
From: Jean <[REDACTED]>
Sent: Thursday, January 14, 2021 12:21 AM
To: envcomments
Subject: Deny RMG Permit

[Warning: External email]

I would like to voice my objection to the expansion of RMG on the southeast side of Chicago. I attended the virtual meeting in December and am concerned about how that platform excluded many from participation. If this is not a "done deal" I would think that the pandemic we are currently experiencing would be sufficient reason to halt this expansion, or at least delay further action until we can safely meet in person to discuss it. The fact that this is even being considered at a time when research is showing that COVID-19 is more lethal for people who are breathing dirty air is absurd.

"Researchers from Harvard University's T.H. Chan School of Public Health analyzed data on PM2.5 levels and COVID-19 deaths from about 3,000 U.S. counties covering 98 percent of the U.S. population. Counties that averaged just one microgram per cubic meter more PM2.5 in the air had a COVID-19 death rate that was 15 percent higher."

"If you're getting COVID, and you have been breathing polluted air, it's really putting gasoline on a fire," said Francesca Dominici, a Harvard biostatistics professor and the study's senior author.

This is in addition to the wide-ranging health damage the environmental toxins of our community cause on their own. If, as your website states, "the City is committed to working with residents to improve quality of life and mitigate air pollution in low-income communities and communities of color disproportionately impacted by pollution" why are we even considering RMG's expansion to this area? Despite the city saying it is not "a violation of the federal Executive Order 12868 on Environmental Justice to move General Iron's facility to the southeast side of Chicago," it is an overt violation of the commitments Chicago makes to reducing racial & economic segregation when receiving Federal dollars from the US Dept of Housing and Urban Development. The City has moved a vast majority of industrial businesses from the rezoned North Branch Industrial Corridor to Industrial Corridors in Black & Latinx majority communities, in addition to giving 1.3 billion dollars of TIF money to that same area that is not blighted and would be enticing and profitable without such incentives to developers.

There are many terms the city is using that I find disturbing. We need to be protected from more than "visible" dust. "Mitigation" is not sufficient to keep our community safe. I still do not know the frequency of "regular" inspections. I am not comfortable with issues of "on-road mobile emissions sources and PM2.5" being "addressed in more comprehensive air permitting rules that we plan to develop." It is imperative that we are protected from PM2.5 now!

History has shown us that watchdog groups put in place to safeguard us end up serving other interests. We continue to be disappointed by elected officials, but hopefully current events have reminded us of the power of our vote. Do not assume that we are being fooled. RMG has acknowledged that the background PM10 measured by the IEPA Air Quality Monitors at GWHS is already at 77micrograms / L. These levels are considered dangerous by the World Health Organization and are illegal in the European Union. It is imperative that our air become cleaner, not more harmful! We also know that fines and citations are not effective in preventing additional violations.

For forty years, alongside other concerned citizens, I have worked to defend our community from threats to our health, our homes, and our children, by taking buses to hearings, attending meetings, signing petitions. It is exhausting, but we

are motivated because it is the right thing to do. Now we need the decision makers and influencers to do the right thing, too. RMG's history of polluting our ground, water, and air should be sufficient to deny this permit. Current regulation is not preventing violations. We need a moratorium on polluting industry in this area already oversaturated with pollution, not expansion of it. The Chicago Department of Public Health must assert its regulatory authority to protect the health of Chicago's residents in the 10th Ward. Please deny this permit.

Thank you,
Jean Madigan

From: Robert Garcia [REDACTED]
Sent: Thursday, January 14, 2021 1:43 AM
To: envcomments
Subject: Public comments on RMG expansion Southeast side
Attachments: itemD.jpg; itemK.jpg; itemL.jpg; itemC.jpg; imageF.jpg; itemA.jpg; itemH.JPG; itemG.jpg; itemB.jpg; imageE.jpg; itemJ.jpg; publiccomments.pdf

[Warning: External email]

Good evening,

I am writing to request that you deny the proposed General III, LLC (d/b/a Southside Recycling) Large Recycling Facility permit application due to its failure to meet the legal requirements as set forth in Chicago municipal code. The proposal for the facility located at 11554 S. Avenue O fails to meet several requirements that offer protections to families such as mine that reside in the immediate vicinity. I also am requesting additional time for area residents to continue to review the current proposal and provide comments.

In summary in addition to issues already identified by the city there are three others that the applicant fails to consider:

- Based on Section 11-4-2640 section D the facility application proposal does not meet the fencing requirements.
- In accordance with 11-4-2640 section A the facility application proposal does not the pavement requirements.
- Due to the acquisitioned sites history of violations insufficient evidence is provided to decide as to whether any person having control of applicant or any of its proposed operations, has, within the past three years, violated any federal, state or local laws.

I am enclosing photos that were posted on facebook of the area, aerial photos, and screenshots from the Southside Recycling proposal. I have labeled them for your convenience. These will be referred to based on their labelling in the comments. comments. A pdf copy of these comments is attached.

First, the proposed site does not meet fencing requirements.

Section 11-4-2640 section D of the Chicago municipal code on recycling facility requirements states:

(d) Every premises or enclosure, except a completely enclosed building, now or hereafter used as a recycling facility, shall be entirely surrounded by a solid fence eight feet in height which is so constructed as to completely obscure all materials stored or kept within the boundaries thereof, provided that, if the commissioner determines that it would be physically impractical to comply, the commissioner may waive the requirements that all such stored or kept materials must be completely obscured.

A screen capture of the code section is included as itemA.

Page V-45 from the application permit contains an "approximate limit" as specified by the company of the sites processing area. This processing area extends from the railroad tracks on the east to the river on the west with northern and southern boundaries that extend beyond the leased area. A copy of this is included as itemB.jpg. The sites leased

area limit also as identified in section V-8 of the application extends to the same limits both east and west. A copy of this is included in itemC.jpg.

According to the publication City of Chicago rules - Rules for large recycling facilities effective June 5, 2020:

"Facility" means the land and all structures, equipment, and ancillary fixtures on said land used to Process, Store, or Recycle materials, including structures, buildings, scales, roadways, parking areas, queuing areas, fences, Tipping Floors, Processing equipment, Processing Areas, Staging Areas, and monitoring stations.

This is confirmed in 17-17-0105-D of the municipal code which defines Recycling facility as:

Any building, portion of building or area in which Type A, Type B, Type C or Type D recyclable material is collected, stored, or processed for the purpose of marketing the material for use as raw material in the manufacturing process of new, reused, or reconstituted products.

Therefore, in accordance with 11-4-2640 section D and 17-17-0105-D the site, whose borders extend to near the railroad and the river, is considered a facility which has a fencing requirement.

The only mention of fencing however, in the application proposal is an assertion that the site will contain security fencing on the north boundary and northern part of the east boundary, fencing and a berm on the southern boundary and the river on the west. This is on section V-13 and described as part of the ambient air boundaries. A copy of this is included as itemD.jpg.

Two images obtained from social media are included that show this boundary and existing site fencing. The first imageE.jpg shows the boundary next to a stick approximately 6ft in height. The second imageF.jpg shows the fencing.

As per my understanding section 11-4-2640 section D require a solid fence that is 8ft in height. I feel the intentions of this should be in helping to prevent dust from leaving the site as much as it is to preserve area aesthetics through screening and provide security for the site. The current 6ft chain link fence does not meet this requirement. Failure to meet this requirement presents a risk to both the health and safety of local residents like myself and children who live in proximity to the site. This should also be extended to the security monitoring requirements.

Second, the current storage processes on the grounds owned by RMG which include portions of the leased site fail to meet the requirements as described in 11-4-2640 section A. There is no mention in the application that these requirements will be met on the leased lands. According to section A:

(a) Receptacles for the storage of recyclable materials, any processing equipment and other facility operations shall be located on paved or concrete surfaces which may include asphalt, stone or gravel when deemed appropriate by the commissioner or completely enclosed within a building.

The image labeled itemG.jpg shows how Southshore recycling currently stores some material on roads which are not paved in accordance with 11-4-2640 A. The image labeled itemH.jpg shows the extent of this bulk storage of material on nonpaved surfaces in land that includes the parts of the proposed facility. The image labeled itemI.jpg shows how close to the river potential material may be stored.

I believe the rule exists to provide needed protections. The failure to store material on paved roads allows for metals and other material to engrain itself in ground dust. Research has shown the dangers of metals and other particulates on similar brownfields sites. While the application models the potential PM10 impact there is no indication it accounts for the transient dust nor does it cover the more concerning PM 2.5 impacts. Further, the photos also show the proximity of the site to exposed river with no barriers. The photos show how material is already mixing with what appears liquids. This presents a hazard to the waterways.

Third, the application does not include sufficient information to decide as discussed in the city of Chicago publication titled recycling facility permits under 2-112 and 11-4. Page 3 of the publication section 4 discusses city rules that allow the commissioner to deny or refuse to renew permits if it is shown that:

(l) the applicant, or any owner or officer of the applicant, or any person having control of applicant or any of its operations, has, within the past three years, violated any federal, state or local laws, regulations, standards, permit conditions, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site, including, but not limited to, the operation of a junk, recycling, or waste handling facility without required permits;

A copy of this is included in the image itemJ.jpg.

In accordance the applicant provides no information on who will be operating or managing the facility. Reports have suggested and statements from RMG indicate that employees will be hired directly from the current General Iron facility which recently closed in Lincoln Park. While RMG has assumed ownership of the facility and is applying under a separate entity, the site has received numerous citations for violations of local, state and federal law in the past several years. Some of these violations such as the explosion for which it was cited by the city of Chicago in June of 2020 occurred following its acquisition.

According to the news article "Southeast Siders Tell General Iron's Owner, City: We Don't Want Your Metal Scrapper Here", RMG spokesperson Randall Samborn stated that most existing General Iron employees are expected to move to the Southside recycling center. A screenshot from the article is provided as image itemK.jpg. The permit application makes no mention of which employees, managers, directors or other decision makers who may have been involved with either General Iron or General Iron following the RMG acquisition during the time of its violations will remain.

To comply the applicant needs to provide information that can allow the city to decide if any of the new site's decision makers were involved in previous violations. Any continued involvement by any known violators would violate city rules and expand the responsibility for liabilities in the event similar violations occur.

I am not opposed to industry in the area and am not currently in support of rezoning. However, I believe that area industry needs to go beyond the minimal legal obligations for protecting the health and property of residents, the environment and at the very least should provide a demonstratable benefit to area residents. The city has already identified many deficiencies with the application. I have provided some that I feel were not included. Failure to comply with the code requirements puts the lives, health, and property of nearby residents like myself at risk. I do not feel the current owners of the company provided a good faith effort in their plans to build in our community or follow our laws and therefore I feel that the permit should be denied.

I thank for your time in reviewing these comments and trust you will do what is right to protect the lives, property, and health of local residents by ensuring our laws are properly enforced

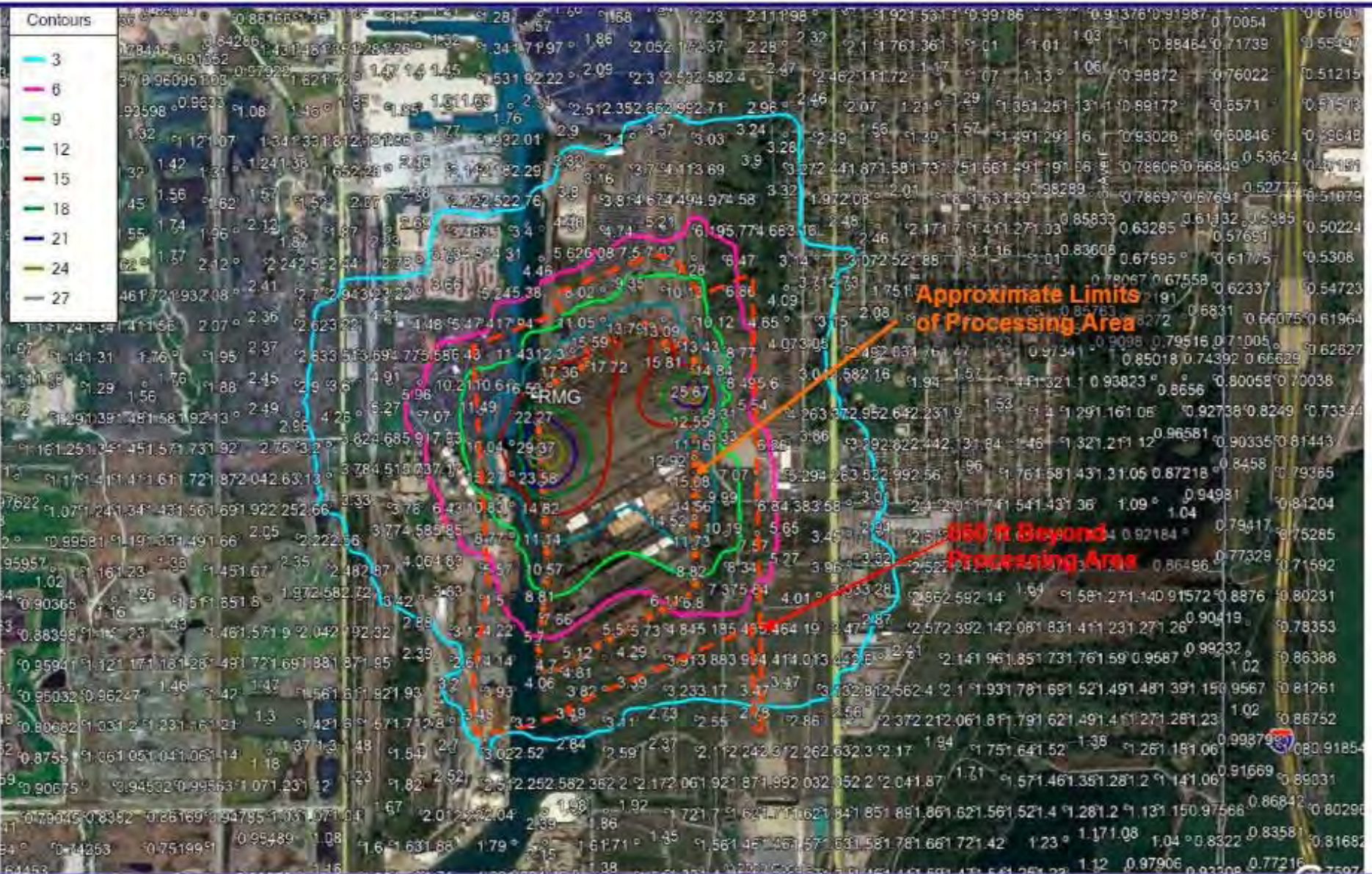
Sent with [ProtonMail](#) Secure Email.



11-4-2640 Facility requirements.

In addition to any other requirements under the Municipal Code, rules and regulations or a permit and its conditions, recycling facilities permitted under this article shall meet the following requirements:

- (a) Receptacles for the storage of recyclable materials, any processing equipment and other facility operations shall be located on paved or concrete surfaces which may include asphalt, stone or gravel when deemed appropriate by the commissioner or completely enclosed within a building;
- (b) Adequate parking and driveway facilities shall be provided in accordance with the Chicago Zoning Ordinance;
- (c) Each facility shall have a sign, clearly visible to the public, which states the name, address and telephone number of the permittee, the type of recyclable materials accepted, and the hours during which the facility shall be open to the public;
- (d) Every premises or enclosure, except a completely enclosed building, now or hereafter used as a recycling facility, shall be entirely surrounded by a solid fence eight feet in height which is so constructed as to completely obscure all materials stored or kept within the boundaries thereof, provided that, if the commissioner determines that it would be physically impractical to comply, the commissioner may waive the requirements that all such stored or kept materials must be completely obscured.



2S631 ROUTE 59, SUITE B
WARRENVILLE, IL 60555
630-393-9000/630-393-9111

COMMENTS	
Air Dispersion Modeling Report for the Assessment of PM₁₀ Emission Impacts	
DRAWN BY:	APPROVED BY: DD

PM₁₀ Isopleths			
Southside Recycling			
11600 S. Burley, Chicago, Illinois			
PROJECT NUMBER	DATE DRAWN	REVISED DATE	
R19439-7.10	10-2020		

FIGURE
C-1



<p>25631 ROUTE 59, SUITE B WARRENVILLE, IL 60556 630-393-9000/630-393-9111</p> <p>RK AND ASSOCIATES, INC.</p>	<p>Location: Air Dispersion Modeling Report for the Assessment of PM₁₀ Emission Impacts</p> <p>Author: JGP</p> <p>Approved by:</p>	<p>Project Number: R19439-7.10</p> <p>Site Bound: 10-2020</p> <p>Revised Date:</p>	<p>Figure: 1-2</p> <p>Facility Map Southside Recycling 11600 S. Burley, Chicago, IL</p>
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Google Earth - Oct 2018

3.3 Ambient Air Boundaries

There is security fencing on the north boundary and the northern part of the east boundary of the RMG industrial campus property that leads to a guard shack with gates (open when occupied or closed when unoccupied). The southern boundary of the RMG industrial campus property is a combination of fencing and berm, while the west boundary is the Calumet River.

Based on the above, ambient air boundaries have been set at the RMG industrial campus property boundaries shown in Figure 1-2.





3159

South







4.0 History of Compliance/Material threat to continued compliance. Before granting a new permit or renewing an existing permit for any recycling facility, the Commissioner will conduct an evaluation of the applicant's prior experience in recycling or junk facility operations or other waste handling operations. The Commissioner may deny or refuse to renew a permit if the evaluation shows that:

(1) the applicant, or any owner or officer of the applicant, or any person having control of applicant or any of its operations, has, within the past three years, violated any federal, state, or local laws, regulations, standards, permit conditions, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site, including, but not limited to, the operation of a junk, recycling, or waste handling facility without required permits; or

(2) conditions at a previously permitted site or facility, existing at any time during the pendency of the Department's review of a permit renewal application, pose a material threat to continued compliance with any of the laws, regulations, standards, permit conditions, or ordinances identified in subsection (1) above. For purposes of this section, the phrase "material threat to continued compliance" shall mean analytical data, facility records, instrument readings, laboratory results, or photographic evidence sufficient to establish a prima facie showing of a violation(s) of any of the laws, regulations, standards, permit conditions, or ordinances identified in subsection (1) above.

If the Commissioner denies (or refuses to renew) any permit under this section, the Department shall transmit to the applicant, in accordance with the notice provisions in section 11-4-040(b), a written statement as to the reasons the permit application was denied.

For purposes of this regulation, violations committed by an entity may be attributed to any person having ownership or control of the entity or any of its operations.

Seven residents who spoke in favor of the permit being issued, including two RMG employees and other industry backers, mainly addressed the economic benefit and jobs they expect Southside Recycling to provide to the area.

Most existing General Iron employees are expected to make the move from Lincoln Park to Southside Recycling, RMG spokesman Randall Samborn said in October.

“Let’s be real proactive about our neighborhood and keep good-paying jobs in our community,” said Ted Stalnos, president and CEO of the Calumet Area Industrial Commission.

Stalnos said he expects “the strong watchful eye of the [Environmental Protection Agency and] the city of Chicago’s department of health” to hold the facility to regulatory

Good evening,

I am writing to request that you deny the proposed General III, LLC (d/b/a Southside Recycling) Large Recycling Facility permit application due to its failure to meet the legal requirements as set forth in Chicago municipal code. The proposal for the facility located at 11554 S. Avenue O fails to meet several requirements that offer protections to families such as mine that reside in the immediate vicinity. I also am requesting additional time for area residents to continue to review the current proposal and provide comments.

In summary in addition to issues already identified by the city there are three others that the applicant fails to consider:

- Based on Section 11-4-2640 section D the facility application proposal does not meet the fencing requirements.
- In accordance with 11-4-2640 section A the facility application proposal does not meet the pavement requirements.
- Due to the acquisition sites history of violations insufficient evidence is provided to decide as to whether any person having control of applicant or any of its proposed operations, has, within the past three years, violated any federal, state or local laws.

I am enclosing photos that were posted on facebook of the area, aerial photos, and screenshots from the Southside Recycling proposal. I have labeled them for your convenience. These will be referred to based on their labelling in the comments. comments.

First, the proposed site does not meet fencing requirements.

Section 11-4-2640 section D of the Chicago municipal code on recycling facility requirements states:

(d) Every premises or enclosure, except a completely enclosed building, now or hereafter used as a recycling facility, shall be entirely surrounded by a solid fence eight feet in height which is so constructed as to completely obscure all materials stored or kept within the boundaries thereof, provided that, if the commissioner determines that it would be physically impractical to comply, the commissioner may waive the requirements that all such stored or kept materials must be completely obscured. A screen capture of the code section is included as itemA.

11-4-2640 Facility requirements.



In addition to any other requirements under the Municipal Code, rules and regulations or a permit and its conditions, recycling facilities permitted under this article shall meet the following requirements:

- (a) Receptacles for the storage of recyclable materials, any processing equipment and other facility operations shall be located on paved or concrete surfaces which may include asphalt, stone or gravel when deemed appropriate by the commissioner or completely enclosed within a building;
- (b) Adequate parking and driveway facilities shall be provided in accordance with the Chicago Zoning Ordinance;
- (c) Each facility shall have a sign, clearly visible to the public, which states the name, address and telephone number of the permittee, the type of recyclable materials accepted, and the hours during which the facility shall be open to the public;
- (d) Every premises or enclosure, except a completely enclosed building, now or hereafter used as a recycling facility, shall be entirely surrounded by a solid fence eight feet in height which is so constructed as to completely obscure all materials stored or kept within the boundaries thereof, provided that, if the commissioner determines that it would be physically impractical to comply, the commissioner may waive the requirements that all such stored or kept materials must be completely obscured.

Item A: Municipal code 11-4-2640

Page V-45 from the application permit contains an "approximate limit" as specified by the company of the sites processing area. This processing area extends from the railroad tracks on the east to the river on the west with northern and southern boundaries that extend beyond the leased area. A copy of this is included as itemB.jpg.



Item B: Proposed site approximate limit

The sites leased area limit also as identified in section V-8 of the application extends to the same limits both east and west. A copy of this is included in itemC.jpg.



 25631 ROUTE 59, SUITE B WARRENVILLE, IL 60555 630-393-9000/630-393-9111	COMMENTS: Air Dispersion Modeling Report for the Assessment of PM₁₀ Emission Impacts		Facility Map Southside Recycling 11600 S. Burley, Chicago, IL		FIGURE 1-2
	DRAWN BY:	APPROVED BY: JGP	PROJECT NUMBER: R19439-7.10	DATE DRAWN: 10-2020	REVISED DATE:

Item C: Proposed leased area limit

According to the publication City of Chicago rules - Rules for large recycling facilities effective June 5, 2020:

"Facility" means the land and all structures, equipment, and ancillary fixtures on said land used to Process, Store, or Recycle materials, including structures, buildings, scales, roadways, parking areas, queuing areas, fences, Tipping Floors, Processing equipment, Processing Areas, Staging Areas, and monitoring stations.

This is confirmed in 17-17-0105-D of the municipal code which defines Recycling facility as:

Any building, portion of building or area in which Type A, Type B, Type C or Type D recyclable material is collected, stored, or processed for the purpose of marketing the material for use as raw material in the manufacturing process of new, reused, or reconstituted products.

Therefore, in accordance with 11-4-2640 section D and 17-17-0105-D the site, whose borders extend to near the railroad and the river, is considered a facility which has a fencing requirement.

The only mention of fencing however, in the application proposal is an assertion that the site will contain security fencing on the north boundary and northern part of the east boundary, fencing and a berm on the southern boundary and the river on the west. This is on section V-13 and described as part of the ambient air boundaries. A copy of this is included as itemD.jpg.

3.3 Ambient Air Boundaries

There is security fencing on the north boundary and the northern part of the east boundary of the RMG industrial campus property that leads to a guard shack with gates (open when occupied or closed when unoccupied). The southern boundary of the RMG industrial campus property is a combination of fencing and berm, while the west boundary is the Calumet River.

Based on the above, ambient air boundaries have been set at the RMG industrial campus property boundaries shown in Figure 1-2.

Item D: ambient air boundary fencing description

Two images obtained from social media are included that show this boundary and existing site fencing. The first imageE.jpg shows the boundary next to a stick approximately 6ft in height. The second imageF.jpg shows the fencing.



Item E: Security fence approximate 6ft stick



Item F: Security chainlink fence

As per my understanding section 11-4-2640 section D require a solid fence that is 8ft in height. I feel the intentions of this should be in helping to prevent dust from leaving the site as much as it is to preserve area aesthetics through screening and provide security for the site. The current 6ft chain link fence does not meet this requirement. Failure to meet this requirement presents a risk to both the health and safety of local residents like myself and children who live in proximity to the site. This should also be extended to the security monitoring requirements.

Second, the current storage processes on the grounds owned by RMG which include portions of the leased site fail to meet the requirements as described in 11-4-2640 section A. There is no mention in the application that these requirements will be met on the leased lands. According to section A:

(a) Receptacles for the storage of recyclable materials, any processing equipment and other facility operations shall be located on paved or concrete surfaces which may include asphalt, stone or gravel when deemed appropriate by the commissioner or completely enclosed within a building.

The image labeled itemG.jpg shows how Southshore recycling currently stores some material on roads which are not paved in accordance with 11-4-2640 A.



Item G: Aerial photo of site material storage

The image labeled itemH.jpg shows the extent of this bulk storage of material on nonpaved surfaces in land that includes the parts of the proposed facility.



Item H: Aerial photo of site material storage on unpaved road

The image labeled itemI.jpg shows how close to the river potential material may be stored.



Item I: Aerial photo of site material storage near waterway

I believe the rule exists to provide needed protections. The failure to store material on paved roads allows for metals and other material to engrain itself in ground dust. Research has shown the dangers of metals and other particulates on similar brownfields sites. While the application models the potential PM10 impact there is no indication it accounts for the transient dust nor does it cover the more concerning PM 2.5 impacts. Further, the photos also show the proximity of the site to exposed river with no barriers. The photos show how material is already mixing with what appears liquids. This presents a hazard to the waterways.

Third, the application does not include sufficient information to decide as discussed in the city of Chicago publication titled recycling facility permits under 2-112 and 11-4. Page 3 of the publication section 4 discusses city rules that allow the commissioner to deny or refuse to renew permits if it is shown that:

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A copy of this is included in the image itemJ.jpg.

4.0 History of Compliance/Material threat to continued compliance. Before granting a new permit or renewing an existing permit for any recycling facility, the Commissioner will conduct an evaluation of the applicant's prior experience in recycling or junk facility operations or other waste handling operations. The Commissioner may deny or refuse to renew a permit if the evaluation shows that:

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(2) conditions at a previously permitted site or facility, existing at any time during the pendency of the Department's review of a permit renewal application, pose a material threat to continued compliance with any of the laws, regulations, standards, permit conditions, or ordinances identified in subsection (1) above. For purposes of this section, the phrase "material threat to continued compliance" shall mean analytical data, facility records, instrument readings, laboratory results, or photographic evidence sufficient to establish a prima facie showing of a violation(s) of any of the laws, regulations, standards, permit conditions, or ordinances identified in subsection (1) above.

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For purposes of this regulation, violations committed by an entity may be attributed to any person having ownership or control of the entity or any of its operations.

Item J: city rule on history of compliance

In accordance the applicant provides no information on who will be operating or managing the facility. Reports have suggested and statements from RMG indicate that employees will be hired directly from the current General Iron facility which recently closed in Lincoln Park. While RMG has assumed ownership of the facility and is applying under a separate entity, the site has received numerous citations for violations of local, state and federal law in the past several years. Some of these violations such as the explosion for which it was cited by the city of Chicago in June of 2020 occurred following its acquisition.

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Seven residents who spoke in favor of the permit being issued, including two RMG employees and other industry backers, mainly addressed the economic benefit and jobs they expect Southside Recycling to provide to the area.

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Stalnos said he expects “the strong watchful eye of the [Environmental Protection Agency and the city of Chicago’s department of health] to hold the facility to regulatory

Item K: clip from article on hiring considerations.

The permit application makes no mention of which employees, managers, directors or other decision makers who may have been involved with either General Iron or General Iron following the RMG acquisition during the time of its violations will remain.

To comply the applicant needs to provide information that can allow the city to decide if any of the new site’s decision makers were involved in previous violations. Any continued involvement by any known violators would violate city rules and expand the responsibility for liabilities in the event similar violations occur.

I am not opposed to industry in the area and am not currently in support of rezoning. However, I believe that area industry needs to go beyond the minimal legal obligations for protecting the health and property of residents, the environment and at the very least should provide a demonstratable benefit to area residents. The city has already identified many deficiencies with the application. I have provided some that I feel were not included. Failure to comply with the code requirements puts the lives, health, and property of nearby residents like myself at risk. I do not feel the current owners of the company provided a good faith effort in their plans to build in our community or follow our laws and therefore I feel that the permit should be denied.

I thank for your time in reviewing these comments and trust you will do what is right to protect the lives, property, and health of local residents by ensuring our laws are properly enforced.

From: Aquanette Thompson [REDACTED] >
Sent: Thursday, January 14, 2021 6:58 AM
To: envcomments
Subject: RMG Expansion - Resident Comment Letter
Attachments: RMG Letter CDH_AThompson.docx

[Warning: External email]

Good Morning, please see the attached letter listing my comments and concerns regarding the RMG expansion to the southeast side of Chicago.

Thank you.
Aquanette Thompson, 10th Ward Resident
[REDACTED]

January 14, 2021

To: Chicago Department of Public Health (CDPH)

From: Aquanette Thompson

Re: RMG/General Iron Expansion

My name is Aquanette Thompson and I am a resident of the 97th & Oglesby Ave. block. I attended the Zoom meeting held on December 10, 2020.

As a member of the South Deering Manor Community Association, I support its mission to create a community working together in unity to impact the quality of life in our neighborhood by bringing resources to improve our homes, schools, churches, businesses, and eliminate crime.

Our concerns regarding the RMG Expansion fall into the two categories listed below along with the corresponding deficiencies listed in the Chicago Department of Public Health Application Deficiency Letter:

- Traffic Pollution:

- o 11. Pursuant to paragraph 3.9.13.2 of the Rules, provide a stacking plan of all trucks and vehicles during the Facility's peak AM and PM traffic hours.
- o 12. Pursuant to paragraphs 3.9.13.4 to 3.9.13.7 of the Rules, provide a traffic study in conformance with the requirements of said paragraphs. A traffic study was previously submitted to CDPH for initial review but was not included in the Application.

- Environmental Pollution:

- o 33. Pursuant to 3.10.11 of the Rules, revise the hours of operation, taking into consideration the restrictions imposed under the IEPA construction air permit ID No. 031600SFX ("IEPA Air Permit"). For example, the IEPA Air Permit limited facility vehicle traffic to 14 hours per day on weekdays and 12 hours per day on weekends. These hours conflict with the 24/7 operation proposed in the Application. Other conflicting hours between the IEPA Air Permit and the Application include the non-ferrous system operation hours and barge loading hours.
- o 34. Pursuant to 1-4-2530(I), provide an odor control plan that addresses the potential odors at the Facility. Such plan shall include, but may not be limited to, the following:
 - a. An inventory of odor-emitting activities;
 - b. The location, time, and duration of each odor-emitting activity;
 - c. An odor mitigation plan that includes specific administrative and/or engineering controls and best management practices for each odor-emitting activity;
 - d. Routine odor inspections around the Facility and nearby adjacent Sensitive Areas; and
 - e. Protocols for investigating odors discovered during routine inspections or as reported in an odor complaint.

We are completely aware that our area is surrounded by industrial properties and is a proper space for this business and regardless of the company or product, we will do everything necessary to keep our residents safe from traffic, environmental and chemical pollution. There is new technology that **must** investigate and procure. It would prove their interest in being a good community partner.

We will continue to advocate for our safety and wellbeing and hope you can join us by protecting our quality of life. Imagine your company being located where you live; have that same level of concern for our community.

I appreciate the opportunity to submit my concerns regarding the RMG Expansion to 11600 S. Burley on the Southeast Side of Chicago.

Sincerely,

Aquanette Thompson, 10th Ward Resident

████████████████████

From: [REDACTED]
Sent: Thursday, January 14, 2021 8:23 AM
To: envcomments
Subject: General Iron

[Warning: External email]

As an octogenarian and life-long resident of Chicago's Southeast Side, I - along with many of my loved ones - have since birth been exposed to industrial pollution on a massive scale. With the demise of the steel industry and the curbing of petcoke handlers along with other detriments, the area has been able to take steps to become a desirable residential area enhanced by its vast open and green space. Blocks of relatively new housing, almost adjacent to the space General Iron hopes to occupy, confirm this trend. In addition to these assets, the former site of the Republic Steel Mill has historic value - not sufficiently landmarked - but significant to those who experienced steelworking first-hand. 116th and Burley is the location of the 1937 Memorial Day Massacre.

The Southeast Side celebrates its green buildings, gardens and open space. Those whose efforts are to the contrary would do well to respect our achievements and work to enhance them. Our environmental activists are home-grown and truly dedicated to the cause. We live and breathe here.

Respectfully,

Joann Podkul

From: Thomas Sadzak [REDACTED]
Sent: Thursday, January 14, 2021 8:23 AM
To: envcomments
Subject: South Side Recycling

[Warning: External email]

Hello. My name is TJ Sadzak. I am 54 years old and a lifelong 10th Ward resident. I currently reside on the East Side and I write this correspondence in support of Southside Recycling.

The media, along with local activists, and environmental groups, are trying to scare the community into believing that this project will do harm to and possibly kill people. This simply isn't true. The Chicago Sun Times publishes articles portraying RMG as a bad, dirty business and show pictures of properties which are not RMG. They purposely deceive the public.

Recycling metal is environmentally friendly and needed. The question you have to ask yourself is would you rather have these end of life products recycled or put into a landfill. This state of the art shredder will be the safest, most efficient in the country, if not the world.

Our local environmentalists do not want any kind of development in the ward which is a shame.

The 10th Ward has always been and will always be an "Industrial" Ward. It is who we are. Without industry we would have been one giant empty lot.

I encourage the City to issue the permit to South Side Recycling.

From: Liliana Rivera [REDACTED]
Sent: Thursday, January 14, 2021 10:23 AM
To: envcomments
Subject: Stop General Iron

[Warning: External email]

Hello,

My name is Liliana Rivera and I am an Eastside resident for over 30 years. I stand in solidarity with the Eastside Coalition on banning and blocking the permit for General Iron. We deserve clean air and we currently do not have it in our neighborhood. So why add another polluter to a community filled with them?

I went to Northeastern University and in school is where I found out that my neighborhood and surrounding neighborhoods were the most polluted areas in Illinois. I sat there in the lecture hall embarrassed and with no clue to what could be done to combat the pollution in my neighborhood.

I stand here today realizing that I should not be embarrassed from where I come from but instead to educate myself and become more aware of my resources. The city needs to stop having us run circles with these comments and town hall meetings. We do not want this polluter in our neighborhood, you have already polluted our lungs and continue to treat us like second class citizens.

Block the permit and ban General Iron from coming into our neighborhood.

Sincerely

10 ward resident

Liliana Rivera

From: Tom Gaulke <[REDACTED]>
Sent: Thursday, January 14, 2021 10:33 AM
To: envcomments
Cc: pastor.zemanick@gmail.com
Subject: Letter

[Warning: External email]

Hello,

My name is Rev. Dr. Thomas R. Gaulke, and I am a pastor of the Evangelical Lutheran Church in America. I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
- A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, wind will carry pollutants directly to the learning environment of our students and negatively impact their health.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,

Rev. Thomas R. Gaulke, Ph. D.

Rev. Thomas R. Gaulke, Ph.D.
he/him/his
Communications
[Metropolitan Chicago Synod, ELCA](#)

Office Hours: M 3-8 PM, T-TH, 7:30 AM - 12:30 PM
Metro Word submissions deadline: the 15th of each month
Weekly Metro e-Word submissions deadline: Wednesdays

"Those who live in love live in God and God lives in them." - 1 John 4:16



Metropolitan Chicago Synod
Evangelical Lutheran Church in America
God's work. Our hands.

From: Tucker Barry [REDACTED]
Sent: Thursday, January 14, 2021 10:41 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Tucker Barry

[REDACTED]
Chicago, IL 60647

From: Michael Saldana [REDACTED]
Sent: Thursday, January 14, 2021 10:42 AM
To: envcomments
Subject: Deny General Iron's Permit

[Warning: External email]

Dear Mayor Lightfoot and Chicago Dept. of Public Health:

I live in Southeast Chicago, where we already have our fair share of dangerous pollution. Now that could be made worse if General Iron is allowed to move to our largely black and brown neighborhood from the more affluent Lincoln Park neighborhood.

I have family who are elderly and family who have contracted cancer and other diseases after living with this pollution their entire lives. You say you care about public health, why is it that your caring stops right here with the southeast side. I implore you and your office to do the right thing and be on the right side of history.

Sincerely,
Registered Chicago Voter

Michael Saldana
[REDACTED]

60633

From: Paloma Campillo [REDACTED]
Sent: Thursday, January 14, 2021 10:56 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Paloma Campillo
[REDACTED]
Oak Park, IL 60304

From: Christopher Taraszka <[REDACTED]>
Sent: Thursday, January 14, 2021 11:33 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Christopher Taraszka

[REDACTED]
Burbank, IL 60459

From: Julio Ibarra <[REDACTED]>
Sent: Thursday, January 14, 2021 11:43 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside. The Southeast side is always burdened with villains for aldermen and mayor. With Democrats like this who needs Republicans.

Thank you for your consideration,

Sincerely,
Julio Ibarra

[REDACTED]
Chicago, IL 60617

From: Robert Kennedy [REDACTED]
Sent: Thursday, January 14, 2021 11:43 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Robert Kennedy

[REDACTED]
Chicago, IL 60614

From: Erika Chavez <[REDACTED]>
Sent: Thursday, January 14, 2021 11:44 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Erika Chavez

[REDACTED]
Chicago, IL 60647

From: Jeff Shelden <[REDACTED]>
Sent: Thursday, January 14, 2021 11:44 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Jeff Shelden

[REDACTED]
Chicago, IL 60622

From: David Wilcox [REDACTED] >
Sent: Thursday, January 14, 2021 11:45 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
David Wilcox
[REDACTED]
Lombard, IL 60148

From: Colton Davis <[REDACTED]>
Sent: Thursday, January 14, 2021 11:46 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Colton Davis

[REDACTED]
Chicago, IL 60640

From: Rafael Desantiago [REDACTED]
Sent: Thursday, January 14, 2021 11:47 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Rafael Desantiago
[REDACTED]
Chicago, IL 60617

From: J Alan Prechel [REDACTED]
Sent: Thursday, January 14, 2021 11:47 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
J Alan Prechel

[REDACTED]
Crystal Lake, IL 60012

From: Michael Anderson [REDACTED]
Sent: Thursday, January 14, 2021 11:48 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Michael Anderson

[REDACTED]
Lynwood, IL 60411

From: Mark Tortoriello [REDACTED]
Sent: Thursday, January 14, 2021 11:48 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Mark Tortoriello
[REDACTED]
Chicago, IL 60612

From: Karen OHayer [REDACTED]
Sent: Thursday, January 14, 2021 11:49 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Karen OHayer

[REDACTED]
Libertyville, IL 60048

From: Daniel Goldberg [REDACTED]
Sent: Thursday, January 14, 2021 11:49 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Daniel Goldberg

[REDACTED]
Normal, IL 61761

From: Pamela Crowell [REDACTED] >
Sent: Thursday, January 14, 2021 11:50 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Pamela Crowell

[REDACTED]
Chicago, IL 60625

From: Catherine King [REDACTED]
Sent: Thursday, January 14, 2021 11:50 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Catherine King

[REDACTED]
Chicago, IL 60659

From: Colleen Smith [REDACTED] >
Sent: Thursday, January 14, 2021 11:51 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Colleen Smith
[REDACTED]
Chicago, IL 60657

From: Jerome Seidenfeld [REDACTED]
Sent: Thursday, January 14, 2021 11:52 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Jerome Seidenfeld

[REDACTED]
CHICAGO, IL 60659

From: Sara West [REDACTED]
Sent: Thursday, January 14, 2021 11:53 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Sara West

[REDACTED]
Chicago, IL 60609

From: Jess Vogt [REDACTED]
Sent: Thursday, January 14, 2021 11:53 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Jess Vogt

[REDACTED]
Chicago, IL 60625

From: Marcin Matelski [REDACTED]
Sent: Thursday, January 14, 2021 11:53 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Marcin Matelski
[REDACTED]
Chicago, IL 60634

From: Leah Hartung [REDACTED]
Sent: Thursday, January 14, 2021 11:54 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,
Leah Hartung

Sincerely,
Leah Hartung

[REDACTED]
Libertyville, IL 60048

From: Rachel Cohen [REDACTED]
Sent: Thursday, January 14, 2021 11:54 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,
Rachel Cohen
Professor of Practice in the Arts
University of Chicago
Resident of Southeast Chicago

Sincerely,
Rachel Cohen
[REDACTED]
Chicago, IL 60615

From: Antonio Nevarez [REDACTED]
Sent: Thursday, January 14, 2021 11:55 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Antonio Nevarez
[REDACTED]
Chicago, IL 60633

From: Nina Charlier [REDACTED]
Sent: Thursday, January 14, 2021 11:55 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Nina Charlier

[REDACTED]
Chicago, IL 60630

From: Rachel Havrelock [REDACTED]
Sent: Thursday, January 14, 2021 11:55 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Rachel Havrelock

[REDACTED]
Chicago, IL 60607

From: Janet Whitmore [REDACTED]
Sent: Thursday, January 14, 2021 11:55 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Janet Whitmore

[REDACTED]
Chicago, IL 60660

From: Jeff Crum [REDACTED]
Sent: Thursday, January 14, 2021 11:55 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Jeff Crum

[REDACTED]
Arlington Heights, IL 60004

From: Mark Burger [REDACTED]
Sent: Thursday, January 14, 2021 11:56 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Mark Burger

[REDACTED]
Oak Park, IL 60304

From: Robin Weaver [REDACTED]
Sent: Thursday, January 14, 2021 11:56 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Robin Weaver
[REDACTED]
Bartlett, IL 60103

From: Jan Boudart [REDACTED] >
Sent: Thursday, January 14, 2021 11:57 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

City of Chicago: Proceed with GREAT caution. After the un-regulated fiasco of dropping pollution from demolition onto Little Village, the goodness of your reputation is in great question.

