

In regards to the Department of Public Health letter dated 2.6.20 I have the following responses.

Question #1: To clarify, does this mean “450,000 to 600,000 tons or is one of the numbers a typo?

This is a typo and should read 450,000 tons to 600,000 tons per year.

Question #2: How does Watco know that this iron ore slag material contains up to 2% manganese?

We know that the iron ore slag material contains trace amount of manganese less than 2% because manganese is not listed on the Universal Minerals SDS sheet. If manganese were present at 2% or more, it would be listed on the Universal Minerals SDS sheet.

Question #3: please confirm the amount of this material that remains on site?

The current amount of iron ore slag on site is 2,383 net tons as of 2.17.20. This is down significantly from the date of the original variance.

Question #4: Please also explain what is meant by the term “fines” above, and explain how dust is controlled during the storage and handling of this material?

The term “fines” is an industry standard used to refer to a material with dimensions of ½ x down or smaller. ½ x down means the largest size is ½”, and the smallest size is 8 to 16mesh. The dimensions of the iron ore slag fines on site typically range from ¾ inch x down to ½ inch x down. The potential for fugitive dust from the iron ore slag fines is controlled in the same manner as Pig Iron. It is stored outside and is typically always wet or damp. In the summer months, it is sprayed down by water when needed. (The current Iron ore slag pile consists of ¾ x down with 60% being ¾ x 1/2 , 30% being ½ x ¼ , 5% as ¼ x 1/8, and 5% 1/8 x 16 mesh).

Question #5: (Ferro-Phosphorus) How much of this material does Watco have on site: What is its manganese content: where is it stored: and how are emissions from this material controlled?

The terminal currently has 389 net tons of this material on site. It is stored in super-sacks in various locations. The MN content ranges from 2.64 to 1.68 MN and the emissions are controlled because it’s in super-sacks.

Note: We receive Fe Phos inbound by truck and unload into storage. This material arrives in packaged form and typically ships outbound in the same package it arrived in. In some cases we (the terminal) are asked to re-package it into super-sacks or 50 lbs. bags, or sometimes ship out bound in bulk form. If the material is to be re-packaged we utilize the Dust collectors in both buildings H and E to control emissions. If the material ships out in bulk form, we empty the bags inside of building F (a fully enclosed structure within the meaning of the Bulk Solid Materials Rules) and the material is loaded out inside of building F using the building F dust collector that is used for each and every bulk load.