



January 13, 2014

**CONSOLIDATED MILL SUPPLY, INC.**

**COPY**

Department of Public Health  
Attn: Environmental Permitting and Inspections  
333 S. State Street, Room 200  
Chicago, IL 60604

RE: Notice of Proposed Regulations – For the Handling and Storage of Bulk Material Piles

Dear Sirs:

I am writing concerning the Notice of Proposed Regulations for the Handling and Storage of Bulk Material Piles that was posted on December 19, 2013.

Our company distributes pig iron to iron foundries and steel mills via multiple terminals within the City of Chicago. The customers we are delivering pig iron to through these terminals are located in the states of Illinois (including within the City of Chicago), Indiana, Iowa, Michigan and Wisconsin.

We understand that there are certain cargoes which have raised environmental concerns, but we are not shipping these products. The pig iron at these terminals is handled safely, in an environmentally friendly way and does not pose a health risk for the residents of the City of Chicago.

Including the language 'any solid substance or material which can be used as a fuel or as an ingredient in a manufacturing process' in the proposed regulation is too broad of a definition and over-reaching the issue. If these regulations are implemented as currently drafted, it likely become cost-prohibitive to load/discharge all of our cargoes in the City of Chicago. This would add significant transportation costs to our business and would certainly have a negative impact on businesses located within the City of Chicago. Those businesses impacted include our stevedores, truckers, barge carriers and barge fleeting services, other service providers and most importantly our customers.

We urge you to re-draft the proposed regulations for the handling and storage of bulk material piles and to specifically not include pig iron. Otherwise, explicitly name those materials that have been identified as a potential for environmental concerns rather than using such a broad definition.

As it is written now, if passed, these regulations will likely have a devastating impact on our company as well as many Chicago based companies that we work with.

Sincerely,

Mark Kaplan  
President  
Consolidated Mill Supply, Inc.  
[mkaplan@consolidatedmillsupply.com](mailto:mkaplan@consolidatedmillsupply.com)