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Jan Boudart

[REDACTED]
Chicago, IL 60626

From: Meredith West [REDACTED]
Sent: Thursday, January 14, 2021 11:57 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Meredith West
[REDACTED]
Chicago, IL 60622

From: Thelma Hoogland [REDACTED]
Sent: Thursday, January 14, 2021 11:58 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Thelma Hoogland

[REDACTED]
Oak Forest, IL 60452

From: Jane schmit [REDACTED]
Sent: Thursday, January 14, 2021 11:59 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Jane schmit

[REDACTED]
Chicago, IL 60605

From: Gaerin Warman-Szvoboda [REDACTED] >
Sent: Thursday, January 14, 2021 11:59 AM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Gaerin Warman-Szvoboda
[REDACTED]
Chicago, IL 60641

From: Susan Pearson [REDACTED] >
Sent: Thursday, January 14, 2021 12:00 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I AM A HOMEOWNER IN PULLMAN.

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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Thank you for your consideration,

Sincerely,
Susan Pearson

[REDACTED]
Chicago, IL 60628

From: Carol Devoss [REDACTED]
Sent: Thursday, January 14, 2021 12:00 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Carol Devoss

[REDACTED]
St. Charles, IL 60174

From: Brian Barrett [REDACTED]
Sent: Thursday, January 14, 2021 12:00 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Brian Barrett

[REDACTED]
Glenview, IL 60025

From: Emily Sharrow [REDACTED]
Sent: Thursday, January 14, 2021 12:01 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing because we can't keep making the same mistakes over and over again! It is widely known that low income and communities of color are unfairly harmed by pollution and industry, so why do we keep perpetuating that pattern? Do we really value these companies over these lives? Particularly this company which has proven several times that they are NOT good actors, NOT trustworthy, and NOT interested in being good stewards of our city? So I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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Thank you for your consideration,

Sincerely,
Emily Sharrow

[REDACTED]
Chicago, IL 60647

From: Evan Callan [REDACTED]
Sent: Thursday, January 14, 2021 12:03 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect ALL the Chicago communities, not just those on the Northside. People before corporate profits.

Thank you for your consideration,

Sincerely,
Evan Callan

[REDACTED]
Chicago, IL 60608

From: Deborah Fenner [REDACTED]
Sent: Thursday, January 14, 2021 12:05 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Deborah Fenner
[REDACTED]
Chicago, IL 60640

From: Beverly Ann Conroy [REDACTED]
Sent: Thursday, January 14, 2021 12:06 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Beverly Ann Conroy
[REDACTED]
Oak Park, IL 60304

From: Lana May [REDACTED]
Sent: Thursday, January 14, 2021 12:07 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Lana May

[REDACTED]
Mount Prospect, IL 60056

From: Karen Anderson <[REDACTED]>
Sent: Thursday, January 14, 2021 12:08 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Karen Anderson
[REDACTED]
Chicago, IL 60657

From: Toni DiDonato [REDACTED] >
Sent: Thursday, January 14, 2021 12:08 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Toni DiDonato

[REDACTED]
Skokie, IL 60076

From: Michelle Thoma-Culver [REDACTED]
Sent: Thursday, January 14, 2021 12:12 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to request that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Michelle Thoma-Culver

[REDACTED]
Chicago, IL 60618

From: Maya Crystal [REDACTED]
Sent: Thursday, January 14, 2021 12:14 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Maya Crystal

[REDACTED]
Wilmette, IL 60091

From: Michael Allen [REDACTED]
Sent: Thursday, January 14, 2021 12:16 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Michael Allen

[REDACTED]
Chicago, IL 60613

From: Becky Darling [REDACTED]
Sent: Thursday, January 14, 2021 12:17 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Becky Darling

[REDACTED]
Chicago, IL 60647

From: Debra Gleason [REDACTED]
Sent: Thursday, January 14, 2021 12:19 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Debra Gleason
[REDACTED]
Chicago, IL 60634

From: Frank K. Thorp [REDACTED]
Sent: Thursday, January 14, 2021 12:20 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Frank K. Thorp
[REDACTED]
Palos Park, IL 60464

From: Hillary Colby [REDACTED] >
Sent: Thursday, January 14, 2021 12:21 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Hillary Colby

[REDACTED]
Aurora, IL 60504

From: V Evan [REDACTED]
Sent: Thursday, January 14, 2021 12:21 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,

V Evan

[REDACTED]
Chicago, IL 60660

From: Marilyn Davis [REDACTED] >
Sent: Thursday, January 14, 2021 12:22 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Marilyn Davis
[REDACTED]
Evanston, IL 60202

From: Harley, Keith [REDACTED]
Sent: Thursday, January 14, 2021 12:23 PM
To: envcomments
Subject: Public Comments - General III, LLC Large Recycling Facility Permit Application
Attachments: SETF Comments General III Permit Application.docx

[Warning: External email]

Please be advised that I represent the Southeast Environmental Task Force.

Please accept the attachment as SETF's comments on the Large Recycling Facility Permit Application submitted by General III, LLC (d/b/a Southside Recycling), 11554 S. Avenue O, Chicago, Illinois.

Keith Harley
Attorney for the Southeast Environmental Task Force
Greater Chicago Legal Clinic, Inc. f/k/a Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
312-726-2938
kharley@kentlaw.iit.edu

January 14, 2021

Chicago Department of Public Health
333 S. State, Room 200
Chicago, IL 60604

Submitted Via Email To: envcomments@cityofchicago.org

Re: Large Recycling Facility Permit Application, General III, LLC (d/b/a Southside Recycling), 11554 S. Avenue O – Chicago, Illinois

To The Chicago Department of Public Health:

Please be advised that I represent the Southeast Environmental Task Force (“SETF”). SETF is an environmental education and advocacy organization based on Chicago’s southeast side. Its members include individuals who live, work and recreate on the southeast side. This organization and its members work to ensure a healthy and safe environment for local residents, to preserve regional ecological resources and to achieve a sustainable economy that enhances local communities.

Please accept this letter as SETF’s comments on General III’s Large Recycling Permit Application. SETF is working in collaboration with the Chicago Southeast Side Coalition to Ban Petcoke and the Natural Resources Defense Council, and endorses the comments submitted by these allied organizations. SETF’s comments are meant to supplement rather than repeat the comments submitted by the Coalition and NRDC. Similarly, SETF has reviewed CDPH’s Deficiency Letter regarding General III’s permit application, and will not repeat CDPH’s list of deficiencies. Finally, because this process is at a preliminary stage, these comments focus on fatal omissions in the application. It is difficult to comment on an application which has so many deficiencies which should lead to permit denial on this basis alone.

As you know, the City of Chicago is prohibited from engaging in actions that have the effect of discriminating on the basis of race, color and national origin. Pursuant to Title VI of the Civil Rights Act of 1964, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity which receives federal financial assistance. SETF is a Complainant in a pending HUD action regarding the City’s participation in facilitating the transfer of this operation from the northside to the southside. SETF will not repeat the Complaint in these comments, but stands by its Complaint.

For the record, SETF, many public interest organizations and local residents expressed specific concerns during CDPH’s public hearing. By way of summary, many public commentators expressed concern about the environmental impacts of this metal shredding operation, the risks of which they assert are inadequately characterized and controlled. These commentators assert that the EJ area where the facility will operate is already characterized by air quality challenges like toxic metal emissions to which the facility will add. This concern includes emissions from several co-located and co-owned scrap processing facilities that are not included in the permit application. Commentators expressed concerns about the air quality impacts posed by the

hundreds of trucks that are needed to bring materials to the facility and to remove processed materials from the facility, especially on local PM-10 ambient air quality conditions. Because the permitted facility is transferring the business, operations and equipment from an existing metal shredder on Chicago's northside, many commentators testified about the troubled compliance history of this northside operation and urged CDPH to develop measures to address recurrent problems.

SETF Comment One: In light of the characteristics of the immediately surrounding area, SETF is formally requesting CDPH to conduct an environmental justice analysis as part of its permitting process. This analysis should address whether the environmental consequences of the applicant's facility, viewed comprehensively and in the context of where it will operate, will cause or contribute to significant, adverse and disproportionate risks for local communities.

There is a strong justification for an environmental justice analysis. According to information derived from the demographic feature of U.S. EPA's ECHO database, there are 68,947 people living within a three-mile radius of General III's proposed facility. 49% of the people who live in that three-mile radius are Hispanic, and 30% are African American. The ECHO database also indicates that there are 26,624 households in this area as well as 19,051 minors younger than 18. Nearby residential communities include the East Side, South Deering and Hegewisch. The facility would operate immediately adjacent to the Calumet River. In addition, the facility is less than one mile from Washington High School and nearby community parks. This area scores above 90% in eleven categories assessed by U.S. EPA's EJ screening tool, including PM 2.5, diesel PM, NATA air toxics cancer risk, NATA respiratory hazard index, traffic proximity, lead paint indicator, superfund proximity, risk management plan proximity, hazardous waste proximity and wastewater discharge proximity. This U.S. EPA assessment aligns with the findings of the City of Chicago Air Quality and Health Report, which is documented at: https://www.chicago.gov/city/en/depts/cdph/provdrs/healthy_communities/svcs/air-quality-and-health.html

The communities which will be impacted by the proposed facility are already susceptible due to pre-existing health and social factors including a prevalence of COPD, heart disease, asthma, and rates of poverty. Even absent the proposed facility, these communities experience higher rates of outdoor pollutant concentrations, air toxins, traffic proximity and proximity to hazardous waste facilities and Superfund sites. Cumulatively speaking, this predominantly minority community is among the most environmentally burdened in the city. Their burden is significant and disproportionate by comparison to other Chicagoans generally and, especially, by comparison to the community from which the applicant's business and operations are being moved.

Unlike other similarly-sized municipalities like New York City and Los Angeles, Chicago has no established environmental justice commitments or policies. Despite CDPH's own Air Quality and Health Report, CDPH has provided no description of how this and related evidence will affect its review of the permit application, its requirements for the permit applicant, its interactions with the public or its Draft Permit.

SETF asserts the city's history of ignoring the risks of significant, adverse and disproportionate harm in already susceptible, overburdened Chicago communities must be remedied beginning with CDPH's review of the present permit application.

SETF Comment Two: In assessing the proposed permitting transaction, CDPH should assess the cumulative impacts of several related, co-located facilities. The permit application is based on an incorrect source determination that does not include all of the pollutant-emitting activities that are part of a single source. General III and the other facilities co-located at 11600 S. Burley are a single source, but are being segmented into constituent operations for purposes of permitting.

In the present case, the 11600 S. Burley facilities include Napuck Salvage, Reserve Marine Terminals, South Chicago Recycling, RSR Partners/Regency Technologies, General III LLC and, perhaps, Calumet Transload. These co-located facilities belong to the same industrial grouping or operate as mutually supportive facilities, are located on contiguous or adjacent properties, and are under common ownership or common control. Despite this, CDPH appears to be conducting separate permitting activities which inappropriately segment a single source into its constituent operations. CDPH should not act on a permit application that provides only a partial and incomplete picture of this single source.

SETF Comment Three: The permit applicant is proposing to transfer the business, operations and equipment of General Iron to the 11600 S. Burley facility.

General III, LLC is also the entity that sought a construction permit for the southeast Chicago facility from the Illinois Environmental Protection Agency in September, 2019. In this application, General III, LLC expressly linked the decommissioning of General Iron to the construction of the facility on the southeast side:

“The facility described in this application will replace an existing facility currently owned and operated by General Iron Industries, Inc. (General Iron) located at 1909 North Clifton Avenue in Chicago, Illinois, which is scheduled to close by the end of 2020. This existing facility has been in operation at that location for over 60 years. Another RMG affiliate, GII, LLC (GII), is purchasing certain assets used in connection with the operation of General Iron’s scrap metal business and intends to operate the business for a period of time at the existing facility and then transition scrap metal operations from the Clifton Avenue location to its property at South Burley Avenue. Currently, the existing facility is processing approximately 750,000 ton [sic] per year of shreddable recyclables but is configured to process 1,000,000 tons per year. For purposes of this application, the existing facility is known as the “GII facility.”

The proposed GIII facility on South Burley Avenue will also be configured to process 1,000,000 tons per year of shreddable recyclables and will effectively replace the GII facility.”

Because of the connection between General Iron and General III, LLC, several members of the public testified about the history of non-compliance at the General Iron facility. CDPH is well-aware of this history, including evidence of a 2020 explosion at General Iron that led the City of Chicago to order the closure of the General Iron facility for several weeks. The Coalition will submit extensive information about multiple enforcement initiatives and contemporary citizen complaints related to General Iron’s operations. This information is directly relevant to

the applicant's capacity as necessary to correct, detect, or prevent noncompliance, particularly since equipment from General Iron will be transferred to the General III facility.

For this reason, SETF believes the permit application is improperly devoid of information about how the permit applicant will respond to non-compliance at its facility. What are the immediate and proactive measures that will be in place to identify, affirmatively report and institute corrective actions should non-compliance occur? What will be different about the environmental management system that will prevent chronic, recurrent non-compliance? What will be the system to record and respond to citizen complaints? In the absence of a detailed, comprehensive system, it is naïve to believe the pattern of facility non-compliance will change just by virtue of changing from one side of town to another.

For this same set of reasons, in contemplating a permit, CDPH should expressly state its reservation of rights to revoke the permit based on evidence of non-compliance. Simply stated, even the strongest permit CDPH can issue is meaningless for local communities if they subsequently experience the chronic problems that characterized the northside operation. CDPH should require the permit applicant to anticipate and have a fully realized plan to address non-compliance, and CDPH should be prepared to revoke the permit if noncompliance persists.

SETF Comment Four: For many of the same reasons described in the previous comment, CDPH should require the permit applicant to develop a proactive, comprehensive emergency response plan, including coordinating efforts with first responders, CDOT and nearby public school and park facilities. In its application, General III includes a boilerplate appendix that includes a spill prevention contingency plan for its tank system. However, despite the history at the General Iron facility, there is no plan to address explosions, fires and related off-site releases during catastrophic events arising from other facility operations. In the absence of a proactive, comprehensive emergency response plan, there is unacceptable risk to first responders, nearby residents, school children, teachers and others.

SETF Comment Five: SETF does not believe the emission characterizations in the permit application are credible in light of the operating history of the General Iron facility.

As revealed by the air permit, which CDPH issued without any opportunity for public participation, much of the equipment employed by General Iron will be moved to the proposed General III facility, including the RTO and other pollution control equipment. Consistent with this, the pending application is based on the operating characteristics of existing equipment employed by General Iron. In this way, General III's permit application is not typical because it proposes to move existing pollution control equipment from General Iron to a new location. This facility will be utilizing used parts, including key components like the emissions capture hood, cyclone, filter and RTO and associated pollution control equipment. Equally important, the emission characterizations in the permit application are based on the effective operation of this transferred equipment.

Consequently, CDPH should not issue a permit without an answer to the most essential question – has the pollution control equipment that is being transferred to the General III facility worked effectively at General Iron? SETF asserts that the representations in the permit application do not accurately represent the operation of the equipment that will be employed at the proposed

new General III facility. The permit application is an inadequate basis for permit review and is incomplete. SETF's assertion is based on the explosion that occurred at General Iron shortly after the public hearing, coupled with the long history of compliance issues related to this equipment that are detailed in written comments submitted by the Coalition. Initial reports suggest the explosion originated in the RTO, one of the pieces of pollution control equipment that is to be transferred to the proposed General III facility. Moreover, even if the operation of the RTO is not the only cause of the explosion, the transfer of any equipment that can cause this kind of catastrophic failure suggests the applicant's representations must be fundamentally questioned as part of any credible permit review.

In light of the operating history of the General Iron facility, there is a significant, disproportionate and adverse risk of harm in accepting the applicant's representations about the proposed use of any equipment, its control efficiency, and the applicant's ability to operate the equipment safely and effectively. Moreover, existing emission estimates and air quality models that do not account for emissions during periods of catastrophic failure like the May 2020 explosion and must be rejected. Omitting this analysis is inconsistent with the health, safety and welfare of nearby schools, parks, river users and residential neighborhoods. For this reason, SETF asserts the pending permit application is incomplete and does not provide a basis for CDPH to make permitting decisions about the General III facility.

SETF Comment Six: The permit application acknowledges that the facility will manage hazardous waste streams, including PCBs and mercury, yet does not include information about targeted safety and security measures related to these hazardous wastes. It is also unclear if these hazardous waste operations were fully vetted by city officials and city council members as part of local siting approval for the facility. In its Proposed Findings of Fact submitted to the ZBA, General III, LLC characterizes itself as "...a new Class IV-B recycling facility by Chicago Zoning Ordinance ("CZO") §16-6-0403-F, Row HH, 5." Hazardous waste storage facilities are a separate classification pursuant to the Chicago Zoning Ordinance.

General III, LLC will introduce a significant new hazardous waste operation into southeast Chicago. Section 3.9 of the Operating Plan describes PCB ballasts/capacitors, used oil, parts wash solvent and recovered refrigerants, but only in the context of their ultimate disposal facilities. More detail is provided in the Feedstock Management Plan in Appendix W, which also refers to propane and acetylene from gas cylinders, flammable and combustible materials like solvents and liquid fuels from containers, lithium-ion batteries and ignition devices, mercury containing-devices, paints and coatings and asbestos-containing materials. Page W-14 refers to accepting electronics "incidentally" despite not being an electronics recycler (the co-located Regency Technologies which engages in electronics recycling is not included in the permit application, so the process for safe movement of these wastes from one operation to another is unclear). Accepting these materials from suppliers may ensure they are not hidden in a load of scrap, but it also means on-site operations include managing a significant quantity of hazardous wastes, including flammable, combustible and ignitable materials, as well as PCBs, mercury and asbestos.

Given the diversity and volume of these hazardous materials, Appendix W provides very little information about how the materials are managed once they are segregated at the facility stating, for example, on page W-3: "If any materials that require special handling are observed, the scale

operator notifies the team of inspectors and the suspect materials are closely examined to determine a proper course of action.”

The permit application is incomplete because it does not include a comprehensive, detailed description of the nature and extent of hazardous waste streams that are being aggregated, stored at and directed from the facility, nor “the proper course of action” employed at the facility given the diversity of hazardous waste streams it routinely manages. From SETF’s perspective, this aspect of facility operations has not been meaningfully described in any of its interactions about this facility in any venue. This begs a larger policy-oriented question about whether embedding this hazardous waste operation in the midst of a residential neighborhood and adjacent to a waterway is a good idea. This is why SETF questions if this aspect of facility operations was fully vetted as part of the local land use approval process.

SETF Comment Seven: The permit application does not characterize or address perhaps the biggest threat to public health posed by the facility – short- and long-term exposure of residents to tailpipe emissions from vehicles that will drive everyday through their neighborhoods to service the facility.

As an initial matter, SETF asserts CDPH must *assess* the air quality impacts of emissions from new truck traffic that will move through local communities to access the General III facility. On a weekly basis, General III’s operations will attract hundreds of trucks carrying junk automobiles, appliances and other scrap metal; this is an essential part of General III’s business. Even if CDPH cannot directly regulate tailpipe emissions from these mobile sources, it is CDPH’s responsibility to assess the cumulative, short- and long-term impacts of these emissions to determine if they will cause or contribute to unhealthy air quality for nearby residents. This is especially true because of evidence, described above, suggesting traffic proximity and diesel emission exposure are already key risk drivers for nearby communities. If these significant, additional off-site tailpipe emissions cause or contribute to unhealthy air quality, the permit application must be denied.

The General III facility cannot operate unless it receives deliveries of scrap metal by truck. This essential aspect of General III’s operations will bring hundreds of trucks – and their associated tailpipe emissions – to its location every week. These trucks and their cumulative emissions will be a new, permanent source of air pollution in nearby residential neighborhoods, both when they come to and go from the General III facility using local roadways. These impacts will be compounded if trucks idle at or near the facility or at the many traffic stopping points they will encounter as they move to and from the facility on local, public roads, many of which are adjacent to residential neighborhoods.

On page 12 of the Traffic Impact Study that was submitted on or about March 5, 2019 by General III, LLC to the Zoning Board of Appeals, presented a partial estimate of the number of site-generated trips for different categories of vehicles. These numbers represent only “peak hour” additional traffic because the focus is congestion, not public health impacts. For example, on a weekly basis, the Traffic Study estimates 140 new site-generated passenger vehicle “peak hour” trips to-and-from the facility. There is no estimate for non-peak hours. Single-unit truck traffic, which the applicant assumes will only be a fraction (roughly one-fifth) of the trucks that service the Clifton facility, are estimated to add only 50 weekly additional trips to-and-from the

facility. This dramatic reduction from the Clifton operation is difficult to understand given the larger operating capacity of the proposed southeast side facility (from Clifton's 750,000 tons per year to the new facility's capacity of approximately 1,000,000 tons per year or more, see p.3 above). Most importantly, the Traffic Study estimates there will be 220 new "articulated trucks" added to local roadways on a weekly basis just during peak hours. Information about the total number of new trucks inclusive of non-peak hours is not available. An analysis of the off-site impacts of vehicle emissions was not part of the local siting process, which considered only congestion and related safety issues. This analysis was also not part of the Illinois EPA permitting process; Illinois EPA confined its review to the air quality impacts of on-site vehicles. To date, there has been no meaningful public health assessment of the total impacts of new tailpipe emissions connected to this facility, and no assessment of the public health consequences of these emissions in light of existing conditions and in combination with other new sources like the adjacent warehouse complex.

The relocation of the business and operations of General Iron to the proposed General III facility will result in the introduction of hundreds of trucks every week of every year into southeast Chicago, including many diesel vehicles. There is clear cause for public health concern; even absent General III, the area surrounding the proposed General III facility scores above the 90% percentile in several risk-based, transportation related categories assessed as part of U.S. EPA's EJ screening tool, including PM 2.5, diesel PM, NATA air toxics cancer risk, NATA respiratory hazard index and traffic proximity. The tailpipe emissions that will result from the trucks needed to service the proposed General III facility will only exacerbate these off-site risks, but have not been assessed. This omission is to the advantage of the permit applicant, but places the environmental justice community in peril.

SETF Comment Eight: The concerns of local residents about releases of odors from the proposed General III facility are legally and factually compelling. Odors can constitute a substantial and unreasonable interference with the use and enjoyment of nearby properties, as well as interfering with the right of the public generally to be free of offensive and injurious conditions. As revealed by the analysis submitted by the Coalition, odor concerns are not mere speculation, but rather are identified as a recurrent problem at the existing General Iron facility despite the use of the same pollution control equipment that will be transferred to General III. These odors are not merely unpleasant; they evidence fugitive releases of categories of regulated pollutants including metals, volatile organic materials and particles. Multiple CDPH Inspection Reports state that city inspectors experience pungent odors of sweet metal that burn the nostrils, odors of burning material and fugitive dust. For example:

“CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL RESPONDED TO A CITIZEN'S COMPLAINT REGARDING ODORS AND AN EXPLOSION HEARD IN THE MORNING COMING FROM THE FACILITY AT 1909 N CLIFTON AVE, GENERAL IRON INDUSTRIES (GII, LLC). GII LLC OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC1063430) ISSUED BY CDPH. WHILE CANVASSING THE AREA SURROUNDING GII, LLC ON FEBRUARY 10, 2020, ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: HOME DEPOT (1232 W NORTH AVE) PARKING LOT, INTERSECTION OF THROOP ST WABANSIA AVE, AND INTERSECTION OF THROOP ST WABANSIA AVE. IT IS A PUNGENT ODOR OF SWEET METAL THAT BURNS MY NOSTRILS. I ALSO OBSERVED AN ODOR OF BURNING MATERIAL. THE SAME ODORS OF SWEET METAL WERE ALSO OBSERVED ONSITE. UNTREATED EMISSIONS WERE

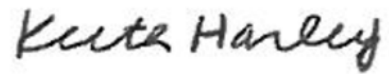
OBSERVED ESCAPING THE TOP AND THE SIDES OF THE SHREDDER. I ALSO OBSERVED SMOKE LEAVING THE SHREDDER AND TRAVELING THROUGH THE PROPERTY ACROSS FROM THE NORTH BRANCH CHICAGO RIVER. THE SHREDDER IS NOT AN ENCLOSED PIECE OF EQUIPMENT. IT DOES CONTAIN A HOOD TO CAPTURE THE EMISSIONS AND PROCESS THEM THROUGH A REGENERATIVE THERMAL OXIDIZER (RTO) AND A WET SCRUBBER TO REMOVE VOLATILE ORGANIC COMPOUNDS (VOCS), HAZARDOUS AIR POLLUTANTS (HAPS), AND OTHER AIRBORNE SOLVENTS. BEING ABLE TO OBSERVE EMISSIONS ESCAPING THE SHREDDER LEADS ME TO BELIEVE THAT THE EQUIPMENT CAPTURING THE EMISSIONS IS INSUFFICIENT. CONSEQUENTLY, THIS DOES NOT ALLOW THE RECENTLY INSTALLED AIR POLLUTION CONTROL EQUIPMENT TO PROCESS THE EMISSIONS SINCE THEY ARE ESCAPING AT THE SHREDDER BEFORE THE TREATMENT PROCESS. AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED ON THE PROPERTY DIRECTLY SOUTHWEST AND ACROSS THE NORTH BRANCH CHICAGO RIVER. AUTO FLUFF IS A PRODUCT OF SHREDDING OPERATIONS AND IT CONSIST OF FINE PARTICLES OF GLASS, FIBERS, RUBBER, METAL, PLASTIC, DIRT, AND AUTOMOTIVE FLUIDS. FUGITIVE DUST WAS ALSO OBSERVED ONSITE WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS TO AND FROM TRUCK TRAILERS. MISTING CANNONS WERE OBSERVED TO NOT BE IN OPERATION TO CONTROL AIRBORNE PARTICLES AT THE TIME OF THE INSPECTION. OBSERVING AUTO FLUFF IN THE OUTSIDE OF GII, LLC'S PROPERTY AND FUGITIVE DUST WITHOUT OPERATING MISTING CANNONS LEADS ME TO BELIEVE THAT REASONABLE MEASUREMENTS WERE NOT AND ARE NOT BEING TAKEN TO ENSURE DUST, DEBRIS, AND DIRT WON'T MIGRATE OFF SITE AND INTO THE PUBLIC WAY. I SPOKE TO JIM AND HE INFORMED ME THAT THERE WAS AN EXPLOSION IN THE SHREDDER DURING THE MORNING HOURS BETWEEN 7:30AM ? 7:40AM. HE SAID THIS IS A COMMON OCCURRENCE. A NOV CITATION #E0000***** WAS ISSUED FOR AIR POLLUTION PROHIBITED (11-4-730) AND HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]). A NOV CITATION #E0000***** WAS ISSUED FOR VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 46 WHICH REQUIRES THE PERMITTEE TO CONTROL AND SUPPRESS DUST AND OTHER MATERIALS TO PREVENT OFF-SITE MIGRATION AND NUISANCE IN CONNECTION WITH BUSINESS (7-28-080). THE HEARING DATE FOR THE CITATIONS WILL BE ON APRIL 30, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO GENERAL IRON INDUSTRIES (GII, LLC) AGENT LISTED ON THE ILLINOIS SECRETARY OF STATE CORPORATION FILE DETAIL REPORT. THE AGENTS NAME AND ADDRESS ILLINOIS CORPORATION SERVICE C AT 801 ADLAI STEVENSON DRIVE, SPRINGFIELD, IL 62703.”

The inspector was able to attribute these releases to General Iron because she observed the same effects on-site as well.

This inspection report dates from December, 2019, after General Iron's existing pollution control equipment – which will be transferred to General III – was installed. General III's permit application is incomplete because it does not address the severe, recurrent releases that were constantly reported at the General Iron facility, and which are clearly injurious to human health and the use and enjoyment of property. The permit application should be regarded as incomplete unless it includes a comprehensive odor management plan that identifies changes in material, the installation of controls and other measures to control odors, and mandates for a corrective action plan if odors are observed or odor complaints are received by facility operators or regulators. The odor management plan should also require General III to identify and implement odor monitoring equipment to detect the characteristic odors that are related to its characteristic metallic, volatile and particulate emissions.

Please contact me if you have any questions or comments or if I can provide additional information regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Keith Harley". The signature is written in a cursive, slightly slanted style.

Keith Harley
Attorney for the Southeast Environmental Task Force
Greater Chicago Legal Clinic, Inc. f/k/a Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
312-726-2938
kharley@kentlaw.iit.edu

From: Jim Atols [REDACTED] >
Sent: Thursday, January 14, 2021 12:23 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,

Jim Atols

[REDACTED]
Schaumburg, IL 60194

From: Michelle Holtzman [REDACTED] >
Sent: Thursday, January 14, 2021 12:26 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Michelle Holtzman
[REDACTED]
Buffalo Grove, IL 60089

From: Michelle Jorgensen [REDACTED] >
Sent: Thursday, January 14, 2021 12:27 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Michelle Jorgensen
[REDACTED]
Chicago, IL 60640

From: Elisabeth N. [REDACTED]
Sent: Thursday, January 14, 2021 12:27 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Elisabeth N.

[REDACTED]
Chicago, IL 60617

From: Kate Harder [REDACTED]
Sent: Thursday, January 14, 2021 12:29 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Kate Harder

[REDACTED]
Glen Ellyn, IL 60137

From: Mary Griswold [REDACTED] >
Sent: Thursday, January 14, 2021 12:31 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Mary Griswold

[REDACTED]
Evanston, IL 60202

From: Ceci Quinones [REDACTED] >
Sent: Thursday, January 14, 2021 12:31 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Ceci Quinones
[REDACTED]
Chicago, IL 60608

From: Gabriel Klooster [REDACTED]
Sent: Thursday, January 14, 2021 12:33 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Gabriel Klooster

[REDACTED]
Chicago, IL 60608

From: Melissa Villalba [REDACTED]
Sent: Thursday, January 14, 2021 12:35 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Melissa Villalba
[REDACTED]
Chicago, IL 60622

From: lauren herskovic [REDACTED] >
Sent: Thursday, January 14, 2021 12:36 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
lauren herskovic

[REDACTED]
Chicago, IL 60647

From: envcomments
Sent: Thursday, January 14, 2021 12:36 PM
To: envcommentsDL
Subject: FW: Please deny General Iron's final permit request

From: lauren herskovic
Sent: Thursday, January 14, 2021 12:36:08 PM (UTC-06:00) Central Time (US & Canada)
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
lauren herskovic


Chicago, IL 60647

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this e-mail in error, please respond to the individual sending the message, and permanently delete the original and any copy of any e-mail and printout thereof.

From: Mario Fornarelli [REDACTED] >
Sent: Thursday, January 14, 2021 12:37 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Mario Fornarelli

[REDACTED]
Norridge, IL 60706

From: Caitlin Brown [REDACTED]
Sent: Thursday, January 14, 2021 12:37 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Caitlin Brown

[REDACTED]
Chicago, IL 60657

From: Cindy Parrone [REDACTED]
Sent: Thursday, January 14, 2021 12:37 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Cindy Parrone

[REDACTED]
Murphysboro, IL 62966

From: Jane Friedman [REDACTED]
Sent: Thursday, January 14, 2021 12:38 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Jane Friedman
[REDACTED]
Chicago, IL 60625

From: Anna Chicoine [REDACTED] >
Sent: Thursday, January 14, 2021 12:38 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Anna M. Chicoine

Sincerely,
Anna Chicoine

[REDACTED]
Chicago, IL 60622

From: Ann Waller [REDACTED]
Sent: Thursday, January 14, 2021 12:41 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Ann Waller

[REDACTED]
Chicago, IL 60631

From: Jerry Mazzolini [REDACTED]
Sent: Thursday, January 14, 2021 12:46 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Jerry Mazzolini

[REDACTED]
Chicago, IL 60640

From: Brittany Zwicker [REDACTED]
Sent: Thursday, January 14, 2021 12:47 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Brittany Zwicker

[REDACTED]
Chicago, IL 60625

From: Linda Seyler [REDACTED]
Sent: Thursday, January 14, 2021 12:48 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Linda Seyler

[REDACTED]
Montgomery, IL 60538

From: Pat Rose [REDACTED]
Sent: Thursday, January 14, 2021 12:49 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Pat Rose

[REDACTED]
Skokie, IL 60077

From: James Shannon [REDACTED]
Sent: Thursday, January 14, 2021 12:49 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
James Shannon

[REDACTED]
CHICAGO, IL 60622

From: Linda Townill [REDACTED]
Sent: Thursday, January 14, 2021 12:49 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Linda Townill
[REDACTED]
Plainfield, IL 60544

From: Renee Patten [REDACTED] >
Sent: Thursday, January 14, 2021 12:51 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Renee Patten

[REDACTED]
Chicago, IL 60640

From: Lou Storino [REDACTED]
Sent: Thursday, January 14, 2021 12:51 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I was born in South Chicago hospital and lived my formative years on the Southeast side of Chicago among the spewing coke plants for the steel mills. I have many relatives who still live there and I visit often.

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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Thank you for your consideration,

Sincerely,
Lou Storino

[REDACTED]
Chicago, IL 60614

From: Molly Older [REDACTED] >
Sent: Thursday, January 14, 2021 12:54 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Molly Older

[REDACTED]
Chicago, IL 60640

From: Taylor Schaub [REDACTED] >
Sent: Thursday, January 14, 2021 12:58 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Taylor Schaub

[REDACTED]
2711, IL 60601

From: Joanna Racho [REDACTED]
Sent: Thursday, January 14, 2021 12:59 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,
Joanna

Sincerely,
Joanna Racho

[REDACTED]
Chicago, IL 60641

From: Rebecca McDaniel [REDACTED]
Sent: Thursday, January 14, 2021 12:59 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

Please understand that granting this permit would put members of our southside community in unfair danger. Do not continue the trend of submitting majority Black and Latinx neighborhoods to unfair environmental injustice!

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Rebecca McDaniel

[REDACTED]
Chicago, IL 60618

From: envcomments
Sent: Thursday, January 14, 2021 12:59 PM
To: envcommentsDL
Subject: FW: Please deny General Iron's final permit request

From: Rebecca McDaniel
Sent: Thursday, January 14, 2021 12:59:11 PM (UTC-06:00) Central Time (US & Canada)
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Rebecca McDaniel


Chicago, IL 60618

This e-mail, and any attachments thereto, is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail (or the person responsible for delivering this document to the intended recipient), you are hereby notified that any dissemination, distribution, printing or copying of this e-mail, and any attachment thereto, is strictly prohibited. If you have received this e-mail in error, please respond to the individual sending the message, and permanently delete the original and any copy of any e-mail and printout thereof.

From: Eloisa Pacheco [REDACTED]
Sent: Thursday, January 14, 2021 1:01 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Eloisa Pacheco

[REDACTED]
Chicago, IL 60617

From: YVETTE WHORTON [REDACTED]
Sent: Thursday, January 14, 2021 1:06 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
YVETTE WHORTON

[REDACTED]
Chicago, IL 60649

From: Ann Joseph [REDACTED]
Sent: Thursday, January 14, 2021 1:06 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Ann Joseph

[REDACTED]
Chicago, IL 60617

From: Christiane Rey [REDACTED] >
Sent: Thursday, January 14, 2021 1:08 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Christiane Rey

[REDACTED]
Chicago, IL 60618

From: Marcella Bondie [REDACTED] >
Sent: Thursday, January 14, 2021 1:10 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Marcella Bondie
[REDACTED]
Chicago, IL 60625

From: Lisa Boatright [REDACTED]
Sent: Thursday, January 14, 2021 1:14 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Lisa Boatright
[REDACTED]
Winfield, IL 60190

From: Christine Favilla [REDACTED] >
Sent: Thursday, January 14, 2021 1:15 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Christine Favilla
[REDACTED]
Alton, IL 62002

From: Gerardo De La Torre [REDACTED]
Sent: Thursday, January 14, 2021 1:16 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Gerardo De La Torre
[REDACTED]
Chicago, IL 60608

From: Eric Bauer [REDACTED]
Sent: Thursday, January 14, 2021 1:17 PM
To: envcomments
Subject: Concerns about the expansion of the General Iron plant

[Warning: External email]

To whom it may concern,

I wanted to add my voice to share that—despite the safeguards put in place—I am very concerned about the effects of the expansion of the General Iron plant, both on the underserved and minority communities on the Southeast Side and on surrounding natural areas like Indian Ridge. I don't believe this expansion is in the best interests of communities, nature, and the city of Chicago.

Eric Bauer

From: Kyra Mikala [REDACTED]
Sent: Thursday, January 14, 2021 1:19 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Kyra Mikala

[REDACTED]
Aurora, IL 60503

From: Jack Shouba [REDACTED]
Sent: Thursday, January 14, 2021 1:21 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Jack Shouba
[REDACTED]
Elburn, IL 60119

From: Ethan Sellers [REDACTED]
Sent: Thursday, January 14, 2021 1:24 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Ethan Sellers

[REDACTED]
Chicago, IL 60649

From: Maddie Fernandez [REDACTED]
Sent: Thursday, January 14, 2021 1:25 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

It's ridiculous that the city spent \$6 BILLION but still won't take steps to build equitable future in the city's southeast side. I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Maddie Fernandez

[REDACTED]
Chicago, IL 60640

From: Rachel Vance [REDACTED]
Sent: Thursday, January 14, 2021 1:30 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Rachel Vance

[REDACTED]
Chicago, IL 60617

From: Marcia Stoll [REDACTED]
Sent: Thursday, January 14, 2021 1:35 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

It is not okay for the City of Chicago to approve General Iron's permit to operate at the 11600 S Burley Avenue in the Southeast Side.

What is not good for the north side is not good for the south side. During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations.

To use the Southeast Side as the City's dumping ground goes against the promise of environmental justice from Mayor Lightfoot.

Thank you for your consideration,

Sincerely,
Marcia Stoll

[REDACTED]
Evanston, IL 60202

From: Laura Long laura [REDACTED]
Sent: Thursday, January 14, 2021 1:38 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Laura Long laura
[REDACTED]
Chicago, IL 60616

From: Chloe Gurin-Sands [REDACTED]
Sent: Thursday, January 14, 2021 1:38 PM
To: envcomments
Cc: Megan Cunningham; Angela Tovar; Josh Ellis; Christina Harris
Subject: Comments Re: General Iron 11600 S Burley
Attachments: MPC_GIII_1.14.20.pdf

[Warning: External email]

Hello,

The Metropolitan Planning Council submits the attached comments re: the GIII/RMG/General Iron permit at 11600 S. Burley. MPC respectfully urges the Chicago Department of Public Health to deny this permit.

Thank you,

Chloe Gurin-Sands (*she, her, hers*)

Manager, Health Equity & Planning | [Metropolitan Planning Council](#)
140 S. Dearborn St. | Suite 1400 | Chicago, IL 60603
312-863-6037 | cgurinsands@metroplanning.org

This season, we invite you to help us continue [#MakingPositiveChange](#) by including MPC in your year-end giving. Gifts help us shape and advance a better, bolder, more equitable future for our region.



**To: Commissioner Allison Arwady, Chicago Department of Public Health
333 S State St. Room 200, Chicago IL 60604**
Cc: Angela Tovar, Chief Sustainability Officer
**Re: Large Recycling Facility Permit Application, General III, LLC,
11600 S. Burley Avenue, Chicago IL**

January 14, 2021

Dear Commissioner Arwady,

Thank you for the opportunity to provide comments on Gill, LLC's ("Gill") request to begin operations at a recycling facility at 11600 S. Burley Avenue in Chicago. The Metropolitan Planning Council is a nonprofit planning, policy, and advocacy organization with over 85 years of experience developing solutions to complex regional and citywide challenges. We have a longstanding interest in racially equitable development policies and thriving, healthy rivers. As we consider the inequitable and inadequate planning embedded in this proposal, we urge the Chicago Department of Public Health (CDPH) to deny Gill's permit request.

This relocation epitomizes institutional environmental racism, whether intentional or not. It goes against the stated commitments of the City of Chicago to protect both human health and the quality of our natural resources in Southeast Chicago, and risks more exposure to pollutants for a community already unduly burdened in this regard.

Compounding environmental exposures already burden communities of color in the Calumet Industrial Corridor. This relocation would layer yet another source of toxic heavy metals, particle pollution and other industrial pollutants on top of the overlapping health threats that already exist near the proposed site in the Calumet Industrial Corridor (the concerning materials are detailed in the comments submitted by the Southeast Environmental Task Force). Southeast side residents are already experiencing poor air quality and contaminated soil, and research conducted by the Calumet Connect shows that compared to citywide averages and most other industrial corridors in Chicago, there are higher rates of Chronic Obstructive Pulmonary Disease (COPD) and heart disease within this corridor. Approval of this relocation and the risk it carries for exposure to pollutants would stand in opposition to the CDPH's stated goal to increase the life expectancy of Chicago's Black and Brown populations by improving air quality, reducing exposure to pollution, and evaluating cumulative impacts of pollution (Healthy Chicago 2025). Furthermore, this relocation would remove operations that produce industrial pollutants from an affluent, majority White neighborhood and place them in a lower-income, majority Latino and Black neighborhood, continuing a pattern of environmental racism in Chicago which repeatedly shifts risk toward already overburdened communities to make space for improvements elsewhere.

Duty of the Chicago Department of Public Health to ensure safety. It is the legal duty of the CDPH to enforce environmental rules, and the public's health and safety. Gill's recent and ongoing record of noncompliance must be considered, and the CDPH's first obligation should be to prevent further harm. The CDPH's oversight and inspection processes did not adequately prevent and correct violations in Lincoln Park (as evidenced by inspection reports of issues that continued into November and December 2020). The same processes cannot be expected to prevent the likelihood of future violations simply because of a relocation to the Southeast side.

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Steven N. Miller
Origin Ventures

Charles J. Moore
The Banc Funds

J. Marshall Peck
InterPark Holdings LLC

Joan Rockey
Cerity Partners LLC

Katherine M. Scherer
Deloitte LLP

Michael Scudder
First Midwest Bancorp, Inc.

Kristofer Swanson
Charles River Associates

Scott Swanson
PNC Bank, Illinois

Stephan B. Tanda
AptarGroup, Inc.

Jim TenBroek
Growth Catalyst Partners

Edward J. Wehmer
Wintrust Financial Corp.

Theodore Weldon
Lendlease

President

MarySue Barrett •

Executive Committee •
General Counsel ••

Serious improvement to oversight and regulation are needed to ensure safety. In addition, we urge the CDPH to exercise their legal ability to institute more strict environmental standards than the Illinois Environmental Protection Agency (as detailed in the statement submitted by Northwestern's Environmental Law Clinic on behalf of the Coalition to Ban Petcoke). Since neither meaningful improvements to CDPH's capacity for oversight nor tighter standards are in place, we are gravely concerned that a new facility would operate without sufficient oversight to ensure environmental and public health compliance, regardless of any potential upgrades to facilities that may be proposed.

