-4-15	9 AM	JmL	Y									Y	N	Container

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

DC9

TRUCK UNLOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY, CHICAGO, ILLINOIS

								Weather Conditions							
Date	Time	Initials	Was unloading completed within a building or shed? (Y/N) *(if Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended ? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Temp	Wind (none, avg., high or observed mph)	Operations Suspended*? (Y/N)	Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(if proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
11-7-14	9AM	JmL	Y	N	N	N/A	N	40	AVG	N	N/A	Y	N	
11-10-14	NOON	JmL	Y									Y	N	
11-12-14	10AM	JmL	N	N	N	N/A	N	31	AVG	N	N/A	Y	N	Aluminum
11-13-14	10AM	JmL	N	N	N	N/A	N	29	AVG	N	N/A	Y	N	Aluminum 75
11-14-14	NOON	JmL	N	N	N	N/A	N	27	AVG	N	N/A	Y	N	Aluminum 75
11-17-14	11AM	JmL	N/Y	N	N	N/A	N	18	AVG	N	N/A	Y	N	H/c mw, Containers
11-18-14	1PM	JmL	N/Y	N	N	N/A	N	22	High	N	N/A	Y	N	H/c mw, Containe
11-19-14	10AM	JmL	N/Y	N	N	N/A	N	26	AVG	N	N/A	Y	N	H/c mw, Containers
11-20-14	NOON	JmL	Y									Y	N	Containers
11-21-14	7AM	JmL	Y									Y	N	Containers
11-24-14	10AM	JmL	Y									Y	N	Container
11-25-14	11AM	JmL	N/Y	N	N	N/A	N	26	AVG	N	N/A	Y	N	H/c mw, Contained
11-26-14	1PM	JmL	N/Y	N	N	N/A	N	25	Lite	N	N/A	Y	N	H/c mw, Containers
11-28-14	10AM	JmL	N/Y	N	N	N/A	N	23	AVG	N	N/A	Y	N	H/c mw, Containers
12-1-14	11AM	JmL	N/Y	N	N	N/A	N	25	AVG	N	N/A	Y	N	H/c mw, Containers
12-2-14	7AM	JmL	N/Y	N	N	N/A	N	35	AVG	N	N/A	Y	N	H/c mw, Containers
12-3-14	NOON	JmL	N/Y	N	N	N/A	N	36	AVG	N	N/A	Y	N	H/c mw/ Containers
12-4-14	10AM	JmL	N/Y	N	N	N/A	N	34	Lite	N	N/A	Y	N	H/c mw / Containers
12-5-14	NOON	JmL	N/Y	N	N	N/A	N	37	Low	N	N/A	Y	N	H/c mw / Containers
12-8-14	1PM	JmL	Y	N	N	N/A	N	36	AVG	N	N/A	Y	N	Containers
12-9-14	1PM	JmL	N/Y	N	N	N/A	N	38	AVG	N	N/A	Y	N	H/c mw / Containers
12-10-14	9AM	JmL	N/Y	N	N	N/A	N	35	AVG	N	N/A	Y	N	H/c mw / Containers
12-11-14	NOON	JmL	Y	N	N	N/A	N	28	AVG	N	N/A	Y	N	Containers
12-12-14	NOON	JmL	Y									Y	N	Containers
12-15-14	10AM	JmL	Y									Y	N	Containers
12-16-14	9AM	JmL	Y									Y	N	Containers
12-17-14	9AM	JmL	Y									Y	N	Containers
12-18-14	NOON	JmL	Y									Y	N	Containers
12-19-14	10AM	JmL	Y									Y	N	Containers

*Operations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line

** If Y, see operating procedures for course of action and increase frequency of VE readings

Drg

TRUCK UNLOADING OPERATIONS CHECKLIST - DRY
S.H. BELL COMPANY CHICAGO, ILLINOIS

Date	Time	Initials	Was unloading completed within a building or shed? (Y/N) *(If Y skip to "Proper...")*	Is material able to sprayed with water? (Y/N)	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Weather Conditions: Temp	Weather Conditions: Wind (none, avg., high or observed mph)	Weather Conditions: Operations Suspended*? (Y/N)	Weather Conditions: Date/Time if Operations Suspended	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line**? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed, dry mat'l loaded outside, etc.)*
10-24-14	10AM	JimL	Y	N	N	N	N/A	N	55	Low	N	N/A	Y	N	Container
10-27	10AM	JimL	Y	N	N	N	N/A	N	63	AVG	N	N/A	Y	N	Containers
10-28	10AM	JimL	Y	N	N	N	N/A	N	55	AVG	N	N/A	Y	N	Containers
10-29	NOON	JimL	Y	N	N	N	N/A	N	51	AVG	N	N/A	Y	N	Containers
10-30	NOON	JimL	Y	N	N	N	N/A	N	51	AVG	N	N/A	Y	N	Containers
10-31	2PM	JimL	Y	N	N	N	N/A	N	40	High	N	N/A	Y	N	Containers
11-3-14	11AM	JimL	Y	N	N	N	N/A	N	57	~~High~~ AVG	N	N/A	Y	N	Cont / ~~[illegible]~~
11-4-14	11AM	JimL	Y	N	N	N	N/A	N	55	AVG	N	N/A	Y	N	Containers
11-5-14	NOON	JimL	Y	N	N	N	N/A	N	55	Low	N	N/A	Y	N	Container
11-6-14	11AM	JimL	Y	N	N	N	N/A	N	46	High	N	N/A	Y	N	VANS

11-7-14 Changed To New Log Sheets

perations are only performed when windspeeds are 20 mph or less unless water can be applied and/or no VE is observed at the property line
f Y, see operating procedures for course of action and increase frequency of VE readings

TRUCK UNLOADING OPERATIONS CHECKLIST - MOIST

S.H. BELL COMPANY CHICAGO, ILLINOIS

Moist

Date	Time	Initials	Is material moist? (Y/N) *(if Y skip to "Proper...")*	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Proper Methods Followed? (Y/N) *(includes minimizing drop heights)*	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(if proper loading / unloading methods were not followed)*
11-3-14	11 AM	JWL	Y	N	N/A	N/A	N	Y	N	wet SiC
11-10-14	3PM	JWL	Y					Y	N	wet SiC
11-12-14	10 AM	JWL	Y					Y	N	wet SiC
11-25-14	11 AM	JWL	Y					Y	N	wet SiC
12-8-14	1PM	JWL	Y					Y	N	wet SiC
12-9-14	1PM	JWL	Y					Y	N	wet SiC
12-10-14	9AM	JWL	Y					Y	N	wet SiC
12-11-14	NOON	JWL	Y					Y	N	wet SiC
12-15-14	10 AM	JWL	Y					Y	N	wet SiC
12-16-14	9AM	JWL	Y					Y	N	wet SiC
12-17-14	9AM	JWL	Y					Y	N	wet SiC
12-18-14	NOON	JWL	Y					Y	N	wet SiC

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

Moist

TRUCK UNLOADING OPERATIONS CHECKLIST - MOIST
S.H. BELL COMPANY CHICAGO, ILLINOIS

Date	Time	Initials	Is material moist? (Y/N) (*if Y skip to "Proper..."*)	Is material able to sprayed with water? (Y/N)	Was material sprayed with water? (Y/N)	Water appl. suspended? (Y/N)	Date/Time if water appl. suspended	Mobile misters used? (Y/N)	Proper Methods Followed? (Y/N) *(Includes minimizing drop heights)*	VE at nearest property line*? (Y/N)	Comments or Corrective Measures *(If proper loading / unloading methods were not followed)*
10-24	10AM	JML	NO	Moist	TRUCKS	until	further	notice			
11-3-14	11AM	JML	Y	Y	N	N/A	N/A	N	Y	N	Sic wet
				11-7-14	changed	To	New	Log	Sheets		

* If VE is noted, see operating procedures for course of action and increase frequency of VE readings

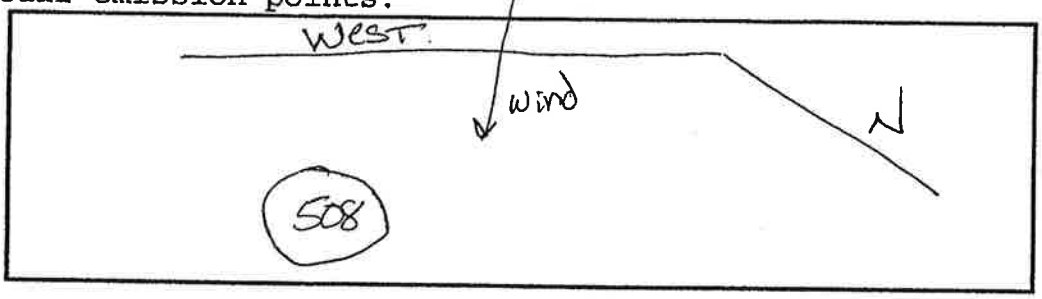
2-23-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer JmL Affiliation Date 2/23/15
Sky Conditions Clear Precipitation ø	Wind Direction WNW Wind Speed 6 MPH
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



Property Line

OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:20 AM	6 min	ø
End Observation	7:26		ø %

Process unit	date
small partical	X 2-23-15
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

