

Southeast Side Coalition to Ban Petcoke

banpetcoke@gmail.com

Via email to: EnvComments@cityofchicago.org.

September 2, 2014

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

Re: Comments on Variances Requested by Horsehead Corporation, Kinder Morgan/Chicago Arrow Terminal, North America Stevedoring, LLC, and S.H. Bell Company

Dear Responsible Official:

I am submitting these comments on behalf of the Southeast Side Coalition to Ban PetCoke (“the Coalition”), a community organization made up of residents of Chicago’s Southeast Side. The Coalition was formed to provide concerned residents with a forum to organize and respond to the storage of bulk materials along the Calumet River in Southeast Chicago. Consistent with that goal, the Coalition submits the following comments in response to the requests for variance submitted by Horsehead Corporation, Kinder Morgan/Chicago Arrow Terminal, North America Stevedoring, LLC, and S.H. Bell Company (“facilities”).

The Coalition urges the Chicago Department of Public Health (“the Department”) to deny the variance requests made by the above-named facilities which would allow noncompliance with Air Pollution Control Rules and Regulations For Control of Emissions from the Handling and Storage of Bulk Material Piles (“regulations”). The Coalition fundamentally opposes the variance process and believes that the health of the citizens should be the highest priority of the Department. The variance process strengthens a system where facilities can sidestep regulation based on financial hardship and the Coalition believes human health and the lives of Chicagoans must always outweigh corporate profits.

The Coalition particularly objects to the request of each and every of these facilities to forgo the particulate matter (PM10) monitoring requirement established in the regulations. Protecting the health of the residents, families, workers, and students in closest proximity to the facility should be the primary goal of these regulations. Because there is no safe level of particulate matter,¹ the burden to monitor for this pollutant should be considered a bare minimum for any facility operating in the City of Chicago. Though these facilities complain of the cost of monitoring, the cost is small in comparison to the lives of families in the community. The residents of the southeast side should not stand alone in bearing the cost to protect their own health and safety.

The Coalition appreciates the opportunity to comment on this process. Thank you for your time and consideration.

¹ The Lancet Oncology, Volume 14, Issue 9, Pages 813 - 822, August 2013.

Sincerely,

/s/ Lydia Jordan

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