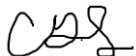
Undermines long-term industrial planning in Chicago. The City of Chicago has embarked upon an Industrial Corridor Modernization process, in which the Department of Planning and Development is reviewing and sometimes modifying existing land uses within its industrial corridors. Some corridor reviews, such as along the North Branch of the Chicago River (2017), have been completed while others, such as along the Calumet River, have not even begun. At best, it is premature to relocate an industrial facility of this magnitude given that this Corridor's planning process is slated to begin in 2021. At worst, relocating this project would have an outsized influence on any future planning efforts, incentivizing other businesses to similarly move to the Southeast Side, and preventing a fair assessment of the corridor as well as its relationship to the other industrial corridors and the city as a whole. This facility should not be considered for relocation until a planning process—one that squarely centers community stakeholders, human health, and both environmental and economic justice—has been completed.

Inconsistent with our collective vision for Chicago's rivers and riverfront communities. The proposal is inconsistent with Chicago's vision for healthy, thriving rivers, as documented in *Our Great Rivers*. Among other goals, the vision encourages river-adjacent land uses that address environmental impacts to humans and the river ecosystem itself. Overland and stormwater runoff have been identified by the US Army Corps of Engineers as major sources of dredge material in the Calumet River (the toxic sediment that is routinely removed from the river to ensure the waterway remains navigable). The CDPH has noted the gradation of the riverfront portion of the site and requested additional information from GIII about any planned barge use and discharge from this site running into the Calumet River. Metals operations along the Calumet already produce noxious odors, and the application for GIII also falls short on how the facility will identify and mitigate such odors. Riverfront industrial users must protect the quality of the waterway and habitat it would sit along, as well as ensure that other uses of the waterways, like recreation, are not hindered by its operations; it is unclear how the applicant plans to do this.

Approving GIII's permit will place another source of environmental pollutants in a mostly Latinx and Black community already burdened by serious health threats. It is inconsistent with the duties and commitments of the City to protect the public's health and safety, as well as our natural resources. It continues an unjust pattern of environmental racism and undermines our future aspirations for economically and environmentally sound planning across Chicago.

Please contact the Metropolitan Planning Council with any questions regarding this statement.

Sincerely,



Chloe Gurin-Sands
Manager, Health Equity & Planning
Metropolitan Planning Council



Christina Harris
Director, Land Use & Planning
Metropolitan Planning Council

From: Celine Wysgalla [REDACTED]
Sent: Thursday, January 14, 2021 1:41 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Celine Wysgalla

[REDACTED]
Park Ridge, IL 60068

From: Hillary Geller [REDACTED]
Sent: Thursday, January 14, 2021 1:41 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Hillary Geller

[REDACTED]
Chicago, IL 60615

From: xiili sarkela [REDACTED]
Sent: Thursday, January 14, 2021 1:43 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
xiili sarkela
[REDACTED]
chicago, IL 60612

From: Diane Gioe [REDACTED]
Sent: Thursday, January 14, 2021 1:47 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration.

Sincerely,
Diane Gioe
[REDACTED]
Bartlett, IL 60103

From: Todd Kinney [REDACTED] >
Sent: Thursday, January 14, 2021 1:55 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Todd Kinney

[REDACTED]
Urbana, IL 61801

From: Mary McKinstry [REDACTED] >
Sent: Thursday, January 14, 2021 1:58 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,

Mary McKinstry

[REDACTED]
Palos Heights, IL 60463

From: Ignacio Salinas [REDACTED]
Sent: Thursday, January 14, 2021 1:58 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Ignacio Salinas

[REDACTED]
Chicago, IL 60637

From: Irene Weinman [REDACTED]
Sent: Thursday, January 14, 2021 1:59 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Irene Weinman

[REDACTED]
Niles, IL 60714

From: Patricia Serckie [REDACTED]
Sent: Thursday, January 14, 2021 1:59 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Patricia Serckie

[REDACTED]
CHICAGO, IL 60633

From: Erica Trujillo [REDACTED]
Sent: Thursday, January 14, 2021 2:07 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Erica Trujillo

[REDACTED]
Chicago, IL 60615

From: Becky Brodsky [REDACTED]
Sent: Thursday, January 14, 2021 2:12 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Becky Brodsky

[REDACTED]
Skokie, IL 60076

From: Gwendolen Casey [REDACTED]
Sent: Thursday, January 14, 2021 2:12 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Gwendolen Casey

[REDACTED]
Chicago, IL 60659

From: Laura Davis [REDACTED] >
Sent: Thursday, January 14, 2021 2:13 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Laura Davis

[REDACTED]
Inverness, IL 60010

From: judith pollock [REDACTED]
Sent: Thursday, January 14, 2021 2:21 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
judith pollock
[REDACTED]
Evanston, IL 60202

From: Annamarie Garza [REDACTED]
Sent: Thursday, January 14, 2021 2:21 PM
To: envcomments
Subject: DENY OPERATING PERMITS TO GENERAL IRON/RMG FACILITIES ON THE SOUTHEAST SIDE

[Warning: External email]

Dear City of Chicago Leaders:

My name is Annamarie Garza and I live at [REDACTED] (60617). I am a parent and East Side community member. I stand in solidarity with 10th ward South East Side residents against General Iron. The Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady have a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

- **Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.**
- **A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, wind will carry pollutants directly to the learning environment of our students and negatively impact their health.**
- **According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.**

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

I URGE you to Deny RMG/General Iron's permit to operate a Large Recycling Facility. WE DESERVE CLEAN AIR.

Sincerely,
Annamarie Garza
[REDACTED]

From: Juanita Irizarry [REDACTED]
Sent: Thursday, January 14, 2021 2:29 PM
To: envcomments
Cc: Abigail Johnston
Subject: Friends of the Parks comments re: General Iron/RMG
Attachments: FOTP General Iron Final Permit Public Comments 1.14.2021.pdf

Importance: High

[Warning: External email]

Dear Dr. Arwady—

Please find attached Friends of the Parks' comments in opposition of the siting of the relocated operations of General Iron to the RMG facility on the Southeast Side.

Sincerely--

Juanita

Juanita Irizarry
Executive Director
Friends of the Parks
17 N. State St., Suite 1450
Chicago, IL 60602
312-857-2757 ext. 2
irizarryj@FOTP.ORG
www.fotp.org





January 14, 2020

Dr. Allison Arwardy
Commissioner of the Chicago Department of Public Health

Dear Dr. Arwardy,

Friends of the Parks (FOTP) is an Illinois not-for-profit organization founded in 1975 and dedicated to promoting healthy parks in the City of Chicago. Our goals include ensuring park lands are equitably distributed and managed across the city in a way that supports healthy communities and a healthy environment.

As such, we write to you regarding the pending air pollution control permit filed by Reserve Management Group (RMG) for the purpose of relocating General Iron's recycling operations to the Southeast Side at 11600 S. Burley Avenue. FOTP urges you to consider the following factors and deny this permit. The City of Chicago should not facilitate the relocation of dangerous operations that offer environmental threats to the 10th Ward, an already overburdened Environmental Justice community.

The proposed relocation site of General Iron by its parent company, RMG, to 11600 S. Burley Avenue, is within walking distance of Rowan Park. Rowan Park is adjacent to George Washington High School and serves as space for high school students to participate in recreational activities. Additionally, Rowan Park is a key gathering place for the 10th Ward community, where residents regularly visit for their physical and mental health--and especially now, amidst a pandemic in which more people than ever are turning to outdoor spaces to socially-distance.

This is not the first instance of the City of Chicago being complacent in allowing polluters to be sited near local parks. Finkl Steel moved its operations to Burnside within a couple of blocks of Burnside Park and Byrnes Park, and the MAT Asphalt plant continues to emit fumes on McKinley Park. Low-income communities and communities of color that we now find are experiencing particularly high rates of COVID-19 are bearing the brunt of these poor decisions, and their health and well-being continues to be threatened. The City of Chicago must not continue to turn a blind eye to the issue of environmental threats being located near parks, including this most timely issue on the Southeast Side.

17 N. State Street • Suite 1450 • Chicago, Illinois 60602 • p (312) 857-2757 • www.fotp.org
Healthy Parks for a Healthy Chicago

The science behind the pollution putting the Southeast Side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into the environment from RMG/General Iron and put resident's lung health and immune systems at risk and further compromise the health of the 10th Ward community amidst a pandemic that targets respiratory systems.
- George Washington High School conducted a study that found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, wind will carry pollutants directly to the learning environment of students and towards community members using Rowan Park.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased lifespan.

The Southeast Side historically has battled petcoke and manganese, to name a few. Just recently, arsenic and lead were found in children's baseball fields in the area. Meanwhile, the Confined Disposal Facility at the confluence of the Calumet River and the lakefront is leaking PCBs, mercury, arsenic, and lead back into our water supply, an issue which the Army Corps of Engineers tried to keep from public view.

As all of Chicago has seen, the operations at the General Iron site in Lincoln Park have led to an explosion in May 2020 and a fire in November 2020. Lincoln Park residents have long monitored bad smells, questionable dust, and other concerns associated with this operation and organized to get this threat to their health and safety out of their neighborhood. So we believe that Southeast Side residents have good reason to be concerned. We stand in solidarity with 10th Ward residents in saying that if it isn't good enough for Lincoln Park, it isn't good enough for the predominantly Latino and African-American 10th Ward.

We see this as a great opportunity for the City of Chicago to go back to the drawing board and create environmentally just policies that uplift our overburdened communities. Again, we respectfully request that CDPH deny the permit to operate a large recycling facility in the 10th Ward.

Sincerely,



Juanita Irizarry
Executive Director

From: Myrna Frankel [REDACTED]
Sent: Thursday, January 14, 2021 2:39 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Myrna Frankel

[REDACTED]
Schaumburg, IL 60195

From: Karen Peterson [REDACTED]
Sent: Thursday, January 14, 2021 2:46 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Karen Peterson

[REDACTED]
Northbrook, IL 60062

From: Aguilar, Josue [REDACTED]
Sent: Thursday, January 14, 2021 2:49 PM
To: envcomments
Cc: Friend, Megan
Subject: INFO: NRDC Public Comments - General Iron - City of Chicago
Attachments: NRDC General Iron Cover Letter City of Chicago 1.14.21.pdf; Chicago General Iron NRDC Public Comments 1.14.21.xlsx; Chicago General Iron Petition of Protest NRDC Public Comments 1.14.21.xlsx

[Warning: External email]

Dear Chicago city officials,

Please accept the attached **3,307 comments** from members and online activists of the Natural Resources Defense Council (NRDC) asking you to deny the move of General Iron's operations to the Southeast Side of Chicago.

General Iron has been cited repeatedly for violating the City of Chicago's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down for public health citations.

During the COVID-19 crisis (which is disproportionately affecting communities of color), they want to move their operations to a working-class community of color that's already overburdened with pollution. This is environmental racism in action — and is indicative of the type of injustice communities of color deal with every day.

Although the inequalities in our country are not new, we have an opportunity to address them considering the worsening COVID-19 pandemic and the renewed push for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. We ask that you deny the move of General Iron's operations to the Southeast Side of Chicago.

Thank you.

Sincerely,
Josue

JOSUE AGUILAR
*Communications Assistant,
Digital Advocacy & Fundraising*

NRDC & NRDC ACTION FUND

40 W 20TH STREET
NEW YORK, NY 10011
T 646.889.1402
F 212.727.1773
JAGUILAR@NRDC.ORG
NRDC.ORG
NRDCACTIONFUND.ORG

Please save paper.
Think before printing.



January 14, 2021
Chicago City Hall
121 N La Salle St,
Chicago, IL 60602

Submitted via email to: envcomments@cityofchicago.org

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NATURAL RESOURCES DEFENSE COUNCIL

40 W 20TH STREET | NEW YORK, NY | 10011 | T 212.727.2700 | F 212.727.1773 | NRDC.ORG

first_name last_name city state zip comment

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Chuck Jesse Chicago IL 60631 Thank you so much for your time.

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Clara Rebolledo Chicago IL 60632 Thank you so much for your time.

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Sarah Ludden Chicago IL

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Moises Sandoval Chicago IL

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Joan Smelkinson Chicago IL

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Paul Johnson Chicago IL

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Daniel Raichel Chicago IL

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Ronald Spears Chicago IL

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Randie Shapiro Chicago IL

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Thomas Behrendt Chicago IL

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Barbara Pohl Chicago IL

60618 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a pediatrician and your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Nahiris Bahamon Chicago IL

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Gabriel Judd Chicago IL

60602 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a Chicago, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

I work at Lurie Children's Hospital, and dedicate my career to try to keep Chicago kids healthy and safe. Allowing General Iron to move to the SE side of Chicago will put working class families of color, and many Lurie Children's patients, at risk.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Brigid Stegemoeller Chicago IL

60622 Thank you so much for your time.

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Alice Hargrave Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Richard Stuckey Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I, first, want to say, I think you are amazing and I am so happy you are our mayor.

Second, as your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Thank you so much for your time and all the amazing work you're doing!!! Seriously, YOU 60611 ARE AMAZING!

Kat Thigpen Chicago IL

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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W. D Chicago IL

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Gibson Glass Chicago IL

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lori deradoorian chicago IL

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Ellyn V Jung Chicago IL

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Ryan Lothian Chicago IL

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Susan Wolfe Chicago IL

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This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice. Now is the time to prioritize the health and well-being of all Chicago citizens...find another location for General Iron, or move them out of the city altogether.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Ellen Moderhack Chicago IL

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Matt Blackall Chicago IL

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Savanna Rhodes Chicago IL

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Danielle Matej Chicago IL

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Jonathan Hancock Chicago IL

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Jane Heron Chicago IL

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Behn Rudo Chicago IL

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Edwin Hernandez Chicago IL

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jane schmit chicago IL

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Erin Farlow Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Back in the '60s, I grew up on the SE side. Now I am dealing with Stage 4 metastatic breast cancer. For all I know it's all related. I had East/West confusion because while i knew the sunset was in the West, i also saw a glow in the East. Was from the steel mills. No doubt the COVID19 has made this way worse.

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Debra Gleason Chicago IL

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Hillary Geller Chicago IL

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Dana Latkow Chicago IL

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Pete Nixen CHICAGO IL

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David Hudzinski Chicago IL

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Dennis St. John Chicago IL

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Allie Ghaman Chicago IL

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Rachel Oleinick Chicago IL

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Scott Baker Chicago IL

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Kris Reilly Chicago IL

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Lauren Gonzalez Chicago IL

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Stephanie Mistretta Oak Park IL

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Lindsay Kaplan Chicago IL

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Hilary Austin Chicago IL

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Laura Long Chicago IL

60616 Thank you so much for your time.

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Benita Coffey OSB Chicago IL

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Cynthia Kegel Chicago IL

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donald hoffman Chicago IL

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Chris Law Chicago IL

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Andrea Jakubas Chicago IL

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Amy Squires Chicago IL

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Maureen Ellis Chicago IL

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David Thornton Chicago IL

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Ann Waller Chicago IL

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Whitney Wade Chicago IL

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Asha Lahiri Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent--one who helped to elect you--I ask you to deny environmental approval to General Iron for moving its facilities to the Southeast Side of Chicago.

No company that has violated the City of Chicago's environmental codes, been responsible for dangerous explosions and fires, and repeatedly violated public health regulations should be permitted to move wherever in Chicago it wants.

At the very least General Iron should be required to demonstrate a clean record for two (2) years before it is permitted to move.

And under no circumstances should it be permitted to move to a working class community already overburdened with pollution. To allow that is to condone and facilitate rampant racism.

So ... if you need an excuse to stall this horrific move until a fair and healthful local environmental policy can be developed, tell General Iron: probation and a clean record come first.

Alexandra Baehr Chicago IL

60637

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Bob Gendron Chicago IL

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Minna Greene Chicago IL

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Maria de la Rosa-Yo Chicago IL

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Debbie Kim Chicago IL

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LOREN VELASQUEZ Chicago IL

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Tommi Butler Chicago IL

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Daniel Polley Chicago IL

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Dennis McGee Chicago IL

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Elizabeth Roberts Chicago IL

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Renee Cortez Chicago IL

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Rudolph Gartner Chicago IL

60615 walk as well, if you please.

You have recently appointed a Sustainability manager to the city's payroll. You presented yourself as a steward of the environment during your election campaign to become the next mayor of Chicago. You talk a good talk, Mayor Lightfoot. Let's see you do the good

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Kristin Miller Chicago IL

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Mary Bennett Chicago IL

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And now, they want to move their facilities to a working-class community of color that's already burdened with pollution and a disproportionately high COVID-19 death rate.

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Lucy hoying chicago IL

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Joan Gray Chicago IL

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Steven Liska Chicago IL

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And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution. Harvard's recent study shows that people exposed to air pollution have a significantly higher mortality rate from COVID19, and as we know, communities of color are already disproportionately suffering from COVID19. This is an unconscionable double hit.

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Bonnie Bush Chicago IL

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Bernadine Karge Chicago IL

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Katherine Kasserman Chicago IL

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Oleg Evdokimov CHICAGO IL

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Kirsten Dunne Chicago IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Philip Englert Chicago IL

60660 Thank you so much for your time.

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Bill Nordstrom Chicago IL

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Renee Mann Chicago IL

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Vicki Joseph Chicago IL

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Eden-Lisa Kay Chicago IL

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Poll

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Judith Hersh Chicago IL

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Nicole Blackman Georgetown KY

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Jaclyn Wegner Chicago IL

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Linda Diaz Chicago IL

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Rachel Belkov Chicago IL

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Micaela Diaz Chicago IL

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Mary Naftzger Chicago IL

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Sarah Peters Chicago IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Alderman Vasquez:

As your constituent, I'm writing today to ask you to DENY General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Christine Long Chicago IL

60625 Thank you for your time, and for standing with your constituents.

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Christine Gnutek Chicago IL

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Renee Grigorian Chicago IL

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Marie Kielty Chicago IL

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Jean Sachs-Nygard Chicago IL

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Robert Anderson Chicago IL

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Thank you so much for your time.

This community has suffered too much already. Please stop the damage, NOW.

Gail Goldberger Chicago IL

60626

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Beth Ann Devine Chicago IL

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Lindsay Ansai Chicago IL

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Karen Schneider Chicago IL

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Matthew Goldrick Chicago IL

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Daniel Novak Chicago IL

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Kitty Slattery Chicago IL

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Katie Harej Chicago IL

60607 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderman Vasquez:

Keeping this one simple: let's not move General Iron to the south side. Let's not overburden our city's south side even further with a notorious polluter. That's some Captain Planet villain stuff. And yeah, that's also environmental racism in action. Looting and polluting, that's not the way.

Lincoln Park can handle it. It's already home to a lot of noxious personalities so they probably don't even notice the other pollutants. Just kidding obviously. But let's finally prioritize the health of vulnerable brown and black communities. Deny General Iron's environmental approvals immediately.

Kyle Raum Chicago IL

60625 Thanks!

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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steve adler chicago IL

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Josh Torrey Chicago IL

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Gary Courington Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

I grew up on the South East side - in an area called Fair Elms. I lived at 113th and Ewing Avenue. Not far from the Indiana Illinois state border. I lived there from 1947 to 1969. I have suffered from the effects of the terrible pollution there. When the steel mills shut down, the pollution lessened. Please Mayor Lori- don't subject the people living there now to the miseries my parents and my sibs and myself suffered from. Thank you for you consideration.

Diane Conrath Chicago IL

60631 Diane

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Johanna Thompson CHICAGO IL

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Payton McAbee Denver CO

80209 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Sean Bender Chicago IL

60625 Thank you so much for your time.

Dear Mayor Lightfoot, Chicago Department of Public Health, and my Alderman:

Please deny General Iron's environmental approvals to move facilities to the southeast side of Chicago.

General Iron was found liable for violating city environmental codes; they're responsible for dangerous explosions and fires; and they've been repeatedly shut down for health violations.

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Lisanne Freese Chicago IL

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Sarah Babu Chicago IL

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Seamus Cunningham Chicago IL

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Kim McCabe Chicago IL

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Corie Anderson Chicago IL

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Barbara Cochran Chicago IL

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Merry Bolt Chicago IL

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Robert Lifson Chicago IL

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Raymond Mudryk Chicago IL

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Tony Gray Chicago IL

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K Davis Chicago IL

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Susan Zimny Chicago IL

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Judith Nelsen Chicago IL

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Tim Hoyt Chicago IL

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Ce Baldwin Chicago IL

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Deb Arcabascio Chicago IL

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Amanda Cornelius Chicago IL

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately. Please do your job and protect your people, all of them, equally.

Thank you so much for your time and consideration! Prayers for you to stay safe and 60630 healthy during this time.

Assma Aldaeri CHICAGO IL

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Cynthia Givens CHICAGO IL

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Kathe Walton CHICAGO IL

60645 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a former resident of the Tenth Ward, I can attest to the often severe environmental problems caused by various polluting industries. Although I have moved to a different part of the City, I still have family and friends who live in Hegewisch, the East Side, or South Chicago. Therefore, as your constituent, I'm writing to ask that you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has a history of not being a good corporate "neighbor". It consistently has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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George Milkowski Chicago IL

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IvV°n Moreno CHICAGO IL

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R. Stephen Berry CHICAGO IL

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Bob Score Chicago IL

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Kirk Shellko Chicago IL

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Alyssa Soren Chicago IL

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Andrew Heiberger CHICAGO IL

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Dawn M Nothwehr Chicago IL

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Nora Kyger Chicago IL

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Justine Putnam Chicago IL

60626 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am counting on you to do the unequivocally correct thing and shut down General Iron. I expect you to live up to your stated concerns about the environment and environmental racism. Mayor, that is one of the reasons I supported you for Mayor even before you announced your candidacy. Do what is right.

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Jane Friedman Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Andrew Rowlas Chicago IL

60645 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Ann McCabe Chicago IL

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Amy England Chicago IL

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Linda Rydman Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Please respect the environmental health of all our residents, especially those in poor challenged communities.

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Janet Mroczek Chicago IL

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Cathy Leibovitz Chicago IL

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Stacey Weiss Chicago IL

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Edith Tovar Chicago IL

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"Only when the last tree has been cut down, the last fish been caught, and the last stream poisoned, will we realize we cannot eat money." ,Āi Cree Indian Prophecy

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Kathy Ruopp Chicago IL

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Leslie Shipley Chicago IL

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Tanuja Jagernauth Chicago IL

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Helen Hill Chicago IL

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Robert Kennedy Chicago IL

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Tina Albright Chicago IL

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A. Anne Holcomb Chicago IL

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Dawn Silver Chicago IL

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Alfredo Mac Laughlin Chicago IL

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Gloria Picchetti Chicago IL

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Joey Nakayama Chicago IL

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Terri Mankus Chicago IL

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Amanda Powell CHICAGO IL

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Victoria Sullivan Chicago IL

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Denise Diaz Chicago IL

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Jennifer Bogardus Chicago IL

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Wayne Garritano Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

I live in the 2nd Ward where General Iron violated its permits throughout the pandemic. Rather than afflicting an already overburdened ward with more pollution, let's take the opportunity to insist that General Iron change its practices.

Why should they be rewarded with a permit?

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Rachel Havrelock-Lai Chicago IL

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Pam Kmiec Chicago IL

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Rachel Krucoff Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Environmental Racism has no place in a community, especially one that already has been burdened with weak healthcare. This polluter needs to be moved to an area that is far from communities (regardless of economic status) and should be taxed on how much it pollutes. All companies that pollute should be taxed extra. It's not a secret that polluting hurts humans and the environment.

Ask yourself if you would want your family living in the community that you have allowed this company to move to?

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Veronica Menendez Chicago IL

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Lois Nowak Chicago IL

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Andrew Hellinger Chicago IL

60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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jane nye Chicago IL

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Naomi Leighton Chicago IL

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Rich Fennema Chicago IL

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Tyra Taylor Chicago IL

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Shirley JACKSON Chicago IL

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Mark Brooker Chicago IL

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

Additionally they have engaged in the "pay to play" Chicago politics that you promised to address during your campaign. Your promise to Chicagoans earned my vote.

It is regrettable that Governor Pritzker abandoned his "We're all in this together" philosophy that I heard him state every afternoon on NPR during the Covid-19 crisis and didn't find a way to intervene at the state level. I thought he presented to be on the side of the people during this time. My opinion of his sincerity to protect Illinoisans has been damaged with this decision.

You are the only hope for Chicago's environment and for the Southeast side neighborhood that shouldn't be saddled with this polluter in their neighborhood. General Iron has lied before about cleaning up their act, so what's different now?

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

Ruth Thuston Chicago IL

60654

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Larry Wisniewski Chicago IL

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Isabella Sacca Chicago IL

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Glenn Golden Chicago IL

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Virginia Witucke Chicago IL

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Rachel Lindsey Chicago IL

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Janice Frankel Chicago IL

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Dagmara Kalnins Chicago IL

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Susan Barnes Wheeling IL

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Kelly Bauer Chicago IL

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Denise Byrne Chicago IL

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Hillary Montgomery Chicago IL

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MaryAnn Kage Chicago IL

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joann butkus chicago IL

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Sandra Franz Chicago IL

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Armando Cuaya Chicago IL

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Rosalie Isaacson Chicago IL

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Sandra Laase Chicago IL

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Tim Paul Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron violated our environmental regulations, resulting in dangerous explosions and fires, and they've been shut down repeatedly for threatening our public health.

Now, during a pandemic, they want to move their facilities to a working-class community of color that's already burdened by toxins? Absolutely not.

This is environmental racism, as if we don't have enough racism in Chicago to eradicate. We cannot stand for it.

Put people of color over corporations. Deny General Iron's environmental approvals today.

Michael Rudden Chicago IL

60614 I thank you in advance for doing what's right and standing by the citizens of your city.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Noelle Lara Chicago IL

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Eva Silverman chicago IL

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Rita Cardoso Chicago IL

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Maureen Koneval Chicago IL

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Gayle Blakeslee Chicago IL

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Haim Izrael Chicago IL

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Margaret Lanterman Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I KNOW YOU HAVE GREAT CONCERN FOR THE ENVIRONMENT IN GENERAL AND FOR CHICAGO SPECIFICALLY.

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Pamela Smith Chicago IL

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Maureen Howard Chicago IL

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Joy White Chicago IL

60645 Thanks, Mayor, for so much of what you do. Add this to the list please.

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Linda Johnson Chicago IL

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Clive Riseam Chicago IL

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M.E. Johnson Chicago IL

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Kate Rooney Chicago IL

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Ellen P Ayalin Chicago IL

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Kristen Hawkins Chicago IL

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Margaret Ladner Chicago IL

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Milos Kovacevic Seattle WA

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Tamia Webb Chicago IL

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Iris Rudnick Chicago IL

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Claire Stuart Quinta Chicago IL

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Marene Babula Chicago IL

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Sonia Cszasz Chicago IL

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Patrick Maloney Chicago IL

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We, United Citizens of Chicagoland... demand Governor Pritzker renounce his reckless plan, granting a permit to General Iron, and Do the Right Thing, by utilizing his mighty sway and entitled influence to protect and provide the people of Chicago a safe environment and community to live work and play and not "handing over the keys" to a dirty,

Robin Gols Chicago IL

60656

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Colleen O'Brien Gloucester MA

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

David Crim Brookport IL

62910 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Scott Cowan Chicago IL

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Kelsie Strobel Chicago IL

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Mikel Villalobos Chicago IL

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Meredith West Chicago IL

60622 Thank you so much for your time.

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Oscar Estrada Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderwoman Garza:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

When my family immigrated here in 1958, the southeast side was a true land of opportunity. At that point, while we were heavily polluted, there were limitless job opportunities which made it possible for my parents to provide for nine children without public assistance. I can still hear the sounds of the steel mills surrounding us, the bustling commercial district and the sea of cars passing my house at the end of each steel mill shift. While prosperous, eventually our community's health paid a heavy price. My family has experienced asthma, cardiac failures, lung disease and cancers. With the arrival of General Iron, our community stands to suffer from yet more pollutants and to add insult to injury, there will be no financial or employment gain to the very population that must sustain it.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Rita Alvarez Chicago IL

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Robert Uptain Chicago IL

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Bette Reskey Chicago IL

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Nancy tibbits Elmwood Par IL

60707 Thank you so much for your time.

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Valeria Duron Chicago IL

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Jana Scalzitti Chicago IL

60606 Thank you so much for your time.

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Michelle London Chicago IL

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Stephanie Klenotich Chicago IL

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Olivia Zeb Chicago IL

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james eichman Chicago IL

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Rita Sarkes Chicago IL

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Thank you so much for your time.

Sincerely,

Joseph Tanke Chicago IL

60638

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Araceli Aponte Chicago IL

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Thomas Frohlich Chicago IL

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Josef Goldufsky Chicago IL

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Julie Lakehomer Chicago IL

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Sandra Marquez Chicago IL

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Arthur Burzykowski Chicago IL

60634 Thank you so much for your time.

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Edward Torres Chicago IL

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Michele Rosado Chicago IL

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Gabriella Brown Chicago IL

60647 Thank you so much for your time.

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Beatriz Beckford Chicago IL

60653 Thank you so much for your time.

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Taylor Dewitt Carmel IN

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Sully Wilson Santa Fe NM

87508 Thank you so much for your time.

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

In addition, the Southeast side is home to Calumet Park and Rainbow Beach, for a total of almost 300 acres that serve as the backyard to the residents of the Southeast side. It is vital that we keep our community healthy.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Maria Hernandez Chicago IL

60633

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Southeast Chicago does not deserve to suffer from another environmental burden. Deny General Iron's environmental approvals immediately.

Allyn Gordon Glendale heig IL

60139 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Amy Argentar Boston MA

2215 Thank you so much for your time.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Marla Di Benedetto Liberty MO

64068 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman: Suzan Garza

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Sophia Vela Chicago IL

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Angelica Cornejo Chicago IL

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Hannah Obenaus PA

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Lee Vaughan Chicago IL

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Ellysha Chavez Auburn CA

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Maria Ortiz Chicago IL

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Rosalina Alejo Chicagi IL

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Megan Rupp Chicago IL

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Humberto Martinez Chicago IL

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Daniela Selagea Chicago IL

60641 Thank you so much for your time.

Dear Mayor Lightfoot,

Please do everything in your power to prevent the relocation of General Iron to the Southeast Side. The south side has historically been occupied by metal and chemical plants, mills, landfills, and food processors which have left their carcinogenic waste in the water and smoke in the air. To add yet another polluter to this area would be to further the injustices inflicted upon the working class communities of color that live here.

As Mayor of Chicago, you have the opportunity and responsibility to not only prevent such injustices from happening, but also to remove the ones that are present already. Please try to keep General Iron from moving to the southeast side, and please impose stricter environmental regulations upon the conduct of General Iron and other industrial facilities in Chicago. Please make sure these facilities are checked frequently to ensure they uphold these standards (General Iron, for instance, has not upheld such standards in the past).

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Thank you for listening.

Take care,
Elena Sparrow

Elena Sparrow Chicago IL

60637 Life-long Hyde Park resident

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Lisa Heiberger Chicago IL

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Tessa Denison Carpinteria CA

93013 Thank you so much for your time.

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Ann Phillips Chicago IL

60646 Thank you so much for your time.

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Daisy Magana Chicago IL

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Kevin Carroll Chicago IL

60626 Thank you so much for your time.

Dear Chicago Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Well, our "Independence Day Holiday Weekend" is about ready to begin! Besides get-togethers with family and friends (under COVID-19 restrictions), this is also the time to reflect upon the 'core' Jeffersonian values which our nation was founded upon. Promoting environmental protection and environmental quality, and fighting environmental racism, are a part of the "New Patriotism" ('Green Is the New Red, White, and Blue'). CONTINUING ON, I AM REQUESTING THAT YOU DENY GENERAL IRON'S ENVIRONMENTAL APPROVALS TO MOVE ITS FACILITIES TO A WORKING-CLASS NEIGHBORHOOD OF COLOR ON THE SOUTHEAST SIDE OF CHICAGO!!

Being a notorious metal shredding polluter, General Iron has been found liable for violating the City's environmental codes, they have been responsible for dangerous explosions and fires, and they have been shut down repeatedly for public health violations.

Now, in the middle of the COVID-19 crisis, they want to move their facilities to a neighborhood of color that is already burdened with pollution. This is environmental racism in action—and is indicative of the type of injustice which neighborhoods of color in Chicago are forced to deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 Pandemic and the movement for racial justice.

DENNIS R. NE Energy-Envirc Chicago IL

60680 Please prioritize the health of Chicago's most vulnerable residents over industrial profits.

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John Stoner Chicago IL

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Karen Daiter Chicago IL

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Ethan Saltzberg Chicago IL

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Peggy Boyer Long Chicago IL

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Josie Upton Carmel IN

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Deloris Culpepper Chicago IL

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Kelsey Woods LISLE IL

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Heather Ervin Chicago IL

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Ken Irwin Chicago IL

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Bridget Heneghan Chicago IL

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Elisabeth N.

IL

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Leo uribe

Burnham IL

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Beatriz Diaz Chicago IL

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James Anderson Chicago IL

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Meredith Hawley Chicago IL

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Dianna Uchida Chicago IL

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Laura Salazar CHICAGO IL

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Marci Rogal Kalamazoo MI

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Leuise Crumble Chicago IL

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Joe Fong Chicago IL

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Jordan Micus Chicago IL

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Sharon Rolek Chicago IL

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Whitney Richardson Chicago IL

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Maria Medina Chicago IL

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Li Bloom Chicago IL

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Kathleen Gadarowski Chicago IL

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Bonnie Fritz Chicago IL

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MARY ASPROYERAK CHICAGO IL

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Our community has been the city's dumping ground for far too long and we're sick of it - literally!!! Stop the move NOW!!!

Mary Esquivel Chicago IL

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Thomas Sarelas Chicago IL

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Alexandria Romasanta Chicago IL

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Evan Callan Chicago IL

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Danielle Elliott Chicago IL

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Will you place the safety and health of the people of Chicago foremost, as you have sworn to do? It is your job to do so. These are the people you work for.

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Hope Barnes Chicago IL

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kati llewellyn austin TX

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Mathew Patalano SANTA FE NM

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Craig Bostick Jamaica Plain MA

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Howard Mock chicago IL

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Raul Insurriaga Chicago IL

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Isidro Nuno Chicago IL

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Sandra Nuno Chicago IL

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Brenda Velasco Chicago IL

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Iris Kozisek Aurora CO

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Alderman Hopkins:

I'm writing today to ask you deny environmental approvals for General Iron's move to the Southeast Side of Chicago.

General Iron has a proven history of bad actions. They've been found liable for violating Chicago environmental codes. They've been responsible for dangerous explosions and fires. They've been shut down multiple times for public health violations.

Now, in the middle of the COVID-19 crisis that already disproportionately impacts Chicago residents of color, they have gotten approval to move their facilities to a working-class community of color to add to the pollution that already suffers from higher levels of pollution and a resultant decrease in the health of residents.

This, clear and simple, is environmental racism in action. Although the inequalities that exist in our city are by no means new, you have a new opportunity to start to address them now.

In light of the impacts of COVID-19 on communities of color and the growing movement for racial justice, you must prioritize the health of Chicago residents over industrial profits. Protect the health and the lives of your constituents and fellow citizens. Deny General Iron's environmental approvals immediately.

Kathryn Antonatos Chicago IL

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Norma Corona Chicago IL

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Patricia Hunt Chicago IL

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Jeremy Hoff Chicago IL

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We need your time to address the issues of the 10th Ward. We need so much more than 60633 more pollution!

Lisa Sowa-Downs Chicago IL

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Anna Gallardo Chicago IL

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Elizabeth Osorno Chicago IL

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Mia Cinquini Chicago IL

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Geri Collecchia Chicago IL

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Doreen Merich Chicago IL

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Claire Poelking CHICAGO IL

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Jake Anderson Chicago IL

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Blake Lenoir CHICAGO IL

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Colleen Burgess Chicago IL

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Eva Murillo Chicago IL

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Meaghan Pedjoe Shrewsbury MA

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Eve Dean Denver CO

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Lara Bond Cambuslang Scotland

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Katelyn Luff SASKATOON SASKATCHEW.S7H 2H1

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Kassidy Fodor Costa mesa CA

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Joshua Roth Chicago IL

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Claudia Vickrey Chicago IL

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Andrea Banks Chicago IL

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Carol Wu Des Plaines IL

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Evan Tracy Chicago IL

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Eugenia Huang Chicago IL

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Mary O Shea prospect heig IL

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Christopher Devine CHICAGO IL

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Lorena Hinojosa Brookfield IL

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Michael Lahey Chicago IL

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Gabriel Judd Chicago IL

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Sheron Shapiro chicago IL

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Lynn Harvey Chicago IL

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Claire Johnston Chicago IL

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Nancy Berg Chicago IL

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Jamie Reifman Chicago IL

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robin houghton chicago IL

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Pamela Pluta Chicago IL

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Austin Heredia Chicago IL

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WANDA THOMPSON Chicago IL

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Julie Deignan Chicago IL

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Carolyn Holmes Chicago IL

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Cynthia Andersen Elk Grove Vill IL

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Karen Stacey Chicago IL

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Chelsea Wiedemann Chicago IL

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Maria Gonzalez Chicago IL

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Cynthia Dietzmann Wilson WY

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Dr. Seth Parker Wood Chicago IL

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Mark Shippy Chicago IL

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Chris Apap CHICAGO IL

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Jeffrey Schomer Chicago IL

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Susanne J. Klein Chicago IL

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M A Evanston IL

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Elizabeth Klein Chicago IL

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Macaire Grambauer Chicago IL

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Ellen Domke Chicago IL

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James Kempner Chicago IL

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Irene Berkey Chicago IL

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Mario Zdybel Chicago IL

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Amanda Summers Chicago IL

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Rachael Solone Chicago IL

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Anastacia Holden Chicago IL

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Carol Spiegel Chicago IL

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Dennis Tom Chicago IL

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ahmad abdul rahman Chicago IL

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Barry S. Finkel Chicago IL

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laura anderson Chicago IL

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Janie Wilkie CHICAGO IL

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Paul Bennett Chicago IL

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Roxanne Glasser Chicago IL

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Kathleen Osberger Chicago IL

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Wendy Olmsted Chicago IL

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John LaMantia Chicago Cook IL

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Deborah Fenner Chicago IL

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melanie moore chicago IL

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Albert Legzdins Chicago IL

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Joann Williams Chicago IL

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Deeana Mendoza Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jeff Glenn Chicago IL

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Margaret Aguilar Chicago IL

60613

Prove you have the health and welfare of all of the residents of the city as a first priority, above the interests of a business that is a bad neighbor and environmental polluter—regardless of its political contributions and clout.

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Albertine Guy Chicago IL

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Thomas Russell Evanston IL

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Erin Orozco Chicago IL

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Paul Fagen Chicago IL

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Sara Strahan Chicago IL

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It's way past time to be looking out for your constituents and not big business.

Elizabeth Igoe Chicago IL

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Terra Levin Chicago IL

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Judith Izzi Chicago IL

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Penny Blubaugh Chicago IL

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Jenny Kendler Chicago IL

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William Olmsted Chicago IL

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Cathie Sekendur Chicago IL

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Drina B Chicago IL

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Stephen Bauser Chicago IL

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Rita Crowley Chicago IL

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Ana Cots Chicago IL

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Sara Guernsey Chicago IL

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Benjamin Wimmer Chicago IL

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

The teachers and students at George Washington high school and our many local feeder schools, many of whom already suffer from a variety of health and breathing issues, will fight tirelessly to protect our children and families from this unjust, financially motivated decision which will further devastate this underserved community of hard working immigrants and predominantly minority families.

Do the right thing, or expect a long lasting fight with the entire South East side. The people in our community will defend our neighborhood and protect our children.

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Nancy Anderson-Gri Chicago IL

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This move seems to have originated and hidden under the massive (and well deserved) publicity of the coronavirus. We must deny such a crushing blow to our efforts toward a clean environment for "even" the South Side of Chicago.

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Joyce Swedlund Chicago IL

60637

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderman Waguespack:

As a long-time Northsider, I know first hand how dirty and polluting General Iron industries can be. Therefore, I find it unconscionable that we are moving it to a diverse, working-class neighborhood that doesn't want it either. In our collective desire to see a more just City of Chicago, this seems like a fantastic place to start.

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Frances Eaton Chicago IL

60657 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has a long record of irresponsible behavior, with explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Make a decision based on something other than money and connections. Show moral guidance.

Deny General Iron's environmental approvals immediately.

Jeffrey Rovner Chicago IL

60659

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Izabella West Chicago IL

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Jessica Guzlas Chicago IL

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Cathie Van Wert Chicago IL

60641 Thank you so much for your time, and for your immediate attention to this matter.

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Nancy McAdam Chicago IL

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Anita Lendway Chicago IL

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Alexander Filippini Chicago IL

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Vivian Watkins Chicago IL

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Adele Wegner CHICAGO IL

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Maureen Mooney Chicago IL

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Dara Reiff Chicago IL

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Kimball Wright Chicago IL

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Charmaine Rogers Chicago IL

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Christian Guajardo Chicago IL

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Giselle Hernandez Bolingbrook IL

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Monzerrat Diaz Chicago IL

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Jamie Richards Chicago IL

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Dara Rubin Chicago IL

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Helen Banta Chicago IL

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Melanie Kane chicago IL

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Deanna Andrews Chicago IL

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Molly Older Chicago IL

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Elissa Marcus Chicago IL

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Lauren Bell Chicago IL

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Soo Jong Chicago IL

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Michael Reed Chicago IL

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Yuliya Pieletskaya Chicago IL

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Sitoshna Ghuru Chicago IL

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Renate Gokl chicago IL

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Georgina Garcia Chicago IL

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General Iron has been found liable for violating the City's environmental codes.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution? This makes zero sense.

This is environmental racism in action — and I would hope Chicago can stand up to polluters and racism everytime!

Ontop of that, companies that are major polluters should be shut down? Why are they open when there are other alternatives? Don't you want to save our earth and the people on it?

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Dont do this for Capitolism. Dont do this for money. Do this for the people.