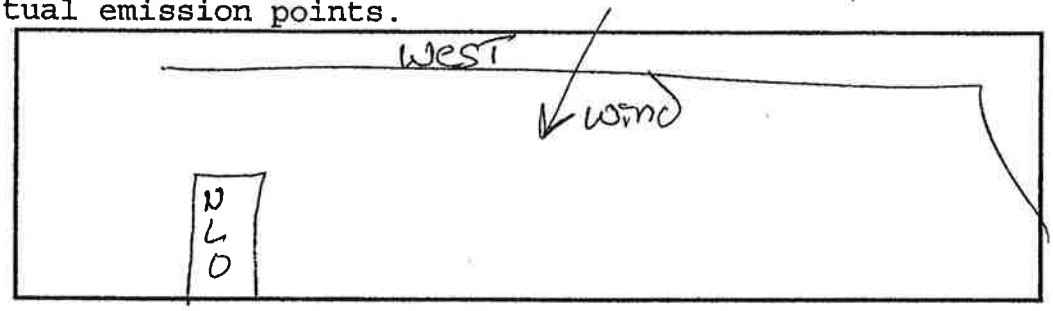
2-23-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Location SH Bell Company Rep.	Observer JmL Affiliation Date 2/23/15
Sky Conditions Clear Precipitation 0	Wind Direction WNW Wind Speed 10MPH
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:30 AM	1 min	0
End Observation	7:36 AM		0 0/0

Property Line

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	X 2-26-15
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

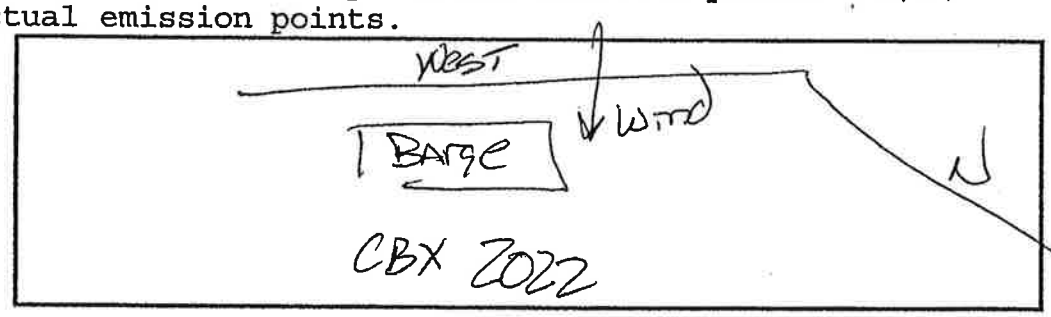
2-23-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer Jim L Affiliation Date 2-23-15
Sky Conditions clear Precipitation Ø	Wind Direction WNW Wind Speed 10mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	8:10AM	60:00	Ø
End Observation	8:16AM		Ø %

Properly me

Process unit	date
small partical	
active pile	
barge unloading	X 2-23-15
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

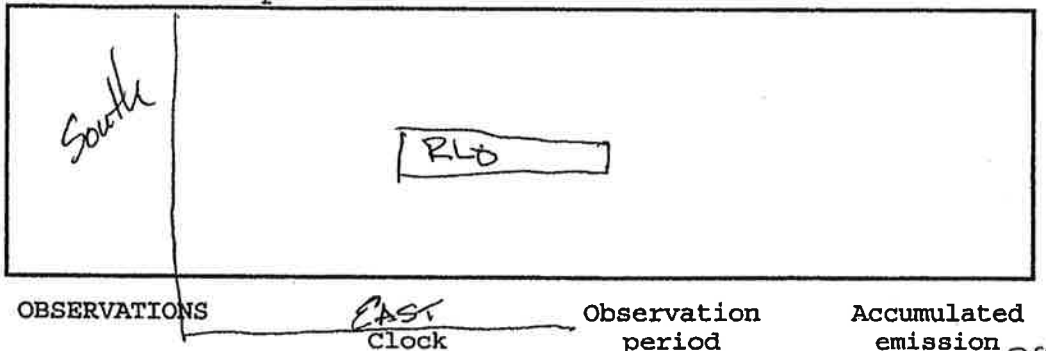
2-23-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer JWL Affiliation Date 2-23-15
Sky Conditions clear Precipitation Ø	Wind Direction ~~E~~ WNW Wind Speed 6 mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	8:25 AM	(5 min)	Ø
End Observation	8:31 AM		Ø %

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson.	X 2-23-15
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

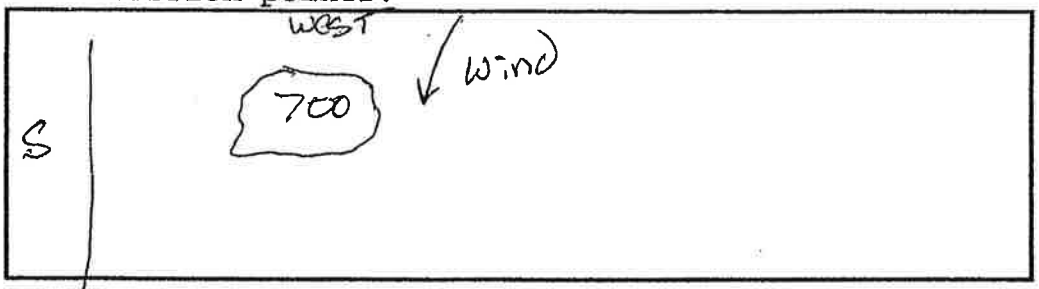
2-23-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer JmL Affiliation Date 2-23-15
Sky Conditions Clear Precipitation Ø	Wind Direction WNW Wind Speed 6mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



Process unit	date
small partical	
active pile	X 2-23-15
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	X 2-23-15
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	8:35 AM	6 min	Ø
End Observation	8:41 AM		Ø %

Figure 22-1

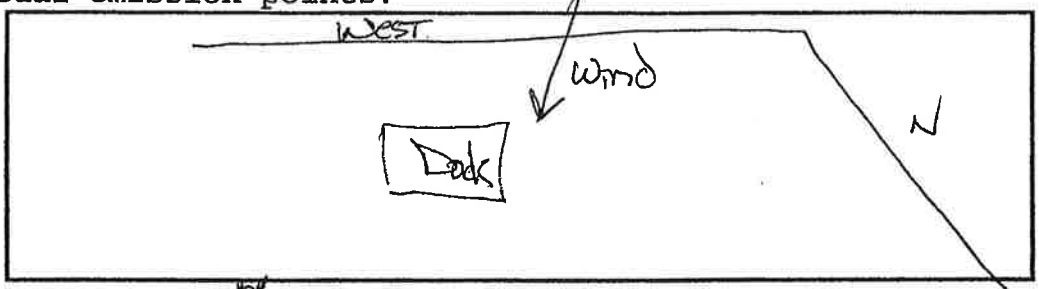
2-23-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer Jim L Affiliation Date 2-23-15
Sky Conditions clear Precipitation ø	Wind Direction WNW Wind Speed 6mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS FANS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	9:20AM	60:00	ø
End Observation	9:26AM		ø%

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	X 2-23-15
truck unload moist	

Figure 22-1

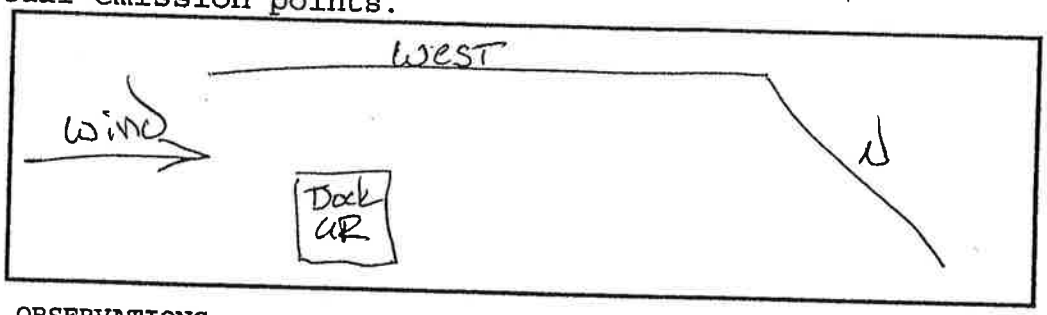
2-20-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer JmL Affiliation Date 2-20-15
Sky Conditions Cloudy Precipitation Ø	Wind Direction S Wind Speed 6mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:30	6min	Ø
End Observation	7:36		Ø%

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	X 2-20-15
truck unload moist	

property Line

Figure 22-1

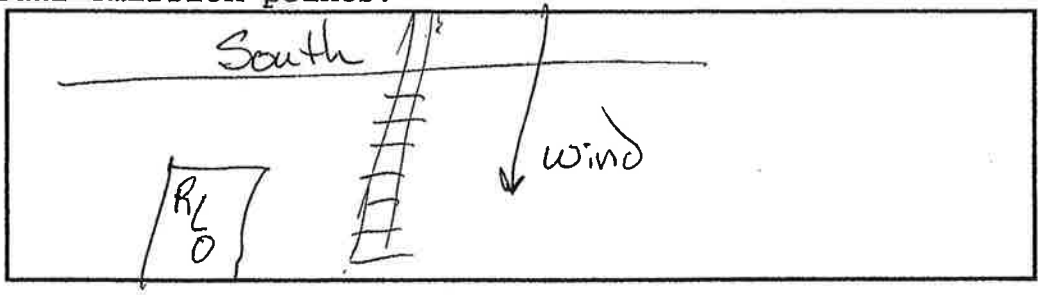
2-20-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer Jim L Affiliation Date 2-20-15
Sky Conditions Cloudy Precipitation ø	Wind Direction S Wind Speed 6mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:40	6min	ø
End Observation	7:46		ø %

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson.	Y 2-20-15
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Property Line

