

## Hesse, Jennifer

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**From:** Lori Roman [lori@saltinstitute.org]  
**Sent:** Thursday, January 23, 2014 11:52 AM  
**To:** PetCokeComments  
**Cc:** Lori Roman; Laura Elliott  
**Subject:** Comments from Salt Institute

January 23, 2014

To: Chicago Department of Public Health, Environmental Permitting and Inspections  
From: Lori Roman, President, Salt Institute

Re: Proposed regulations for the handling and storage of bulk material piles

The scope and purpose of the proposed rules and regulations are clearly stated in Section 1:

“...to prescribe reasonable, specific operating and maintenance practices to minimize emissions of airborne particulate matter from the storage, blending, handling, Processing, and transport of Bulk Solid Materials as defined herein, including but not limited to ores, coal, and coke, including petroleum coke (“petcoke”) and metallurgical coke (“metcoke”).”

These rules and regulations should not apply to salt for the following reasons, including, but not limited to:

1. Salt is not an airborne pollutant. On the contrary, salt therapy has been adopted as a formal medical treatment. Halotherapy involves placing a patient in an environment containing airborne salt particles (as in a working salt mine or special rooms with artificially generated aerosolized salt particles) and is a long-recognized treatment for individuals with asthma and other chronic pulmonary diseases.<sup>[1]</sup>
2. Road salt is too large to create airborne dust concerns. Salt piles for road salt principally contain cubic shaped particles that are approximately ¼ inch on a side and are not airborne (ASTM Standard D632 – 12).
3. The Dust Suppressant System in the proposed regulation is inappropriate for salt piles. The regulations specify a water spray system “...that uses water or water-based solutions delivered through pipes, tubes, or hoses that are fitted with one or more nozzles and operated at pressures ranging from 1 to 1500 psi.” Spraying water on a salt pile is an untenable action as salt is water soluble.

For the above-mentioned reasons, it is clear that these proposed rules and regulations should not apply to salt piles. And we suggest that the language be amended to read:

**BULK SOLID MATERIAL** means any solid substance or material that can be used as a fuel or as an ingredient in a manufacturing Process that may become airborne or be scattered by the wind, including but not limited to ores, coal,

and coke, including petcoke and metcoke, but shall not include, **SALT**, construction and demolition materials, or materials that are handled or stored pursuant to a recycling, reprocessing, or waste handling Facility permit under Chapter 11-4 of the Code, or materials used in manufacturing cement at a facility that has obtained a construction permit and prevention of significant deterioration approval from the Illinois Environmental Protection Agency.

<sup>[1]</sup> SLIVKO R.Y. (1980). Dynamics of blood serum histaminopexy levels in patients with bronchial asthma after treatment in salt mines. Immunology and Allergology. 14, 22-25.



*Everything's better with a little salt.*

Lori Roman  
President, Salt Institute  
[www.alittlesalt.org](http://www.alittlesalt.org)