Diana Benocilla Chicago IL

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Cynthia Suarez Chicago IL

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Melanie Plank Chicago IL

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Carol Bruns Wheaton IL

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Magdalena Boland Chicago IL

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Glenda ODell Montgomery IL

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Amber Moore Chicago IL

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David Lorenc Chicago IL

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Kristina Tamutyte Chicago IL

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Deb Bourne Naperville IL

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Eliss Kohr Skokie IL

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Adoree Dunn Chicago IL

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Zahara Campbell Chicago IL

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Anna Schoenberge Downers gro IL

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HELEN GUNN Chicago IL

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Chloe Pruett Glen Ellyn IL

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Julie Martinez Chicago IL

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Jenna Ludwig Chicago IL

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Ryan Schreder Wilmette IL

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Diana Rolnicki Elgin IL

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Kelly McInnis Chicago IL

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Corey Allbritten Chicago IL

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Suzanne Dunn Chicago IL

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Chad Roat Broadview IL

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Nikki Krzebiot Chicago IL

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Scottie Akines Chicago IL

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Sally B. Van Wert Sun City Wes AZ

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Katelynn Soto Chicago IL

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Jasmine Wong Chicago IL

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Philip Rudolph Chicago IL

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Allowing companies such as General Iron to move their facilities to neighborhoods that have already been intentionally marginalized through years of racist policies continues to send the message that Chicago stands for this kind of systemic racism. I urge you to

Lindsay Miner Chicago IL

60625 research cases such as the pollution in the 5th and Hill neighborhood of Champaign where

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Meredith Lee Chicago IL

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Elizabeth Tsui Chicago IL

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Mary Murphy Chicago IL

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Nell Jones Evanston IL

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This is environmental racism in action — and it,Ãs one of many injustices that communities of color in Chicago deal with every day.

There,Ãs a chance to lessen the gap between the marginalized and the powerful and lessen the wrongs perpetrated by our current system.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Taylor Brown Chicago IL

60641 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Damon Cook Chicago IL

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Andrew Hayes Chicago IL

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John Martin Evanston IL

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Thank you so much for your time.

Regards,

Alicia Dutkiewicz Chicago IL

60654 Alicia D.

First the demolition in Pilsen, now General Iron being allowed to move south . When will you stop allowing businesses to harm working class poc communities?

They have violated numerous codes and laws, so much so that they've been shut down for various public health violations. This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

You need to put people, particularly black and brown people, before profit by taking back General Iron,Ás approvals.

Meghan Sovell Chicago IL

60625 Best,

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman: Michele Smith

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Elena Mulcahy Chicago IL

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Lindsey Hegarty Chicago IL

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Judith Pell Homer Glen IL

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Carolyn Campbell Chicago IL

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Cillian Cullina Chicago IL

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Ian Phillips Chicago IL

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Miriam Chinkers Chicago IL

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Emily Guzman Chicago IL

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Medina Karic Chicago IL

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Bryan Bosque Chicago IL

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Sean Doumas Chicago IL

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Daniel Fiedler Chicago IL

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Marie W Tinley Pk IL

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Mary Ellen Channon Chicago IL

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Adam Zmick Chicago IL

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Vanessa Soliz Champaign IL

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Sonia Lopez Chicago IL

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Madeline Thompson Chicago IL

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Joy Kolodny Chicago IL

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Carolyn Jones Chicago IL

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Kate Ellbogen Chicago IL

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Marina Lopez Chicago IL

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Kelsey Overberg CHICAGO IL

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Ronald Fritz Chicago IL

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Phyllis Cole Chicago IL

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Teresa Greco Chicago IL

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Leslie walle-santos chicago IL

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Lauren Wilkin Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to demand you deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. So really, they should receive a hefty slap on the wrist.

As you SHOULD know, working class communities of color typically live in more polluted areas already. This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the pandemic and the movement for racial justice.

Prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Ashley Mei Chicago IL

60616 Thank you for your time, I hope to hear good news soon.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent and as a Registered Nurse, I'm writing today to highly consider you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago, where I currently reside and am acutely aware of the health problems the community faces.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Asron Betton Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Eliz Benney Chicago IL

60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Mayor Lightfoot made promises during her campaign and after taking office to advocate for Chicago's most vulnerable communities. So far, she has done very little to make good on those promises. Please deny General Iron's environmental approvals!

Monica Lim Downers Gro IL

60515 Alleviating pollution burden is one step toward de-segregating Chicago as a whole and

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Angie Ostrowski Chicago IL

60605 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Bridgette Wilson Chicago IL

60641 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Wingate Steitz Chicago IL

60660 Thank you so much for your time.

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Josiah Miller Chicago IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution. These families do not always have as many resources available as the more privileged Lincoln Park residence do, especially including having their voice heard and taken seriously in Chicago politics.

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Rebecca Whittenhall Chicago IL

60609 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Katie Carey Algonquin IL

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Ken Berg Bloomingdale IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Gwenyth TRUE Chicago IL

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Steven Keiser Chicago IL

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Rosalie McMenammin CHICAGO IL

60622 Thank you so much for your time.

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Kristina Dehlin Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Gina Collier Chicago IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Serena Westcott Chicago IL

60630 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is a perfect example of environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Priscilla Tang Chicago IL

60608 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Rahul Wadhvani Chicago IL

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Natalie Infantes Skokie IL

60076 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Isabelle walker Chicago IL

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Elizabeth Rzepecki chicago IL

60659 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Olivia Parwana Chicago IL

60622 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to demand you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Anya Safford Chicago IL 60601

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Liliana Galic Oak Park IL 60302 Thank you so much for your time.

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Alex Harris Chicago IL

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Monica Detres Chicago IL

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Caroline Cotto Chicago IL

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Karla Valadez Chicago IL

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Felix Acuna Chicago IL

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M C Wheaton IL

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claire salman Downers Gro IL

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Bamboo Solzman Chicago IL

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Alison Moro Lombard IL

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Anna Hinton Chicago IL

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Will Hobbs Chicago IL

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Alejandra Vargas Chicago IL

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Victoria Jackiw Erlangen Bavaria

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Riley Meyer Apt. 3 IL

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Jennifer Chiaramonte Clarendon Hill IL

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Elizabeth Roberts Chicago IL

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Kristina Peoples Chicago IL

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Kari Kan Lake Forest IL

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James Schlesinger Chicago IL

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Allison Elkins Boulder CO

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Mellanie Barnes Chicago IL

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Doreen Sayegh chicago IL

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Brittany Johns Chicago IL

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Matt Casey Chicago IL

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Grace Searles Schaumburg IL

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Lily Maluck Bolingbrook IL

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Lennon Murphy Chicago IL

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Alice Stewart Chicago IL

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Sarah Faith Chicago IL

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Ashleigh Edwards Chicago IL

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Nina Ewinj Chicago IL

60605 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am a resident of St. Paul, MN, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Karen Henry Lauderdale MN

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Annette Alonzo Cicero IL

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Paloma Campillo Oak Park IL

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Adolfo Luna Chicago IL

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Cheryl Richardson Chicago IL

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Stephanie Bliese Elmhurst IL

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Lily Papaleo Chicago IL

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Rose Bielamowicz Chicago IL

60612 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am a working class woman and this is unacceptable. As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Allison Lindahl Chicago IL

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Tara Galal Chicago IL

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Alexandra Effrein Chicago IL

60607 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Elizabeth Scheffler Skokie IL

60077 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Connor Judd Chicago IL

60613 Thank you so much for your time.

To whom it may concern,

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. This company has proven they will violate the city's environmental codes, they have been shut down repeatedly for public health violations.

Right now, in the middle of the COVID-19 crisis, as you know, families are suffering. Especially people of color. General Iron wants to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Althea MacMillan Chicago IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice. Enough is enough.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Sophia Paul Rolling mead IL

60008 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Roxy Pelagio Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Capri Abernathy Chicago IL

60618 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Heather Hayden Chicago IL

60610 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Janis O'Neill Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Miguel Garcia Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Janet Duran Romeoville IL

60446 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

diana kolaski chicago IL

60654 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Heather Gonzalez Chicago IL

60622 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I, a Logan Square resident, am writing today to ask you to deny the approval of General Iron's move.

They have been found liable for violating the City's environmental codes, and been shut down repeatedly for public health violations. I think they need to stay in place and correct their wrongdoings, proving that they can work safely before moving to another neighborhood and burdening them.

Additionally, the move to a predominately black area certainly seems to follow trend of racially charged decision making of the past.

Please prioritize the health of residents and ecology over industrial profits. Deny General Iron's environmental approvals immediately.

Tyler Hartshorn Chicago IL

60647 Thank you.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Sherry Kraft Chicago IL

60645 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Elizabeth Burke Evanston IL

60202 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Emily Gross Chicago IL

60605 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. Allowing corporations and large-scale companies to occupy working class neighbourhoods only deepens institutionalised racism within our communities.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. There is no reason why a company like this should be allowed near neighbourhoods - whatever their socio-economic status.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution. THIS IS NOT OKAY.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Meg Kobza Chicago IL 60608

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Kristen Ritchie Chicago IL 60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Antonette Slater Chicago IL

60633 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am diagnosed with COPD and clean air is critical to my health and well-being especially living on the South side of Chicago.

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Katrina Ryan Chicago IL

60616 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Mia Hakenen Glencoe IL

60022 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Ivana Bukvich Chicago IL

60626 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Megan Klein-Zrihen Chicago IL

60631 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Thomas Quinn Evanston IL

60201 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jaclyn Kubek Chicago IL

60608 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Christina CVzrdova-He Chicago IL

60608 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Marissa Fischer Harwood Heil IL

60706 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jacqueline Duran Berwyn IL

60402 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderwoman Garza:

As a resident of the SE side, I'm asking you to deny approval of General Iron's move into my neighborhood.

Too many such polluters have found home near my home. I'm sure you know General Iron's record, it's not for nothing they're being run out of a more affluent neighborhood up north, but please do not let them be another on the list of industrial polluters on the SE side. This type of environmental and racial injustice is not new, we've been dealing with it over and over with little relief. Please take another look and reconsider adding to the difficulties of my struggling and marginalized neighbors.

Please put the health of Chicago's most vulnerable residents over industrial profits and deny General Iron's environmental approvals.

Kyle Schlie Chicago IL

60617 Thank you for reading.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Amy Klimkowski Chicago IL

60642 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Joseph Smithy Los Angeles NY

10001 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Kripa Khanal Arlington Heights IL

60004 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Michelle Schallmo wheaton IL

60187 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Rebecca Snyder Chicago IL

60642 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Steven Schnorr Chicago IL

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Alex K Chicago IL

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Erica Henry Chicago IL

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Ashley Villarreal Chicago IL

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Samantha Janas Chicago IL

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Valerie Katzenberg Chicago IL

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Benjamin Mengebier Chicago IL

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Caitlin DesSoye Evanston IL

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Kristen Finnegan Chicago IL

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Kevin Prorise Chicago IL

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Miriam Chavez Chicago IL

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Maya David Garcia Chicago IL

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Kaitlin Owen Chicago IL

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Alex Lovely Chicago IL

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Keri Poma Hometown IL

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Emily Gryglak Chicago IL

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Tim Plewa Chicago IL

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Mikaela Lind tinley park IL

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Brian Chapman Chicago IL

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Evelyn Gonzalez Chicago IL

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Mike Talladen Chicago IL

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Tyler Dedrick Chicago IL

60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am a former CPS student and currently attending Northwestern University. I am writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

Corporate America, in conjunction with the US government, is making embarrassing, racist, and problematic decisions everyday that shows how little the American government cares about minorities and the lower class. And now, in the middle of the COVID-19 crisis, General Iron wants to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, as seen with the visible segregation of the city, lack of action to protect to its black citizens, and the disregard of lower class communities, we have a new opportunity to address these inequalities in light of the COVID-19 pandemic and the movement for racial justice.

Maya James Chicago IL

60615 It is your duty to protect and provide for your citizens. It is not your duty to be a corporate

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Vanessa Alvarez Chicago IL

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Curly Sue Oruga NE

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The Southeast Side of Chicago has enough pollution from the BP plants and others near Whiting, Indiana. We do not need another one.

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Zoila Lopez Chicago IL

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

COVID-19 being a respiratory based illness especially, polluting the air is doubly dangerous to citizens in your city.

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Anna DiTucci cappi Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

I realize you face a lot of pressure to get General Iron out of Lincoln Park; those constituents have powerful connections in the city. But we have to stop our society's practice of making the working class and poor pay, and denying them their right to clean air and a clean environment. This is a chance to demonstrate to Chicagoans with YOUR action, by treating south siders equitably and not sending the north side's pollution elsewhere.

As you know, General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Susan Sattell Chicago IL

60640

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kim berley chicago IL

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Ellis Fagan Chicago IL

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Meredith Fischer Harwood Heights, IL

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Eden Ezsak Chicago IL

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Carla Winterbottor Chicago IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Rahul Ramkumar Buffalo Grove IL

60089 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, Patrick Thompson

I'm writing today as a concerned neighbor to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Mable Palombo Chicago IL

60616 Thank you

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Meghan Aines Northbrook IL

60062 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderman Rossana Rodriguez-Sanchez,

Hello. My name is Karena Anderson Rodriguez. As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice. Let's stop the injustice from piling on even more, at the very least. To allow this to happen in the current circumstances is a slap in the face to those working so hard to stop the horrors experienced by BIPOC in our city. Continue to support the work being done to make Chicago just as safe and welcoming for the most vulnerable communities as it is for the most affluent. General Iron cannot be a part of that thriving city.

Karena AndersonRod Chicago IL

60625 Please prioritize the health of Chicago's most vulnerable residents over industrial profits.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

My name is Molly Berkson and I live in the Hermosa neighborhood. I'm writing to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution. This move could turn this deadly disease even deadlier, as pollution weakens the respiratory system.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Molly Berkson Chicago IL

60639 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Gloria Barajas Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Colin Phillips Chicago IL

60608 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Colleen Kingsbury Oak Lawn IL

60453 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Melanie Molnar Chicago IL

60657 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Dionne Smith Chicago IL

60637 Thank you so much for your time.

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Marvin Aguilar Chicago IL

60613 Thank you so much for your time.

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sylvie bendier chicago IL

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Steven Rajewski Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Jaime Venegas chicago IL

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Lisa Daleiden Chicago IL

60707 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Evan Turcotte Chicago IL

60618 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

John Leen Chicago IL

60625 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to tell you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

WHAT YOU'RE DOING TO THE WORKING CLASS COMMUNITIES IN CHICAGO IS WRONG! POLLUTING OUR AIR, WATER AND LAND BY GRANTING PERMISSION TO CHICAGO LAND. I AM BEYOND DISGUSTED IN HOW YOU'VE BEEN TREATING CHICAGO LIKE ITS YOUR PERSONAL PIGGY BANK TO SUPPORT CORRUPT CAUSES. YOU MAKE ME SICK TO SAY THAT I FATHOMED THE IDEA OF VOTING YOU IN AT ONE POINT.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Maureen Ryan Chicago IL 60638

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Kent Leng Barrington IL 60010 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Denise Nora Winnteka IL

60093 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Joseph Rosga Chicago IL

60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Ellen Shieh Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Gilberto Lopez Chicago IL

60641 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day. Everyone deserves the right to safety, and to live unburdened by the threat of environmental weapons being slow release deployed in their neighborhoods. The neighborhood is a neighborhood of color, those who live there already exist precariously due to systemic racism and a calculated lack of resources on behalf of the state. Do better by our communities of color. Do not allow this catastrophe to happen in this, or any neighborhood filled with vulnerable people!

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. 60616 Deny General Iron's environmental approvals immediately.

Erin Miller Chicago IL

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Marisela Garcia Chicago IL

60609 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Jenny Andersen Waukegan IL

60085 Thank you so much for your time.

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Susana Rivas Chicago IL

60642 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Riley Cook Chicago IL

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Rebecca Schmidt Chicago IL

60657 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Arielle Rogers Chicago IL

60640 Thank you so much for your time.

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Katie Keating Chicago IL

60657 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderwoman Maria Haddon:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Wendy Caspersen Chicago IL

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Kara Wilkinson Chu IL

60660 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Kimberly Roberts Chicago IL

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Carolina Fragoso Chicago IL

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Artemis Asproyerakas Chicago IL

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Jazan Northrop Chicago IL

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Care Allen Chicago IL

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Andrea Hernandez Chicago IL

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MaryKate Smith chicago IL

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Candace Williams Chicago IL

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Karen Hunter North Barrington IL

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Camille Swift Chicago IL

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Alexa Laureano Chicago IL

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Jessie Lenning Hoffman Esta IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago, an area of the city already polluted and at greater risk for cancer, respiratory illnesses, and asthma because of PetCoke.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Gizelle Alvarez Chicago IL

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Gisela Schmidt Chicago IL

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Haley Cannon Chicago IL

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Alynn McCormick Chicago IL

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McGarrah Wilson Chicago IL

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Diana Barthelemy Chicago IL

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Destanee Rudd Chicago IL

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Laura Espinoza Chicago IL

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dennis shea evanston IL

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As you continue to ponder how to support the Black Lives Matter movement and to reinvigorate Chicago's poorest communities, consider the effects of environmental racism. Facilities like General Iron's impact the health of communities and families. No community wants pollution in their neighborhood but the solution cannot be to send polluters to Black and brown communities just because it's cheaper or fewer people will fight back.

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Raven Thompson Brookfield IL

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And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution. In Louisiana and Texas we've seen that communities burdened with environmental issues are more likely to suffer more from COVID-19. We can't willingly and knowingly put a Chicago community in that situation.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day. I go to university in Houston, and I've taken classes on environmental injustices. I've been lucky to never face them myself, but many are not. And when environmental issues affect a community, they impact literally every aspect of that community. Environmental racism becomes overwhelming and stops the community from being able to function as they'd like. It results in major health issues, housing issues, employment issues, and so on. We cannot allow these issues to be introduced into any community in Chicago, but especially not a community of color since they already suffer so much.

Annelise Goldman Evanston IL

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Joe Fischer Harwood hts IL

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JILLIAN BREWER CHICAGO IL

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Chicago Department of Public Health, and my Chicago Alderman:

LISTEN, READ, TAKE ACTION!!

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. If that,Ãs not reason enough, then please, keep reading....

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Cathryn Shiel Chicago IL

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david Leon Chicago IL

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Alex Burg Chicago IL

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Daniel Vicens Des Plaines IL

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Nadia Zurita Chicago IL

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Claire Yeske Chicago IL

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Adriana Reyes Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Ali Andarcia Chicago IL

60615 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderman Gardiner:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Megan Humphrey Chicago IL

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Kelsey Wagner Chicago IL

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Mickey Gallardo Chicago IL

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Jaden Ownby La grange IL

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Ryan Clark Chicago IL

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Thomas Russell Chicago IL

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Shirley Cotrina Tampa FL

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Claire De Leon Chicago IL

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Natalie Pierce Chicago IL

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Allyson Rupe chicago IL

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Tricia Mccann Chicago IL

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Ben Al CHICAGO IL

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Kathy Kane Oak Forest IL

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Ruth Chen Chicago IL

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Laura Davalos Chicago IL

60632 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I,Ãm not against recycling cars. That,Ãs easy to support. But I am for requiring that it be done in a manner that doesn,Ãt pose a risk to the surrounding community, or greater environmental good.

I,Ãm sure that if this facility is in a wealthier community, e.g. where I live in Logan Square by Wrightwood and Bernard St., that it would face the scrutiny and oversight that would make sure the work is done responsibly.

Let,Ãs please do the right thing: either don,Ãt allow the facility, or absolutely require that it meet environmental standards and regulations. I,Ãd be for local/state/federal funds if needed to keep the company viable (*if* necessary) in order to provide jobs as long as they,Ãre decent jobs.

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Mark Raulston Chicago IL

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Margaret Kirsh Chicago IL

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CARA AMMON CHICAGO IL

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Thomas Lau Chicago IL

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Denise Kaufman Chicago IL

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Torey Kervick Chicago IL

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Carlos Castillo Chicago IL

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Jessica Stevens Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent and an asthmatic, chronically ill resident on the SE side, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Viviana Gentry Ferna Chicago IL

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Lisa May Simpson Chicago IL

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Aracely Galvan Chicago IL

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Stephanie James Downers Gro IL

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Megan Anstrom Chicago IL

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Kristen Holtz Berkeley IL

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Aleida Iriarte Woodridge IL

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Sarah Gebhardt Chicago IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Dawn Albanese Elk Grove Vill IL

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Anna Pleitt Chicago IL

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Tiffanie Walker Chicago IL

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Elizabeth Pronove Elmhytst IL

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Kyle Strobel Libertyville IL

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Shacunda White Chicago IL

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Alithea Tashey Chicago IL

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Jovan Turner Chicago IL

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Wandaly Vargas Chicago IL

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Haley Ventura Chicago IL

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Chandra Fields Chicago IL

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Sandra Padilla chicago IL

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Juan garcia Brookfield IL

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Alyssa Colletti Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Katherine Burke Winnetka IL

60093 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

My name is Elia Ton-That and I am a student of Northside College Prep concerned about social justice, as I,Ãm sure you are, too. I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. I believe these approvals actively go against your policies of keeping our city safe and equitable for all residents.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. I urge you to deny General Iron's environmental approvals immediately.

Elia Ton-That Chicago IL

60646 Thank you so much for your time and consideration.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

My name is Kim Boland and as your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Kim Boland Chicago IL

60618 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

This company has a problematic reputation When it comes to health, safety and the environment. Since we are in the middle of the biggest global health pandemic in our generation,Ãs history, it is unconscionable to allow a polluter company to move into a working-class community of color that's already burdened with pollution and disproportionate impact of Covid-19.

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Do the right thing and prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Katy Donaldson Chicago IL

60601 Thank you so much for your time.

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Julie Cahillane Chicago IL

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Christina Schlegel She Chicago IL

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Angela Shah Arlington Heights IL

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Lauren Rice Chicago IL

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Stacy B Skokie IL

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Eire Hoke Chicago IL

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Krystal Velazquez Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

WE ARE TIRED OF BEING THE CITY,Ä&S DUMPING GROUND. YOU CANT BE SERIOUS TO ALLOW GENERAL IRON TO CONTINUE TO OPERATE IN OUR CITY BUT ESPECIALLY IN OUR NEIGHBORHOOD. OUR BASEBALL FIELD AT 127& CARONDOLET IS BEING CLEANED OF LEAD AND ARSENIC AFTER YEARS OF USE BY NEIGHBORHOOD CHILDREN. WHAT MORE ARE YOU EXPECTING US TO ENDURE AT THE CITY,Ä&S EXPENSE. ENOUGH IS ENOUGH! FIGHT FOR US LIKE YOU PROMISED TO DO...OR WAS THAT JUST TO GET YOU ELECTED!!!

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Mary Esquivel Chicago IL

60617

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Maia Wheeler Chicago IL

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Miranda Saldana Chicago IL

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Patricia Serckie CHICAGO IL

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Nikole Cabello Chicago IL

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Frank Gomez Chicago IL

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Ron Cserep Chicago IL

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Brian Gabriel Chicago IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Sandra Almaraz Chicago IL

60617 Thank you so much for your time.

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Maricela Velazquez Chicago IL

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Eileen Duck Chicago IL

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Serena Herrejon Chicago IL

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Kai Burkhardt Chicago IL

60607 Thank you so much for your time.

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Natasha Malone Chicago IL

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Tim Gizynski Chicago IL

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Olivia Snell Chicago IL

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Alejandro Laureano Chicago IL

60707 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderman Osterman:

As your constituent, I'm writing today to ask you to block General Iron's move to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. They have proven their inability to operate without releasing dangerous emissions.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution. What is not good enough to stay in Lincoln Park should not be good enough for the East Side.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents and deny the permits for General Iron's relocation.

Danielle Gill Chicago IL

60640 Thank you for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Leah Canvasser Chicago IL

60661 Thank you so much for your time.

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Jennifer Gates Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately. As a resident of Little Village, someone who voted for and supports our current mayor - I want us to do better about protecting the health of Latino and Black communities. This is not just!

Alejandra Villa Chicago IL

60623 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Brittany Jones Rockford IL

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Jacquelyn Booe Chicago IL

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A Beato Chicago IL

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Jana Anderson Chicago IL

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Michael Be. Chicago IL

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Megan Nissim Chicago IL

60614 Thank you so much for your time.

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Alex Kazmierczak Chicago IL

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Michelle Moran Chicago IL

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Juan Flores Chicago IL

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Andrew Morrison Chicago IL

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Deborah Handler Chicago IL

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Margarita Hernandez Chicago IL

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Penelope Bremner Chicago IL

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Nelly Martv#nez Chicago IL

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Gerica Davis Chicago IL

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Margaret Krzesinski Chicago IL

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Brad Wertz Montoursville PA

17754 Thank you so much for your time.

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Carol Platt Chicago IL

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Vanesa campos chicago IL

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Tony Quintanilla Chicago IL

60645 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Seriously please stop dumping EVERYTHING on us. Can you please just once make rich people find solutions to their problems without crushing us?

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Celia B chicago IL

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Catherine Clark Chicago IL

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Alejandro Diaz Chicago IL

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Lora Cattoni Chicago IL

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Samuel Sharp Chicago IL

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Vanessa Sosa Chicago IL

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Erick Perez Lisle IL

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Shantee Hope Chicago IL

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Kate Locke La Grange IL

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Haydee Lopez Chicago IL

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raina gillis East Chicago IN

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Leslie Herrera Chicago IL

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Matt Dudzik Chicago IL

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This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Alyssa Hepker Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Sergio Cruz Chicago IL

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Linda Baumann Chicago IL

60618 Thank you so much for your time.

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Bree Mckenna Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderwoman Maria Hadden:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Geneva Garcia Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Andrew Moreno Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a long-time 10th ward resident who frequently visits and still has many family members in the area, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Kristal Gonzalez Highland IN

46322 Thank you so much for your time.

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Leslie Tighe Whiting IN

46394 Thank you so much for your time.

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Emma Whitmore Chicago IL

60625 Thank you so much for your time.

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Jillian Banks Evanston IL

60201 Thank you so much for your time.

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Dao Nguyen Chicago IL

60608 Thank you so much for your time.

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Kathryn Miller Chicago IL

60612 Thank you so much for your time.

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Cristina Rodriguez Chicago IL

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Victoria Cotto Hammond IN

46327 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Andy Navarrete Bloomingdale IL

60108 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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emilio ferral Chicago IL

60611 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Adenike Adeniji Chicago IL

60619 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent and fellow Chicagoan, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Deni Alviar Chicago IL

60620 Thank you so much for your time. And help us stand against racism.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Cesar Pulido Chicago IL

60633 Thank you so much for your time.

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Lisa Mysker Chicago IL

60640 Thank you so much for your time.

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Jennifer Elsaid Hammond IN

46323 Thank you so much for your time.

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Joi Kamper Chicago IL

60661 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Yvonne Montgomery Lansing IL

60438 Thank you so much for your time.

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Cynthia Castorena Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Katie Rosebrock Morton Grov IL

60053 Thank you so much for your time.

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Amy Jahnke Chicago IL

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Arturo Anaya Chicago IL

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Sergio Juwa Chicago IL

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Nicolas Thornton Chicago IL

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mikayla mendez Chicago IL

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Salvador Cisneros Chicago IL

60641 Thank you so much for your time.

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Paola Avalos Chicago IL

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Phyllis Chavez Chicago IL

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Rachael Smith Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Olivia Marmer Oak park IL

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Rosaleen Diaz Chicago IL

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Laura Prout Franklin Park IL

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Esperanza Baeza Chicago IL

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Ronaldo Sanchez Chicago IL

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Claudia Martinez Chicago IL

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Hannah Spencer Chicago IL

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Jessica Dennis Chicago IL

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Stephanie Herrera Chicago IL

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Ameyalli Barba Chicago IL

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James Phillips Chicago IL

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Lorena Paredes Chicago IL

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Lisa He Chicago IL

60637 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. Our city sees too many unfair exploits of the south side of Chicago. Our brothers and sisters on the south side deserve to be treated equally and fairly, and this is just another outrageous moment of institutionalized racism in the city of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. It's an absolute disgrace that the Pritzker administration is allowing a company who routinely fails its environmental tests to move into a vulnerable neighborhood in our city.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity, and you, an obligation as public servants, to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jasmine Klein Chicago IL

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. It's placement there, or anywhere, would harm the surrounding community exponentially.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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eleonora benedetti chicago IL

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Maria Katsaros Chicago IL

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Jessica Padilla Chicago IL

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Kristin Piszczek Chicago IL

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Morgan Prewitt Chicago IL

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Whitney Pasch Chicago IL

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Olivia Chambers Chicago IL

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Louis Sanchez Chicago IL

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delia garcia Chicago IL

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wendy carson Chicago IL

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Tea Logli Glenview IL

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Janette Avila Chicago IL

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Taylor Brode chicago IL

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Barry Scolnick Chicago IL

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Erica contreras chicago IL

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Michael Pruitt Chicago IL

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Lise Ross Chicago IL

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Diana Webb Chicago IL

60626 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

This is absolutely disheartening that you,Äd allow even MORE pollution and toxic waste to an already struggling and oppressed area. You must DENY General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

LeeAna Theberg Chicago IL

60642 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day. As a new resident of the south side, I am particularly concerned with the city's disinvestment in this area. I see every single day the consequences of Chicago's apathy towards the south side. People are waking up. Enough.

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Sara Whitecotton Chicago IL

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Jana Greenslit Chicago IL

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Erick Castro Chicago IL

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Agapito Rodriguez Chicago IL

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Eric Saucedo Chicago IL

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Esmeralda Cardenas Chicago IL

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Jacqueline Lopez Chicago IL

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Julia Quezada Chicago IL

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Tulasi Janjukia Elk Grove Vill IL

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Maritza Larios Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health

Though I am from Brooklyn, NY I am deeply concerned about Chicago. I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Lily Wass Brooklyn NY

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Kelley Guiney Everett WA

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Savannah Ayala Chicago IL

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Kevin Varley Chicago IL

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Norma Nelson Orland Park IL

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Nathan Pulcher Chicago IL

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Galatea Kontos Bolingbrook IL

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Lauren Nash Wilmette IL

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Phillippa Paisley Chicago IL

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Megan Rivera Chicago IL

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Destinee Ortez-Garcia Chicago IL

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Melissa Zorio Chicago IL

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Lizet Cuevas Chicago IL

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Catron Booker Evanston IL

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Courtney Bryant Chicago IL

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Bridget Mitchell Palos Heights IL

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Lina Cervantes Chicago IL

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Beth Cole Chicago IL

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Brianna Alba Chicago IL

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Ivette Saldana Chicago IL

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Cathleen Cramer Chicago IL

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Yesenia Ventura Chicago IL

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My family has lived in this community our entire lives. I suffer from asthma like many resident. Allowing this move would only hurt our already hurting community. Instead of bringing business or resources to help build up our community we are offered this and we reject it.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Yesenia Ventura Chicago IL

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Jason Roach Anchorage AK

99517 Thank you so much for your time.

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Kristy Eisele Levi Brooklyn NY

11218 Thank you so much for your time.

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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John Samora Chicago IL

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Hugo Fonseca Hialeah FL

33014 Thank you so much for your time.

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Simon Hicks Prieto Chicago IL

60615 Thank you so much for your time.

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Reginaldo Saucedo Jr Chicago IL

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Maggie Malloy Forest park IL

60130 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Ashley Garcia Chicago IL

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Crystal Dogan Chicago IL

60615 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderwoman Garza:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to the South-East side, working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Yesenia Chavez Chicago IL

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Holly Abney Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Valerie Alvarez Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, Alderman O'ÁShea :

As your constituent and a new voter, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice. The time has come to act.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Emily Nelson Chicago IL

60643 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Cristina Munoz Chicago IL

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Hector Lopez Chicago IL

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Jesse Cheshire chicago IL

60647 Thank you so much for your time.

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Cassandra Nolen Chicago IL

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Patrick Aguilar Eugene OR

97402 Thank you so much for your time.

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Steve Drexler Chicago IL

60633 Thank you so much for your time.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Emily Kincanon EVANSTON IL

60202 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your neighbor, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Melissa Smiley Naperville IL

60540 Thank you so much for your time.

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Patrick Hageman Evanston IL

60203 Thank you so much for your time.

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Ashley Magana Chicago IL

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amanda Digangi Chicago IL

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patricia fuller chicago IL

60605 Thank you so much for your time.

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Jason Berumen Chicago IL

60608 Thank you so much for your time.

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Jessica Salazar Chicago IL

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Katie Fleming Chicago IL

60613 Thank you so much for your time.

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isabel liss Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jennifer Orozco River Forest IL

60305 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Athena Skaff Chicago IL

60622 Thank you so much for your time.

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

PROTECT our environment like you protect Lincoln park,Ãs environment. WORRY about our residents health like you worry about Lincoln park,Ãs residents health. 16 tons of particular matter a year to a residential area with thousands of families and a neighborhood no more than 3.5 miles long is catastrophic to our everyday lives.

Alejandro Llamas Chicago IL

60617

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Yaritza Velazquez Chicago IL

60617 Thank you so much for your time.

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Stephanie Chamberlin Chicago IL

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Sandra Toscano Chicago IL

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Jesus coronqdo chicago IL

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Joanna Krzozostaniak Chicago IL

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Denny Sanchez Chicago IL

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Elena Knetl Chicago IL

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Elsie Ayala Chicago IL

60606 Thank you so much for your time.

Dear Mayor Lori Lightfoot and Chicago Department of Public Health,

My name is Marielle Magnin. As your constituent and neighbor from the Logan Square neighborhood, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Marielle Magnin Chicago IL

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Liz Cramer Evanston IL

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Alexandra Navarro Chicago IL

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Alma Juarez Chicago IL

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Sarah DiCera Chicago IL

60617 My family has lived in this community for over 60 years. We are constantly fighting for the bare minimum of a healthy community. However it seems that the politicians don't care about our forgotten south side community. Your voters on the southeast side are watching your actions closely, and our voices will be heard.

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Daniela Aponte Chicago IL

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Jerry Valentine Oak Park IL

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Carolyn Schwarzkopf Chicago IL

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Alexa Harris Chicago IL

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Gabriela Porras Chicago IL

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Patricia Flores Evanston IL

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Karen Martinez Chicago IL

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Megan Hovany Chicago IL

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Elizabeth Kirchner Chicago IL

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Jose Reyes Chicago IL

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Julia Burns Chicago IL

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Camilla Chee Rolling Mead IL

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Yessenia Balcazar Chicago IL

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Natali Marin Buffalo Grove IL

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Jamie Passaglia Chicago IL

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Tiffani Curry Hazel Crest IL

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cruzita arambula chicago IL

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Sean Brown Chicago IL

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Laura vaineo Chicago IL

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Pedro Gutierrez Chicago IL

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Laura Catherwood Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to APPROVE General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been a valued member of the Lincoln Park neighborhood from before its gentrification in the late 70s. The Labkon, were contributors to the local causes, Marilyn Labkon specifically an early partner in helping former Alderman Vi Daley start the Chicago Sculpture Exhibit (that grew to a city-wide cultural event.)

WE ALL KNOW HOW THEY WERE SQUEEZED OUT OF RAHM EMMANUEL, LINCOLN YARDS AND THROWN UNDER THE FUCKING BUS. WE ALSO KNOW THAT THEIR RECENT FIRE WAS LIKELY ARSON AND SABOTAGE!

We are also VERY unhappy that your administration walked into office approving the outrageous TIF ABUSES OF THE LINCOLN YARDS DEAL- which if you want to know, is the REAL RACIST MOVE HERE by siphoning TAX DOLLARS that should have been used to bolster CPS and south & west side development- not line real estate developers pockets with one helluva cluster fuck of a Schaumburg-like development!

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Nicole Beck Chicago IL

60612 PLEASE APPROVE General Iron's environmental approvals immediately. I'm sure their scrubber and new facilities will be up to code.

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Carolina Cruz Chicago IL

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Ann Terry Evanston IL

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chloe ochoa glen ellyn IL

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We need to boost people, not allow more harm to come to them.

Kaley Martens Chicago IL

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elsa trejo chicago IL

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Claire O'Connell Chicago IL

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Gisela Estrada Chicago IL

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Ethan Smith Naperville IL

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Francisco Hernandez Chicago IL

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Bridget Breidenbach Chicago IL

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Jill Kapson Chicago IL

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Laura Ag Chicago IL

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Marielle Calvano Willow Spring IL

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Dane Hites Chicago IL

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Maya Bhatia Chicago IL

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Karen Diaz Valpo IN

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Julia Ralenkotter Chicago IL

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Danielle Kowalsky Chicago IL

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Christina Beller Chicago IL

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Leslie Murray Chicago IL

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Rosalyn Christianson Chicago IL

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Ms. Sonia Mendo Chicago IL

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Erin McMahonill Chicago IL

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Elizabeth Tillar Chicago IL

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Jacqueline Patterson Chicago IL

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Monica Wlodarkiewicz Addison IL

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Jennifer Llamas Chicago IL

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Diane Abbasi Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Maggie Lane-Moore Chicago IL

60622 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Melissa Gayton Chicago IL

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Nanci Lopez Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

As a human, how can this be seen as a healthy idea for our planet. Any money aside, we are struggling so severely with global warming. Please do not allow this to continue to perpetuate the destruction of this planet.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Mackenzie Frantz Chicago IL

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Richard Penaloza Chicago IL

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Bria Blair Chicago IL

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Jenn Heard chicago IL

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Bridget Barry Chicago IL

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Barbara Schmidt-Baile Downers gro IL

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Anya Ravitz Chicago IL

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Maria Meja Chicago IL

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Tarek Hijaz Chicago IL

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Jennie Garcia Chicago IL

60609 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. Are you truly concerned with communities of color and the inequalities they face, like you say on your Instagram daily? Yes? Ok, good - then after reading the below, this should be an easy decision.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Amanda Miller Chicago IL

60654 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

My name is Leah Geis, and I'm a resident of Chicago. I'm writing because General Iron was granted permit to move to a community of color. General Iron is a massive polluter and this is a prime example of environmental racism.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Leah Geis Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Please consider the future, not the short term gain.

Zachary Welman Chicago IL

60622 Thank you so much for your time.

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Jennifer Daigle East Greenbu NY

12061 Thank you so much for your time.

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Kendall Jambor Winnetka IL

60093 Thank you so much for your time. Please do the right thing.

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Kelly Lynch Chicago IL

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Kaitlyn Pascus Chicago IL

60647 Thank you so much for your time.

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As your constituent, I'm writing today to urge you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Benjamin Wald Chicago IL

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Martin Smith Chicago IL

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Taylor Morgan Chicago IL

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Jocelyn Sanchez Chicago IL

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Tiana Schlottman Chicago IL

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Elizabeth Greenwald Gary IN

46403 Thank you so much for your time.

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Clara Guerrero Chicago IL

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Melina Collins La Grange IL

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May Leandicho Carol stream IL

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Jennifer Ford Chicago IL

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Greer Homstad Chicago IL

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Max Hass Chicago IL

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Breana Jehning Chicago IL

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Maureen Mccurrie-Gib Chicago IL

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Isabelle Roman Chicago IL

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Kinsey Lahn Chicago IL

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Linda Wing Chicago IL

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Ella Smith New York city NY

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Emily Kuusisto Chicago IL

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Julianna Crisanti Lyons IL

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Joanne de Levign Chicago IL

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Tranae LaBranche Chicago IL

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Jonathan Kutcher Chicago IL

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Victor Flores Chicago IL

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Joseph Wenzel Lake Elmo MN

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Kristina Lugo Chicago IL

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Anneilis Cunningham Chicago IL

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Meztli Mijes Chicago IL

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Amsale Yirga Chicago IL

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Rosemary Orellana Chicago IL

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Kedest Immanuel Chicago IL

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Marissa Rhines Chicago IL

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Kriste Jasen Chicafo IL

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Angelica Pavone Chicago IL

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Marydee Reynolds Chicago IL

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Joi G Calumet Park IL

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Stefanie Coleman Chicago IL

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Linda Sanchez Chicago IL

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Nancy Antunez Chicago IL

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Gretchen Frueh Lombard IL

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Claudia Guzman Chicago IL

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Hannah Hempstead Wheaton IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Margarer RingiaHart Evanston IL

60202 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Brenden Carney Elmhurst IL

60126 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

I live in the Ranch Triangle neighborhood. I live right by General Iron's current facility - but I also live in an area surrounded by trees and parks. Instead of sparing me the negative impacts of this industry by allowing them to move to a neighborhood already suffering from air pollution, keep them where they are and force them to clean up.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Gabrielle Habeeb chicago IL

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Stephanie Voss Chicago IL

60647 Thank you so much for your time.

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Taiga Larkin Oak Park IL

60304 Thank you so much for your time.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

I am not sure where they should be allowed to move instead, but let's stand up for all communities if the city.

Kathleen Warner Chicago IL

60610 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Kathryn Baron Oak Park IL

60302 Thank you so much for your time.

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Leo Gilbert Chicago IL

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Sophia Reddekopp Chicago IL

60625 Thank you so much for your time.

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Anne Roche Chicago IL

60643 Thank you so much for your time.

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Nadia Herrera Chicago IL

60634 Thank you so much for your time.

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Toshi szoyra Chicago IL

60657 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Jim Drake Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice. This keeps happening to my neighborhood, and I want it to stop.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Lisette Casas Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Macy Scully Des Moines IA

50327 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Emma Martin Glen Ellyn IL

60137 Thank you so much for your time.

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Bianca Aguirre Chicago IL

60622 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Jorge Becerra Chicago IL

60633 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Ashley Egan Hoffman esta IL

60169 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a Chicago resident, I'm writing today to ask you to please turn down General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has violated the City's environmental codes, been responsible for dangerous explosions and fires, and been shut down repeatedly for public health violations.

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Keren Faling Chicago IL

60615 Thank you so much for your time.

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Kelley Fitzgibbons Chicago IL

60610 Thank you so much for your time.

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Colin Young Chicago IL

60647 Thank you so much for your time.

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Elise Krueger Chicago IL

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Sarah Weinstock Chicago IL

60612 Thank you so much for your time.

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Hilarie Denomme Chicago IL

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Jill Klusendorf Chicago IL

60646 Thank you so much for your time.

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Joshua Snader Chicago IL

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Jacob Shisoff Avon CO

81620 Thank you so much for your time.

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Izaak Thompson Chicago IL

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Sarah Bruketta Chicago IL

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Lindsay Karcher Chicago IL

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Tre Nowaczynski Chicago IL

60637 Thank you so much for your time.

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Samantha Schmid Chicago IL

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Kamilah Hiner Chicago IL

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Yolanda Chavez CHICAGO IL

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Garrett Allain Chicago IL

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Raquel Ochoa Chicago IL

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Ethan Crow Chicago IL

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Rachel Gaunce Chicago IL

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Jonathon Neumann Chicago IL

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Juan Bermudez Chicago IL

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Andrew Reyes Chicago IL

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Marisa Ikpoh Chicago IL

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Christine Malesky Chicago IL

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Linda Matiwaza Chicago IL

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Molly Strom Chicago IL

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Lorin Reidenbach Chicago IL

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Lisbeth Vargas Chicago IL

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Marilyn Siddiqi Chicago IL

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Sandra Gonzalez Chicago IL

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Keisha-Marie Allison Chicago IL

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Lanny Fiorillo Chicago IL

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Nicholas Venturelli Chicago IL

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Tetyana Krutsik Arlington Heights IL

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Stephanie Santos CHICAGO IL

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Kelsey Foss Chicago IL

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Lydia Aguirre Park forest IL

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Cameron Arquines Romeoville IL

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Jennifer Haney Chicago IL

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Vanessa Sanchez Chicago IL

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Chantel Snelling Chicago IL

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Esther Bediako Bolingbrook IL

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Kelly Burke Chicago IL

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Alex Szmyd Glenview IL

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Kiersten Neumann Chicago IL

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Shannon Martino Chicago IL

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Molly Corbitt Chicago IL

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Matthew Martino Chicago IL

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Kimberly Torres Chicago IL

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Zach Roth Chicago IL

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Katie Taylor Chicago IL

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Patricia Villa Chicago IL

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Alondra ValdV@s Chicago IL

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Kathryn Bauman Chicago IL

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Amna Sajjad Streamwood IL

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Donte,Ã Thrasher Chicago IL

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Ehrin Smith Chicago IL

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CJ Truesdale Wheaton IL

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Yosan Efrem St. Paul MN

55105 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman, the amazing Sophia King:

First of all, Lori, I love you and we are so lucky to have you. Thank you for putting Chicagoans first through your laborious love and steadfast leadership.