Figure 22-1

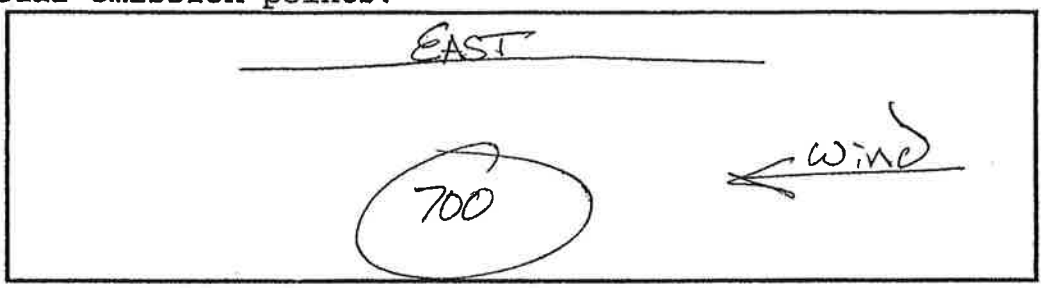
2-20-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Location SH Bell Co Company Rep.	Observer Jim L Affiliation Date 2-20-15
Sky Conditions Cloudy Precipitation Ø	Wind Direction S Wind Speed 6mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:50	6min	Ø
End Observation	7:56		Ø %

Property Line

Process unit	date
small partical	
active pile	X 2-20-15
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	X 2-20-15
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

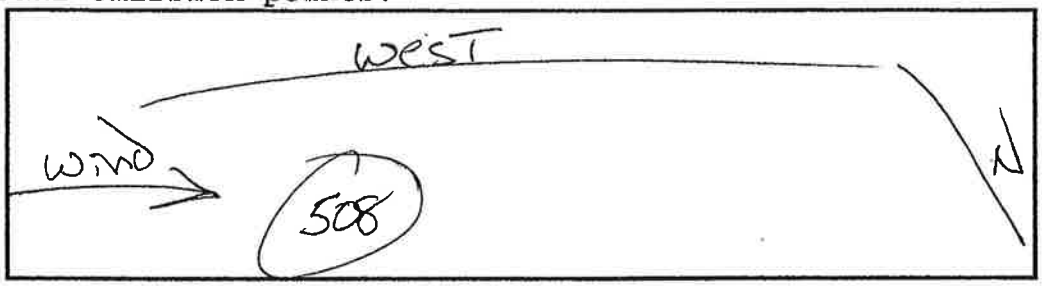
2-20-15

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Location SH Bell Co Company Rep.	Observer Jon L Affiliation Date 2-20-15
Sky Conditions cloudy Precipitation Ø	Wind Direction S Wind Speed 10mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	8:10	6min	Ø
End Observation	8:16		Ø%

Property Line

Process unit	date
small partical	X 2-26-15
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

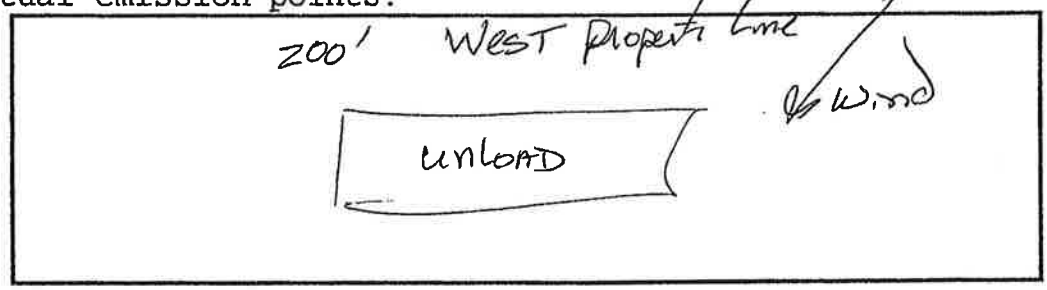
2/19

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer JMC Affiliation Date 2-19-15
Sky Conditions Clear Precipitation	Wind Direction NW Wind Speed 11 mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:20	6 min	0
End Observation	7:26		0%

Property Line

Process unit	date
small partical	
active pile	
barge unloading	X 2-19-15
crusher screener	
truck load ryerson.	
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

2/19

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Co Location Company Rep.	Observer Jim L Affiliation Date 2-19-15
Sky Conditions CLEAR Precipitation ∅	Wind Direction NW Wind Speed // mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.

OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:10 AM	6 min	∅
End Observation	7:16 AM		∅%

Property Line

Process unit	date
small partical	X 2-19-15
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	X 2-19-15
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

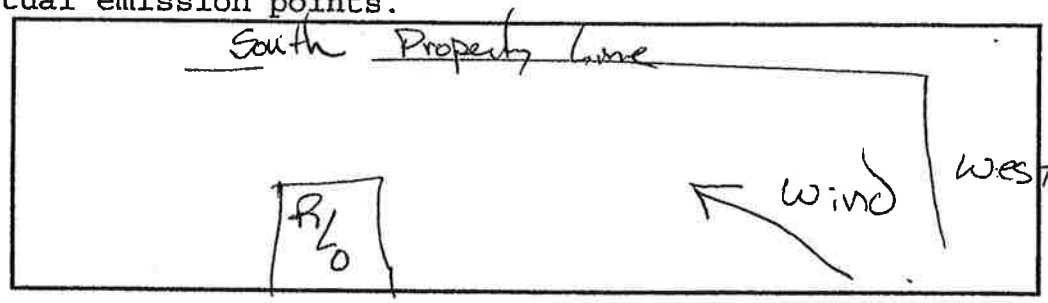
2/19

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Location Company Rep. SH BELL	Observer Jim L Affiliation Date 2-19
Sky Conditions CLEAR Precipitation	Wind Direction NW Wind Speed 11 mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:30	60 min	0
End Observation	7:36		0%

Property Line

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson	X 2-19-15
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

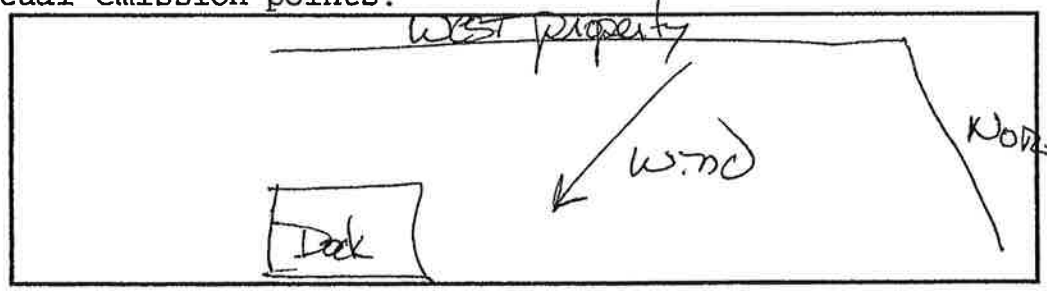
2/19

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company / Location / Company Rep. SH Bell Co	Observer / Affiliation / Date Jim L / 2-9-15
Sky Conditions clear / Precipitation 0	Wind Direction NW / Wind Speed 11 MPH
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



Property Line

OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:45	Cont'd	0
End Observation	7:51		6%

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	X 2/19/15
truck unload moist	

Figure 22-1

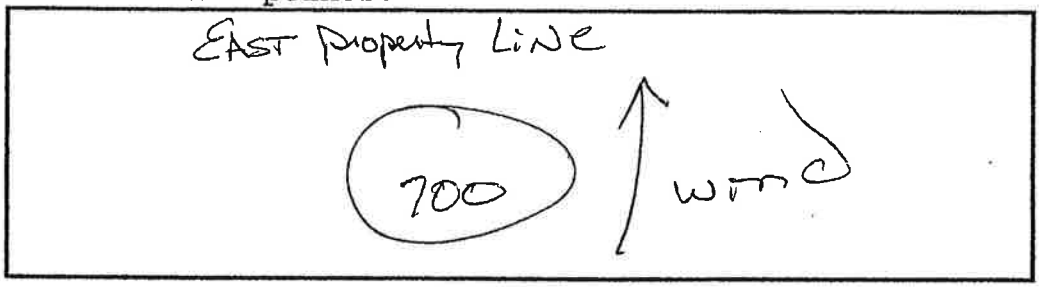
2/18

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Location SH Bell Company Rep.	Observer Jim L Affiliation Date 2/18/15
Sky Conditions Cloudy Precipitation None	Wind Direction ~~SSE~~ West 292 Wind Speed 10mpH
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:25AM	6min	Ø
End Observation	7:31 AM		0%

Property Line

Process unit	date
small partical	
active pile	2-18-15 X -700
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	
rail load mosit	2-18-15
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

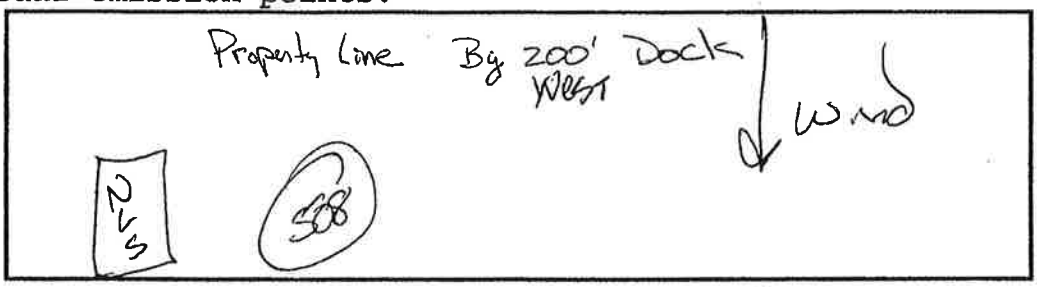
2/18

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company SH Bell Location Company Rep.	Observer Jim L Affiliation Date 2/18/15
Sky Conditions Cloudy Precipitation None	Wind Direction ~~292~~ ~~250~~ ~~SW~~ WEST Wind Speed 10 mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:15	6 min	0
End Observation	7:21	6 min	0/0

Property Line

Process unit	date
small partical	508 2/18/15
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	2-18-15 (508 Area)
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

Figure 22-1

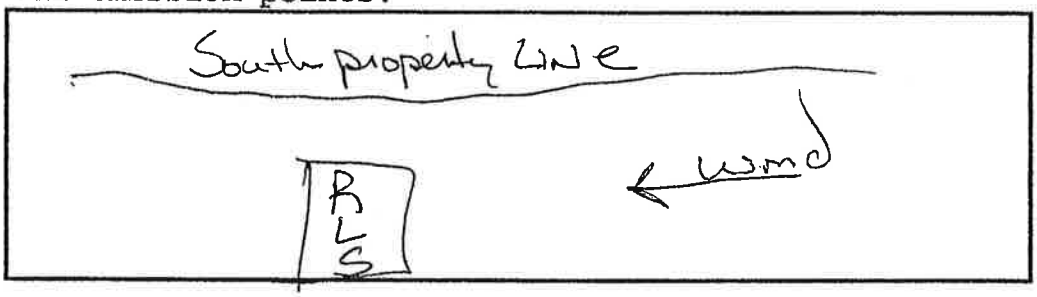
2/18

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Location SH Bell Company Rep.	Observer Jim L Affiliation Date 2/18/15
Sky Conditions Cloudy Precipitation None	Wind Direction ~~West~~ WEST Wind Speed 10 mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	7:35 AM	6 min	0
End Observation	7:41 AM		0%

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson	12-18-15
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	
truck unload moist	

property line

Figure 22-1

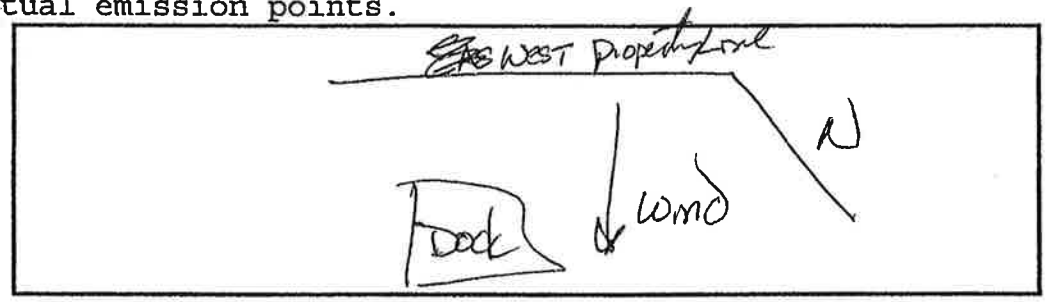
2/18

Method 22

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company Location SH Bell Company Rep.	Observer Jim L Affiliation Date 2/18/15
Sky Conditions cloudy Precipitation None	Wind Direction SW Wind Speed 10mph
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	9:20 AM	60 min	0
End Observation	9:26 AM		0%

Process unit	date
small partical	
active pile	
barge unloading	
crusher screener	
truck load ryerson	
truck load norcon	
truck load moist	
rail load mosit	
rail load dry	
rail unload	
truck unload dry	UR-2/18/15
truck unload moist	

Figure 22-1

2-23-15

EPA Method 9 Observation Form

COMPANY NAME	SH Bell Co
LOCATION	Ave O
LOCATION	
CITY / STATE / ZIP	
PROCESS EQUIPMENT	Barge Unload CBX 2022
OPERATING MODE	
CONTROL EQUIPMENT	
OPERATING MODE	
DESCRIBE EMISSION POINT	Excavator Bucket to Dump Truck Bed
HEIGHT ABOVE GROUND LEVEL	START 8'-10' END 8'-10'
HEIGHT RELATIVE TO OBSERVER	START 4'-5' END 4'-5'
DISTANCE FROM OBSERVER	START 150' END 150'
DIRECTION FROM OBSERVER	START West ° END West
VERTICAL ANGLE TO OBS. POINT	START 10 ° END 10
DIRECTION TO OBS. POINT	START East ° END East
DESCRIBE EMISSIONS	START None END None
EMISSION COLOR	START END
IF WATER DROPLET PLUME	ATTACHED ☐ DETACHED ☐ NA ☐
DISTANCE OF OBSERVATION POINT FROM EMISSION OUTLET	START END
DESCRIBE PLUME BACKGROUND	START END
BACKGROUND COLOR	START END
SKY CONDITIONS	START END
WIND SPEED	START 6 mph END 6
WIND DIRECTION	START 300 ° END 300
AMBIENT TEMP	START 3 °F END 3
WET BULB TEMP	°F
RH PERCENT	%

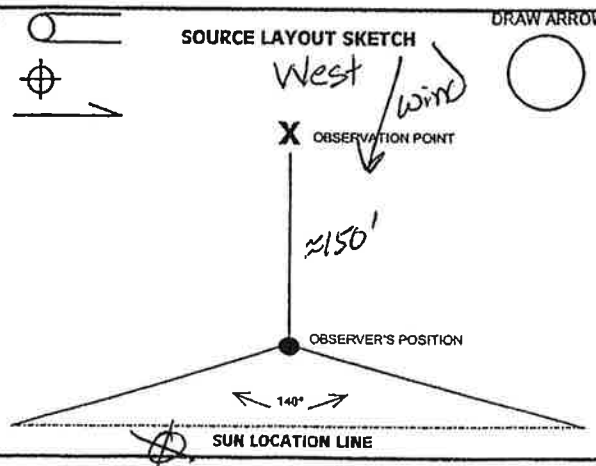
STACK WITH PLUME ○—

SUN ⊕

WIND →

SOURCE LAYOUT SKETCH

DRAW ARROW ○



ADDITIONAL INFORMATION: Pyfe Barge shipped open from NOLA material wet

FORM NUMBER	
PAGE	1 OF 1
OBSERVATION DATE	2-23-15
START TIME:	7:45
END TIME:	8:00 AM

SEC / MIN	0	15	30	45	COMMENTS
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16					
17					
18					Opacity = 0%
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					

OBSERVERS NAME (PRINT)	James Landrum
OBSERVERS SIGNATURE	
DATE:	2-23-15
ORGANIZATION	SH Bell Co
CERTIFIED BY:	Whitlow Enterprises LLC
DATE:	

CONTINUED ON VEO NUMBER

~~Foggy~~ ACL 06116

2/19/15

EPA Method 9 Observation Form

COMPANY NAME: SH Bell Co
LOCATION:
LOCATION:
CITY: | STATE: | ZIP:

PROCESS EQUIPMENT: 200' Barge unload | OPERATING MODE:
CONTROL EQUIPMENT: | OPERATING MODE:

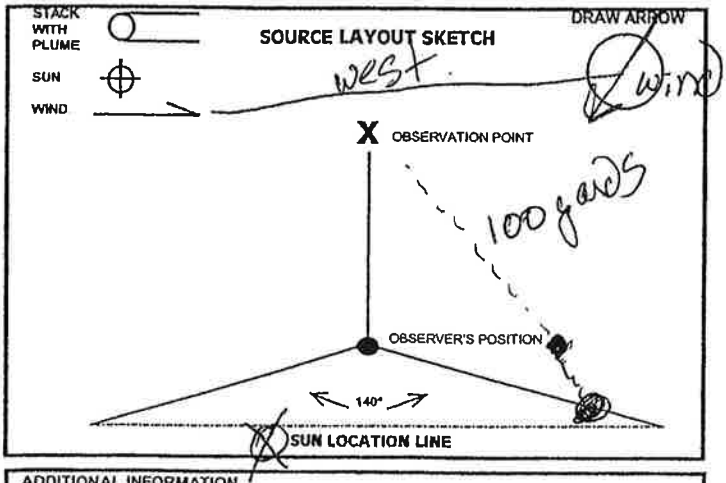
DESCRIBE EMISSION POINT: Backhoe Bucket Into Dump Truck

HEIGHT ABOVE GROUND LEVEL START	END	HEIGHT RELATIVE TO OBSERVER START	END
DISTANCE FROM OBSERVER START	END	**DIRECTION FROM OBSERVER** START °	END
VERTICAL ANGLE TO OBS. POINT START °	END	**DIRECTION TO OBS. POINT** START °	END

DESCRIBE EMISSIONS
START | END
EMISSION COLOR: START Gray | END Grey
IF WATER DROPLET PLUME: ATTACHED ☐ DETACHED ☐ NA ☐
DISTANCE OF OBSERVATION POINT FROM EMISSION OUTLET: START | END

DESCRIBE PLUME BACKGROUND: START Blue Sky | END Blue Sky

BACKGROUND COLOR START	END	SKY CONDITIONS START	END
WIND SPEED START 11 mph	END 11	**WIND DIRECTION** START NW °	END NW
AMBIENT TEMP START 0 °F	END 0	**WET BULB TEMP** °F	**RH PERCENT** %



ADDITIONAL INFORMATION:

FORM NUMBER: | PAGE 1 OF 1

OBSERVATION DATE: 2-19-15 | START TIME: 8AM | END TIME: 8:12 AM

SEC / MIN	0	15	30	45	COMMENTS
1	0	0	0	0	
2	0	0	10	10	
3	10	0	45	5	
4	5	0	0	0	opacity - 4.8%
5	0	30	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	40	5	0	20	
10	0	10	0	0	
11	20	5	0	5	
12	0	0	0	0	opacity - 4.4%
13	0	0	0	0	
14	0	0	0	0	
15	0	40	0	0	
16	5	0	5	0	
17	0	20	0	5	opacity = 3%
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22					
23					
24					
25					
26					opacity = 3.5%
27					
28			opacity		
29					
30					

OBSERVERS NAME (PRINT): James Langbehn
OBSERVERS SIGNATURE: | DATE: 2-19-15
ORGANIZATION: SH Bell
CERTIFIED BY: Whitlow Enterprises LLC | DATE:

CONTINUED ON VEO NUMBER:

RAILCAR
UNLOADIN

RAILCAR LOADING
/ UNLOADING

S. GREEN

TRUCK LOAD-OUT SHED
(DUST COLLECTOR TO
BE INSTALLED)

KEY
(ALL LOCATIONS APPROXIMATE)

- APPROXIMATE FACILITY BOUNDARY
- TYPICAL BULK STORAGE PILE LOCATIONS (MIN. 20 FT SETBACK)
- EP — EMISSION POINT
- TYPICAL TRAFFIC PATTERNS
- COVERED MANHOLE
- INLET TO COMBINED SEWER
- WIND SPEED MONITOR
- PRIMARY AREAS OF TRUCK UNLOADING

THE INFORMATION ON THIS SHEET WAS TAKEN FROM:
GREMLEY & BIEDERMANN, INC.
PLAT PLAN
DATED JAN. 25, 1984
AND FROM
ROWLAND A. FABIAN
DATED JAN. 29, 1997

GRAPHIC SCALE

100 0 50 100 200 400

(IN FEET)
1 inch = 200 ft.