And Sophia, thank you for your service and leadership to Chicago, the 4th ward. It is the greatest part of the city thanks to your commitment to listening to your constituents.

My incredible leaders, Please do what you can and we will do what we can; we know the way this system works and we've seen the damage it causes for generations. With knowledge AND power, we must act against environmental racism. I know we're in this together which is why I write asking you to Please help:

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Molly Young Chicago IL

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Katie Breck Western Springs IL

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Juan Gonzalez Chicago IL

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Audrey Schulte Chicago IL

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Elizabeth Rea Chicago IL

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Grace Wilson Chicago IL

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Layne Langford Chicago IL

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George Taylor Western Spri IL

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Thomas Mathew Chicago IL

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Sophia Gallo Glen ellyn IL

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Justin Somerville Chicago IL

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Melanie Umbaugh Saint Louis MO

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Awien Kuanyin-Agot Barrington IL

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Lisa Waitley Chicago IL

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Raymond Trelka Chicago IL

60625 This aggression will not stand, man.

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Neringa Valkiunas Darien IL

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The people of this neighborhood deserve better. They are already at risk and approving this measure only puts them further at risk, please do something today to help the people of Chicago instead of burdening them further.

Linda Martinez Chicago IL 60618

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Dylan DeLoach Chicago IL 60639 Thank you so much for your time.

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eleena ahmed South Barrington IL

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Willow Davis Highwood IL

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Anna Laudicina Chicago IL

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Tasha Ruiz Chicago IL

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Arushi Rai Chicago IL

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Rachel Donofrie Bolingbrook IL

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Jasmyne Gooden Calumet City IL

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Guillermo Reyes Chicago IL

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Egle Malinauskait Chicago IL

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Marisol Ruiz chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. It's not acceptable to push this on to people and communities that are unable to keep it out.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Erin McMahonill Chicago IL

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Jared Sawyer Chicago IL

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Maria Aurora Renteria Chicago IL

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Joanna Nichols Chicago IL

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Claire Marzolf Arlington Heights IL

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Erin Steva Chicago IL

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Sharon Wang Chicago IL

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Andrea Pierce Chicago IL

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Andrea Kohlenberg Wheaton IL

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Juliette Jardim Chicago IL

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Elaina Palada Evanston IL

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Catie Fleming Naperville IL

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Jessie Kido Kedzie IL

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Alexandra Reese Naperville IL

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Sydney Alpers Warrenville IL

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Alexis Marquez Glenview IL

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Kalina Honczarenko Highland Parl IL

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Joseph Salas Chicago IL

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Brian j Field Norridge IL

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Clara Grosse Chicago IL

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Marisa Sun Wilmette IL

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Barbara Hubbard Chicago IL

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Jessica Godinez Melrose Park IL

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Selena Fuentes Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately. We must maintain the safety of Black and Brown residents who already face disproportionate impact of COVID-19 and negative environmental actions.

Nia Carter Chicago IL

60642 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Katharine Dickson Chicago IL

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Kierston Bovastro Chicago IL

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Sundar Tumuluru CHICAGO IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

We all deserve a better future than this! Everyone does! We are sick and tired of this! Do not let this happen!

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Sherry Kinyui Chicago IL

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Blythe Buchholz Oak Park IL

60302 Thank you so much for your time.

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Shavon Harris Chicago IL

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Ryanne Brown Chicago IL

60643 Thank you so much for your time.

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Kayli Stevens Chicago IL

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Jarietta Benton Chicago IL

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Joyce Ma Northbrook IL

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Tyonne Green Chicago IL

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Brianna Gannon Chicago IL

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Ani Tanus Chicago IL

60608 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health:

I'm not your constituent, but live in Oak Park and I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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M Kruegel Oak Park IL

60304 Thank you so much for your time.

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Lauren Ruffolo Homewood IL

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Margaret Stafford Chicago IL

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Parker Garlough Naperville IL

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Corenna Roozeboom Chicago IL

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Kim Jones Chicago IL

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Emily Walsh CHICAGO IL

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Megan Tillstrom Chicago IL

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Alayla Martin Chicago IL

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Maria Chavez Chicago IL

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Sandra Lopez Chicago IL

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Nancy Quiroz Chicago IL

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Kirstie Shanley Chicago IL

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Yahmini Wiley Chicago IL

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Angeline Pedrote Maywood IL

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Suro Purkhursandi Chicago IL

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LINDA SHORE Chicago IL

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately. There's also much to be said for ridding the city of unsustainable and damaging practices like those practiced by General Iron, the consequences of which are, again, disproportionately suffered by low-income communities. You have the power to dig out one of the largest roots of this systemic injustice. Everyone is watching. The revolution is coming- make sure you, on

Alexis Joyce Chicago IL

60657 the right side of it.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Kim B Harvard IL

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Diana Walker Chicago IL

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Tracy Murray Tinley Park IL

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Audrey Barrett Chicago IL

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Amanda Prochaska Hinsdale IL

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Arjun Kaushal Chicago IL

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Joy Bunton Chicago IL

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Claire Blomquist Elk Grove Vill IL

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Annelly Guerrero Chicago IL

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Jessica Pritzker Glenview IL

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Emily Springer Chicago IL

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Mary Ann Crosetto Oak Forest IL

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Keelin Wilson Chicago IL

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Rosemary Bell Glen Ellyn IL

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Estrella Popoca Melrose Park IL

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Lenora Johnson Chicago IL

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Andrea Rosales Chicago IL

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Sierra Hilt Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am a born and bred southsider, and while I may live in the suburbs now, I still work in the city and love sharing everything Chicago has to offer with my family. I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Kristina Chamis Tinley Park IL

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Kendall Brunson Jacksonville FL

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Kellye Whitney Homewood IL

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JoNell Smith Oak Park IL

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Natalia Escobar Chicago IL

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Theodore Rodriguez Des plaines IL

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Alana Fligelman Chicago IL

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Tansy Wang Chicago IL

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Elda Rubio Chicago IL

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Chicago is one of the nation's leading cities. It's time we take the long-awaited and necessary step forward to protect racial and environmental justice.

Victoria Pontikes Park Ridge IL

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Phoebe Lind Chicago IL

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Chris Cummings Chicago IL

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Dorothea Pantelios Chicago IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

The idea that these fuckwads should be allowed to move their carcinogenic bullshit into a community of color that is ALREADY disproportionately DYING because of COVID-19 due to environmental and socio-economic factors which have strained their health, is clearly and unambiguously racist, classist, and lacks any regard for your fucking constituents.

You better deny this action, not for the sake of the people who live in that community but for your own political careers. The days of incestuous love between government and industry are over. We are watching, and when I get my ballet you better believe I,Äöll

Malcolm Hansell Winnetka IL

60093 know what you did, and so will everyone I know.

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Antonio Mota Chicago IL

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Nelly Mota IL

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Danielle Garcia Midlothian IL

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Laura Adkins Chicago IL

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Edina Hadzic Chicago IL

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Shannon Burke Chicago IL

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Alyse Ketcham chicago IL

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Vashti Araia Evanston IL

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Kirsten Michelotti Libertyville IL

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Chelsea Lu Glenview IL

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Camila Cuesta Chicago IL

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Elizabeth Zeman Chicago IL

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Jake Steger Winnetka IL

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Christina Demos Chicago IL

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Amarrilys Ferrell Chicago IL

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Arie Carter Chicago IL

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Diana Yates Chicago IL

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Vanessa Haro Justice IL

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Johanna Rohde Princeton WI

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Madison McMahan W: Chicago IL

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Stephanie Brendle Chicago IL

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Greg Torris Chicago IL

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Sandra Brown Chicago IL

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Aashish Warty Chicago IL

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Ashley Matz-Stuk Chicago IL

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Karina Cunculs Chicago IL

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Luz Sepulveda Chicago IL

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Cait Thornburton Chicago IL

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Erin Juache Xhicago IL

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Alana Martin Chicago IL

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Kristen Youngman 8474140657 IL

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Kaleigh Richards Chicago IL

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Anna Castiglione Hoffman Esta IL

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Yesenia Roman Chicago IL

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This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jason Liu CHICAGO IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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David Haskins Wheaton IL

60187 Thank you so much for your time.

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Taylor Parsons Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Kira Durbin Sherman Oak CA

91423 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Amber Fleming Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, and Chicago Department of Public Health:

As a Cook County resident , I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Lily Thornton Glencoe IL

60022 Thank you so much for your time.

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

I may not live in Chicago now, but that's still my home. My mother and siblings live there, my friends live there. I want to keep them safe and HEALTHY. My mother is elderly and already has enough issues with COPD. Please protect your community.

Alicia Diaz Bolingbrook IL 60490

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Kenya Sims Chicago IL 60649 Thank you so much for your time.

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Lorraine Falls Chicago IL

60617 Thank you so much for your time.

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Sarah Herning Chicago IL

60646 Thank you so much for your time.

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Maribel Rodriguez Chicago IL

60639 Thank you so much for your time.

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Megan Mallouk 3 IL

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Emily Broadfoot Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Swati Patel Elk Grove Vill IL

60007 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am a concerned citizen of the Earth. I'm writing you to talk about General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, has been responsible for dangerous explosions and fires. As you know, in the past they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution???. Not ok.

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Madeleine Lyman Wilmette IL

60091 Thank you so much for your time.

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Caitlin Abramson Clarendon Hill IL

60514 Thank you so much for your time.

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Anisha Eckert Chicago IL

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Mahja Foster Chicago IL

60619 Thank you so much for your time.

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Hanna Udischas Chicago IL

60625 Thank you so much for your time.

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Moira Allison Chicago IL

60607 Thank you so much for your time.

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Maria LaSota Oak Park IL

60302 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Hannah Ratain Chicago IL

60657 Thank you so much for your time.

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Carly Herrera Cicero IL

60804 Thank you so much for your time.

Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I'm writing today to demand that you deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new at all, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

helena boyer chicago IL

60647 Deny General Iron's environmental approvals immediately.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Jessica Beck Park Ridge IL

60068 Thank you so much for your time.

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Sarah Bailey Lombard IL

60148 Thank you so much for your time.

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Desiree Zepeda chicago IL

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Marcy Usalis Bloomingdale IL

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George Murray Gary IN

46403 Thank you so much for your time.

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Tyler Jackson West Chicago IL

60185 Thank you so much for your time.

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Alejandra Torres Bolingbrook IL

60440 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Moriam Yarrow Chicago IL

60612 Thank you so much for your time.

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Chelsea Miller Arlington Heights IL

60005 Thank you so much for your time.

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Tangalina Scales Chicago IL

60616 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

You,Ãve proved over and over again that you do not care about black and brown neighborhoods in Chicago yet we are the ones who hold this city together. Please think about the power you have think about how policing and neglecting these neighborhoods affect families, children, babies, elders, put yourself in our place please I am begging you.

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Brenda Morales Chicago IL

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Lisa Hadesman Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman Scott Waguespack:

As your constituent, I'm writing today to ask you to strongly deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already been burdened with pollution for years.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Alexander Gargano Chicago IL

60618 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a responsibility to address them equitably and ensure that all Chicagoans are granted safe environments to reside in regardless of their socioeconomic status or race.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Erica Butler Chicago IL

60645 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Lillie Ese Chicago IL

60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jessica Simms Lombard IL

60148 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Margot Bardeen Chicago IL

60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Zoe bottger chicago IL

60616 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Tyler Koester Brooklyn NY

11215 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Petros Berhe Chicago IL

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Saya Vazquez Bolingbrook IL

60440 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Mya Beauford Chicago IL

60643 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Miguel Ramirez Chicago IL

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As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Juanita Ramirez Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Liliana Ramirez Chicago IL

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Karina Velazquez Oak park IL

60302 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Makenzie Thompson Chicago IL

60641 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is MY community and we don't want them here.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

christina Sigers Chicago IL

60619 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Muskan Shrivastava Edison NJ

8820 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Margarita Martinez Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Kristin Fabian Chicago IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution. It is abhorrent to treat this community's home with such disrespect and indifference.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Agatha Sullivan Northbrook IL

60062 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

George Kuritza Park Ridge IL

60068 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Charles Beneke Chicago IL

60618 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Tess Oetter Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Elizabeth Lies Chicago IL

60625 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a local physician and constituent of Chicago I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution. This is absolutely unacceptable and we cannot allow at risk communities to be put further in danger.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Thank you so much for your time.

Allison Law Chicago IL

60660 Dr. Allison Law

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

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Antoinette Jost Chicago IL

60707 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Susan Stock Chicago IL

60622 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Tara Grenier Los Angeles CA

90029 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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julie foster Chicago IL

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Kiah Hardy CHICAGO IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Matthew Henry Lindenhurst IL

60046 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Melyssa Stankiewicz Cumberland RI

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Karren Jackson Granada Hills CA

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Raylon East Chicago IL

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Alexandra Freling Chicago IL

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Millaray Ugarte Chicago IL

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Sara Farthing Naperville IL

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Adrienne Pullen Chicago IL

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KYLEAH Kirby SpiceWood TX

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Paulina Schmidtke Chicago IL

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Trevor Trevino Chicago IL

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Yewon Rhee Chicago IL

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Justine Silverstein Hinsdale IL

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Ericka Torrence Chicago IL

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April Sharelis Melrose park IL

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Maya Crystal Wilmette IL

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Kristyn Briggs Downers Gro IL

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Alana Rosenbaum Chicago IL

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Corey B Chicago IL

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Kim Farley Willowbrook IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a concerned resident of Berwyn and Chicago transplant, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Ana Rios-Rico Berwyn IL

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Stephen Ucherek Chicago IL

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Bryon Medina Chicago IL

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Nijn Esra Nijmegen Gelderland

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Maria Rosa Chicago IL

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Laurel Gilligan Burkittsville MD

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Michael Heffernan CHICAGO IL

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Sue Breen St Regis Falls NY

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Diana Martinez Chicago IL

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Katia Sanchez Chicago IL

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Fletcher Keyes Park City UT

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Anna Garcia Chicago IL

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Melissa Ortega Chicago IL

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Natalie Ramirez Chicago IL

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Aurelia Alvarez Chicago IL

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Beatriz Castro Chicago IL

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Cielo Rojas Chicago IL

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Katie Budrow Mundelein IL

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Edele Heath Englewood CO

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Cynthia Martinez Chicago IL

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Karla Carrasco Chicago IL

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Adriana Ortiz Chicago IL

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Samuel Johnston Chicago IL

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Lizbeth Lopez Placentia CA

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Carlos Luna Chicago IL

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Eva Jimenez Chicago IL

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Additionally it is your moral and professional obligation to protect citizens from harmful practices. You serve the people and must help protect us from harm.

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Emma Kennedy Evanston IL

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Christopher T Mizera Chicago IL

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Carlie Leoni HINSDALE IL

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gilberto prats chicago IL

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Amy Richards Chicago IL

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Cynthia Hicks Phoenix AZ

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Kelly Popper Park Ridge IL

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Anne Smith Portland OR

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Hunter Boswell Glendale AZ

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Eamon Morris Orange CA

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David Villegas Chicago IL

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Kara Boyd CHICAGO IL

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Rebecca Moslo Mountlake Terrace WA

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Anna Mather Chicago IL

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Kyle Law Binghamton NY

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Olga Martinez Mesa AZ

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am not your constituent, but as a resident of Cook County, I hope you will listen to me all the same. I was saddened and angered to hear that the Illinois EPA approved General Iron's request to move. Mine was one of many comments submitted to the IEPA during the public comment period, voicing our concern that the move would shift more pollution from White people's backyard to Black people's.

I did not expect the IEPA to ignore our voices. I expected that they would recognize that approving General Iron's move to the Southeast Side was unjust. I don't understand how we can look at those neighborhoods, already struggling to survive disproportionate environmental harm and the disproportionate effects of the coronavirus and say, sure, we can send more toxic pollution there. From my reading of the facts, it's flatly wrong.

General Iron runs an important yet dangerous business function. Whether they have been negligent (as I have read) or not, it's an inherently dangerous business. I understand that they have been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. Whether or not they have "cleaned up their act," adding their presence to the Southeast Side seems to require blatant disregard for the status and needs of that community.

Yes, those communities desperately need economic development -- but not the kind that kills them. Please deny General Iron's environmental approvals.

Jeff Oremland Prospect Heights IL

60070

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Kate O'Driscoll Arlington Heights IL

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Delaney Ryan Wilmington NC

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Andrea Bryson Chicago IL

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Jordan Wilson Warsaw NY

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Rachel Schillmoeller West Dundee IL

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Kelli St. Louis Chicago IL

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Alicia Martell Buffalo Grove IL

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Aggie Shapiro Phoenix AZ

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Kyla Jarka Chicago IL

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Ruth Rogers Woolwich ME

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Raleigh Koritz MPLS MN

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theo de wert Best CA

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E J Mississauga NY

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Elise Schroeder Oak Park IL

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Anne Miettinen

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Chris Usami Jamaica NY

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Danielle L'ecuyer Ottawa Ontario K1N 1C4

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Judy Piehl Schaumburg IL

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Marc van de Waars Zierikzee Zeeland

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Tabitha Totten Cliffside Park NJ

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Victoria Curley Chicago IL

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benoit dominique

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Jim Takahashi Christchurch Canterbury

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Jordan Stevens Metamora MI

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Brianne Hoppe Woodinville WA

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Haley Witzeman Irvine CA

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David DeBoskey Aurora CO

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Stephanie Berry Harrisburg PA

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Kaela Shaulson South Salem NY

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Mark Zackrison Marquette MI

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Stephanie Evans Laurel spring: NJ

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Denise Graf Arlington Hei IL

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LYDIA KEENAN Salt Lake City UT

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Rebecca Reynolds San Diego CA

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Maridyle Fiege GA

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Dennis Dougherty San Rafael CA

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This is just another item to be added on in the city that already is hazardous to so many in the community.

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Isabella Noble Salem OR

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Cheryl Wagemann Ringwood NJ

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Katie Jacobson Brooklyn NY

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Danielle Anderson Portland OR

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Brandon Murillo Des Plaines IL

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Janelly Lopez Columbus IN

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Elijah Hernandez Stafford TX

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Danielle Leahy Chicago IL

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Devin Harkins Chicago IL

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Yahaira Cardoza Los Angeles CA

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Perry Giambuzzi Williamstown NJ

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Jenny Gondek Klamath Falls OR

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Lauren Alexander Brooklyn NY

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Caroline Bass Lewiston ME

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Stop being greedy and STOP allowing these injustices, these communities need your help. Your children also need this help because toxins permeate everything, not just one area. This eventually gets into your food and your body system too. If anyone you know has gotten cancer for no known reason, rest assured it,Äôs these types of chemicals that aren,Äôt registered and banned that were the cause of their sickness. I hope you realize

Etelvina Chavez Los Angeles CA

90020

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Andrea Bean Brandywine MD

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Mary Kate Coy Eugene OR

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Grace Smith Lexington SC

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Katherine Earle New York NY

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Victoria Lundy Manassas VA

20109 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Please Lori! I voted you in to stand for the health and safety of all Chicagoans. Prove my vote right protect my neighbors in the south side. We both know this wouldn't fly if General Iron was trying to move into a rich suburb. Protect the working class that built Chicago.

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Chloe Kucirka Chicago IL

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Rachele DeSantis Ivyland PA

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Forrest Aderholt Austin TX

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Emily Stager Melrose FL

32666 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a human being, I perceive that building this facility on the SE side is not right. As other human beings, I would hope you see that too.

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Zachary Jewison Okemos MI

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Sarah Standley Chicago IL

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Laura Klinger Steamboat CO

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Rosekathleen Moore Smithtown NY

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Alex Sweeney Seattle WA

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Christina Chang Chicago IL

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Lara Watrous Milford NJ

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Caleb Denyer Norwich CA

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Bambi Morgan Los Angeles CA

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Amy Szczurowski Boston MA

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As a concerned citizen, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Chana Friedenberg Suffern NY

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Nikki Chapman La CA

90026 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I may not directly be your constituent, but nonetheless I am still writing today as someone who has seen how industry hurts the environment to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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C Ralowicz Gaithersburg MD

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Lucy Lowe Traverse City MI

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Elizabeth Burnett West Allis WI

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Allison Baldyga Chicago IL

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David Pluska Winchester VA

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Alexandra Anderson Plainfield IL

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Zoie Hendricks Roanoke VA

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Emma Stocks Seattle WA

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Stephanie Papayanis Moorpark CA

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Chloe Dale Chicago IL

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Julia Kon Fairfax VA

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Maddie Giegold Evanston IL

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Jocelyne Peiffer Sourbrodt AE

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Ella Francesconi Chicago IL

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Teresa Orosa Palm beach g FL

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Shashikiran Duraisamy Champaign IL

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Sarah Soleiman Chicago IL

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Morgan Burks springfield MO

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Lisa Salazar Shasta Lake CA

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Mary Miller Richmond VA

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Natalie Clark Chicago IL

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Rebecca Lourwood Arlington Heights IL

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Tesia Jaramillo Brooklyn NY

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Lucy Martin Oak Park IL

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Jessica Fleming Chicago IL

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Luke Moore Santa rosa CA

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Livia Rossi Saratoga Spry NY

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Isabella Falsetti Rockford IL

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Omar Espinoza Chicago IL

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Caitlin Barlow Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Mary Coleman Chicago IL

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice. We have the chance to be the change. You have the chance to say no and stand up for communities of color on the southeast side.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Danielle Douglas Chicago IL

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Eva Montejano Chicago IL

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Chelsea Rugel CHICAGO IL

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Emma Centeno Buena Park CA

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AARON BOURQUE Aurora CO

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Rae Zehel Madison TN

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Adia Harrison Oakland CA

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Ryan C Chicago IL

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Beverly Bullock New York NY

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Darlene Krauss OQUAWKA IL

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Jonathan Schmeling Chicago IL

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Alison Block Brooklyn NY

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Meghan Ward Chicago IL

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Brian McCammack Chicago IL

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Kimberly Bernstein Fort Collins CO

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Lilli Ross New York NY

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Brian Venable Seattle WA

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Kumar Jensen Chicago IL

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Meghan Kay Chicago IL

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paul gavarre chicago IL

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Peggy Tortoriello Chicago IL

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Julie Lakehomer Chicago IL

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Katherine Tsiang Chicago IL

60657 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I grew up on Chicago's SE side. Even back in the '60s the pollution was horrible. I am now dealing with Stage 4 metastatic breast cancer. I cannot imagine what it would be like now for residents on the SE side. They deserve less pollution. Not more.

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Debra Gleason Chicago IL

60634

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Silvia Saucedo Chicago IL

60632 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I have experience with the reckless nature of this polluter. My uncle was harmed and disabled and nearly killed by an explosion at General Iron while there as a truck driver making a delivery. The northside may have successfully pushed General Iron out, but these new SE neighbors do not have the money or clout to protect themselves, their homes, and children from this reckless business. It is your job to protect them.

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Jana Anderson Chicago IL

60622 Please prioritize the health of Chicago's most vulnerable residents over industrial profits.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Our city has failed to protect all of its neighborhoods from pollution. The South and West sides always face the brunt of this. Does their health not matter to you?

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Rita Sarkes Chicago IL

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Mercedes Kane Chicago IL

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General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. Furthermore a colleague of mine had very expensive equipment that would have been of no use to anyone except her (it was professional circus equipment) stolen out of her garage; because the equipment was metal, we had to conclude the thieves were metal scrappers. This company is a polluter AND a parasite. Can we shut them down permanently?

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Camille Swift Chicago IL 60618

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Alice Sedy Chicago IL 60659 Thank you so much for your time.

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Laura Pappas Chicago IL

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And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jane McConville Chicago IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Aisha Chaudhri Chicago IL

60609 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes. They've been shut down repeatedly for public health violations. So why allow them to move to the SE side. Respectfully Mayor Hispanics believed in you and voted for you. You are Chicago's Mayor.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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L.LARA RODRIGUEZ CHICAGO IL

60647 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Mark Estabrook Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Today I,Ãm writing to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Sarah Thong Grand Rapids MI

49503 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderperson:

As your constituent, I'm writing today to ask you to DENY General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Lara Oppenheimer Chicago IL

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Samantha Sosa Chicago IL

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Linda McGuire Milwaukie OR

97267 Thank you so much for your time.

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Jess Rappe Chicago IL

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Dolores Pino Chicago IL

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Linda Englund Chicago IL

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Lin Shook Schale Chicago IL

60618 Thank you so much for your time.

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Christa Velbel Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Ezra Silkes San Diego CA

92119 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and to Chicago Aldermen Michele Smith and Brendan O'Reilly:

As an early booster of Lori Lightfoot's long-shot mayoral bid, I urge you to live up to your commitment to working and lower-income Chicagoans of color and ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

Ironically, I am a former Lincoln Park homeowner (47 years) who feels that the neighbors in Lincoln Park KNEW that General Iron and Goose Island industry was nearby when they bought their expensive homes and condos! And while LP scores very high on new Covid cases, it's become horribly young and affluent and they don't feel they need to wear masks. So obviously we should not worry about them breathing pollution

Regard the health of disadvantaged people living on the Southwest Side, people who already have enough to deal with including polluting industry that benefits the entire City of Chicago and its more affluent residents, General Iron is a really unfair and dishonest company to allow to move into the Southeast Side.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

Patricia Terry Chicago IL

60611

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Catherine Marcroft Chicago IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am imploring you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Sophie Circenis Chicago IL

60659 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Emilia Garcia Chicago IL

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Sylvia Chung Chicago IL

60642 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Dr. Arwady, and Alderman Tunney:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Ricca Slone Chicago IL

60657 Thank you.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately. This keeps happening to my neighborhood and its heartbreaking. Companies use their money and power to prevent the community, that is underprivileged, from fighting back. Why does this never happen on the north side? Does our skin color mean we deserve trash? It feels like we are thought of as trash. Please help us.

Lisette Casas Chicago IL

60617

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Michelle Bradley Chicago IL

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Lucy hoying chicago IL

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Clifola Coleman Chicago IL

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Victoria Bobadilla Chicago IL

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Kathy Ruopp Chicago IL

60643 Thank you so much for your time.

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Melissa Normann Chicago IL

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Donna Katz Chicago IL

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Martha A Dwyer Chicago IL

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Jennifer Smith Chicago IL

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Mary ann Gottlieb Chicago IL

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Sara Grimm Tucson AZ

85716 Thank you so much for your time.

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Valerie Lockard Columbus OH

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Emily Kane WINNETKA IL

60093 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Lisa Hunkler Palm City FL

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Elissa Tinajero Chicago IL

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Julia Smith Chicago IL

60626 Thank you so much for your time.

Dear Honorable Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I am a resident of the 46th ward, and am employed and work Back of the Yards at The Plant on 47th and Loomis. I'm writing today implore you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. This is not ok.

General Iron has violated the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. Your citizens need your help, and we do not wish the Southeast Side to be struck with the pollution, be inundated with this company's inability to be safe and clean.

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Christina Seo Chicago IL

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Nancy Loeb Chicago IL

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Stephanie Koblich Lombard IL

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Amy Genender Chicago IL

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Katie Piotrowska Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I trust you will do the right thing!

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Jean Farley Brown Chicago IL

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Tewosret Vaughn Chicago IL

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Beth Braun Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

Lauren Rice Chicago IL

60622 Why are we letting General Iron do this to people?

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Lisa Barcy Chicago IL

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Peggy Salazar Chicago IL

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Jamie Leinss-Doyle Roselle IL

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Gina Rizzo Chicago IL

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Stephanie Fanta Long Grove IL

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Sarah Cornacchio Shirley NY

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Terri Wilson Chicago IL

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Lynn Bosko Chicago IL

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Kelly Gagen New Lenox IL

60451 Thank you so much for your time.

To Alderman James Cappleman, Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm asking you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has violated the City's environmental codes, their negligence has caused explosions and fires, and have been repeatedly shut down for health code violations.

Now, amidst the COVID-19 crisis, they seek to move their facilities to a community of color, of already disenfranchised working-class Chicago citizens, and further burden their living spaces with pollution.

This is environmental racism. I will not support leaders who perpetuate this type of injustice in Chicago and who do not proactively protect communities of color from further disenfranchisement.

These inequalities in our city are not new, NOW is the opportunity to address them in light of the COVID-19 pandemic and the step toward racial justice.

These issues effecting communities of color will be the issues I examine when voting for the leaders of my ward and city. If you ask for my vote, I expect your record to reflect justice and protection for communities of color.

Justin Gentry Chicago IL

60640 Prioritize the health of Chicago's vulnerable communities over the interests of industrial profiteers. Deny General Iron's environmental approvals immediately.

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Martha Torrez Allen Chicago IL

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Antonio Chico Chicago IL

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Carlos Salazar Chicago IL

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Erika castellano Chicago IL

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Sandra Leon Chicago IL

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Imelda Leon Chicago IL

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Araceli Nunez Oroz Chicago IL

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Crystal Leon Chicago IL

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Mimi O'Connell Chicago IL

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Vivian Orozco Chicago IL

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Robert Gagen Chicago IL

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Freddy Madrigal Chicago IL

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Valentin Vaca Chicago IL

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Jennifer Thusing Chicago IL

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Alexia Mosqueda Chicago IL

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Angelica Barajas Chicago IL

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Brian Lampert Chicago IL

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Nidia Davila Chicago IL

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Michele Kroeget Chicago IL

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Katherine Kampf Chicago IL

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Skye Flores Chicago IL

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Vee Chambers Annandale VA

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Chris Mitchell Charlottesville VA

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Tim Looney Chicago IL

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Christine Esposito Chicago IL

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Andrea Freerksen Chicago IL

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Kristen Wunder Hoffman Esta IL

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Lizeth Castro Chicago IL

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Deborah Labb Riverside IL

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John Devens Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As a resident of the East Side, I sincerely wish the move of General Iron to the neighborhood be stopped. You all have worked to stop injustice in our city, and by allowing G.I. to move from affluent Lincoln Park to our middle class community showcases environmental racism. Aside from our demographics we are no different than people in Lincoln Park. We are not asking for special treatment, we are asking for equality! Please take this into consideration and do the right thing for us, the people of Chicago.

Christopher Wantuch Chicago IL

60617 Sincerely, Christopher of 9909 S Ewing.

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Daisy Zuniga Chicago IL

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Elismar Espada Chicago IL

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Shane Culgan Pittsburgh PA

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Patricia Walter Glenview IL

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Elise Roberts Fayetteville NC

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Aileen Rivera Richmond VA

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Kathy Figel Chicago IL

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Katie Fitzgerald Chicago IL

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Margaret Dosch Chicago IL

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julie sklom Blue Island IL

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Gail McLaughlin Chicago IL

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Christopher Kozak Chicago IL

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Juliana Juarez Chicago IL

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Matthew Churney Chicago IL

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Diane pech Chicago IL

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Denny Carlson Chicago IL

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Jazmin Dua Chicago IL

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Gabriela Kolpak Palos Hills IL

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Theo Katsaounis Chicago IL

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Annissa Zak Chicago IL

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Pearl Shing-Roth Kenilworth IL

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Hannah Foster Northbrook IL

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Lauren Dixon Chicago IL

60647 Little Village is largely Latinx. Do not stand for these environmental detriments in the city

Additionally, I urge you to hold accountable HILCO developers, who have twice demolished parts of an old coal plant, releasing potentially harmful dust during a pandemic. This is yet another example of environmental racism, as the neighborhood of

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Kelli Frost CHICAGO IL

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Joseph Snedden chicago IL

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Savannah Bell chicago IL

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Naomi Fireman Evanston IL

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Katie Welch chicago IL

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Sofia Ford Skokie IL

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Dune Horwitz Deerfield IL

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Diana Parrino Plainview NY

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Monica Kim Chicago IL

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Poornima Tata prospect heig IL

60070 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. If it is not good enough for the Northside, it is not good enough for the Southside!

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Karina Pantoja Chicago IL

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Gabriel Morcote Chicago IL

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Abby McKenna Naperville IL

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Erin Warden St Petersburg FL

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Abigail Wolfe Chicago IL

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Elinor Bell Brooklyn NY

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Margaret Rubin Chicago IL

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Lilli Sher Chicago IL

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Ilana Blumin Chicago IL

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Carmel DeRogatis Chicago IL

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Kathryn Ganas Chicago IL

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Curtis Mason Chicago IL

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Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

My name is Benjamin Hushek and I live in Lakeview, Chicago. As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Benjamin Hushek Chicago IL

60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and Alderman Smith,

As your constituent of Ward 43 in Lincoln Park, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Naomi Borowsky Chicago IL

60614 Thank you so much for your time.

Ms. Lightfoot,

I am emailing on behalf of my concerned friends living in Chicago. As I,Äm sure you are aware, General Iron is planning a move to the south side due to complaints from it,Äs current neighborhood. It would be absolutely astonishing and rude if you let the burdens of this recycling plant poison a community in the city because another community complained. Please use the *power you were given by the people* who voted you in to protect *all* of your citizens.

Thank you,

Lena Daitz Naples FL

34108 Concerned citizen

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Evin Williams Chicago IL

60616 Thank you for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Reilly Waters Chicago IL

60660 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

My name is Eliana, and as your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

We've seen how communities of color have been more severely impacted by COVID. Do your part to remedy three disparities, not add to them with pollution.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Eliana Herman Chicago IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Emily Graber MD Chicago IL

60618 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago. I live in Lincoln Park, and I believe this move from LP to the SE side is unjust and racist.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Julia Turner Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Jack Lewis Chicago IL

60613 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Rian Hunter Chicago IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Laura Thompson Chicago IL

60618 Thank you so much for your time.

To Mayor Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

This is environmental racism in action — and is indicative of the type of injustice communities of color in Chicago deal with every day.

I used to work across the street from General Iron -- the fumes and the dust and the grit are foul. The plant will have NO incentive to improve their emissions and safety standards if they're allowed to leave Lincoln Park and move to a community whose concerns (I fear) won't be given the same weight as General Iron's current white, affluent neighbors.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Anna George Chicago IL

Thank you,
60618 Anna George

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Clara Raubertas Chicago IL

60615 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Lucero Flores Chicago IL

60609 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

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Kate Woziwodzki Chicago IL

60660 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Angela Fayad Chicago IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent and a current resident of Lincoln Park, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Kayla Baum Chicago IL

60614 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Isaiah Newman Chicago IL

60615 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Dawson Henson Little Rock AR

72205 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

olivia frey Skokie IL

60076 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations. And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

Deny General Iron's environmental approvals immediately.

Merav Price Skokie IL

60076 Thank you

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Leah Reinfranck Chicago IL

60657 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Silvia Rodriguez Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

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Vanessa Burciaga Chicago IL

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Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

maryann Broyles Honokaa HI

96727 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Amulya Yerrapotu Chicago IL

60657 Thank you so much for your time.

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yasmin chaudhry chicago IL

60645 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

NK A. Boston MA

2122 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Erika Magallanes Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Maegan Ojeda Chicago IL

60617 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

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Sofia Hadley Glen Ellyn IL

60137 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Eleanor Colligan Lake bluff IL

60046 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Becky Brookshire Marshall NC

28753 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Kathleen Mitchell Chicago IL

60640 Thank you so much for your time.

Dear Mayor Lori Lightfoot, Chicago Department of Public Health, and my Chicago Alderman:

As your constituent, I'm writing today to ask you to deny General Iron's environmental approvals to move its facilities to the Southeast Side of Chicago.

General Iron has been found liable for violating the City's environmental codes, they've been responsible for dangerous explosions and fires, and they've been shut down repeatedly for public health violations.

And now, in the middle of the COVID-19 crisis, they want to move their facilities to a working-class community of color that's already burdened with pollution.

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Although the inequalities that exist in our city are not new, we have a new opportunity to address them in light of the COVID-19 pandemic and the movement for racial justice.

Please prioritize the health of Chicago's most vulnerable residents over industrial profits. Deny General Iron's environmental approvals immediately.

Rachael Bild Chicago IL

60618 Thank you so much for your time.

first_name last_name city state zip

Petition of Protest Text

Dear Chicago city officials:

I'm writing today to ask you to deny the move of General Iron to the Southeast Side of Chicago.

General Iron has been cited repeatedly for violating traffic codes, they've been responsible for dangerous explosions, and they've caused down for public health citations.

And now, in the middle of the COVID-19 crisis (which is harder on all levels), they want to move their operation to a color that's already overburdened with pollution.

This is environmental racism in action — and it indicates that communities of color deal with every day.

Although the inequalities that exist in our country are a major opportunity to address them in light of the worsening COVID-19, renewed push for racial justice.

Please prioritize the health of Chicago's most vulnerable communities. I ask that you immediately deny environmental approval for the operation to start up in Chicago's Southeast Side.

Drew	Tomlin	Chicago	IL	60631
Elijah	Panico	Chicago	IL	60634
Aaron	Solis	Chicago	IL	60634
Melissa	Smith	Nags Head	NC	27959
Matthew	Dahlstrom	Chicago	IL	60630
Megan	Friend	Oregon City	OR	97045
Shane	Holmes	Mount Vernon	NY	10552
Andrea	Jakubas	Chicago	IL	60616
Rickie	Ryan	Evanston	IL	60202
Victoria	Wilczek	Chicago	IL	60634
Andrew	Hoffman	Morton Grove	IL	60053
Jeffrey	Mengler	St. Charles	IL	60174
Noemi	Sena	Rockford	IL	61109
Nichole	Pauson	Joliet	IL	60435
Mary	Hendrickson	Rockford	IL	61108
Jessica	Miller	Mundelein	IL	60060
Elizabeth	Emmel	Wheaton	IL	60187
Kimberly	Jakob	Sheldon	IL	60966
Robert	Henkin	Chicago	IL	60613
Rose	Tilley	Decatur	IL	62526
Howard	Crocker	Belleville	IL	62221
Amy	Johnson	Chicago	IL	60647
Sharon	Ward-Fore	Chicago	IL	60601
Gina	Rizzo	Chicago	IL	60639
Aaron	Turkewitz	Chicago	IL	60615
Andy	Heller	Chicago	IL	60657

Mike	Butche	Aurora	IL	60504
Andrew	Rowlas	Chicago	IL	60645
Norman	Frey, Jr	Bourbonnais	IL	60914
Orrin	Merritt	Genoa	IL	60135
Esther	Flicek	Lombard	IL	60148
Nicholas	Feda	Cary	IL	60013
Mary	Delaware	Chicago	IL	60647
Sheila	Sheehan	Woodstock	IL	60098
Ann	Blanchard	Rolling Mead	IL	60008
Wesley	Wolf	Lake Barringt	IL	60010
Andrew	Mortland	Arlington Hei	IL	60005
Robert	Hughes	Chicago	IL	60618
Toni	Noll	Belleville	IL	62221
Meredith	West	Chicago	IL	60622
John C.	Vidinich	Chicago	IL	60626
Chris	Ahearn	Chicago	IL	60613
Palma	Leddy	Downers Gro	IL	60516
Ron	Nosek	Elmhurst	IL	60126
Brittney	Dunn	Wheaton	IL	60187
Harry	Hinkle	Chicago	IL	60631
Bill and Fran	Stenberg	Oak Brook	IL	60523
Bruce	Rhoades	Downers Gro	IL	60515
Amity	Johnston	Minooka	IL	60447
Lisanne	Freese	Chicago	IL	60646
Elizabeth	Lynch	Downers Gro	IL	60516
Thomas	Frost	Quincy	IL	62305
Jane	Ballengee	Glenview	IL	60025
Jeff	Green	Glenview	IL	60025
Joseph	Naidnur	Peoria	IL	61604
Lawrence	Zim	Woodstock	IL	60098
Janet	Mroczek	Chicago	IL	60618
Sue	Pingel	Antioch	IL	60002
Clover	Krajicek	Hodgkins	IL	60525
peter	genet	lake zurich	IL	60047
Kristen	Britt	Chicago	IL	60613
Cynthia	Breunlin	oak park	IL	60301
Sid	Imam	Chicago	IL	60607
Linda	Moorman	Chicago	IL	60653
Richard	Stefaniak	Westville	IL	61883
Diane	Kuta	Chicago	IL	60657
Ellen	Rosenberg	Wilmette	IL	60091
Gregory	Penderghest	Decatur	IL	62526
Diana	Riley	Monmouth	IL	61462
Shannon	Leitner	Edwardsville	IL	62025
David	Gustafson	Moline	IL	61265
Mike	Roche	Western Sprin	IL	60558
Jeffrey	Webb	Mattoon	IL	61938
Deborah	Labb	Riverside	IL	60546
Donna	Scaletta	AURORA	IL	60502
Renee	Cortez	Chicago	IL	60646
Julie	Berberi	St. Charles	IL	60175
Beata	Fiszer	Mount Prosp	IL	60056

Jason	Freeman	McHenry	IL	60050
Gregory	Azzarello	Plainfield	IL	60544
Glenn	Morrison	Riverside	IL	60546
Stephen C.	Duck	Wilmette	IL	60091
Joanna	Kling	Urbana	IL	61801
Eva	Silverman	chicago	IL	60630
Dr. Kira	Meskin	Chicago	IL	60612
Bob	Gendron	Chicago	IL	60630
Ellen	Morgan	LA GRANGE	IL	60525
Alex	K	Chicago	IL	60605
Alex	Lubertozzi	OAK PARK	IL	60304
Eileen	McWherter	Elk Grove Vill.	IL	60007
Denise	Dean	La Grange	IL	60525
Bill	Nordstrom	Chicago	IL	60605
Rick	Sutton	Bloomington	IL	61701
Lorraine	Hurt	FRANKFORT	IL	60423
Keith	Neagle	Chicago	IL	60625
Susan	Boldrey		IL	
Kris	Gebhard	CHICAGO	IL	60615
Jean	Ogilvie	Chicago	IL	60612
Anna	DiRienzo	Chicago	IL	60615
Rudolf	Mortimer	Urbana	IL	61802
Evan	Callan	Chicago	IL	60640
Amy	Argentar	Boston	MA	2215
Debra	Greenley	Chicago Hts	IL	60411
Susan	Williams	Addison	IL	60101
Emily	Schuttenberg	Chicago	IL	60615
Katherine	Sutton	Northbrook	IL	60062
Mary	Vazquez	Chicago	IL	60630
Cassandra	Metz	Springfield	IL	62704
Patricia	Trakselis	Riverside	IL	60546
Ellen	Domke	Chicago	IL	60660
Nancy	Brown	Evanston	IL	60201
Steven	Bussell	Roselle	IL	60172
Kellie	DeFosset	Bethalto	IL	62010
Jennifer	McAnally	Sycamore	IL	60178
W	_	Chicago	IL	60611
Mary	Tobin	Evanston	IL	60201
Linda	Johnson	Chicago	IL	60643
Mrs. Donna	Miciunas	Downers Gro	IL	60515
Jane	Abatangelo	Evanston	IL	60201
Carla	Taylor	Minooka	IL	60447
Caro Lynn	Pierceall	Plainfield	IL	60586
D.	Nelsen	Chicago	IL	60610
Annie	Hanrahan	Forest Park	IL	60130
Brandi	Frantz	Freeburg	IL	62243
Diane	Haubrich	Highland Park	IL	60035
J	Swanson	Lake Zurich	IL	60047
Ed	K	Western Sprin	IL	60558
Madeleine	Gaca	Oak park	IL	60302
Jenny	Hudson	Bloomington	IL	61701
S	Israil	Skokie	IL	60076

Mary Lou	Wirtz	Wheaton	IL	60187
Lee	Bowman	Morton Grove	IL	60053
Katie	Harej	Chicago	IL	60607
ANDREW	GILMAN	skokie	IL	60077
dagmar	mclaughlin	palatine	IL	60067
Heather	Fitzpatrick	Brookfield	IL	60513
Linda	Markram	Chicago	IL	60601
Shirley	Sutter	Vernon Hills	IL	60061
Kyra	Mikala	Aurora	IL	60503
Fran	Alcantara	Riverside	IL	60546
Mary	Warren	Wheaton	IL	60187
Steven	Griffin	Naperville	IL	60540
Leslie	Malz	Arlington Heights	IL	60005
Debbie	Pastors	OAK PARK	IL	60302
Lynn	Zadkovic	Mokena	IL	60448
Joanne	Pakieser	Chicago	IL	60640
Marilyn	Anderson	Mount Carroll	IL	61053
Audrey	Engelking	Sycamore	IL	60178
Judith	Bauer	Depew	NY	14043
Debra	Rosenberg	Chicago	IL	60614
Rik	Brown	Chicago	IL	60613
Phyllis	Bird	Evanston	IL	60202
Jeff	Cooke	Buffalo Grove	IL	60089
Erin	Breen	Elgin	IL	60120
Gabriella	Brown	Chicago	IL	60647
Avis	Shapiro	Chicago	IL	60610
Billita	Jacobsen	Carpentersvil	IL	60110
Matt	Rynkiewicz	Chicago	IL	60614
Christine	Rattigan	Frankfort	IL	60423
Will	Low	Santa Fe	NM	87505
Ben	Ewert	Downs	IL	61736
Camilla	Steff	Chicago	IL	60657
Rosezellar	McCray	Peoria	IL	61603
Noelle	Thompson	Tinley Park	IL	60477
Ellen	Karmin	Highland Park	IL	60035
Daniel	Goldberg	Normal	IL	61761
Diane	Rosenbaum	Highland Park	IL	60035
Dawn	Albanese	Elk Grove Vill	IL	60007
Laura	Winston	Evanston	IL	60201
Evelyn	Pape	Elmhurst	IL	60126
Ira	Gerard-DiBen	South Elgin	IL	60177
Janel	Wager	Champaign	IL	61821
Vicki	Joseph	Chicago	IL	60626
Anastasia	Johnston	Machesney P	IL	61115
Gladys	Reyes	Hawthorn W	IL	60047
Verlyn	Rosenberger	Decatur	IL	62526
Joan	Schommer	Evanston	IL	60202
Rod	Fletcher	Urbana	IL	61802
Roberta	Giblin	Villa Park	IL	60181
Barbara	Wonser	Wheaton	IL	60189
S	ZZ	Plainfield	IL	60585
Violette	Ballecer	Allston	MA	2134

Brenda	Hasler	Naperville	IL	60565
Kevin	Brankin	Oak Lawn	IL	60453
Jessica	Rodriguez	North Aurora	IL	60542
Christina	Beal	Bolingbrook	IL	60440
Carla	Kipen	Chicago	IL	60613
Sima	Shah	Chicago	IL	60618
Mary	Johnson	Rockford	IL	61101
Clara	Piecuch	Lake Zurich	IL	60047
Maureen	Koneval	Chicago	IL	60640
Linda	Englund	Chicago	IL	60626
Kelly	Bauer	Chicago	IL	60640
Karen	Reimer	Chicago	IL	60637
JAcqueline	Alcantara	Chicago	IL	60608
Shirley	Adams	Evanston	IL	60202
Marilyn	Freese	Normal	IL	61761
Polly	Doyle	Durand	IL	61024
J	Knop	Bellwood	IL	60104
Carole	O'Connell	Chicago	IL	60660
Joan	Bradbury	Chicago	IL	60618
Lisa	Keim	Oak Lawn	IL	60453
Sonja	Novak	Oak park	IL	60303
Kim	Dennis	Carbondale	IL	62903
Karen	Kortsch	Lake Bluff	IL	60044
Christopher	Hansen	Hamilton	IL	62341
Pat	Egleston	LaPorte	IN	46350
steve	babin	normal	IL	61761
Sherry	Kraft	Chicago	IL	60645
Laura	Rosenbauer	Chicago	IL	60622
Julie	Hanson	Rochelle	IL	61068
Elizabeth	Novickas	FLOSSMOOR	IL	60422
Karen A	Katrak	Naperville	IL	60565
Fern	Webber	Princeton	IL	61356
W	K	Plainfield	IL	
Dr. Colleen	Hester	Grafton	IL	62037
Mike	Trahan	Mundelein	IL	60060
Peter	Gunther	Chicago	IL	60659
Sarah	Hasler	Chicago	IL	60640
Don	Dieckmann	Alton	IL	62002
Laurie	Townsend	Lyons	IL	60534
James	Thomas	Springfield	IL	62702
Bob	Score	Chicago	IL	60637
Suzanne	Schock	Long Grove	IL	60060
Robin	Kearnton	Urbana	IL	61801
Jane	Miller	Vienna	IL	62995
Ruth	Goring	Chicago	IL	60626
Karen	Kosky	Batavia	IL	60510
Debra	Gleason	Chicago	IL	60634
Kristen	Kepnick	Brookfield	IL	60513
Gregory	Baker	Champaign	IL	61821
Candace	Crossley	Galena	IL	61036
Cathleen	Conley	Sycamore	IL	60178
Wayne	Brotze	Carlinville	IL	62626

Nancy	Hayes	NAPERVILLE	IL	60563
Janice	Rockwell	Macomb	IL	61455
Linda	Sullivan	Chicago	IL	60640
Schmidt	Family	St. Charles	IL	60174
N	S	Chicago	IL	60607
Rachel	Krucoff	Chicago	IL	60615
Frances	Hutchcroft	Rockford	IL	61114
Christina	Ghiotto	Naperville	IL	60540
Diane	Buttitta	Des Plaines	IL	60016
Martha	Holman	Evanston	IL	60201
Terry	Evans	Chicago	IL	60615
Hillary	Montgomery	Chicago	IL	60616
Arden	Fortner	Downers Gro	IL	60515
Diane	Morgan	Chicago	IL	60625
Isabella	Sacca	Chicago	IL	60640
Emmy	John	Aurora	IL	60506
Giamila	Fantuzzi	Chicago	IL	60614
Ellyn V	Jung	Chicago	IL	60625
Elaine	Soble	Chicago	IL	60605
Catherine; Da	Critz; Blight	Metamora	IL	61548
Sandra	Couch	Naperville	IL	60564
Samantha	Pearson	Chicago	IL	60655
Steph	Pentz	Evanston	IL	60202
Byron	Dale	Rockford	IL	61108
Kathy	Finn Gibson	Naperville	IL	60540
La Vista	Learning Cent	Godfrey,	IL	62035
Nora	Rybarczyk		IL	
Margaret	Agnello	Elk Grove Vill.	IL	60007
Tere	Dillard	Decatur	IL	62526
mohammad	Rashan	Naperville	IL	60565
Erin	Orozco	Chicago	IL	60660
Sarah	Kaul		MA	
Susan	Balaban	Wilmette	IL	60091
Michael	Simmons	Rockford	IL	61102
Hillary	Colby	Aurora	IL	60504
Catherine	Dunnington	Mount Prosp	IL	60056
John	Bramlet	JOLIET	IL	60435
Suzanne	Gaspar	Zion	IL	60099
Tamara	Dreier	Ofallon	IL	62269
Neal	Harris	Barrington	IL	60010
Raquel	Shirey	Chicago	IL	60646
Keeley	Bombard	Rochester	MI	48306
Judy	Whiteside	Charleston	IL	61920
Mark	Stenftenagel	Oak Brook	IL	60523
Karen	Geahlen	Marine	IL	62061
Diane	Markel			
Joni	Lindgren	Elgin	IL	60124
Maureen	Ellis	Chicago	IL	60613
Joan	Gregg	Morris	IL	60450
Lynette	Davidson	Chicago	IL	60622
Roxanne	Doremus	Mount Prosp	IL	60056
Dawn	Jackson	Round Lake	IL	60073

Armen	Kasparian	Wood Dale	IL	60191
Margaret	Wedoff	Oak Park	IL	60302
Marvin	Makinen	Chicago	IL	60615
Gibson	Glass	Chicago	IL	60613
Kendra	Foley	Lake Forest	IL	60045
Michael	Patti	Chicago	IL	60645
Kelly	Dennis	Crystal Lake	IL	60014
Judy	Genandt	East Dundee	IL	60118
Meredith	Bratt	CHICAGO	IL	60613
Carol	Devoss	St. Charles	IL	60174
Matthew	Thompson	North Riverside	IL	60546
Margaret	Zak	Brookfield	IL	60513
Teresa	Buckley	East Moline	IL	61244
Gwen	Doolan	McHenry	IL	60050
Michael	Pasteris	Champaign	IL	61821
Margaret	Chilton	Morton	IL	61550
Holly	Wilinski		IL	
Monica	Kim	Chicago	IL	60607
Lanlan	Hoo	Wheaton	IL	60189
Tamara	Foehring	Geneva	IL	60134
Rosalie	McMenamin	CHICAGO	IL	60622
Jack	Caplan	Chicago	IL	60614
Katherine	Stewart	northbrook	IL	60062
Martina	Butucea			62027
Claire	Poelking	CHICAGO	IL	60622
Bernadene	Bowles	Moline	IL	61265
Mair	Mcnamara	Barrington	IL	60010
Carolyn	Taylor	Wilmette	IL	60091
Mark	Steinberg	Chicago	IL	60613
Todd	Cisna	Effingham	IL	62401
Thomas	Frohlich	Chicago	IL	60639
Sara	Buehler	Oak Park	IL	60302
Michael	Heintz	matteson	IL	60443
Mary	Southard	La Grange Pa	IL	60526
Tania	Miranda	Chicago	IL	60647
Sally	Hundley	Park Forest	IL	60466
Verna	Todd	Evanston	IL	60202
Carole	Arett	Naperville	IL	60564
Patricia	Chelmecki	Elburn	IL	60119
Melissa	Mazias	Downers Gro	IL	60516
PEGGY	MCGRATH	Oak Park	IL	60302
L L	Kuhn	Centralia	IL	62801
Brian	Michalsen	Belvidere	IL	61008
Joshua	Spencer	Loves Park	IL	61111
Faith	Lee	Elmhurst	IL	60126
Victoria	Jackiw	Chicago	IL	60646
Margaret	Nuccio	Naperville	IL	60563
catherine	duffin	wheaton	IL	60188
Teresa	Kohl	Kankakee	IL	60901
Luann	Sawyer	Collinsville	IL	62234
Linda	Vilimek	Palos Hills	IL	60465
Carol	Johnson	North Aurora	IL	60542

Emma	Veon	Chicago	IL	60610
Karen	Peterson	Northbrook	IL	60062
Bruce	Christopher	Hoffman Est	IL	60169
Javier	Gloria	Chicago	IL	60641
Scott	Kozoll	Champaign	IL	61821
Robin	Hicks	N. Aurora	IL	60542
Diane	Vandiver	Bolingbrook	IL	60440
Erica	Chau	Chicago	IL	60618
Susan	Hammerschm	Glenview	IL	60025
Alexander	Hamilton	DeKalb	IL	60115
Laurel	Huebner	Morton Grove	IL	60053
Lana	Miyagawa	Chicago	IL	60660
Eric	Thor	Chicago	IL	60625
Jessica	Blasingame	Berkeley	IL	60163
Pat	Dostalek	Springfield	IL	62704
Andy	Xiao	Orland Park	IL	60467
Susan	Crowley	Villa Park	IL	60181
Adam	Gaither	Carmichael	CA	95608
Steve	Mineck	Elmhurst	IL	60126
Michael	Dostalek	Schiller Park	IL	60176
Paul	Simpson	Berwyn	IL	60402
Jeanne	Oursler	LaGrange Par	IL	60526
WILLIAM	DIAMOND	Naperville	IL	60563
Theodore	Johnson	Urbana	IL	61801
Tedd	Ward Jr.	Petersburg	IL	62675
Mary	Stanton	Oak Park	IL	60302
Victoria	Curley	Chicago	IL	60643
Pat	Bryan	Lisle	IL	60532
Kenneth	Voight	Schaumburg	IL	60193
Anna	Witt	Waukegan	IL	60087
Emily	Mccormick	Chicago	IL	60645
Jeanne	Kerl	Skokie	IL	60076
Fallon	Braddy	Mount Prosp	IL	60056
William	Lamorte	Worth	IL	60482
Cecilia	Young	Oak Brook	IL	60523
Rose Mary	Meyer	Chicago	IL	60630
Debra	Alleman	Belleville	IL	62221
Tom	Cloud	River Forest	IL	60305
Olubunmi	Ayoola	Chicago	IL	60637
Linda	Roberts	Burr Ridge	IL	60527
Robin	Pinsof	Highland Park	IL	60035
KAREN	NELSON	Park Ridge	IL	60068
Jane	Drews	McHenry	IL	60050
jeffrey	sanders	evanston	IL	60203
C.	Schloss	Arlington Hts	IL	60005
Alison	LaBarge	Carol Stream	IL	60188
Mark & Heat	Kolar	Lindenhurst	IL	60046
C Kent	Argenta	Springfield	IL	62704
Stephen	Gliva	Evanston	IL	60202
ML	Ewing	Carthage	IL	62321
James	John	Chicago	IL	60647
R. Terry	Lyon	Taylor Ridge	IL	61284

Willow	Volkert	Lake bluff	IL	60044
James	Bachman	Saint Charles	IL	60174
m	stokes	belleville	IL	62226
Sarah	Babu	Chicago	IL	60642
Brian	Chapman	Chicago	IL	60625
Orly	Shaker	Lincolnwood	IL	60712
V. A.	Zoch	Bull Valley	IL	60098
Julie	Griffith	St. Charles	IL	60174
Elizabeth	Cuellar	Melrose	IL	60160
Camille	Swift	Chicago	IL	60618
Brian	Mustain	Urbana	IL	61801
Judi	Slate	Elmhurst	IL	60126
Roberta	Kessler	Crest Hill	IL	60403
Michael	Hansen	Deerfield	IL	60015
Barton	McGee	Chicago	IL	60619
Elin	Soderquist	Saint Charles	IL	60175
Clara	Guerrero	Chicago	IL	60641
CYNTHIA	FABRICIUS	OTTAWA	IL	61350
J.	Beverly	Urbana	IL	61801
Cynthia	Arneson	Bloomington	IL	60108
John	Marro	Chicago	IL	60638
Gregory	Reingruber	Brookfield	IL	60513
Beth	Keleske	Cary	IL	60013
Lora	LaDew	Evanston	IL	60201
Roger	Podewell	Homewood	IL	60430
A Nicole	Mazar	Lake Forest	IL	60045
Robert	Banning	Carpentersvil	IL	60110
Andrew	Mazar	Lake Forest	IL	60045
Steven	Serikaku	Chicago	IL	60660
Deborah	Fenner	Chicago	IL	60640
Mario	Zdybel	Chicago	IL	60638
Mickie	Benak	Glenview	IL	60025
Harley	Doss	Rockford	IL	61103
johanne	minich	WINNETKA	IL	60093
Brian	Nielsen	Evanston	IL	60201
Ranae	Rickels		IL	
Diane	Letson	Chicago	IL	60613
Kevin	Belgeri	Marissa	IL	62257
Melissa	Shakman	Chicago	IL	60637
Scott	Lundgren	Chicago	IL	60614
Lucia B.	Rothman-Der	Chicago	IL	60637
Leonard	Cork	chicago	IL	60615
Elaine	Colvzn		IL	
Paula	Enstrom	Charleston	IL	61920
Ellen	Wolcott	Charleston	IL	61920
Keith	Wolcott	Charleston	IL	61920
Mary	Kolak	Des Plaines	IL	60016
Jessica	Hart	Highland Park	IL	60035
Barbara	Holowczak	Elmwood Par	IL	60707
Paula	LeVous	Murphysborc	IL	62966
Cynthia	Andersen	Elk Grove Vill.	IL	60007
Rochelle	Sinclair	Alsip	IL	60803

John	Chadwick	La Grange Pa	IL	60526
Margaret	Georges	Chicago	IL	60630
Bert	Menco	Evanston	IL	60202
Marsha	Bockmann	Stonefort	IL	62987
Sarah	Dolley	Bolingbrook	IL	60440
Dianne	Bruining	Mokena	IL	60448
David	Schulz	Downers Gro	IL	60516
Deanna	Pierce	Aurora	IL	60506
Christine	Dionisio-Bach	Chicago	IL	60618
Shana	Kane	Peoria	IL	61615
Mary	Robbins	Oswego	IL	60543
Megan	Roche	Carol Stream	IL	60188
Holli	Cook	Peoria	IL	61603
Jamie	Polczynski	Chicago	IL	60639
Debra	Jones	Champaign	IL	61822
Sandra	Rutherford	Plano	IL	60545
Donna	Delin	Lombard	IL	60148
Edward	Mockford	Normal	IL	61761
Christine	Schmidt	Schaumburg	IL	60193
c. a.	frelchowski	lockport	IL	60441
Ken	Irwin	Chicago	IL	60657
Sue	Torgersen	Cottage Grov	MN	55016
Kathleen	Furey	River Forest	IL	60305
joan	dobbs	brookfield	IL	60513
Laura	Strong	Crystal Lake	IL	60014
Alissa	Adler	Kildeer	IL	60047
Ellen	Quinn	Woodridge	IL	60517
Carolyn	Massey	Quincy	IL	62301
Mary	Carroll	Chicago	IL	60614
Charles	Miller	Vernon Hills	IL	60061
Clare	Lipinski	Chicago	IL	60615
Michelle	London	Chicago	IL	60610
Yazan	Kudaimi	South Holland	IL	60473
STEVE	SIPOS	BEACH PARK	IL	60087
BRYAN	BLOCK	Moline	IL	61265
Nikole	Barnes	Atlanta	IL	61723
Mary	Mathews	Lake Forest	IL	60045
R	Lev	Naperville	IL	60540
Frank	Mores	Wheaton	IL	60189
Mary-Ellen	Grisham	Alton	IL	62002
Susan	Zimny	Chicago	IL	60641
Linda	LaBuda	Evanston	IL	60203
Ellen	Ayalin	Chicago	IL	60625
Brandon	Northern	Chicago	IL	60617
Robert	Craig	Lake Barringt	IL	60010
Dennis	Dean	LINDENHURS	IL	60046
Joelle	Uzarski	LA GRANGE	IL	60525
Cari	Brookbanks	Oak Park	IL	60302
Silvia	Gomez	Glenview	IL	60025
Ann	McCabe	Chicago	IL	60625
Lisa	LoGrasso	Chicago	IL	60634
Tracy	Dopper	WINFIELD	IL	60190

Jana	Scalzitti	Chicago	IL	60606
Lynn	Travis	Galva	IL	61434
Valeri	Decastris	Rockford	IL	61102
Shannon	McDonnell	Cary	IL	60013
John	Coughlin	Westchester	IL	60154
Rita	Crowley	Chicago	IL	60640
Mary	Hirose	Hoffman Est	IL	60192
CARLTON	MCQUAY	Chicago	IL	60644
Madeline	Piniuta	Palos Hills	IL	60465
Sonia	Csaszar	Chicago	IL	60615
Pat	Fojtik	Palos Hills	IL	60465
Tammy	Katz	Deerfield	IL	60015
Jennifer	Smith	Chicago	IL	60660
Lynne	Cruz	Vernon Hills	IL	60061
Anthony	Ippolito	Arlington Hei	IL	60005
Gwenna	Weshinsky	Murphysborc	IL	62966
Michael	Rynes	Naperville	IL	60565
Doris	Verkamp	Charleston	IL	61920
Bob	Harnish	Crystal Lake	IL	60039
Cynthia	Hautzinger	Prairie View	IL	60069
Anne	Phillips	CHAMPAIGN	IL	61820
Janet	Glidden	St. Anne	IL	60964
Myra	Perez	Marengo	IL	60152
Vonn	Washington	Monee	IL	60449
Ray and Iris	Claycomb	Griggsville	IL	62340
Lydia	Bozovic	Alton	IL	62002
SHELLEY	STEFANIC	ROCKFORD	IL	61114
Elaine	Feddersen	Evanston	IL	60201
Diane	Pfahler	Brookfield	IL	60513
Joshua	Boggioni	CHICAGO	IL	60641
Megan	Kathol Berset	Normsl	IL	61761
Sherry	Stansbury	Chicago	IL	60618
Greg	Boyles	Aurora	IL	60506
Jackie	Candela	Godfrey	IL	62035
Craig	S.	Elmwood Par	IL	60707
Spencer	Pease	Wilmette	IL	60091
Linda	Grube	Streator	IL	61364
Andrew	calcagno	Scandia	MN	55073
Alison	Zepp	Chicago	IL	60625
Thomas	Boling	Libertyville	IL	60048
margaret	foster	Evanston	IL	60202
V	Evan	Chicago	IL	60660
Juanita	Ramey	Glenwood	IL	60425
S	Brownell	Berwyn	IL	60402
Barbara	Tischler	Wheaton	IL	60189
Mark	Tischler	Wheaton	IL	60189
Margaret	Keylin	Downs	IL	61736
Caroline	Sietmann	Chicago	IL	60616
Ernest	Rosado	Berwyn	IL	60402
Kara	Hagen	Urbana	IL	61801
Susan	Bright	LaGrange	IL	60525
Bill	Martin	Sullivan	IL	61951

Barbara	LAWRENCE	Chicago	IL	60637
Elizabeth	Hemzacek	Willowbrook	IL	60527
Rebecca	Elliott	Evanston	IL	60202
Ellen	Sansone	Northbrook	IL	60062
Debbie	Johnson	Champaign	IL	61821
Luke	Shamrock	Naperville	IL	60565
Kelli	St. Louis	Chicago	IL	60640
Stephen	Rhodes	Georgetown	IL	61846
Clive	Riseam	Chicago	IL	60604
Emmy	Wolff	Chicago	IL	60654
Karen	Hays	Elmhurst	IL	60126
Carol	Vandeveire	Batavia	IL	60510
John	Zachwieja	Lake Zurich	IL	60047
Delores	Logue	Decatur	IL	62522
Carolyn	Samec	Carol Stream	IL	60188
Christine	Bowles	Highland Park	IL	60035
Sandy	Machugin	Skokie	IL	60077
Megan	Turnquist	Chicago	IL	60625
Patricia	Todd	Lake Villa	IL	60046
Danny	Kiec	Chicago	IL	60634
Marlen	Schuetz	Lombard	IL	60148
Martha	Stopa	Darien	IL	60561
Leslie	Little	Jackson	MS	39216
Ivvn	Moreno	CHICAGO	IL	60608
Alan	Ehrenberg	Chicago	IL	60639
Dorothy	Ulner	Carbondale	IL	62903
Kathy	Neuckranz	Rolling Mead	IL	60008
Sheryl	Hansen	Bloomington	IL	61701
Ethan	Sellers	Chicago	IL	60649
Sundar	Tumuluru	CHICAGO	IL	60640
Maryann	Kaczorowski	Chicago	IL	60638
Cindy	Risvold	Naperville	IL	60540
Jan	Kraft	Lake Villa	IL	60046
Matthew	Barre	Elmhurst	IL	60126
Olivia	Ruzzi	High Falls	NY	12440
Cathryn	Bulicek	Chicago	IL	60641
patricia	glen	La Grange	IL	60525
Eliana	Bernat	Vernon Hills	IL	60061
Chris	Junker	Rockford	IL	61109
Laurie	Willetts	Chicago	IL	60645
Shannon	Lang	Evanston	IL	60202
Michelle	Giannetti	Crystal Lake	IL	60012
Megan	Lewandowski	Apple Valley	MN	55124
Kim	McCabe	Chicago	IL	60660
Chelsea	Rugel	CHICAGO	IL	60613
Jacqueline	Glass	Belleville	IL	62223
Nancy	Halliday	Glenview	IL	60025
Amy	Lippert	Chicago	IL	60647
Emilie	Jones	Bolingbrook	IL	60440
Seth	T	Chicago	IL	60613
Jacquelyn	Seaman	Evanston	IL	60201
Donna	Limper	Bloomington	IL	60108

Trina	McCarty	Bloomington	IL	61701
K	Penn	Clinton	WA	98236
Tyler	Vaughan	Chicago	IL	60631
James	Clancy	Chicago	IL	60646
Nicholas	Galati	Chicago	IL	60634
Justin	Hasselberger	Chicago	IL	60634
Nancy	Weck	Columbia	IL	62236
Richard	Peterson	Northbrook	IL	60062
Emma	Hatch	Chicago	IL	60647
Riley	Joyce	Chicago	IL	60647
Devon	Bhakta	Laguna Nigue	CA	92677
Priyanka	Bhakta	Fountain Vall	CA	92708
Andrew	Kottl	Chicago	IL	60630
Meha	Kamdar	Wheaton	IL	60189
Andrew	Lucas	Chicago	IL	60634
Julius	Paz	Cicero	IL	60804
Elise	L	Raleigh	NC	27608
Samantha	Sorisho	San Jose	CA	95129
Nathan	Vitez	Chicago	IL	60634
azul	flores	UPLAND	CA	91786
Jeandre	De Wet	Barrington	IL	60010
David	Bier	Odel	IL	60460
Candy	McCray	Elgin	IL	60120
Deborah	Mottl	Willowbrook	IL	60527
jason	warrington	Oak lawn	IL	60453
Beth	Braun	Chicago	IL	60640
Ann	mayo	San Clemente	CA	92673
Michael	Collins	Chicago	IL	60631
Thomas	Hughes	Chicago	IL	60656
Nazar	Fedorovych	Wheaton	IL	60189
Ji	Montgomery	shiremanstov	PA	17011
Marguerite	Huber	Chicago	IL	60622
Eddie	Jacobs	Chicago	IL	60634
Caleb	Corro	Elmwood par	IL	60707
Eduardo	Cortez	Chicago	IL	60625
Donna	Katz	Chicago	IL	60657
Kayla	Kirkendall	Saratoga	CA	95070
Gabriel	Reyes	Aurora	CO	80013
S	S			83838
Eric	Olson	Chicago	IL	60631
Christian	Schwab	Chicago	IL	60630
Isabel	Fitzsimons	Chicago	IL	60626
Jason	Crane	Athens	OH	45701
Breanna	Kellogg	Citrus Height:	CA	95610
MARCUS	PAYNE	Robbins	IL	60472
Bonny	Photinos	Ashland	OR	97520
Carly	Carroll	Durham	NC	27701
Summer	Song	Madison	WI	53703
Jourdan	Ewoldt			
Calder	Wood	Anacortes	WA	98221
Kelsey	Gold	Alameda	CA	94501
Nancy	Anderson	Cumberland	ME	4110

Melissa	Adams	Olympia	WA	98502
Aaron	Brown	Chicago	IL	60613
Mia	Cinquini	Chicago	IL	60656
Krista	Beymer	Chicago	IL	60613
Gabriela	Kolpak	Palos Hills	IL	60465
Rachel	Miller	CONGERS	NY	10920
Shannon	Young	Chicago	IL	60651
Haley	Cannon	Chicago	IL	60640
Karina	Wang	Evanston	IL	60202
Alyssa	Ayen	Madison	WI	53719
Brandon	Zeman	Chicago	IL	60618
Jessica	Winter	Broomfield	CO	80020
Brian	Plesha	Chicago	IL	60612
Zella	Benson	Fairview	OR	97024
Francheska	Feliciano	Evergreen Pa	IL	60805
Rocio	Andrade	Chicago	IL	60625
Chelsea	Hoffmann	Chicago	IL	60622
Shannon	Hartwig	Crystal Lake	IL	60014
Ateeyah	Ahmad	Groveland	FL	34736
Carol	Gadeken	Sammamish	WA	98074
Payton	McAbee	Denver	CO	80209
Joseph	Lariviere	Burlington	VT	5401
Olga	Martinez	Mesa	AZ	85204
Siobhan	Merrill	Southold	NY	11971
Kathryn	Charpin	Washington	DC	20002
Alexandra	Best	Lake Forest	IL	60045
Margarita	Bernal	Chicago	IL	60601
Sarah	Cabana	Winchester	MA	1890
Corinne	Gillenwater	Pembroke	MA	2359
Barb	Gelman	Crystal Lake	IL	60012
Ra	Schumal	Skokie	IL	60076
connie	cooper	godfrey	IL	62035
claire	czerwiec	Chicago Ridge	IL	60415
Alfreda	Gilspie	Chicago	IL	60643
Nancy	Davis	Park Ridge	IL	60068
Ramona	Boston	Springfield	IL	62703
Mimi	Biskun	Gurnee	IL	60031
Ann	Gearren	Oak Park	IL	60302
Jade	Ryckman	Champaign	IL	61821
Don	Albrecht	RIVER GROVE	IL	60171
Devida	Braverman	Vernon Hills	IL	60061
Tamara	Shidlauski	Champaign	IL	61821
Kathleen	MacKay	Chicago	IL	60601
Elizabeth	Bullock	Chicago	IL	60640
Chartruce	Powell	Indianola	IL	61850
Grace	Wilson	Rockford	IL	61101
Cheryl	Moore	Glenview	IL	60025
Lauren	Marquez-Visc	Evanston	IL	60201
Cynthia	Kegel	Chicago	IL	60610
Veena	Singwi	Evanston	IL	60202
Kim	Repede	Vernon Hills	IL	60061
Joanna	Brown	Chicago	IL	60640

Richard	Seitz	Charleston	IL	61920
Jill	Deutsch	Wilmette	IL	60091
Paulette	Marotta	Plainfield	IL	60544
Robert	Carter	Saint Charles	IL	60174
Robert	Michaelson	evanston	IL	60201
Karen	Schneider	Chicago	IL	60657
Dori	Cole	Wheaton	IL	60189
Barbara	Youngquist	Evanston	IL	60203
Marjorie	Duerr	Burr Ridge	IL	60527
Ruth	Thiede	Chicago	IL	60660
Susan	Hammerman	Evanston	IL	60202
Linda	Diaz	Chicago	IL	60608
Dennis	McGee	Chicago	IL	60651
Bonnie	Bush	Chicago	IL	60626
Annie	Morse	Chicago	IL	60622
Susan	Okimoto	chicago	IL	60618
Carol	Nurse	Woodstock	IL	60098
Camilla	Dadey	Deerfield	IL	60015
darlene	grossman	lincolnwood	IL	60712
Kiran	Johnson	Chicago	IL	60610
Rian	Hunter	Chicago	IL	60640
CHARLOTTE	DRAYER	Palatine	IL	60067
Cynthia	Broten	Lake Bluff	IL	60044
Claudia	Stenvig-Olser	Elmhurst	IL	60126
Joel	Maurer	Dekalb	IL	60115
Elliot	Rossen	Highland Park	IL	60035
gary	rejsek	Bolingbrook	IL	60440
Johanna	Beamsley	Dekalb	IL	60115
Ellington	Ellis	chicago	IL	60653
Eduardo	Diaz	Blue Island	IL	60406
Daniel	Katz	Chicago	IL	60657
Brian & Maur	Werner	Glen Ellyn	IL	60137
Jay	Borne	Oswego	IL	60543
Sarah	Trulley	Evanston	IL	60203
Margaret	Ali	Lombard	IL	60148
Elizabeth	Taylor	Lake Forest	IL	60045
B J	Alexis	Rockford	IL	61103
Deena	Wolfson	Chicago	IL	60640
John	Cole	Wheaton	IL	60189
bonnie	muirhead	Chicago	IL	60637
Pamela	Richardson	Chicago	IL	60646
Janet	Beck	Woodstock	IL	60098
Timothy	Bohrer	Oregon	IL	61061
Karole	Grace		IL	
Irene	Berkey	Chicago	IL	60610
Peter	Finger	Glenview	IL	60025
James	Mizgalski	Geneva	IL	60134
Eileen	Soderstrom	Chicago	IL	60645
Chloe	Young	Chicago	IL	60614
Janis	Ebert	St. Charles	IL	60174
Jill	Jarvis	Elmhurst	IL	60126
Colleen	Keaveny	Northbrook	IL	60062

V.	K.	M'boro	IL	62966
Catherine	Carolyn	Lake Forest	IL	60045
Vanessa	Beavers	Chicago	IL	60643
Robert	Schweitzer	Crystal Lake	IL	60014
Kelley	Clink	Oak Park	IL	60302
Tony	Krogh	Chicago	IL	60640
Peggy	Kaczmarek	Rockford	IL	61104
Nancy	Dinger	Chicago	IL	60629
Gary	Blanford	Mundelein	IL	60060
Alan	Rider	MOUNT AUBI	IL	62547
Sandra	Cosner	Wildwood	IL	60030
Ben	Fasman	Chicago	IL	60647
Patti	Brandt	Waukegan	IL	60087
Diana	Martinez	Chicago	IL	60617
Geri	Collecchia	Chicago	IL	60601
Carol	Weger	Palatine	IL	60067
Andrew	Hellinger	Chicago	IL	60613
Jorge	Saldarriaga	Chicago	IL	60622
Andrew	Clarke	Chicago	IL	60601
Dianne	Entwhistle	Elmhurst	IL	60126
Sharon	Zayac	New Berlin	IL	62670
Amy	Bertholomey	Chicago	IL	60634
Peter	Hongisto	Chicago	IL	60640
Hope	Gundlah	Chicago	IL	60637
L	Kuhnn	Centralia	IL	62801
Daniel	Raichel	Chicago	IL	60637
Kevin	Carroll	Chicago	IL	60626
Ben	Deter	Chicago	IL	60647
Alexandra	Sweitzer	Lemont	IL	60439
Valerie	Baffa	Berwyn	IL	60402
Jen	Pagnini	Evanston	IL	60202
James	Jameson	Arlington Hei	IL	60005
Susan	Crothers	River Forest	IL	60305
Cindy	Parrone	Murphysborc	IL	62966
Fern	Kinder	Lockport	IL	60441
Morgan	Walker	Grayslake	IL	60030
Elizabeth	Downie	Winnetka	IL	60093
virginia	klespitz	Batavia	IL	60510
Sarah	Wiedel	Chicago	IL	60643
Steven	Ball	Manito	IL	61546
Benedict	Conley	Chicago	IL	60613
Alex	Miramontes	Campbell	CA	95008
Rachel	Mickelson	Chicago	IL	60640
Roger	Kushla	Evanston	IL	60201
Carol	LaCasse	Barrington	IL	60010
Donna	Hippensteel	Chicago	IL	60605
Daniel	Raz	Chicago	IL	60640
Jacquelyn	Rodriguez	Oak Park	IL	60302
Lynda	Pwtrusha	Willowbrook	IL	60527
Bruce	Lehman	Oak Park	IL	60302
Eunice	Cho	Palisades Parl	NJ	7650
mike	mieszala	gurnee	IL	60031

Kelly	Golding	glenview	IL	60025
M	Strimbu	Homewood	IL	60430
Kathleen	Stanger	Midlothian	IL	
Nicole	Beck	Chicago	IL	60612
Paul	Johnson	Chicago	IL	60613
Jason	Claycomb	Hinsdale	IL	60521
Karla	Petersen	Chicago	IL	60640
Carol	Gayle	Lake Forest	IL	60045
Brian	Hart	Chicago	IL	60622
Mark	Giardina	Chicago	IL	60618
Helen	Hejl	Coronado	CA	92118
Kathryn	Bernotavicius	Orland Park	IL	60462
Micaela	Diaz	Chicago	IL	60608
Penny	Blubaugh	Chicago	IL	60646
Matt	Geer	Willow Spring	IL	60480
Alyson	Henry	Chicago	IL	60605
Larry	Lundy	Evanston	IL	60202
CATHERINE	CLEARY	ROCK ISLAND	IL	61201
Mike	Montes	Crystal Lake	IL	60014
Cathie	Dunal	Glencoe	IL	60022
Katie	Dowling	La Grange	IL	60525
Danielle	Stone	Bridgeview	IL	60455
R	M	H	IL	60133
Russ	Ziegler	downers grov	IL	60516
Rachel	Oleinick	Chicago	IL	60625
JL	Priske	Galena	IL	61036
Tara	Bomba	Chicago	IL	60647
Bette	McAvoy	Winnetka	IL	60093
Robert	Liden	Mokena	IL	60448
Linda	Sanchez	Chicago	IL	60617
CHARLDA	THOMPSON	Gurnee	IL	60031
Benjamin	Cruz	East Chicago	IN	46312
Mercedes	Cervantes	Chicago	IL	60623
Stephanie	Van Winkle	Wilmette	IL	60091
Sharon	Royer	Peoria	IL	61604
Jude	Kitts	Glenview	IL	60025
Joab	Oberlander	Wilmette	IL	60091
Bobby	Erl	Grayslake	IL	60030
Linda	Stevens	Kankakee	IL	60901
Roger	Mairlot	chicago	IL	81042
Maureen	Mccarthy	Des Plaines	IL	60016
Kjerstine	Humiston	Evanston	IL	60202
Colette	Fahrner	Chicago	IL	60631
Kitty	Hopper	Chicago	IL	60647
Lyle and Hele	Sykora	Lanark	IL	61046
Sandra	Franz	Chicago	IL	60657
Leroy	Haeffner	Lombard	IL	60148
Lara	Wolff	Chicago	IL	60640
Rachel	Tsen		IL	
Marilyn	Ferdinand	Skokie	IL	60077
Dolores	Pino	Chicago	IL	60625
Joy	Schochet	Chicago	IL	60613

Suzanne	Poisl	Berwyn	IL	60402
Cynthia	Johnson	Park Forest	IL	60466
David	Camacho	Chicago	IL	60608
Joannie	Jones	Lockport	IL	60441
Cindy	Rehberg	South Elgin	IL	60177
John	Haley	Springfield	IL	62704
Kathy	Krasnowski	St. Charles	IL	60175
Janet	Gerske	Chicago	IL	60640
Georgia	Scarr	Chicago	IL	60610
Joanna	Noyes	Evanston	IL	60202
Frances	Aparicio	Evanston	IL	60203
James	Gibbs	Evanston	IL	60202
Tatiana	Wright	Chicago	IL	60637
Aracely	Galvan	Chicago	IL	60617
Amy	Nussbaum	Chicago	IL	60657
Eoin	Crowley	Chicago	IL	60643
Vanessa	Burciaga	Chicago	IL	60617
shyla	worley	aurora	IL	60506
Lindsey	Dewitt	Chicago	IL	60657
Glory	Jacquat	Chicago	IL	60657
jason	clark	Chicago	IL	60647
Angelica	Hardman	Chicago	IL	60607
Sandra	Costa		IL	69435
Kathleen	Leitelt	Oak Forest	IL	60452
Chaplain Mar	Beauchamp	Moline	IL	61265
Miriam B	Scott	Chicago	IL	60605
Andrea	Zielinski	Glenview, Il	IL	60025
Rosa	Smurawa	Chicago	IL	60622
Patrick	Comer	Clarendon Hill	IL	60514
Tara	Larsen	Clarendon Hill	IL	60514
Andrea	Araujo	Chicago	IL	60644
Kathryne J	Starzec	Hainesville	IL	60030
Marla	Francisco	Urbana	IL	61802
Lindsey	Werts	Chicago	IL	60611
Jackson	Gehrke	Chicago	IL	60612
Judith	Gray	Chicago	IL	60657
Rachel	Gross	Washington	IL	61571
e	kadera	warrenville	IL	60555
Maureen	Lattimore	Downers Gro	IL	60516
Deborah	Peeling	Sterling	IL	61081
Blair	Childers	Berwyn	IL	60402
Mary	Muraski-Stot	Westchester	IL	60154
Georgann	Haeffner	Villa Park	IL	60181
Jacqueline	FRANQUI	Chicago	IL	60629
Sue	Sharpe	Goodfield	IL	61742
Morgan	Kopczynski	Mokena	IL	60448
amanda	henderson	Glen Carbon	IL	62034
Kathryn	Carruthers	Peoria	IL	61604
Hannah	Underwood	Harwood Hei	IL	60706
Cassandra	Henry	Chicago	IL	60649
Monica	Jenkins	Geneva	IL	60134
Madi	Levy	Edwardsville	IL	62025