FIGURE

1

APPROVED	DATE	REVISED DATE
KP	10/23/14	02/25/15

2/25/2015 3:39 PM P:\Env\3410 - SH Bell Co Chicago\CADD\3410140990 Fig 1 02-16-15.dwg FIG-1

Governmental Inspection Report City of Chicago

Plant or Facility: Chicago South Ave "O"	Agency or Contractor Inspecting: [list all] Department of Environment
Inspection Date: 7-11-2008	Inspector's Name: [list all] Christopher Lipman

Complete this report for any inspection by outside interests who visit any S.H. Bell plant or facility. Provide detailed answers to all questions. If more space is required, use additional sheets. Identify additional information by checklist number. Attach copies of all written documents left by the inspector.

	Checklist
1	What credentials did each inspector present? CARD
1a	Did the inspector present a written notice of inspection? (Provide details.) NO
1b	Did the inspector present a Warrant? (Provide details.) NO
2	What was the nature of the inspection? Water front / material Storage Compliance
2a	Did the inspector mention any citizen complaints? (Provide details.) NO
3	Were pre-inspection instructions given to the inspector?. (Provide details.) NO
3a	Did inspector follow these instructions? ☐ Yes ☐ No If no, describe: N/A
4	What products, processes or areas was the inspector interested in? Water front Storage
4a	Did you know what the inspector was looking for? (if yes, note under comments) ☒ Yes ☐ No Material Back 20' from Water edge
5	Was an inspection of the entire facility made? If no, identify which areas were inspected. ☒ Yes ☐ No
6	What records were asked for? (Provide details.) NO
6a	What records did you show? (Provide details. - list all) N/A
6b	What records did the inspector copy? (Provide details. - list all) N/A
7	Did the inspector take photos or videotape? List where and of what. Yes - Photo's of Water front Storage + Demolition Projects
7a	Did you take photos or request duplicates? ☒ Yes ☐ No Yes -

FORM #190 – 10/02

8	List any samples taken, time of sampling, codes of samples. NONE	
8a	Did you request split samples? N/A	☐ Yes ☐ No
8b	Did you request results of agency analysis? N/A	☐ Yes ☐ No
8c	Did you ask the inspector to identify for what tests the samples were taken? If yes, please answer 8d. N/A	☐ Yes ☐ No
8d	Please list test methods/purpose. N/A	
9	Did the inspector request additional records or other follow-up information? (Provide details.) N/A	☐ Yes ☐ No
10	Give additional information to questions asked and answers given, and other observations made by you or other company employees. (Use a question-answer format and identify which company employees were involved.) N/A	
11	Who was present during inspection? Tom L	
12	Was the inspector asked about his/her findings at the end of the inspection?	☒ Yes ☐ No
12a	If yes, what was stated by the inspector? OK - No Problems	
13	Was any corrective action taken during the inspection? ☐ Yes ☒ No If yes, provide details.	
14	Comments: Daily Tour Coming Down the River. Reason for the Inspection	
Signature of preparer:		
Title:		Date: 7-11-08
Terminal Manager's Signature:		Date: 7-11-08

FORM #190 – 10/02

City of Chicago

Christopher D. Lipman
Senior Environmental Inspector
Department of Environment
Permitting and Enforcement
Room 2500
30 North LaSalle Street
Chicago, Illinois 60602
cell 312-656-0775
~~312-744-7249~~
312-744-5272 (FAX)
312-744-3586 (TTY)
chris.lipman@cityofchicago.org

Recycled Paper

From: Aranda, Mario:(ComEd) [mailto:mario.aranda@ComEd.com]
Sent: Friday, February 13, 2015 1:52 PM
To: JIM LANGBEHN
Cc: JOHN BEDECK; SAM H. BELL
Subject: RE: SH Bell Co. load letter application and results of your visit.

Jim,

Next week Thursday 2/19/15 I will have the revised design & cost to you.

Thanks

From: JIM LANGBEHN [mailto:jlangbehn@shbellco.com]
Sent: Tuesday, February 10, 2015 12:05 PM
To: Aranda, Mario:(ComEd)
Cc: JIM LANGBEHN; JOHN BEDECK; SAM H. BELL
Subject: RE: SH Bell Co. load letter application and results of your visit.

Dear Mario,

Please find attached the revised load letter. The EPA is pressing us to get this project completed. Any help you can give completing the design and cost estimate would be greatly appreciated.

Sincerely,

James Langbehn
SH Bell Co - Chicago

773-375-1010
jlangbehn@shbellco.com

From: Aranda, Mario:(ComEd) [mailto:mario.aranda@ComEd.com]
Sent: Thursday, February 05, 2015 10:11 AM
To: JIM LANGBEHN
Subject: RE: SH Bell Co. load letter application and results of your visit.

Jim,

This is to follow up on our phone conversation, you will be installing two 150hp motors which will require a new transformer bank. Please send me a revised load letter showing the new switch size so I can re-design this. And that I will not be sending the contract this Friday because I have to redesign the job.

Also per our phone conversation yesterday your power service need date is an estimated 90 days out, which would put you around April. If you would kindly just let me know a rough date in April so I can schedule your job?

Thanks

From: JIM LANGBEHN [mailto:jlangbehn@shbellco.com]
Sent: Tuesday, February 03, 2015 3:21 PM
To: Aranda, Mario:(ComEd)
Subject: RE: SH Bell Co. load letter application and results of your visit.

2/12/2015

James Langbehn
SH Bell Co - Chicago
773-375-1010
jlangbehn@shbellco.com

From: Aranda, Mario:(ComEd) [mailto:mario.aranda@ComEd.com]
Sent: Tuesday, February 03, 2015 3:10 PM
To: JIM LANGBEHN
Subject: RE: SH Bell Co. load letter application and results of your visit.

Jim,

Could you please tell me what your need date is?

Thanks

From: JIM LANGBEHN [mailto:jlangbehn@shbellco.com]
Sent: Tuesday, February 03, 2015 2:51 PM
To: Aranda, Mario:(ComEd)
Subject: RE: SH Bell Co. load letter application and results of your visit.

Fantastic! Thank you Mario

James Langbehn
SH Bell Co - Chicago
773-375-1010
jlangbehn@shbellco.com

From: Aranda, Mario:(ComEd) [mailto:mario.aranda@ComEd.com]
Sent: Tuesday, February 03, 2015 2:47 PM
To: JIM LANGBEHN
Cc: JOHN BEDECK; SAM H. BELL; RUSTY DAVIS
Subject: RE: SH Bell Co. load letter application and results of your visit.

Jim,

I have completed the design package and its with my job checker for review. I will send this to you by the end of the this week.

Thanks

From: JIM LANGBEHN [mailto:jlangbehn@shbellco.com]
Sent: Tuesday, February 03, 2015 2:35 PM
To: Aranda, Mario:(ComEd)
Cc: JOHN BEDECK; JIM LANGBEHN; SAM H. BELL; RUSTY DAVIS
Subject: SH Bell Co. load letter application and results of your visit.

Dear Mario,

We last met in November when you visited our plant to survey where and how we could drop a new 480 v 600amp service. You took some notes and said that you would figure some costs and let us know what would be involved to provide the new service. Your supervisor called me late December about our load letter application and informed me that Com-Ed would have the results and costs completed by February.

We are getting pressure from the EPA to move this project along.
Would you be able to tell me when you will have the results from your investigation ready? We need to complete the design and move towards construction.

Sincerely,

James Langbehn
SH Bell Co - Chicago
773-375-1010
jlangbehn@shbellco.com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Fresno
TRANSPORT


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Fresno
TRANSPORT

ECKERT SEAMANS
ATTORNEYS AT LAW

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U.S. Steel Tower
600 Grant Street, 44th Floor
Pittsburgh, PA 15219

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Erin Windle McDowell
412.566.6070
emcdowell@eckertseamans.com

SUBJECT TO FED. R. EVID. 408
FOR SETTLEMENT PURPOSES ONLY

August 26, 2014

Via U.S. Mail and E-mail
Molly Smith
Katherine Owens
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: S.H. Bell Company
Notice of Violation

Dear Ms. Smith and Ms. Owens,

This response to U.S. EPA's Notice of Violation dated July 15, 2014 ("NOV") is made on behalf of S.H. Bell Company ("S.H. Bell"). Following S.H. Bell's July 22, 2014 receipt of the NOV, S.H. Bell scheduled and held a Section 113 conference on August 12, 2014 with U.S. EPA, Region 5 representatives. At your request, this letter serves to supplement the discussions in that meeting, including providing additional information and documentation requested by U.S. EPA, and to respond, in writing to the NOV. This response is intended to provide additional information to U.S. EPA and should in no way be construed as a waiver of S.H. Bell's continuing ability to respond and/or refute the assertions in the NOV. The below response follows the format of the NOV, and where applicable, the documentation being provided herewith is described.

U.S. EPA's Findings of Fact

Response to Paragraph 11:
U.S. EPA's statement contained in Paragraph 11 is incorrect and not factual to the extent it asserts that 90% of the materials handled by S.H. Bell are manganese-based alloys. For example, in 2013, manganese-based materials constituted less than half of S.H. Bell's total inbound materials received.

Response to Paragraphs 12-17:
S.H. Bell operates pursuant to its Fugitive Dust Operating Plan ("Plan") which, among other things, identifies best practices that S.H. Bell implements to reduce fugitive emissions. S.H. Bell revised its Plan (a copy of which was provided to U.S. EPA) on June 10, 2014 to incorporate regulatory changes made by the City of Chicago following its promulgation of the Rules and Regulations for the Control of Emissions from the Handling and Storage of Bulk

Material Piles. S.H. Bell employees were trained on July 16, 2014 concerning the revisions to the Plan. Attached hereto as Exhibit A are the training records.

At the time of the inspections and currently, all roadways at the Facility are sprayed daily with water by truck. The spraying is conducted by S.H. Bell and generally takes place, weather permitting, during the hours of 7 a.m. through 11 a.m. Attached hereto as Exhibit B are the records related to roadway water treatment for April 25, May 19 and May 20. In addition, all paved roadways are swept using an industrial vacuum to collect dust. Through August 2014, sweeping was performed by a contractor, but now is performed by S.H. Bell employees, which has proven to be a more effective system for reducing dust. Sweeping generally occurs, weather permitting, during the hours 3 p.m. through 5 p.m. See Exhibit C for related sweeping records.

Further, S.H. Bell purchased two (2) atomized mist technology units which were delivered on June 24, 2014 and August 1, 2014. Training was conducted on June 24, 2014 for proper use of this equipment. Attached hereto as Exhibit D are the training records as well as the specifications of these units. These mobile units are utilized on emissions units throughout the Facility to address activities that may cause fugitive dust. By way of example, when loading a railcar by conveyor or unloading a barge of super sacks where the material must be removed from the sacks, the mist units are utilized to reduce any fugitive emissions.

In addition, as a follow up to our discussing in the Section 113 conference, S.H. Bell is working with its environmental consultants at AMEC to evaluate additional practices for its Plan to enhance its ability to reduce fugitive emissions. S.H. Bell's consultants have informed S.H. Bell that they believe the Plan can be revised within the next sixty (60) days.

Response to Paragraphs 18-19:
Based upon our August 12, 2014 Section 113 conference, it is S.H. Bell's understanding that the opacity readings performed on May 19, 2014 were observed from an active working pile during the unloading of direct reduced iron ("DRI") from a barge to the Facility. DRI is not a manganese-based alloy. Rather, it is a material which provides iron units for the iron and steel-making process. Attached hereto as Exhibit E are representative Material Safety Data Sheets of DRI.

Response to Paragraph 20:
Despite S.H. Bell's request during the Section 113 conference, U.S. EPA has not verified the allegation that fugitive dust crossed the property line. By way of further response, incorporated herein is S.H. Bell's Response to Paragraphs 12-17 above.

Response to Paragraphs 21-22:
Please see Response to Paragraphs 12-17 above, which is incorporated herein.

Response to Paragraphs 23-28:
The assertions set forth in Paragraph 23-28 are not relevant to the NOV and do not correspond with any Illinois SIP-approved requirements. As an initial matter, there are several potential sources of manganese located in the South Chicago area.

Moreover, it is inaccurate and prejudicial to compare a single reading of manganese at an air monitor operated by another entity, across a waterway to the minimal risk level ("MRL"). Contrary to U.S. EPA's discussion of the MRL in Paragraph 26, the MRL, has nothing to do with an isolated, daily exposure level. Rather, the MRL, published by the Agency for Toxic Substances and Disease Registry ("ATSDR"), an arm of U.S. EPA is based upon a lifetime exposure, which ATSDR has currently set at 0.3 mg/L. This is the same threshold as now established in U.S. EPA's recently revised initial threshold screening level for long term exposure to manganese (i.e., "ITSL"). At this exposure level, even the most sensitive of individuals are not expected to be adversely effected. According to ATSDR, exposure to a level above the MRL does not mean that adverse health effects will occur.

Finally, in contradiction to the MRL and ITSL, and in an arbitrary fashion, U.S. EPA highlights one manganese reading (referenced in Paragraph 25), rather than reviewing the available data set which shows readings far below the MRL and ITSL, and an average manganese reading of 0.190, again below the MRL and ITSL. U.S. EPA's presentation of information in the NOV creates a false impression of harmful levels of ambient manganese, and is arbitrary and capricious.

U.S. EPA's Alleged Violations

Response to Paragraph 29:
In accordance with S.H. Bell's Plan, and contrary to Paragraph 29, roadways were watered periodically, on an as needed basis, from approximately 7 a.m. to 11 a.m., in accordance with Rule 212.306. See Exhibit B. Furthermore, Response to Paragraphs 12-17 is incorporated herein.

Response to Paragraphs 30-31:
S.H. Bell purchased two (2) atomized mist technology units. The first unit was received on June 24, 2014 and employees were trained that day on proper use of the unit. The second unit was received on August 1, 2014, as discussed more fully in Response to Paragraphs 12-17, which is incorporated herein.

Response to Paragraph 32:
S.H. Bell is unable to provide a meaningful response to the allegation that "EPA inspectors noted and photographed visible fugitive particulate matter from material handling crossing the western property line . . .and at the eastern property line . . . ." Despite S.H. Bell's request, U.S. EPA has not verified its assertion of a Rule 212.301 violation. By way of further answer, Response to Paragraph 20 is incorporated herein.

Response to Paragraph 33:
S.H. Bell is unable to provide a meaningful response to the assertions in Paragraph 33 which represents U.S. EPA's unsubstantiated opinion. By way of further response, S.H. Bell reserves its rights to refute this assertion, as well as all other assertions set forth in the NOV.

We thank you for the opportunity to meet in person on August 12 and look forward to working with you to resolve the allegations in the NOV.

Very truly yours,

Erin W. McDowell
Enc.

cc: George Czerniak
Nicole Cantello
Scott Dismukes
Jim Langbehn
John Bedeck

From: Scott R. Dismukes
Sent: Friday, January 16, 2015 5:58 PM
To: 'Cantello, Nicole'
Cc: Jim Langbehn; Rusty Davis; John R. Bedeck
Subject: S.H.Bell Company Avenue O Notice of Violation: Settlement Confidential, subject to FRE 408

Settlement Confidential, Subject to FRE 408
Dear Nicole:

As I indicated in last week's e-mail, on behalf of the S.H. Bell Company's ("the Company") Avenue O, South Chicago facility, I write in response to your December 9, 2014 e-mail seeking follow-up information regarding S.H. Bell Company's Fugitive Dust Plan. This information is provided solely for purposes of settlement negotiation with respect to the U.S. EPA's July 15, 2014 Notice of Violation.

We understand that the allegations contained in U.S. E.P.A. July 15, 2014 Notice of Violation are that the Avenue O facility exceeded opacity standards from essentially a DRI fines storage pile during barge unloading and allowed fugitive dust emissions from unspecified material handling operations to migrate. The S.H. Bell Company has already implemented a number of measures which directly address the allegations contained in the Notice of Violation. These include halting of all deliveries of DRI fines (a sub-set of DRI material), purchase and use of two monsoon mobile misting equipment devices, acquisition of a mobile or portable baghouse for control of dust emanating from a variety of material handling operations, and work towards installation of baghouses for truck load-out operations at both the Norcon and Ryerson buildings. We also note the S.H. Bell Company has previously revised its Fugitive Dust Plan in October of 2014 to further address the U.S. E.P.A.'s concerns regarding opacity or visible emissions from storage piles and material handling located at this facility. This facility's Fugitive Dust Plan has been, and as revised continues to be designed to significantly reduce fugitive particulate emissions. As we note below, we will further revise the Fugitive Dust Plan to clarify several issues. This further revision should be completed within thirty (30) days, skipping the holiday, on or about February 17th or 18th.

In addition to this cascade of fugitive dust control and operational measures, we respond to your inquiry regarding the following matters:

Equipment installation/repair:

1. **Add rumble strips.**

   Response - S.H. Bell Company's Avenue O facility already contains rumble strips on the ingress and egress of the facility located by its weigh scales. Photographs of same are enclosed.

2. **Add vehicle wash station.**

   Response - Existing measures are robust. Every vehicle entering and exiting the facility must traverse the rumble strips and all trucks must be tarped once loaded. The facility continues to implement its ongoing program of sweeping the entrance of the facility to collect any loose debris which is tracked out from the facility on an as needed basis. Material track out from the facility has not been observed to be an issue.

3. **Repair flexible coverings in the crusher grinder building and load-out buildings.**

   Response – The flexible material noted during the inspection had been removed for maintenance of other internal equipment. The flexible material was replaced on October 1, 2014. Photographs of before and after replacement of same are attached.

4. **Plastic slats for the garage door and truck load-out.**

   Response – These slats were repaired on October 1, 2014.

5. **Use street sweeper to clean roads within a quarter mile of the facility.**

   Response – S.H. Bell Company notes, as indicated in the response to number 2 above, that its existing fugitive dust measures are designed to significantly reduce fugitive particulate matter and are sufficient to address the track out of any loose debris which emanate from the facility. These measures are, and have been, implemented on an as needed basis based on observation. In S.H. Bell Company's experience, these measures, while infrequently needed, have occurred in very close proximity to the facility entrance or immediately adjacent thereto.