Barbara	Wolfe	Geneseo	IL	61254
Cindy	Tejeda	Cicero	IL	60804
Maya	Crystal	Wilmette	IL	60091
Nia	Raymond	Chicago	IL	60618
Richard	Penner	Lombard	IL	60148
Cynthia	Bergeron	Schaumburg	IL	60194
Aviana	Holst			
Debbie	Spagnola	Chicago Heigl	IL	60411
Julie	Robertson	Mount Olive	IL	62069
Chelsea	Crean	Chicago	IL	60640
Lisa	Delabre	WINTHROP HIL		60096
Carla	Winterbottor	Chicago	IL	60643
Leah	Schultz	Joliet	IL	60432
Victoria	Cortez	Chicago	IL	60612
Jane	Schwartz	Chicago	IL	60642
Alixandra	Perez	ROCKFORD	IL	61108
Michael	Rourke	Skokie	IL	60076
Grace	Searles	Schaumburg	IL	60173
Vince	Kesic	Valparaiso	IN	46385
Lowell	Johnson	Manteno	IL	60950
Tracy	Johnson	Willowbrook	IL	60527
Lindsy	Baugus	Freeport	IL	61032
Melinda	Keith-Singlet	Wheaton	IL	60189
Lucy	Tsitrin	Chicago	IL	60661
Toby	Gussman	Chicago	IL	60641
Callie	Sharp	Downers Gro	IL	60516
Charles	Ryan	Chicago	IL	60613
Jocelyn	Rangel	Chicago	IL	60617
Caitlin	Madlinger	Chicago	IL	60661
Paloma	Campillo	Oak Park	IL	60304
Ellen	Smatlak	Wauconda	IL	60084
Stacy	Rutkowski	Aurora	IL	60504
Ignacio	Salinas	Chicago	IL	60637
Christine	Fleming	Skokie	IL	60076
Sharon	Damery	Decatur	IL	62521
Terri	Saurs	Decatur	IL	62521
Jasmine	Leal	Ottawa	IL	61350
Cardy & Mau	Romero	Palos Park	IL	60464
Parrish	Higgins	Germantown	IL	61548
JaCaria	Williams	East Saint Lox	IL	62203
Debby	Peine	Bloomington	IL	61701
Olivia	Avila	Chicago	IL	60647
Kathryne J.	Starzec	Grayslake	IL	60030
Leslie	Shipley	Chicago	IL	60611
Jean K.	Anderson	Naperville	IL	60540
D	Rosen	Chicago	IL	60608
Lydia	Seiner	Rosiclare	IL	62982
Zach	Frye	Oswego	IL	60543
Brent	Kugman	Lake Forest	IL	60045
Monique	Chavez	Chicago	IL	60613
Kaelah	Serrano	Chicago	IL	60652
Dermot	Edgecombe	Mount Prosp	IL	60056

Jennifer	Guzman	Chicago	IL	60617
Sarah	Kaul	Boston	MA	2215
Emma	Blair	Plainfield	IL	60585
Kathy	Zipperer	Skokie	IL	60077
Maria	Chase	Addison	IL	60101
Joanne	Cahnman	Oak Lawn	IL	60453
Anna	DiStefano	Chicago	IL	60608
Victoria	Ciofani	Lake in the Hill	IL	60156
Monzerrat	Diaz	Chicago	IL	60632
Luz	Guzman	Chicago	IL	60617
Susan	Welch	Marion	IL	62959
Evellia	Rojas- Valdivi	Chicago	IL	60617
Walter	Weichsel	Lebanon	IL	62254
Sharon	Burke	Chicago	IL	60602
Jack	Graber	Lake Forest	IL	60045
Lisa	Catania	Chicago	IL	60643
Ada	Lynch	Bloomington	IN	47407
Grace	Kopasz	Bolingbrook	IL	60440
Andrew	Sager	Lincoln	IL	62656
Poorabi	Nanda	Bloomington	IN	47408
Susan	Chin	Chicago	IL	60625
Garrick	Balk	South Elgin	IL	60177
Christina	Jaime	Chicago	IL	60617
Valeria	Walsh	Rochelle	IL	61068
Amanda	Fermanich	Belvidere	IL	61008
Val	Garcia	Chicago	IL	60617
Claudia	Busiek	Fairview Heig	IL	62208
Jody	Strohm	Sugar Grove	IL	60554
Joan	Stelter	Yorkville	IL	60560
Daniel	DiMeo	chicago	IL	60618
Jeanne	Visteen	Oak Park	IL	60304
Francisco	Rodriguez	Oswego	IL	60543
Jeff	Skrentny	Chicago	IL	60628
Kathryn	Antonatos	Chicago	IL	60610
Cynthia	Fuchs	Poplar Grove	IL	61065
Jeff	Pattawi-Gami	Westmont	IL	60559
Zion	Mallette		IL	
George	Jones			
Susan	Stock	Chicago	IL	60622
Alyssa	Soren	Chicago	IL	60640
Arlene	Rakoncay	Skokie	IL	60076
Alice	Sedy	Chicago	IL	60659
Mark	Goldman	New Lenox	IL	60451
Alex A.	Bobroff	Plainfield	IL	60586
Viveca	Coleman	Chicago	IL	60637
Maria	Duarte	La Grange	IL	60525
Arlis	Ball	Homewood	IL	60430
Margaret	Guzzardo	Rockford	IL	61109
Sophie	Wienczek	Oswego	IL	60543
Letty	Aguirre	Chicago	IL	60617
Darrell	Kozmer	Chicago	IL	60617
Peggy	Simonsen	Palatine	IL	60074

Penny	Will	Homewood	IL	60430
Kyaram	Warutian	Rockford	IL	61109
Kevin	Havener	Chicago	IL	60660
Catherine	Alterio	Chicago	IL	60646
Anne	Houle	Naperville	IL	60563
Claire	Gadbois	Chicago	IL	60614
Heather	Sullivan	Chicago	IL	60614
Dan	Sweetser	Riverside	IL	60546
Anna	Barnes	Chicago	IL	60646
Everetto	Moore	Chicago	IL	60643
Nancy	Kiec	Chicago	IL	60634
Kirsten	Michelotti	Libertyville	IL	60048
Sonia	Ness	Elk Grove Vill.	IL	60007
Marcia	Stoll	Evanston	IL	60202
Elizabeth	Caudy	Wilmette	IL	60091
Susan	Episcopo	Woodridge	IL	60517
Augustine	Colon	Chicago	IL	60651
Donna K	Buechler	Springfield	IL	62707
Georgia	Gebhardt	Wilmette	IL	60091
Elizabeth	Smith	Chicago	IL	60690
S.	Arist	Evanston	IL	60202
Tess	Nugent	Chicago	IL	60626
Linda	Brooks	Olympia Field	IL	60461
Bill	Arnold	Oak Park	IL	60304
Carolyne	Luna	Chicago	IL	60623
Aristea	Geroulis	Norridge	IL	60706
George	Williams	McHenry	IL	60050
Elizabeth	Ritzman	Oak Park	IL	60302
Glenda	Wold	Tuscola	IL	61953
Joy	White	Chicago	IL	60645
Jean	Sachs-Nygaard	Chicago	IL	60614
S.	Kessler	Peoria	IL	61614
Sue	Hanson	Thornton	IL	60476
Kristin	Miller	Chicago	IL	60614
Philip	Englert	Chicago	IL	60660
Pamela	McCann	Chicago	IL	60657
Jennifer	Gilbert	Lyons	IL	60534
LJ	Asbury	Washington	IA	52353
Sun	Butuyan	Elk Grove Vill.	IL	60007
LaRisa	Lynch	Chicago	IL	60617
Alan	Meier	Bloomington	IL	61704
Linda	Burke	Indian Head F	IL	60525
Lynette	Bertsche	Chicago	IL	60637
Katherine	sewell	LaGrange Par	IL	60526
ra	szumal	skokie	IL	60076
Mhairi	Phillips	Wilmette	IL	60091
Michelle	Bradley	Chicago	IL	60618
Silvia	Rodriguez	Chicago	IL	60617
Martha	Torrez Allen	Chicago	IL	60643
Forrest	Cortes	Chicago	IL	60647
Jamie	Garrity	Homewood	IL	60430
Tyra	Taylor	Chicago	IL	60615

Gaudhy	Perez	Chicago	IL	60617
Alexandra	Sipiora	Chicago	IL	60611
Elena	Lopez	Chicago	IL	60638
Xochitl	Lopez	Matteson	IL	60443
Javier	Soler	Chicago	IL	60629
Phillip	Hodges	Chicago	IL	60617
Eduardo	Luna	Chicago	IL	60617
Marissa	Cirilo	Chicago	IL	60617
Kylah	Johnston	Chicago	IL	60612
Antonette	Slater	Chicago	IL	60633
Sarah	Perez	Munster	IN	46321
Rosa	Jimenez-Hern	Chicago	IL	60617
Jason	Palagi	Chicago	IL	60628
Eve	Danner Lentz	Chicago	IL	60618
Hilda	Martinez	Dyer	IN	46311
Maggie	Catania	Chicago	IL	60647
Jennifer	Kfoury	Lisle	IL	60532
Juli	Cicarelli	Arlington Hei	IL	60004
Gary	Kuzminski	South Holland	IL	60473
Lilia	Barboza	Chicago	IL	60617
Bruce	Jelinek	Rockford	IL	61109
Marcelina	Pedraza	Chicago	IL	60617
Bennett	Stewart	Chicago	IL	60639
Irma	Cerda	Chicago	IL	60617
Julio	Ibarra	Chicago	IL	60617
Jeff	Czach	Hoffa Estates	IL	60195
Charles	Espedido	Chicago	IL	60618
Christa	Busse	Whiting	IN	46394
Cyatharine	Alias	Skokie	IL	60076
Alejandra	Frausto	Chicago	IL	60629
Mia	Howerton	Chicago	IL	60626
Felipe	Lagunas	Hazel Crest	IL	60429
Mary	Nommensen	Arlington Hts	IL	60004
Leo	uribe	Burnham	IL	60633
Noel	Navoa	Chicago	IL	60657
Maxime	Delonnay	Chicago	IL	60611
Matthew	Lee	Elmhurst	IL	60126
Jacqueline	Lopez	Chicago	IL	60638
Gerardo	Fregoso	Chicago	IL	60647
Autumn	Laidler	Chicago	IL	60608
Joseph	Salazar	Chicago	IL	60617
Paul	Fitzgerald	Chicago	IL	60649
Ann	Phillips	Chicago	IL	60646
Steve	Cembala	Chicago	IL	60617
Rick	Schoenfield	Westchester	IL	60154
Mayte	Aldrett	Chicago	IL	60649
Frank	Romo	Chicago	IL	60623
Nadia	Carrasco	Chicago	IL	60633
Cynthia	Linton	Chicago	IL	60611
Vicente	Moreno	Chicago	IL	60617
Margarita	Palumbo	Chicago	IL	60642
Julia	Hundley	Park Forest	IL	60466

Shante	DuVerney	Chicago	IL	60617
Amy	Roberts	Sleepy Hollow	NY	10591
Cynthia	Hicks	Phoenix	AZ	85015
Jamie	Zouras	Skokie	IL	60077
Karin	Tatela	Parkesburg	PA	19365
Yaritzza	Guillen	Chicago	IL	60608
Carroll	Ford	SPRINGFIELD	IL	62704
Peggy	Bugajski	Whiting	IN	46394
Carol	Cleave	Wilmette	IL	60091
Aja	Rhodes	Chicago	IL	60613
Anne	Radakovich	Chicago	IL	60607
carina	ruiz	Chicago	IL	60606
Simone	Shevchuk	Chicago	IL	60610
Nat	Miller	Forest Park	IL	60130
Kristin	Murphy	Chicago	IL	60613
Becky	Lyons	Chicago	IL	60630
Laura	Milkert	Chicago	IL	60643
Abigail	Johnston	Chicago	IL	60643
JENNIFER	WANG	Sugar Land	TX	77478
Maria	Moreno	Chicago	IL	60617
Jay and Jill	Twery	Evanston	IL	60201
Sherry	Oliphant	Oak Park	IL	60304
ELizabeth	KROUSE	Chicago	IL	60633
Yanina	Nevarez	Chicago	IL	60617
Julianne	Ohmes	Chicago	IL	60641
Alix	Strunk	Oak Park	IL	60304
Margalit	Matso	Chicago	IL	60651
Angelica	Huerta	Chicago	IL	60617
Sarah	Tharp	Chicago	IL	60617
Jessica	Rios	Chicago	IL	60617
Thomas	Smith	Joliet	IL	60435
Julie	Armijos	Chicago	IL	60617
Michael	wehner	Chicago	IL	60609
Tara	Murphy	Chicago	IL	60617
Eileen	Rice	Des Plaines	IL	60018
Kyra	Woytek	Oak Park	IL	60304
Lisa	Sandall	Princeville	IL	61559
Rhonda	Parsons	Rockford	IL	61114
Peggy	Healy	Woodridge	IL	60517
Samantha	Sarate	Highland	IN	46322
Efren	Beltran	Berwyn	IL	60402
Nita	Graham	Fairview Heig	IL	62208
Daniel	Velazquez	Chicago	IL	60617
Joann	Cimo	Chicago	IL	60618
Carlos	Velv*quez	Chicago	IL	60617
Teri	Valenzuela	Chicago	IL	60602
Lov	Pacheco	Chicago	IL	60617
Rebecca	Campos	Chicago	IL	60617
Margaret	Cortes	Chicago	IL	60617
Thomas	Kirby	Muncie	IN	47304
Andrea	Rivera	Joliet	IL	60435
Maria	Ayala	Chicago	IL	60626

Steven	Alnemri	Chicago	IL	60633
Sara	Brodzinsky	Chicago	IL	60608
Marcia	Liebenow	Peoria	IL	61614
Nancy	Pacheco	Chicago	IL	60629
Michelle	Medrano-Rey	Chicago	IL	60617
Jessica	Simms	Lombard	IL	60148
Emmanuel	Cabrales	Chicago	IL	60617
kevin	roe	Altamonte Sp	FL	32714
Megan	Spitz Pelock	Novi	MI	48374
Paula	Lee-Rosario	Chicago	IL	60617
Trish	Juarez	Chicago	IL	60614
Tessa	Murray	Chicago	IL	60610
Margarita	Villasenor	Chicago	IL	60617
Mary	Klinke	Wood River	IL	62095
Rocio	Perez		IL	
Matty	May	Chicago	IL	60618
Heather	Robinson	Denver	CO	80202
Angela	Serbest	Bartlett	IL	60103
Diana	Young	Portland	OR	97211
Kathy	Moseley	Chicago	IL	60647
Jane	Bodine	Naperville	IL	60540
Alyssa	Kleinsmith	Chicago	IL	60618
Sarah	Feezor	Glenview	IL	60025
Cynthia	Porras	Chicago	IL	60617
Maya	Berrelez	Wauconda	IL	60084
bill	gawne jr	north riversid	IL	60546
Savanna	Rhodes	Chicago	IL	60618
jeff	hopkins	Sunbury	OH	43074
CaroLynne	O,ÁóDonnell	Bloomington	IL	61701
Nancy	Garrett	Glenview	IL	60025
Karen	Hunter	North Barring	IL	60010
Donna	March	Carpentersvil	IL	60110
Veronica	Martinez	Chicago	IL	60633
Joel	Palmer	Algonquin	IL	60102
Margaret	Galka	Chicago	IL	60642
Madeleine	Sher	La Grange	IL	60525
Jo Anne	Murphy	Joliet	IL	60435
Miranda	Bergstrand	Athens	GA	30605
Annamarie	Garza	CHICAGO	IL	60617
Patricia	Martinez	Lake in the Hi	IL	60156
Kaylee	Mccarthy	Woodridge	IL	60517
Susan	Noonkester	Fresno	CA	93727
Melissa	Hernandez	Elgin	IL	60120
Kyle	Kalinich	Elmhurst	IL	60126
Nancy	Genson	Vernon Hills	IL	60061
Geri	Hardy		PA	
Lily	Curley	Spokane	WA	99204
Rosa	Villarreal	Batavia	IL	60510
Maria	De Loera	Chicago	IL	60617
Cristina	Rodriguez	Chicago	IL	60633
S	Schreiber	Lisle	IL	60532
Elizabeth	Foster	Chicago	IL	60617

Refugio	Mariscal	Mundelein	IL	60060
Stephanie	Beilke	Chicago	IL	60622
Ruben	Sierra	Chicago	IL	60633
LINDA	SHORE	Chicago	IL	60630
Maria	Pedroza	Chicago	IL	60617
Anna	McVey	Chicago	IL	60660
Charlotte	Mays	Chicago	IL	60617
mary	hess	Chicago	IL	60601
Susan	Benner	Chicago	IL	60614
Casey	Guerra	Chicago	IL	60639
Janice	Feinberg	Chicago	IL	60611
Jenna	Beeson	Chicago	IL	60618
Armani	Thomas	Chicago	IL	60628
John	Byrne	Chicago	IL	60625
Melissa	Serrano	Chicago	IL	60617
Elizabeth	Lennon	Chicago	IL	60641
April	Plous	Chicago	IL	60625
judith	kritzberg	Chicago	IL	60637
Julio	Garcia	Chicago	IL	60608
Karen	Gibson	Chicago	IL	60613
Elizabeth	Thomson	Milford	MA	1757
Derrick	Golon	Chicago	IL	60637
Caitlyn	Hill	Chicago	IL	60626
Dan	O'Donnell	Chicago	IL	60614
Sandra	Dubois	Chicago	IL	60625
Gena	Rodriguez	Merrillville	IN	46410
Bob	Golon	Whiting	IN	46394
Deborah	Garber	Chicago	IL	60605
Renate	Gokl	chicago	IL	60637
Suzanne	Malec-McKer	Chicago	IL	60660
Amanda	Mills	Crown Point	IN	46307
jennifer	johnson	Chicago	IL	60617
Sandy	Guettler	Chicago	IL	60657
Eleanor	McGee	Country Club	IL	60478
Dorothy	Ramm	Chicago	IL	60614
Gail	McLaughlin	Chicago	IL	60643
Jimmy	Estrada	Chicago	IL	60617
Patrice	Harris	Markham	IL	60428
Debra	Hass	Chicago	IL	60637
Julianne	Litzkow	Chicago	IL	60626
Nicolette	Downs	Chicago	IL	60612
Michael	Stashwick	Chicago	IL	60626
Brian	Waak	Aurora	IL	60505
Blessielyn	Isip	Chicago	IL	60657
Greg	Burnet	Berwyn	IL	60402
Charles E	Brooks	Chicago	IL	60611
Julie	Mandel	Philadelphia	PA	19147
Claire	Harper	Chicago	IL	60612
Bob	Schwartz	Chicago	IL	60640
Jacqueline	Terziewa	Rydal	GA	30171
Cassandra	Grafstrom	Chicago	IL	60622
Lauren	Moltz	Chicago	IL	60637

Lilli	Garza	Chicago	IL	60647
Nancy	Joseph	Chicago	IL	60637
RICARDO	MAGALLANE	Chicago	IL	60617
Sue	Parkansky	Chicago	IL	60654
Virginia	Dan	Chicago	IL	60608
Mary	Oellrich	Chicago	IL	60625
Michael	Furlong	Chicago	IL	60642
Hilary	Austin	Chicago	IL	60626
Clifola	Coleman	Chicago	IL	60619
Janet	Derrick	Chicago	IL	60649
Emily	Filson	Hoffman Esta	IL	60169
Kathryn	Julian	Chicago	IL	60626
Graciela	Venegas	Chicago	IL	60617
Margaret	Peyou	PULLMAN	WA	99163
Troy	McMillan	Chicago	IL	60660
Victoria	Parra	Chicago	IL	60609
Sally	Hamann	Chicago	IL	60647
Patricia	Walter	Glenview	IL	60025
Dawn	Cline	Hemet	CA	92544
Bob	Eder	Chicago	IL	60616
Anne Marie	Bonneau	Sunnyvale	CA	94087
Catherine	Stingi	New York	NY	10014
Lanie	Overton	Santa Cruz	CA	95060
Joely	Friedman	Arlington	VA	22203
Rev. Joellynn	Monahan	La Mesa	CA	91941
Briana	Cowart	Roseville	CA	95678
Catherine	Norman-Burk	Chicago	IL	60625
Jay	Krishnan			
Sophia	Zavarse	Gainesville	FL	32607
Heidi	Nassos	Chicago	IL	60601
Juanita	Rubio	Portland	OR	97230
Revy	Godehn	Chapel Hill	NC	27516
Laura	Scott	Medford	MA	2155
aly	hanhauser	Bay Village	OH	44140
Christine	Burchinal	San Jose	CA	95125
Maribel	Pantoja	Simi Valley	CA	93065
Sylvia	Ehrler	Mount Carrol	IL	61053
Randy	Shonkwiler	Chicago	IL	60637
Katherin	Gil	Maitland	FL	32751
stephanie	pickett	Forsyth	IL	62535
june	bullied		CO	12355
Danielle	Clemens	West Chicago	IL	60185
Elin	Hollinder			
Jessica	Nami	Philadelphia	PA	19118
Laura	Paskvan	Tallahassee	FL	32308
Sarah	Goldfine	Sebastopol	CA	95472
Sandeep	Chitta	Malvern	PA	19355
Daisy	Jones	Venice	CA	90291
Nancy	Torres	Chicago	IL	60647
Melissa	Searle	Grimes	IA	50111
Mina	Bigdeli	Mission Viejo	CA	92692
Charlotte	Glen	Sunnyvale	CA	94087

Alison	Cordano	South Pasade	CA	91030
Joel	Troughton	Orland	CA	95963
Kellie	Mayfield	Atlanta	GA	30310
Maria	Martinez	Pompano Be	FL	33068
Jessica	Pierotti	Chicago	IL	60651
Allison	Parssi	Chicago	IL	60640
Paloma	Krakower	Newburgh	NY	12550
Emma	Parssi	Chicago	IL	60640
Laura	Goldberg	Chicago	IL	60642
Roger	Brown	Silver Spring	MD	20905
Darren	Russell	Catskill	NY	12414
Irene	O'Neill	West Chicago	IL	60185
Jamie	Hyzy	Chicago	IL	60617
Anastasha	Kuipers	Grand Rapids	MI	49506
Alan	Goldberg	Oak Park	IL	60304
Regina	Orozco			25000
Gabrielle	Habeeb	chicago	IL	60614
Martha	Gonzalez	Chicago	IL	60638
Jacqueline	Pluska	Grayslake	IL	60030
Dara	Reiff	Chicago	IL	60607
Chaya	Rubenstein	Northfield	IL	60093
Adriana	Espinoza	Chicago	IL	60623
Brianna	Webber	Chicago	IL	60654
Kathleen	Mitchell	Chicago	IL	60640
Petra	Alebic	Chicago	IL	60617
Kelsie	Strobel	Chicago	IL	60613
Laura	Roncal	Chicago	IL	60660
Tejwant	Gomanie	Chicago	IL	60613
Deborah	Watson	Chicago	IL	60633
Ann	Balke	Chicago	IL	60614
Carrie	Casady	Chicago	IL	60618
Gail	Merritt	Chicago	IL	60605
Sonja	Schnell	Chicago	IL	60647
Julie	Nold	Glenview	IL	60025
Nancy	Juda	Chicago	IL	60657
Jennifer	Wilson	Chicago	IL	60616
Carol	Spiegel	Chicago	IL	60608
Brittany	Riley	Washington	DC	20010
Susan	Osada	Buffalo Grove	IL	60089
Tahlia	Holmgren	Valhalla	NY	10595
Daniela	Uribe	Boulder	CO	80302
Victoria	Tadewald	Boulder	CO	80303
Casey	Mosbacher	oak park	IL	60302
Marian	Csabina	Avon	OH	44011
Neal	Urteaga	Crest Hill	IL	60403
D	Shapiro	Elizabeth	NJ	7207
Sude	Otaner	Village of Rigr	NJ	7450
Ruth	Cranston	Maynard	MA	1754
Betessa	Foreman	Louisville	KY	40207
Scott	Cowan	Chicago	IL	60609
Tewosret	Vaughn	Chicago	IL	60657
Anthony	Moser	Chicago	IL	60609

Sarah	Weatherly	Chicago	IL	60608
Gamze	Bilsen	Chicago	IL	60657
Patricia	Graham	CHICAGO	IL	60614
Rebecca	Lawson	Chicago	IL	60640
Alexis	Daffinson	Norwalk	WI	54648
Shadoe	Drury	Connellsville	PA	15425
Ismaela	Sanchez	Chicago	IL	60617
Georgette	Foss	Chicago	IL	60646
Lindsey	Dorcus	Chicago	IL	60640
Judy	McKee	Chicago	IL	60614
Michael	Saint-Aubin	Montrose	CA	91020
Chelsea	Leigh	Brooklyn	NY	11231
Tessa	Beltrano	Irvington	NY	10533
Elia	Norton	Chicago	IL	60657
Sharman	Kobayashi	Yuba City	CA	95993
Patty	Buttlere	Streamwood	IL	60107
Eileen	Fitzgerald	Dorchester Cr	MA	2124
Christopher	Blowers	Wetumpka	AL	36093
Belinda	Sellari	Brownsville	TN	38012
Jackson	Coleman	Oakland	CA	94601
Nelly	Mota		IL	60627
Michael	Caldie	Chicago	IL	60651
Christopher T	Mizera	Chicago	IL	60626
Deborah	Halpern	Chicago	IL	60611
Christina	Maerfender	Northampton	MA	1060
Melissa	Berger	Princeton	NJ	8540
Annie	Santoro	Chicago	IL	60613
Xoe	Chue	Eastsound	WA	98245
E	Kennedy	Iowa City	IA	52246
Meg	Benhardt	Bellingham	MA	2019
Liliana	Rivera	Chicago	IL	60611
Shea	Millan	Winchester	CA	92596
Zachary	Chico	Chicago	IL	60617
Bella	Santiago	Des Plaines	IL	60016
Selma	Salgado	Chicago	IL	60617
Justice	Moore	Chicago	IL	60611
Leann	Kosior	Boston	MA	2135
Saul	Gonzalez	Chicago	IL	60617
Amanda	Byrne	Portland	OR	97202
Maggie	Mendoza	Chicago	IL	60617
Laura	Cruz	Carol Stream	IL	60188
Kayla	Moore	Chicago	IL	60605
Mark	Yokim	Dallas	TX	75218
Robert	Berg	Chicago	IL	60638
Geo	Potter	Chicago	IL	60645
Sydney	Bronaugh	Fairfax	VA	22030
Joey	Bauer	Farnam	NE	69029
dorina	cragnotti	New York	NY	10014
Allison	Longpre	West Islip	NY	11795
Miranda	Easley	Chicago	IL	60619
Katherine	Oglesby	Houston	TX	77056
Cenia	Mendoza	Chicago	IL	60617

Rose	Sosnowski	Chicago	IL	60607
Annelise	Goldman	Evanston	IL	60201
Muskan	Shrivastava	Edison	NJ	8820
Kimberly	Williamson	Chicago	IL	60614
Julia	Fine	CHICAGO	IL	60647
Steve	Iverson,Ã&os	Newport Bea	CA	92660
Rachel	Freedman	Chicago	IL	60611
Elizabeth	Wray	Geneva	IL	60134
Krystal	Aranda	Chicago	IL	60629
Cheryl	Sullivan	Downers Gro	IL	60515
Katherine	McGinn	Chicago	IL	60657
Alondra	Lopez	Chicago	IL	60632

From: Amy Meyer [REDACTED]
Sent: Thursday, January 14, 2021 2:55 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Amy Meyer

[REDACTED]
Chicago, IL 60615

From: J. Beverly [REDACTED] >
Sent: Thursday, January 14, 2021 2:58 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
J. Beverly

[REDACTED]
Urbana, IL 61801

From: Frida Furman [REDACTED] >
Sent: Thursday, January 14, 2021 2:59 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Frida Furman

[REDACTED]
Chicago, IL 60645

From: Christine Kim [REDACTED]
Sent: Thursday, January 14, 2021 3:04 PM
To: envcomments
Subject: RMG Expansion on Southeast Side/Public Comment AGAINST Proposed Expansion

[Warning: External email]

Good morning. I'd like to submit a comment AGAINST the proposed RMG expansion on the Southeast Side. This community is already subject to increased pollution as a result of environmental racism. This proposed expansion would add to the suffering in this community by adding more pollutants to the environment. Nature Conservancy Illinois has also objected to this proposed expansion. Thank you for your consideration.

Kind regards,
Christine Kim
Chicago, IL

From: Amy Jahnke [REDACTED]
Sent: Thursday, January 14, 2021 3:05 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Amy Jahnke

[REDACTED]
Chicago, IL 60625

From: South Deering Manor Community Association <[REDACTED]>
Sent: Thursday, January 14, 2021 3:09 PM
To: envcomments
Subject: Community Objection to RMG

[Warning: External email]

Good Afternoon,

We the members of the South Deering Manor Community Association write to express our concerns regarding the RMG Expansion to 11600 S. Burley on the Southeast Side of Chicago.

Our mission is to create a community working together in unity to impact the quality of life in our neighborhood by bringing resources to improve our homes, schools, churches, businesses, and eliminate crime.

Our concerns regarding the RMG Expansion fall into the two categories listed below along with the corresponding deficiencies listed in the Chicago Department of Public Health Application Deficiency Letter:

- **Traffic Pollution:**
 - 11. Pursuant to paragraph 3.9.13.2 of the Rules, provide a stacking plan of all trucks and vehicles during the Facility's peak AM and PM traffic hours.
 - 12. Pursuant to paragraphs 3.9.13.4 to 3.9.13.7 of the Rules, provide a traffic study in conformance with the requirements of said paragraphs. A traffic study was previously submitted to CDPH for initial review but was not included in the Application.

- **Environmental Pollution:**
 - 33. Pursuant to 3.10.11 of the Rules, revise the hours of operation, taking into consideration the restrictions imposed under the IEPA construction air permit ID No. 031600SFX ("IEPA Air Permit"). For example, the IEPA Air Permit limited facility vehicle traffic to 14 hours per day on weekdays and 12 hours per day on weekends. These hours conflict with the 24/7 operation proposed in the Application. Other conflicting hours between the IEPA Air Permit and the Application include the non-ferrous system operation hours and barge loading hours.
 - 34. Pursuant to 1-4-2530(I), provide an odor control plan that addresses the potential odors at the Facility. Such plan shall include, but may not be limited to, the following:
 - a. An inventory of odor-emitting activities;
 - b. The location, time, and duration of each odor-emitting activity;
 - c. An odor mitigation plan that includes specific administrative and/or engineering controls and best management practices for each odor-emitting activity;
 - d. Routine odor inspections around the Facility and nearby adjacent Sensitive Areas; and
 - e. Protocols for investigating odors discovered during routine inspections or as reported in an odor complaint.

We are completely aware that our area is surrounded by industrial properties and is a proper space for this business and regardless the company or product, we will do everything necessary to keep our residents safe from traffic, environmental and chemical pollution. There is new technology that must investigate and procure. It would prove their interest in being a good community partner.

We will continue to advocate for our safety and wellbeing and hope you can join us by protecting our quality of life. Imagine your company being located where you live; have that same level of concern for our community.

Our Best Regards,

South Deering Manor Community Association

**"Connecting and Empowering Our Residents for the Good of the Community."
A 501(c)(3) non profit organization ~ All donations are tax deductible**

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From: Louise Voegtle [REDACTED] >
Sent: Thursday, January 14, 2021 3:12 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Louise Voegtle

[REDACTED]
Warrenville, IL 60555

From: Sharron Andresen <[REDACTED]>
Sent: Thursday, January 14, 2021 3:13 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Sharron Andresen
[REDACTED]
Barrington, IL 60010

From: Aria Lester [REDACTED] >
Sent: Thursday, January 14, 2021 3:16 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Aria Lester

[REDACTED]
Lansing, IL 60438

From: James Gibbs [REDACTED] >
Sent: Thursday, January 14, 2021 3:18 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
James Gibbs
[REDACTED]
Evanston, IL 60202

From: Geertsma, Meleah [REDACTED] >
Sent: Thursday, January 14, 2021 3:16 PM
To: envcomments; Dave Graham; Jennifer Hesse; Mort Ames; Angela Tovar; Megan Cunningham; Daniel Lurie; Candace Moore
Subject: NRDC et al comments on recycling permit application for the proposed General III/Southside Recycling
Attachments: Exhibit 1.pdf; Exhibit 3.pdf; Exhibit 4.pdf; Exhibit 5.pdf; Exhibit 6.pdf; Exhibit 7.pdf; Exhibit 2 - text of comments to IEPA.pdf; FINAL GIII Application Comments NRDC 1.14.2020.pdf

[Warning: External email]

Please find attached comments drafted by NRDC and joined by our partners the Southeast Environmental Task Force and the Southeast Side Coalition to Ban Petcoke, regarding the application for a recycling permit for the proposed General III, aka Southside Recycling, operation at 11600 S. Burley.

Also attached with the text of our comments are Exhibits 1 and 3-7, and part of Exhibit 2. Exhibit 2 in its entirety consists of our air permit comments to the IEPA plus exhibits to those comments, which we previously sent to CDPH this past summer and are incorporating by reference here. We are also working on getting a link to CDPH where the full Exhibit 2, including exhibits to our IEPA comments, can be (re)downloaded.

Sincerely,
Meleah Geertsma

MELEAH GEERTSMA
Senior Attorney, Environmental Justice

**NATURAL RESOURCES
DEFENSE COUNCIL**
20 N. WACKER DRIVE, SUITE 1600
CHICAGO, IL 60606
T 312.651.7904
F 312.332.1908
mgeertsma@NRDC.ORG
NRDC.ORG

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North Minneapolis Air Monitoring Project

The MPCA began a special project to monitor air quality in a heavily industrialized area of north Minneapolis in 2013. The project started as part of the MPCA's process in re-issuing the air quality permit for Northern Metal Recycling, Inc., which operates a metal shredding facility south of the Lowry Avenue Bridge on the west bank of the Mississippi River. The project started with one monitor.

The air monitoring sites measure multiple air pollutants including total suspended particulates (TSP), coarse particulates (PM10), and air toxics (metals, VOCs, and carbonyls). The majority of air samples are collected for 24-hours once every six days. PM10 is collected hourly. To date, air monitoring has found violations of the state TSP standards, exceedances of the daily PM10 standard, and elevated metals concentrations at the monitors located adjacent to the Northern Metals facility.

Under a settlement that Northern Metals and the MPCA agreed to in Ramsey County District Court in March 2017, the company will move its metal shredding operation to a new location in 2019 (more info below).

Subscribe to North Minneapolis Air Monitoring

Sign up to receive updates about North Minneapolis Air Monitoring. They're free, and you can manage your subscription preferences and make changes as needed.

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History

- **January 2013** — The MPCA begins air monitoring for fine particles (PM_{2.5}) at Lowry Avenue (909)
- **October 2014** — The MPCA adds TSP and air toxics monitoring to Lowry Avenue (909). In the first month of operation, the monitor violates the daily TSP standard.
- **June 2015** — Monitoring for TSP, PM₁₀, and metals begins at Pacific Street (910)
- **January 2017** — Monitoring for TSP, PM_{2.5}, metals, VOCs, and carbonyls begins at Bottineau/Marshall Terrace (1909)

Map of monitoring sites






Air monitoring results

Elevated levels of airborne particulate and heavy metals have been measured at the Lowry Avenue and Pacific Street sites. Air monitoring results have identified:



- Violations of the daily and annual Total Suspended Particulate (TSP) standards
- Exceedances of the daily PM₁₀ standard
- Elevated lead concentrations, measured at 80% of the national lead standard

- Elevated heavy metal concentrations including three metals (chromium, cobalt, and nickel) measured above chronic inhalation health risk benchmarks

Summary reports

-  North Minneapolis Air Monitoring Study: 2017 Data summary (aq2-209)
-  North Minneapolis Air Monitoring Study: 2016 data summary (aq2-206)
-  North Minneapolis Air Monitoring Study: 2015 data summary (aq2-78)
- Fine particle study results: North Minneapolis 2013-2014

Data reports (updated quarterly)

-  North Minneapolis Air Pollution Monitoring Results (aq2-75)
- North Minneapolis Air Data Explorer — interactive data viewer
 - For additional data requests, complete an  Information Request Form (e-admin11-36).

What the MPCA is doing

The MPCA is actively working to address the elevated air pollution levels in the area surrounding these monitors.

Air monitoring is continuing at the Lowry Avenue and Pacific Street sites (sites 909 and 910, respectively) and the MPCA is providing timely public access to results. In 2017, the agency added a third air-monitoring site on the east side of the Mississippi River in the Marshall Terrace neighborhood at 2522 Marshall St. NE.





In addition to addressing Northern Metals, the MPCA is working with the city of Minneapolis to identify other sources in the area that may be contributing to elevated air pollution levels, and to have these facilities take pollution-reduction measures to improve air quality. These activities include increasing the frequency of site and street spraying and sweeping, moving activities indoors, and changing material-handling practices.

Court action

Northern Metal Recycling was ordered by Ramsey County District Court to cease operation of the Metals Recovery Plant effective September 2, 2016. Subsequently, on February 28, 2017, Northern Metals, the MPCA and the City of Minneapolis signed a court-overseen agreement (Consent Decree) requiring the facility to relocate its shredding operation by no later than August 1, 2019. On July 18 2019, the MPCA announced it would not grant Northern Metal Recycling's request to extend the shut-down date for its shredding operations in North Minneapolis to October 1, 2019.

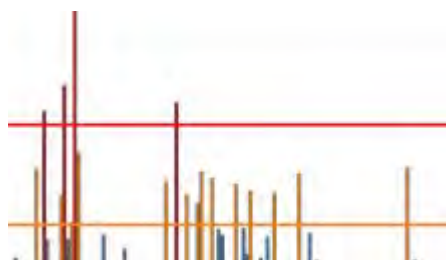
The company disputed the decision and invoked their right to pursue dispute resolution with MPCA, an option available to them under the 2017 consent decree. On July 25, while the dispute resolution was still underway, the company requested court intervention to allow them to continue operation after August 1. On July 30, the Ramsey County District Court issued an order that allows Northern Metals to continue operating after August 1, while Northern Metals and MPCA are engaged in the dispute resolution process.

The MPCA reached a settlement agreement with Northern Metal Recycling regarding its errors in reporting emissions records. Under the settlement, Northern Metal Recycling will permanently shut down its Minneapolis facility at 6 p.m. on September 23, 2019. The company is required to pay a \$200,000 civil penalty by October 1, 2019. The MPCA will also be able to reopen Northern Metal Recycling's permit for the new Becker facility to incorporate additional monitors and reports for pollution control equipment.

-  [Second Consent Decree with Northern Metal Recycling \(September 23, 2019\) \(aq2-56\)](#)
- [MPCA extension denial news release](#)
-  [Northern Metals extension Frequently Asked Questions \(aq2-56f\)](#)
- [MPCA news release \(2017\)](#)
-  [Ramsey County District Court Order](#)
-  [MPCA Consent Decree with Northern Metal Recycling](#)

For more information

- About the MPCA's North Minneapolis air monitoring project, contact **Steve Gorg**, 651-757-2396
- About Northern Metal Recycling, contact Sarah Kilgriff, sarah.kilgriff@state.mn.us or 651-757-2492



North Minneapolis air monitoring results

View results for pollutants measured at air monitoring sites in North Minneapolis, make comparisons over time, and compare with other metro area monitoring sites (updated quarterly).



Northern Metal Recycling (Becker)

In February, there was a major fire at the Northern Metal Recycling facility in Becker. MPCA is investigating potential impacts to soil, surface and ground water.

Characterizing Elevated Urban Air Pollutant Spatial Patterns with Mobile Monitoring in Houston, Texas

David J. Miller,* Blake Actkinson, Lauren Padilla, Robert J. Griffin, Katie Moore, P. Grace Tee Lewis, Rivkah Gardner-Frolick, Elena Craft, Christopher J. Portier, Steven P. Hamburg, and Ramón A. Alvarez

Cite This: *Environ. Sci. Technol.* 2020, 54, 2133–2142

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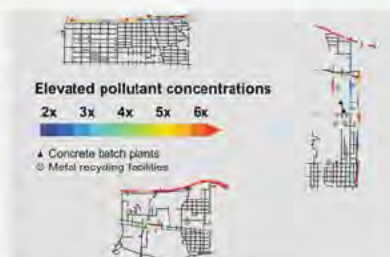
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ABSTRACT: Diverse urban air pollution sources contribute to spatially variable atmospheric concentrations, with important public health implications. Mobile monitoring shows promise for understanding spatial pollutant patterns, yet it is unclear whether uncertainties associated with temporally sparse sampling and instrument performance limit our ability to identify locations of elevated pollution. To address this question, we analyze 9 months of repeated weekday daytime on road mobile measurements of black carbon (BC), particle number (PN), and nitrogen oxide (NO, NO₂) concentrations within 24 census tracts across Houston, Texas. We quantify persistently elevated, intermittent, and extreme concentration behaviors at 50 m road segments on surface streets and 90 m segments on highways relative to median statistics across the entire sampling domain. We find elevated concentrations above uncertainty levels ($\pm 40\%$) within portions of every census tract, with median concentration increases ranging from 2 to 3 \times for NO₂, and >9 \times for NO. In contrast, PN exhibits elevated concentrations of 1.5–2 \times the domain wide median and distinct spatial patterns relative to other pollutants. Co located elevated concentrations of primary combustion tracers (BC and NO_x) near 30% of metal recycling and concrete batch plant facilities within our sampled census tracts are comparable to those measured within 200 m of highways. Our results demonstrate how extensive mobile monitoring across multiple census tracts can quantitatively characterize urban air pollution source patterns and are applicable to developing effective source mitigation policies.