Operational changes:

1. **Define water truck schedule.**

   Response – Appropriate fugitive dust control for facility roadways is implemented on a case-by-case basis dependent on humidity, temperature, precipitation, sun, shade, and application of alternative dust suppressant materials. Such a program requires daily judgment and evaluation and is not a "one-size-fits-all" program and is not well suited to a non-flexible prescriptive approach. S.H. Bell Company's revised October, 2014 Fugitive Dust Plan has been crafted to address the needed flexibility in this regard and is fully supported with daily observation and robust daily recordkeeping. This Fugitive Dust Plan indicates that the facility roads located therein are watered as needed on a daily basis. The unpaved and paved roads will be sprayed daily during working shifts with water from the facility water truck, weather permitting. The frequency of watering will be dependent on observed conditions which will be documented in the recordkeeping logs. For example, less watering may be required in cooler, calm conditions and additional watering may be required in hot, dry conditions. All roads and ramps are also sprayed (weather permitting) as deemed necessary by the facility manager with a dust suppressant for the purpose of reducing fugitive dust emissions caused by wind or vehicular/equipment traffic. In the winter, as necessary, an alternate and/or salt/brine solution will be applied to the roadways during working shifts to prevent icing while reducing any potential fugitive emissions.

   Recordkeeping forms for the daily water spraying activities conducted at the facility are attached. As you will note, these forms address the name and location of the roadway or area controlled, the application rate of the truck, the frequency of application, the general width of each application, identification of the truck used, and total quantity of water or chemical used for each application and include information regarding alternative suppression material application such as brine or CaCl. Similarly, forms for the watering of storage piles are attached for your review.

2. **Define sweeping schedule.**

Response – We reply in similar fashion to Response to number 1 immediately above that the existing program designed to significantly reduce fugitive particulate emissions is sufficient. S.H. Bell Company's revised October, 2014 Fugitive Dust Plan requires all facility roadways to be swept at least once daily during the working shifts, weather permitting, by the company's mechanical brush sweeper which is equipped with a collection hopper. A form recording daily sweeping activities is enclosed for your review. The October 2014 revisions to the Fugitive Dust Plan include provisions to ensure that the facility operates in accordance with the City of Chicago's Bulk Material Handling Regulations with respect to the frequency of street sweeping on an elapsed time or volume of trucked material receipt / dispatch basis unless the roads are free and clear of material transported to or from the facility.

3. **Implement an inspection schedule for all air pollution control devices.**

Response – S.H. Bell Company's revised October, 2014 Fugitive Dust Plan for this facility requires it to ensure that proper operation and adequate inspection of control devices are performed on a daily basis during working shifts for that specific equipment. The Fugitive Dust Plan will be revised to correct any discrepancy regarding inspection frequency to uniformly state "daily". Routine maintenance activities occur weekly. Written records of the inspections, maintenance and repairs are included in the inspection forms attached herewith for your review. The inspection form will be revised to specify 'daily'.

4. **Suggestion to increase the use of super sacks for transported materials.**

Response – the S.H. Bell Company is not usually informed that they will even receive a shipment until materials have already been loaded for shipment which typically occurs at an overseas location. In this regard, it is unlikely that the S.H. Bell Company can influence the use of its customer's choice to use or not use super sacks for the shipment of material.

5. **Define "minimum drop height".**

Response – The S.H. Bell Company is currently evaluating more descriptions of minimum drop height to be included in a further revision to the October 2014 Fugitive Dust Plan. The Company will revise the description in the Fugitive Dust Plan for the following operations:

- Bulk barge unloading;
- Bulk barge loading;
- Rail car unloading;
- Rail car loading;
- Outdoor storage loading to truck.

6. **Actively water all material during unloading.**

Response - Due to the variety of materials delivered (which are delivered as packaged or in bulk) and stored at this facility which are delivered in a variety of means (barge, truck, rail) and unloaded in a variety of methods at a variety of locations, this suggestion is excessive and impractical. This facility has a cascade of fugitive dust controls that significantly reduce fugitive particulate emissions, and implements ongoing observations of process and handling operations and extensive daily recordkeeping for these controls and observations. Further, the Company has added to this existing program the following additional controls: Two (2) mobile misting units, a mobile baghouse and is working on installing baghouses at the two truck loadout locations.

7. **Follow the City of Chicago's 15 mph wind speed operational restrictions.**

Response – The City of Chicago previously stated that the key factor in determining compliance with this requirement is the prohibition of fugitive dust. The facility has measures in place to effectively prevent fugitive dust emissions during high wind conditions, and thus, work need not be stopped to meet this intent as evidenced by the language of Section 5.0 (4) which requires work to be suspended during high winds "unless alternative measures are implemented to effectively control dust in accordance with the approved fugitive dust control plan." As noted at the introduction of this e-mail, S.H. Bell has implemented a cascade of additional dust control measures. Further, operations are subjected to ongoing observations for dust, and as noted in response No. 10 below, the company implements ongoing observations for dust and visible emissions during plant operations. To the extent that these observations indicate an opacity exceeding the established standard, the facility recognizes it already has an obligation to take additional measures to reduce the likelihood of or prevent the exceedence of those standards or to otherwise temporarily delay activities.

8. **Investigate possible use of surfactants.**

Response – For the past several months, the S.H. Bell Company has been conducting trials of the application of calcium chloride as an alternative dust suppressant at this facility. The onsite trials of this material over the course of the last two months this winter appear promising. As noted in responses No. 1 and No. 2 above, the frequency of roadway watering and sweeping activities are, in part, dependent on the outcome of these trials. To this end, a rigid prescriptive approach is not conducive to a fugitive dust control program for this facility's roadways.

9. **Define and maintain specific moisture content for all piles stored outdoors.**

Response – S.H. Bell Company believes that its current measures are appropriate. Its Fugitive Dust Plan requires that small-particle materials (i.e., ½" in size or less) stored outside be sprayed daily (weather permitting) with water using a water truck until crusted, subject to customer material specifications, or tarped when no material transfer is occurring. If no fugitives are noted from the piles, no watering is required. The current October 2014 Fugitive Dust Plan and the cascade of additional fugitive dust control measures already implemented at the facility, particularly given the halt to the receipt of DRI fines, are effective for these purposes.

10. **Ensure at least one Method 9 certified employee is on-site monitoring facility operations.**

Response – Currently Plant Manager, Jim Langbehn, is Method 9 certified. Mr. Langbehn manages all plant operations. This March, the facility will also send one of its foreman to smoke school to ensure personnel with Method 9 certification overlap at this facility. These two individuals are responsible to train hourly employees tasked with daily dust observations from facility operations. Suggesting all observations at all operations during daylight be conducted by Method 9 certified observers is excessive and cost prohibitive in light of the cascade of measures designed to significantly reduce fugitive particulate matter and the extensive daily recording and recordkeeping associated with same.

We hope the foregoing adequately addresses the questions raised in your December 9, 2014 e-mail addressed to me. If you need further discussion regarding these or other matters regarding the S.H. Bell Company Avenue O Facility Fugitive Dust Plan, please let me know.

Sincerely,

Scott R. Dismukes

Scott R. Dismukes, Esquire
ECKERT SEAMANS CHERIN & MELLOTT, LLC
600 Grant Street • 44th Floor • Pittsburgh, PA 15219
Direct (412) 566.1998 | Cell (412) 417.1279
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sdismukes@eckertseamans.com | vcard

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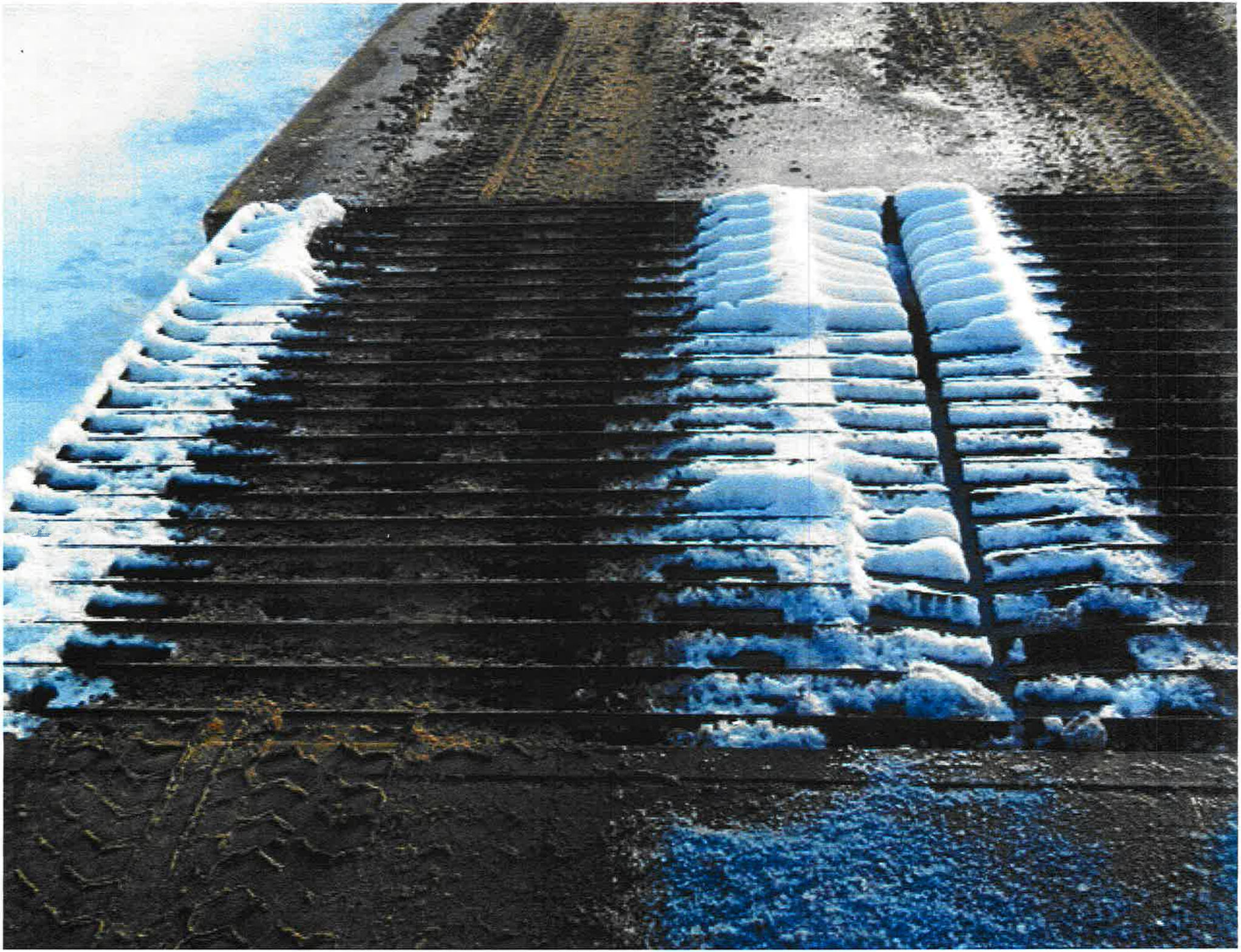


Weekly Dust Control System Inspection Log

Complete All Applicable Sections

Dust Ctrl System: bagger bag house Location: Avenue 'O' Equipment No. 342080

Date:					
Time:					
Inspector:					
BAGHOUSE / DUST COLLECTOR and FAN					
Is Filter Cleaning System Functioning?	Y / N	Y / N	Y / N	Y / N	Y / N
Hopper Discharge Device Operating?	Y / N	Y / N	Y / N	Y / N	Y / N
Any Visible Stack Emissions?	Y / N	Y / N	Y / N	Y / N	Y / N
Check That Hopper is Empty	( )	( )	( )	( )	( )
Check Fan, Belts, etc	( )				
Lubricate Bearings	( )				
COMPRESSED AIR SYSTEMS					
Compressor Functioning Properly?	Y / N	Y / N	Y / N	Y / N	Y / N
Check Hoses and Fittings for Leaks	Y / N	Y / N	Y / N	Y / N	Y / N
Change Filters	( )				
* Any Maintenance Required? *	Y / N	Y / N	Y / N	Y / N	Y / N

Date:	Brief Desc. of Required Maintenance	Repaired By

* If Maintenance Required, Please Notify Your Supervisor to Schedule Time and Personnel as Necessary *

Weekly Dust Control System Inspection Log

Complete All Applicable Sections

PACKAGE bag

Dust Ctrl System: house Location: Avenue 'O' Equipment No. 342080

Date:					
Time:					
Inspector:					
BAGHOUSE/DUST COLLECTOR and FAN					
Record Differential Pressure (dP)	"wc	"wc	"wc	"wc	"wc
Is dP Gage Functioning Properly	Y / N	Y / N	Y / N	Y / N	Y / N
Is Filter Cleaning System Functioning?	Y / N	Y / N	Y / N	Y / N	Y / N
Hopper Discharge Device Operating?	Y / N	Y / N	Y / N	Y / N	Y / N
Any Visible Stack Emissions?	Y / N	Y / N	Y / N	Y / N	Y / N
Check That Hopper is Empty	( )	( )	( )	( )	( )
Check Fan, Belts, etc	( )				
Lubricate Bearings	( )				
COMPRESSED AIR SYSTEMS					
Compressor Functioning Properly?	Y / N	Y / N	Y / N	Y / N	Y / N
Check Hoses and Fittings for Leaks	Y / N	Y / N	Y / N	Y / N	Y / N
Change Filters	( )				
* Any Maintenance Required? *	Y / N	Y / N	Y / N	Y / N	Y / N

Date:	Brief Desc. of Required Maintenance	Repaired B

* If Maintenance Required, Please Notify Your Supervisor to Schedule Time and Personnel as Necessary *

SH Bell bagger baghouse maintance log

Date	Repair Completed
8-13-2009	Put new Rolling Doors infront of hopper
4-25-2012	Replaced roof Top enclosure on hopper
7-26-2012	Replaced 2 Cartriges on Dust system
2-18-2013	Replaced 2 Cartriges on Dust system
3-25-2013	Inspected Inside of Baghouse & greased
8-29-2013	Replaced 2 Cartriges on Dust system
1-23-2014	Replaced 2 Cartriges on Dust System
7-9-2014	Replaced 2 Cartriges on Dust System
11-25-2014	Replaced Media in Compressor Air Dryer

Differential Pressure Range = 1.0 - 5.0

SH Bell box filling baghouse maintance log

Date	Repair Completed
6-8-2012	Replaced 12 Dust filters Part #C412B5
6-8-2012	Installed new vacuume hood over scale.
7-26-2012	Modified hanging system to hold Dust hood
8-13-2012	ordered 12 Dust filters (C412 Bs) from Metal Abrasive resources 412-963-0891
5-15-2012	Replaced Rotary Air Lock motor (motion ind - part 924 MWTS-41000EK
2-18-2013	Replaced 12 Dust filters
2-18-2012	ordered 14 Dust filters
4-26-2013	Replaced motor Belts on Baghouse
6-19-2013	Replaced Baghouse enclosure.
6-24-2013	Replaced Tape on Duct seams
8-29-2013	Replaced Dust filters - ordered 14 more
3-25-2014	Inspected inside of Baghouse and greased All bearings & Pulleys
6-2-14	Purchased 14 Dust Cartriges
1-23-14	Replaced Dust filters
7-9-14	Replaced 12 Dust filters & ordered 14 More
11-25-14	Replaced hopper vibrator & changed oil in Compressor

RECORD OF SWEEPING AND WATERING OF ROADWAYS
S.H. BELL COMPANY CHICAGO, ILLINOIS

DATE: _____

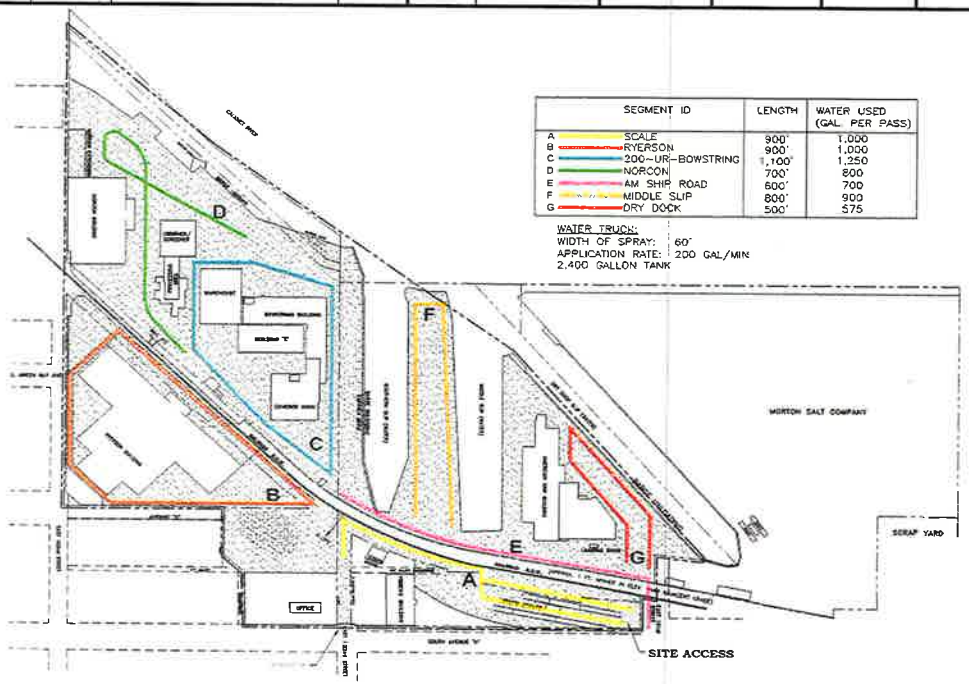
SWEEPING

				Weather Conditions		Sweeping Frequency Method*								
Start Time	End Time	Location(s) Swept *(see facility layout for roadway segment designations)*	Initials	Temp	Conditions (wet, rainy, snow, freezing, etc.)	Roads are free and clear of all material**? (Y/N)	Every 100 trucks? (Y/N)	Every 4 hours? (Y/N)	Time of Sweeping	If truck count, enter count at time of sweeping	All Paved Roads Swept? (Y/N)	If Not Swept, Provide Reason	Note any other areas swept	Comments or Corrective Measures

* Method of sweeping to be determined each day (begins at at 12:01 am for the next 24 hours).
**If roads are free and clear of material, no further records required.

WATERING

				Weather Conditions								
Start Time	End Time	Location(s) Watered *(see facility layout for roadway segment designations)*	Initials	Temp	Conditions (wet, rainy, snow, freezing, etc.)	Roads Already Wet (damp from calcium chloride)? (Y/N)	Roads Already Wet (weather)? (Y/N)	Quantity of Water Used (gallons)	Number of Passes	Calcium Chloride Applied? (Y/N)	Salt or Brine Applied? (Y/N)	Comments or Corrective Measures



SEGMENT ID		LENGTH	WATER USED (GAL PER PASS)
A	SCALE	900'	1,000
B	RYERSON	900'	1,000
C	200-UR-BOWSTRING	1,100'	1,250
D	NORCON	700'	800
E	AM SHIP ROAD	600'	700
F	MIDDLE SLIP	800'	900
G	DRY DOCK	500'	575

WATER TRUCK:
WIDTH OF SPRAY: 60'
APPLICATION RATE: 200 GAL/MIN
2,400 GALLON TANK

MAIN TRAFFIC ROADS
A, B, C, and D

ADDITIONAL OBSERVATIONS OR NOTES