1. INTRODUCTION

Urban air pollutant concentrations vary substantially from neighborhood blocks to city wide scales,^{1,2} impacting public health.^{3–5} These patterns are driven in part by spatially heterogeneous primary particulate matter and nitrogen oxide (NO_x = NO + NO₂) sources, exposure to both of which is associated with increased mortality.⁶ Black carbon (BC) and fine particle number (PN) serve as effective tracers for health relevant, fresh combustion emissions, and PN is also a tracer for particle nucleation events.^{7–9} Primary NO_x and volatile organic compounds (VOCs) also play key roles in photochemistry, serving as precursors to secondary fine particulate matter (PM_{2.5}) and ozone (O₃) formation.^{10,11}

Approaches to quantify fine scale (~kilometer) spatial patterns of urban air pollution and their source drivers include chemical transport and dispersion model simulations, satellite retrievals, and ground based stationary monitoring. Modeling approaches provide attribution of spatial patterns to specific principal source sectors (e.g., Zhang et al.¹²), but have uncertainties at sub kilometer scales associated with emission inventory spatial allocation and micro meteorology representation.¹³ Recent satellite retrieval approaches have pinpointed and quantified larger industrial and mobile urban sources, though once daily, typically afternoon overpass observations must be oversampled over several months to achieve a

kilometer scale spatial resolution and could miss sources during other hours of the day.¹⁴ Ground based stationary sensor networks are capable of characterizing spatial patterns continuously at greater spatial density (sub kilometer scales) than typical regulatory networks, but they are likely to miss local sources located between monitoring locations.^{2,15}

As a complement to fixed sensor networks, ground based mobile monitoring provides high spatial resolution observations, though temporally sparse at any individual location.^{1,16–19} Mobile measurement studies are typically conducted at relatively small scales, including a few city blocks, individual neighborhoods, and major roadway transects.^{20–22} These approaches have been valuable to assess the spatial representativeness of stationary monitors,^{4,23} characterize temporal variations in spatial patterns along urban transects,¹⁸ and evaluate vehicle emission inventories.²¹ Mobile monitoring has also provided observations for inversion modeling using Lagrangian dispersion model footprints¹³ and for building land use regression exposure models.^{8,9,24}

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Revised: January 3, 2020

Accepted: January 7, 2020

Published: January 29, 2020

Using multineighborhood, on road mobile monitoring, Apte et al.¹ found that BC and NO_x concentrations can vary by >5× within individual city blocks and semi quantitatively identified hotspot locations using the median concentrations from repeated drive passes through 30 m road segments. These temporally aggregated concentration estimates are typically reported with ±10 to ±30% precision, depending on the pollutant and study region,^{1,19} yet are summarized using domain wide average uncertainties and generally do not report instrument drifts over time or between mobile vehicles. Some studies also include an hourly temporal adjustment.^{1,19,22,23} However, temporal concentration variability across multiple drive periods may contain valuable information on intermittent or extreme concentrations resulting from local sources and/or meteorological influences that are not captured by the median approach. It remains unclear whether elevated spatial concentration patterns across even larger multineighborhood domains can be quantified and distinguished from potentially large and spatially heterogeneous sampling uncertainties.

In this study, we examine the presence and persistence of elevated concentration patterns using fine scale, multipollutant mobile monitoring data with large spatial coverage of the Houston, Texas metropolitan area. Houston is a large (~1620 km²) urban area with diverse emission sources, including on road and nonroad vehicles, oil refining and petrochemical operations,²⁵ large industrial²⁶ and hazardous air pollutant emissions,^{27,28} a lack of zoning leading to intermingling of industrial and residential areas, and nonattainment designation with regards to Environmental Protection Agency O₃ standards.²⁹ Our approach focuses on mobile source tracers because of the close proximity of vehicle traffic to our on road sampling, though point or area source plumes could also be captured using this approach if they are present at ground level. We apply descriptive statistical methods with comprehensive uncertainty analyses to characterize concentration behaviors of ~10,500 road segments across a nine month period. We utilize our on road concentration pattern observations to identify segments with elevated central tendency, high variability, and extreme concentrations relative to typical characteristics across the entire sampling domain, as well as individual census tracts. Then, we investigate their possible source drivers by examining the proximity of identified road segments to known source locations. Specifically, we conduct three transect case studies focusing on the local source and meteorological influences along road transects where multiple pollutants exhibit elevated concentrations. These analyses can help to improve the effectiveness of mobile monitoring strategies to evaluate fine scale urban emission inventories, identify missing sources, and inform source mitigation policies.

2. MATERIALS AND METHODS

2.1. Instrumentation. We conducted on road mobile measurements of BC, PN, NO, and NO₂ concentrations with two Google Street View vehicles (2009 Hyundai Santa Fe) equipped with a Global Positioning System (GPS) unit (Garmin 18×). PM_{2.5}, O₃, and carbon dioxide (CO₂) were also measured, though we do not use these species in this study as they are the subject of ongoing research. Mobile data were quality controlled and quality assured. Data were removed during instrument warm ups, calibrations, and if conditions were outside an instrument's concentration or relative humidity operating range. Mobile measurements were synchronized to GPS timestamps and time offsets were applied

to account for the inlet residence time differences as detailed in [Supporting Information](#) Section S1. Instrument specifications and analytical uncertainty estimation are detailed in [Supporting Information](#) (Table S1 and Section S2).

We assessed pollutant specific spatial resolutions of on road measurements to choose an appropriate fixed road segment spatial scale such that on road plumes measured at a particular location are assigned to the most likely corresponding road segment. Spatial resolutions were estimated by multiplying the sampling system (inlet and instrument) response time (e folding time for a step change in concentration) by percentiles of the mobile platform vehicle speed distribution. Pollutant specific spatial resolutions ranged from 15 to 72 m on surface streets and 62–170 m on highways with higher vehicle speeds ([Table S1](#)). To compare across pollutants with the instruments used on our mobile platform, we chose a consistent 50 m road segment spatial scale for surface streets and 90 m road segment spatial scales on highways. The majority of on road surface street measurements (e.g., >80% for BC and NO) have a spatial resolution finer than 50 m. There is a small probability that for the slowest instrument responses and highest vehicle speeds on surface streets (i.e., longest spatial resolution), a portion of a detected plume will be observed in an adjacent segment. However, for the worst case scenario of a persistent point source plume, wind direction variations will shift the location of an artificially longer plume decay (due to instrument response time) within a specific road segment. In addition, on road vehicle plumes are intercepted at a variety of locations, and are observed only on a subset of drive periods. Thus, these artifacts are rare and do not significantly impact summary statistics.

The minimum method detection limit (denoted as MDL) was determined for each pollutant via methods detailed in [Supporting Information](#) Section S2. Zero concentration time series were collected periodically throughout the study. We aggregated these periods into one time series for each pollutant, a total of ~4.5 h for particles and ~25 min for gases. The mean + 3σ of the aggregated time series is our best estimate of the MDL, and 3σ is the largest term contributing to MDL values.

2.2. Spatiotemporal Coverage. We repeatedly sampled all public roads within 35 representative census tracts in Harris County, Texas containing ~1300 total road kilometers across ~85 km² area with a range of emission source influences, adverse health outcome rates,³ and population characteristics (further details in [Supporting Information](#) Section S3). To select census tracts for sampling, we created a unit less rank score based upon average daily traffic counts, the spatial density of metal recycling, concrete batch plants, and petrochemical facility source locations, and the presence of freeways. These sources were chosen because of their importance for regional stakeholders and recent public scrutiny in Houston, and our ability to probe source plumes from the ground level, on road mobile sampling locations. Some selected census tracts contain a regulatory air quality monitoring site.

We analyzed data collected on arterial, local, and service drive (frontage) roads, as well as highways and ramps (only ~5% of sampled road segments). The near highway road segments within our sampling domain capture concentration patterns immediately adjacent to or below highways associated with on highway vehicle emissions. VOCs are the primary species of concern that have been observed downwind of

petrochemical facilities.³⁰ Because we focused our measurements on mobile combustion source tracers at ground level (rather than atmospheric columns) with no VOC measurements, our mobile measurements were generally not able to detect lofted petrochemical facility source plumes, nor distinguish elevated stack emissions of NO_x or PM from ground level emission plumes near roadways.

Mobile measurements covered ~51,900 km total driving distance from July 2017 through March 2018. We attempted to drive every public road in a census tract at least once during every drive period. The start times of drive periods in each census tract were distributed across time of day and day of week to minimize systematic temporal biases, in addition to varying the starting location within census tracts. Mobile measurements mainly covered weekday, daytime hours (7:00 to 16:00 local standard time; 5–95 percentile range of timestamps), with limited early morning, late evening, and weekend drive periods (Figure S4). We limited our analyses to the 24 census tracts with 15–44 repeated drive periods to ensure reasonably small uncertainties. The number of drive periods varied across road segments within an individual census tract because practical considerations required additional passes of some roads to obtain full road sampling coverage (Figure S5).

2.3. Geolocation. Measurements were assigned to fixed road segments via methods detailed in Supporting Information Section S1. In brief, GPS coordinates were map matched to a digitized road network of 10 m spaced points along the roadways. This minimizes road assignment misclassification within the ~8 m GPS location accuracy and preserves the mobile sampling trajectory along the road network length. We defined the boundaries of road segments with a preference to separate segments by road types (Figure S1). Data collected <30 m from a dead end and >30 m from a 10 m road point were removed because of potential self sampling of the mobile vehicle's exhaust while stationary or driving in reverse or a GPS error assigning measurements to nonroad locations.

2.4. Statistical Approaches. We created distributions of concentrations measured at each individual road segment during each sampling (drive) period conducted throughout the study (Figure S6). Because census tracts were sometimes sampled during the morning and afternoon on the same day separated by > 4 h, we defined these 4 h periods as distinct drive periods. First, we aggregated multiple 1 s mobile measurements collected during each unique drive pass of a fixed road segment into a drive pass mean, consistent with Messier et al.²⁴ Drive pass means equal weight passes of variable durations and sample sizes, reducing artifacts associated with oversampling of vehicle exhaust plumes during passes in slow moving traffic. Because NO and NO₂ measurements were acquired at a 5 s time resolution, we repeated data points across the 1 s timestamps, consistent with Shah et al.,¹⁷ to represent this integrated measurement across road segments. Second, we calculated the median of drive pass means for each fixed 4 h drive period, termed “drive period median”. This second level of aggregation minimizes overweighting repeated drive passes of a road segment within short (minutes) time intervals. Most drive periods have one drive pass of a single road segment, meaning that drive pass mean = drive period median. Approximately 12% of drive periods have >3 drive passes per road segment. Third, we built distributions of drive period median concentrations at each road segment and extracted summary statistics of these distributions to character

ize near source plume behaviors. Persistently elevated concentrations are represented by elevation in median and 90th percentile, intermittent elevation or high variability by interquartile range (IQR), and high extreme concentrations by exclusive elevation in 90th percentile or skewness.

Next, we compared summary statistics of each road segment's distribution with the median of its corresponding summary statistic across all road segments within the entire sampling domain of multiple census tracts (hereafter referred to as “domain wide”). We mainly focus on domain wide comparisons because of their relevance for city scale emission inventory evaluation and mitigation strategies for the highest impact urban sources. Furthermore, domain wide comparisons allow for detecting elevated concentrations even when the majority of road segments in a given census tract exhibit elevated concentrations. We also performed finer scale analyses to detect locally elevated concentrations relative to each census tract domain and nearest neighbors, the latter via normalization by the inverse distance weighted median of the road segment summary statistic. Our individual road segment comparison is distinct from traditional hotspot analyses. Those approaches identify statistically significant hotspots as locations that are part of a cluster with other locations of elevated concentration.³¹

2.4.1. Elevation above Uncertainty Levels. We defined an elevated summary statistic at an individual road segment as one with a lower confidence bound that does not overlap with the upper confidence bound of a reference domain median statistic, nor the MDL. Although nonoverlapping confidence bounds is a descriptive measure not directly based on a statistical probability, our approach provides a robust test beyond rejection of the null hypothesis (p clearly less than 0.05) that the drive period median distributions at a given road segment are the same as that of the domain median statistics. We found a weak inverse linear correlation ($r = -0.3$, $p < 0.01$) between median NO₂ or PN concentration confidence intervals and their drive period sample size, which is likely associated with a high number of drive periods on roads used to enter or exit other census tracts (Figure S5). However, the discrete locations we detected on local roads have similar sample sizes as other roads within their census tract.

Sampling precision (95% confidence interval) was calculated separately for each summary statistic based upon distributions at each road segment as 1.96 times the standard error via bootstrap resampling with 2000 draws. If the instrument error (bias and precision summed in quadrature) or median temporal sampling uncertainty (Section 2.4.2) were larger than the sampling precision, the higher of these values defined the 95% confidence interval (Table S2). This assumes that these uncertainties have some dependence on or are somewhat correlated with each other. The same method was applied for the domain median summary statistics. For NO₂ and PN, a small number of drive period medians were below the MDL and we included below MDL values without substitution for bootstrap resampling. For NO₂ and PN standard error estimates, we substituted below MDL values with MDL/2 to compute the domain median statistics. Because the majority of BC and NO data are below the MDL, we estimated confidence intervals for the median and 90th percentiles using the reverse Kaplan–Meier estimator of the cumulative distribution function,³² a logarithmic variance approach that appropriately bounds the confidence intervals (Supporting Information Section S4).

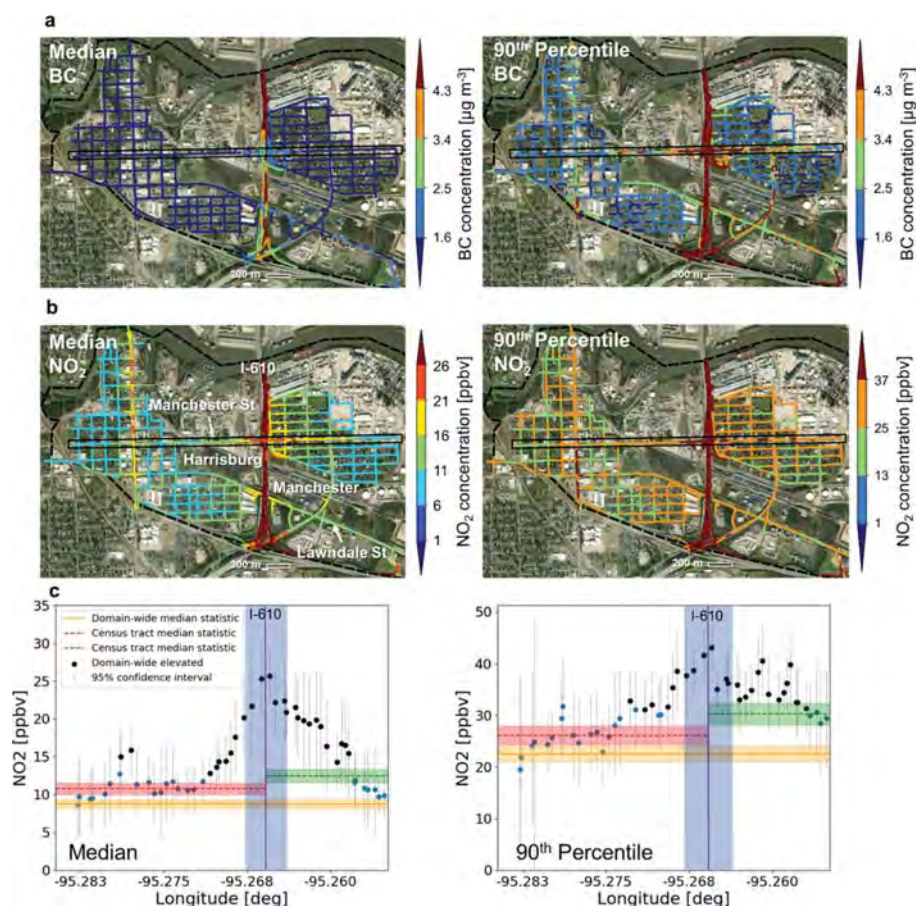


Figure 1. (a) BC and (b) NO₂ median and 90th percentile concentrations at 50 m (surface street) and 90 m (highway) road segments in the Harrisburg and Manchester census tracts, separated by the I 610 interstate highway. The concentration increments represented by the shades of color in the color bar are based upon the BC instrument precision at 3500 ng m⁻³ and for NO₂ the 95% confidence interval of the highest (90th percentile) summary statistic concentration across the domain (Table S2 and Section 2.4.3). Black rectangles indicate the Manchester St transect, and dashed black lines denote census tract boundaries. The Esri World Imagery Map is shown in the background (sources: Esri, DigitalGlobe, Earthstar Geographics, CNES/Airbus DS, GeoEye, USDA FSA, USGS, AeroGrid, IGN, IGP, and the GIS User Community). (c) Road segment NO₂ median and 90th percentile summary statistics across the Manchester St transect. Locations with elevated concentrations relative to domain wide median statistics are shown as black points, with the remaining road segments shown as blue points. The I 610 interstate highway location is denoted by the purple line and the blue shaded region is ± 200 m horizontal distance from I 610.

2.4.2. Temporal Uncertainties. We considered additional uncertainties associated with aggregating temporally sparse mobile measurements at an individual road segment. First, inter census tract temporal sampling error can occur when sampling census tracts on different subsets of days with different background concentrations. This uncertainty is important when comparing statistics associated with individual road segments with those across the entire sampling domain. We estimated the potential magnitude of the error associated with inter drive period atmospheric variability is $\pm 13\%$ for NO and NO₂ based on regulatory monitoring data from the study region (details on other pollutants in Supporting Information Section S5). Second, temporal uncertainty occurs at the intra census tract level associated with 1–2 h concentration changes associated with boundary layer mixing conditions during an individual drive period (Supporting Information Section S5). We found this uncertainty is relatively small (<9% for pollutants reported here) and can thus be ignored in our analysis (Table S2). Because of the relatively small magnitude of these uncertainties and limited or nonexistent stationary monitoring for some pollutants in some

census tracts, we did not perform background adjustments as used in other geographies.^{1,23}

2.4.3. Summary of Uncertainties. Overall, the uncertainty of road segment specific summary statistics was dominated by sampling precision (Table S2, Figure S7). Instrument or temporal sampling uncertainties exceeded sampling precision uncertainty for ≤ 5 and $\leq 1\%$ of locations for PN and NO₂, respectively (Figure S7), indicating that mobile data exhibited a larger variability than the stationary data on which the temporal sampling error estimates were based. NO₂ and PN 90th percentiles exhibited similar confidence intervals (± 35 to $\pm 39\%$) as those of the median, and were much smaller than those of the skewness ($\pm 64\%$) (Figure S7). Thus, the 90th percentile is valuable to characterize the upper portion of the distribution, especially for pollutants with a large fraction of measurements below the MDL. Domain median statistic confidence intervals were much smaller than those for individual road segments and were dominated by instrument or temporal sampling errors.

2.5. Meteorological and Temporal Source Variability Analysis. In order to evaluate the influences of temporally

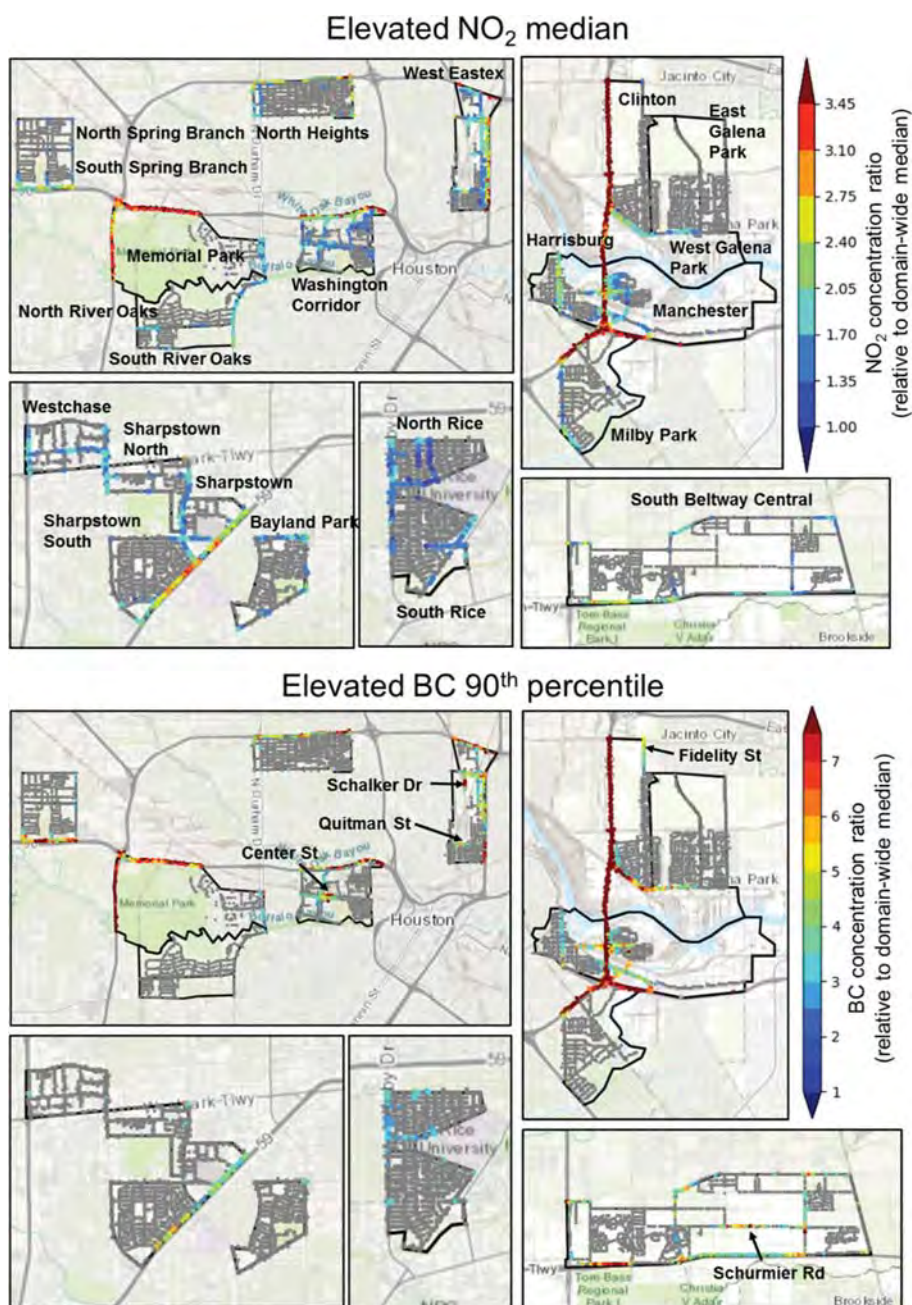


Figure 2. (a) Elevated median NO₂ and (b) elevated 90th percentile BC concentrations normalized by their domain wide median statistics (9 ppbv NO₂; 1600 ng m⁻³ BC). Census tract names (a) and elevated concentration locations in Table 1 (b) are shown for reference. Grey locations indicate road segments that were measured on more than 15 drive periods, but with a summary statistic confidence interval that overlaps with that of the domain wide median statistic. The Esri World Topographic Map is shown in the background (sources: Esri, HERE, Garmin, Intermap, INCREMENT P, GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), OpenStreetMap contributors, GIS User Community).

variable emission sources and meteorological conditions on elevated concentration locations, we examined the patterns of road segment concentrations across the ensemble of individual drive periods and their wind speed and direction characteristics. Because plumes from point sources adjacent to roads are diluted and mixed horizontally and vertically in the turbulent daytime boundary layer before reaching a sampled roadway, it is important to consider the effects of wind conditions and strong signals from local vehicle emission plumes on our platform's ability to detect point source plumes. The closest

meteorological station measuring wind speed and direction every 5 min during our study period³³ was identified based on its distance from the census tract centroid. The mean wind vector was computed during each 4 h drive period to represent that period's prevailing wind conditions. This measure was used to evaluate upwind and downwind sampling periods and does not necessarily represent the exact wind conditions during each drive pass because wind conditions were not measured on the mobile platform.

Table 1. Median Concentration Ratios (Unit Less, Rounded to Nearest Integer) for Each Pollutant Relative to Respective Domain Wide Median Statistics at Select Local Road Sections with Known Commercial/Industrial Facilities^a

census tract(s)	road(s)	potential nearby source influence(s)	BC ^c	NO	NO ₂	PN	number of pollutants with elevated median (90th percentile)
West Eastex	Quitman St	metal recycling facility	3	7	3	2	3 (4)
West Eastex	Schalkler Dr	metal recycling facility	8	5	2		2 (4)
Washington Corridor	Center St	metal recycling facility	5	3	2		2 (4)
South Beltway Central	Schurmier Rd	2 metal recycling & 3 concrete batch plant facilities	2	8			1 (3)
South Beltway Central	S. Wayside Dr.	concrete batch plant facility	4	7	2	2	3 (2)
Clinton	Fidelity St	metal recycling facility	4	8			2 (2)
all	all within 200 m of highways ^b	near-highway (≤ 200 m)	3 5	4 to >9	2	2 3	3 4 (3 4)

^aBlank rows indicate ratios are $\leq 1.5\times$ or elevation criteria are not met. ^bWithin all sampled census tracts. ^c90th percentile concentration ratio.

3. RESULTS AND DISCUSSION

3.1. Identification of Elevated Concentration Locations. We illustrate the process of identifying road segments with elevated pollutant concentrations by focusing on two census tracts in eastern Houston (Manchester and Harrisburg) with populations of ~ 1500 and ~ 1600 , respectively.³⁴ These census tracts contain a major interstate highway, arterial roads with commercial diesel fueled vehicle traffic, recycling facilities, refining and petrochemical facilities, and maritime operations along the Houston Ship Channel.^{25,27} All pollutants exhibit elevated concentration patterns along Manchester St relative to domain wide or census tract median statistics (Figures 1 and S8). For BC in this region, we find spatial structure across road segments in the 90th percentile summary statistic (upper tail of drive period median distributions) that is not evident in the median concentrations, which are often below the MDL (Figure 1a).

Our approach to identify elevated concentration locations in the Harrisburg and Manchester census tracts yields consistent results with previously established near highway concentration decay functions.^{1,35} This case study focuses on two roads, Manchester and Lawndale Streets, which are below and perpendicular to the I 610 highway (Figure 1). Near highway concentration maxima are associated with a combination of on highway emissions transported to surface streets and the short tunnel's concentrating effect. On Manchester St to the west of I 610, we find similar NO, NO₂, and PN concentration decay (from maximum concentration to 50%) at ~ 200 m from the I 610 highway, consistent with Karner et al.³⁵ Although some highway measurements may be assigned to the same GPS location as below the highway on Manchester St, this does not impact our estimates at adjacent road segments >50 m from the highway. NO, NO₂, and PN concentration decays are asymmetric, with elevated concentrations extending >400 m east of I 610 (Figures 1b,c, and S8a) and additional spatial structure, especially in BC 90th percentile concentration (Figures 1a and S8a). The Manchester St behavior is fundamentally different from the sharp, symmetric decay profiles at Lawndale St and near highway surface streets north of Manchester St (Figure 1), and the asymmetry is not linked with wind patterns because both westerly and easterly winds were observed at equal frequencies at the nearby Clinton Drive monitoring site.³³ This suggests that in addition to the highway signal, local NO_x and particulate sources influence Manchester St east of I 610.

Across the entire domain sampled, we find elevated concentrations on highways, on major arterial roadways, on roads below and adjacent to highways, and along discrete sections of local roads (Figures 2 and S9). Median pollutant concentrations are often multiple factors above their corresponding median statistics across all roads sampled. Elevated median concentrations on surface streets range from $2\times$ to $3\times$ the domain wide median for NO₂, $2\times$ to $>9\times$ for NO, and elevated BC 90th percentile concentrations are $2\times$ to $>7\times$ the domain wide median 90th percentile (Figures 2 and S9a). In contrast, PN exhibits surface street elevated median concentrations of $\leq 2\times$ the domain wide median (Figure S9b) and large IQR comparable to the median concentration (Figure S7), consistent with large spatiotemporal variability in ultrafine particle counts reported in previous studies.^{4,23} Elevated NO₂ concentrations occur at $\sim 19\%$ of road segments based on the median and $\sim 13\%$ based on the 90th percentile, but only $\sim 6\%$ based on the IQR owing to wide IQR confidence intervals (Table S3). The inclusion of highway and service drive road segments reduces the percent of elevated concentration road segments detected on surface streets by $\ll 30\%$ (Table S4). The spatial patterns of elevated median PN concentrations differ from those of the other pollutants, with elevated concentrations on residential streets in West and East Galena Park at comparable magnitude to those on the nearby arterial road, Clinton Drive (Figure S9b). Finally, the summary statistics describe combinations of persistent, intermittent and/or extreme concentration behaviors (Figure S10), with further descriptions provided in Supporting Information Section S7.

3.1.1. Domain Sensitivity Analyses. We evaluate the sensitivity of identifying elevated concentration road segments to the choice of the reference domain. For this sensitivity analysis, we examine elevated median NO₂ on surface streets in the Harrisburg, Manchester, and West Eastex census tracts, containing $\sim 12\%$ of all road segments analyzed (Figure S11). In these census tracts, we find that 42% of road segment median concentrations are elevated relative to their domain wide median, while only 10 and 3% are elevated relative to their census tract or nearest neighbor medians, respectively. The nearest neighbors approach provides limited value for our analysis because it is the most stringent comparison that mainly detects a subset of locations identified by the domain wide comparison, particularly in isolated elevated concentration locations (Figure S11).

Separately, we evaluate the sensitivity of our results to the pool of road types considered. We find that elevated

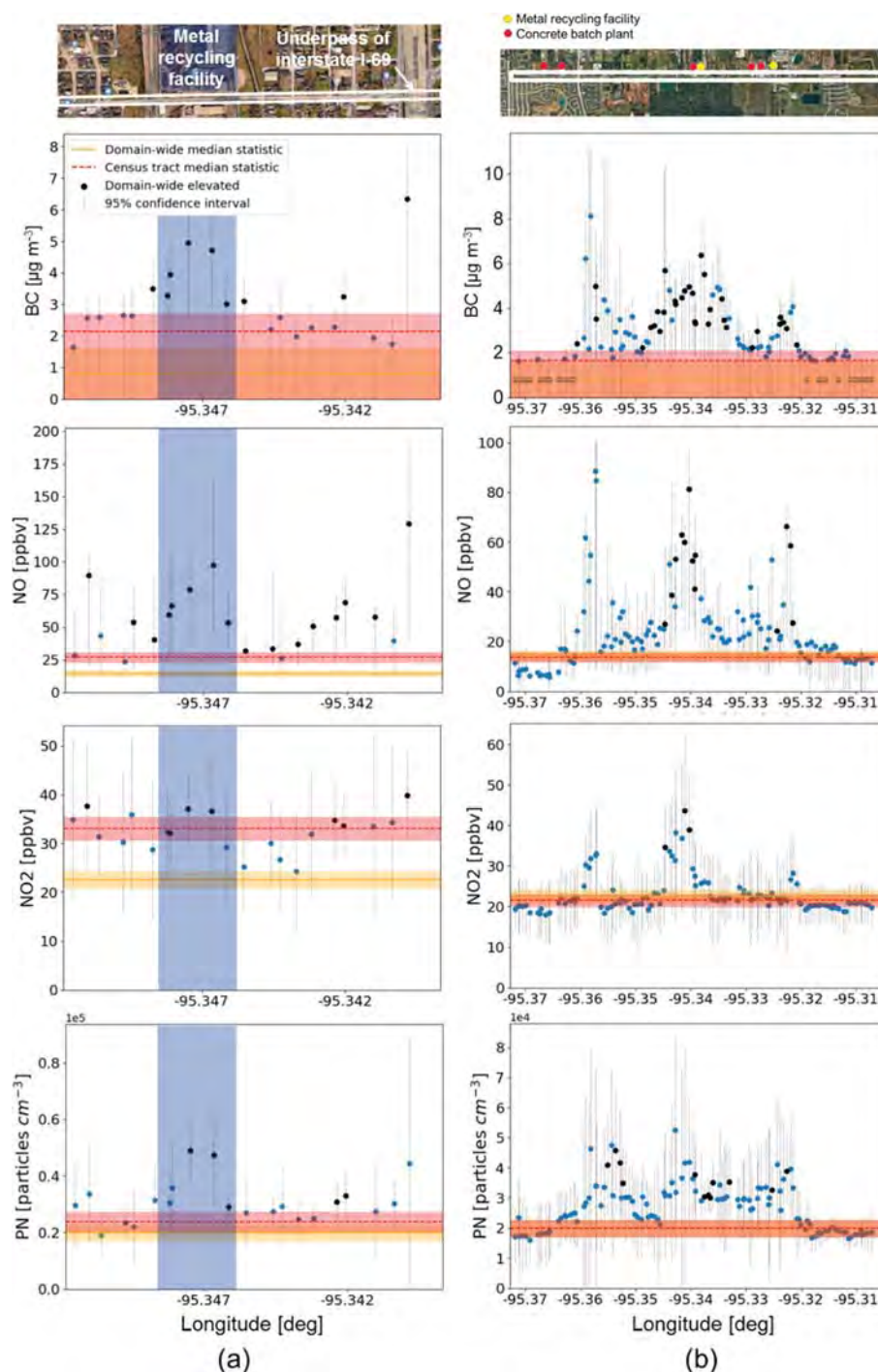


Figure 3. 90th percentile concentrations at (a) Quitman St transect (West Eastex census tract, blue shading represents metal recycling facility boundaries), and (b) Schurmier Rd transect (South Beltway Central census tract). The locations of potential sources influencing the observed patterns are denoted in the Google Earth imagery at top (Imagery 2019 Google, Map data 2019 United States).

concentration detection results are robust to the inclusion of high concentration highway, ramp and service drive road segments, which make up a small ($\sim 9\%$) portion of all sampled road segments. Specifically, we compare median statistic values based on the full population of sampled road segments with those obtained while excluding highway, ramp, and service drive road segments. The former scenario results in $\leq 8\%$ higher domain wide median values than the latter scenario,

with 12% higher domain wide median 90th percentile for NO₂ (Table S5).

3.2. Sources of Elevated Concentrations. Our analysis reveals elevated pollutant concentrations along discrete, local road sections (Figures 2 and S9, Table 1). Specifically, we find elevated median concentration in 2–3 pollutants at close proximity to 38% of (6 out of 16) metal recycling facilities and 24% of (4 out of 17) concrete batch plants within our sampled census tracts (Table 1). Elevated concentration magnitudes at

these facility locations span those observed across the domain (Figures 2 and S9) and are of similar magnitude as those ≤ 200 m of highways within the same census tracts (Table 1). Near these facilities, BC concentration 90th percentiles reach 2–8 \times the domain wide median statistic (Figure 2b, Table 1). These elevated concentration features along local roads are important contributors to overall pollutant spatial patterns. An additional 19% of metal recycling plants and 12% of concrete batch plants are adjacent to road segments exhibiting elevated concentrations on a stretch of major roadway with elevated concentrations along many or all of its road segments. However, apportioning the local contribution of an individual facility relative to the vehicle source along the entire roadway's length is beyond the scope of this study.

Next, we evaluate individual drive periods in elevated concentration locations to examine whether sources and/or meteorology influenced the distributions. We choose two regions with elevated characteristics for illustrative case studies (Figure 3). We find elevated features along a discrete ~ 300 m section of Quitman St (West Eastex census tract) along the property boundaries and immediately south of a metal recycling plant (Figures 3a and S12a). The 90th percentiles show the greatest sensitivity for localized elevation. Elevated concentrations at the eastern edge are associated with near or on highway vehicle emissions, with confidence intervals for segments adjacent to this recycling facility overlapping with those at the near highway road segment (Figure 3a). The locations of high concentrations between drive passes do not exhibit discernible wind dependence (Figure S13). Locations of higher concentration are relatively narrow (50–100 m) and occur at different locations > 50 m apart across individual drive periods (Figure S13). These observations suggest that close proximity mobile sources are the main drivers of these elevated features, rather than a constant point or area source plume shifting with the wind direction. However, more work is needed to rule out effects of on site operation emissions because only $\sim 30\%$ of drive periods occurred downwind of the facility (typically mornings with light north winds; Figure S13).

We also observed broad, spatially heterogeneous elevated features for BC and NO along the Schurmier Rd transect (South Beltway Central census tract), which is immediately south of a variety of emission sources including five concrete batch plants, two metal recycling facilities, trucking facilities, and intersections (Figure 3b). The elevated 90th percentile concentrations for BC, NO, and NO₂ in the middle of the transect extend up to ~ 1 km, with relatively large confidence intervals owing to large variability across drive periods (Figure S12). However, while PN shows high variability and elevated extreme values, PN medians are not elevated (Figures 3b and S12b). Elevated BC and NO_x concentration features are not adjacent to one particular facility or intersection and also do not exhibit wind dependence (Figure S14), suggesting they are associated with an on road mobile vehicle source (e.g., traffic backed up from a nearby intersection) or one or more nearby facility's emission source footprints extending beyond their immediate boundaries.

Both case studies suggest that the road transect spatial concentration patterns are associated with mobile on road or on site diesel fueled vehicle sources with spatial scales corresponding to intercepting an on road diesel vehicle plume for ~ 10 s while driving at 5–10 m s⁻¹. Although older gasoline fueled passenger vehicles with faulty emission control technologies may also contribute to the elevated NO

and NO₂ concentrations,^{36,37} the coincident elevated BC concentrations are more consistent with a diesel engine source.³⁸ Although BC and NO_x may be emitted from on site diesel equipment for recycling processes and particulate matter emissions from such facilities have been reported previously,³⁹ we did not sample during high speed, north wind periods optimal for capturing on site emission plumes. In addition, the longer distance from these sources to on road sampling locations means they are subject to vertical dispersion and dilution to levels below that of much closer on road source plumes.

4. IMPLICATIONS

Our mobile measurements characterized persistently elevated and extreme concentration behaviors on arterial and local roads. We found heterogeneous, elevated concentration spatial patterns that are ubiquitous across a larger spatial domain than previous studies, ~ 85 km² compared with ~ 30 km² in Oakland, California.^{1,24} Our approach explicitly quantifies the sampling attributes that determine the sensitivity of a mobile monitoring method to detect elevated concentrations, which can inform routine monitoring and future study designs in other urban areas. We found sampling and instrument uncertainties across 24 noncontiguous census tracts are reasonably small to identify elevated concentrations at least 40% above that of the domain wide median, even when including near and on highway road segments. This mobile sampling approach offers unique capabilities to both identify and rank locations by their concentrations at specific road sections that facilitate follow up surveys and prioritize locations for inspection. Our road transect case studies suggest a diesel fueled mobile emission source influence with discrete areas (≤ 100 m) of elevated primary emission tracer (BC, NO_x) concentrations near metal recycling and concrete batch plant facilities with potential cumulative effects of multiple closely clustered facilities. These features are an exemplar of urban emission sources that can be identified with mobile monitoring approaches. Metal recycling facilities are ubiquitous in other urban areas and have also been identified as a source of carcinogenic metals in Houston,³⁹ and a hotspot for diesel vehicle emissions in Oakland, California.¹ Overall, these results have important implications for understanding and tracking advection of near facility emission plumes into residential neighborhoods.

Our analyses lay the foundation for future studies focusing on source quantification, source attribution, and health impacts. First, future analyses of individual drive period observations focused on identifying concentration patterns upwind and downwind of known point and area sources and distinguishing their source footprints from on road vehicle plumes under specific atmospheric stability regimes would provide useful insights. Future mobile monitoring opportunities that incorporate more extensive night time and weekend observations would also be valuable to distinguish the relative influence of emissions from light duty passenger vehicles versus heavy duty commercial vehicles operating only during weekdays,⁴⁰ as well as night time emission sources, on elevated concentration patterns. Second, emission ratios with respect to CO₂ in elevated concentration locations can be used to quantify on road vehicle emissions. These results can then be compared with fine scale mobile source emission inventories (e.g., McDonald et al.⁴¹) to improve their spatial emission allocation estimates. Third, follow up mobile monitoring

should include additional urban source tracers (e.g., carbon monoxide, VOCs) to further fingerprint emission sources. Fourth, mobile monitoring observations can be compared with and complement existing stationary monitoring and satellite remote sensing observations, and provide additional measurements where existing monitors do not exist. For example, mobile monitoring observations could serve as an independent test for upcoming geostationary satellite retrievals at kilometer and hourly scales. Finally, an upcoming Health Impact Assessment study utilizing these mobile measurements will complement previous health studies³ and further evaluate disparities in pollution related health impacts. Our study demonstrates the value of using city scale mobile monitoring to inform policy development related to urban air quality and emission source management strategies, and for communicating patterns of near road exposure to policy stakeholders and the general public.

■ ASSOCIATED CONTENT

● Supporting Information

The Supporting Information is available free of charge at <https://pubs.acs.org/doi/10.1021/acs.est.9b05523>.

Text, figures, and tables with detailed information on geolocation and uncertainty methodologies, spatiotemporal data set coverage, and supplementary statistical and sensitivity analysis results (PDF)

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Notes

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Northern Metal Recycling (Becker)

A major fire broke out at the Northern Metal Recycling facility in Becker early in the morning of Tuesday, Feb. 18. A large plume of dense, black smoke caused concern about air quality among residents in a large area. The fire is out and MPCA has conducted air monitoring.

The MPCA will continue to provide updates on this web page.

March 24

Northern Metal has completed a majority of the requirements in the MPCA's February 21 Administrative Order.

-  **Northern Metals, LLC: Administrative Order (March 24, 2020)**
-  **Northern Metals, LLC: Administrative Order (Feb. 21, 2020)**

In early March, MPCA staff inspected the Becker site and observed burned scrap metal feedstock, slag, significant ash and debris, as well as degradation to the concrete surface.

- MPCA staff and MPCA's contractor collected wastewater samples from both the north and south ponds, as well as samples from a sludge layer in the south pond and ash samples from around the yard.
- The results showed elevated levels of SVOCs and VOCs in the wastewater in both ponds on site, as well as elevated levels of total PCBs and total lead in the sludge in the south pond, and elevated levels of total chromium and total lead in the ash.

Today's amended Administrative Order requires Northern Metal to properly handle and dispose of ash and burned materials.

- Northern Metal is required to ensure the Facility does not release or has an ongoing release of pollutants
- Northern Metal is prohibited from using wastewater from any of the ponds at the Facility until the water has been treated and approved for usage by the MPCA.

The amended Administrative Order also allows Northern Metal to start its shredder in Becker, as long as the company does not shred burned cars or debris.

Background

The MPCA conducted air quality sampling on Thursday, Feb. 20, related to the Becker fire. The testing included volatile organic compounds (VOCs), metals, and particulate matter. Results showed nothing unusual in terms of the types and levels of VOCs found, and no metals were detected. Based on these results, VOC and metals sampling was discontinued.

Real-time particulate monitoring starting Feb. 21 in and around Becker showed no particulate levels of concern, and particulate monitoring was discontinued on Friday March 6. Assessment for potential environmental damage at the Becker site continues under the oversight of MPCA's Compliance and Enforcement section.

The Minnesota Department of Health has information about the Becker fire on their web site: **Northern Metals Fire in Becker, Minn.**

Fire breaks out at General Iron week after company pays settlement to city over explosion

Chicago firefighters were called to the Lincoln Park location Tuesday afternoon to extinguish a large rubbish fire.

By Brett Chase | Updated Nov 10, 2020, 5:47pm CST



Three Chicago Fire Department engines were called to a fire at General Iron's Lincoln Park site Tuesday. | Google

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A week after **General Iron's owner paid \$18,000** to settle a number of violation notices issued by the city for air pollution and other nuisances, a fire broke out in the metal-shredder's yard in Lincoln Park Tuesday afternoon.

General Iron's operations are being moved to the Southeast Side and last week's announcement by the city helped the business' owner Reserve Management Group resolve those past issues as it seeks a final permit to begin operations along the Calumet River.

One of the citations settled last week related to an explosion in May.

The fire Tuesday started in some debris laying in General Iron's yard and didn't appear to be related to equipment, said Chicago Fire Department spokesman Larry Langford.

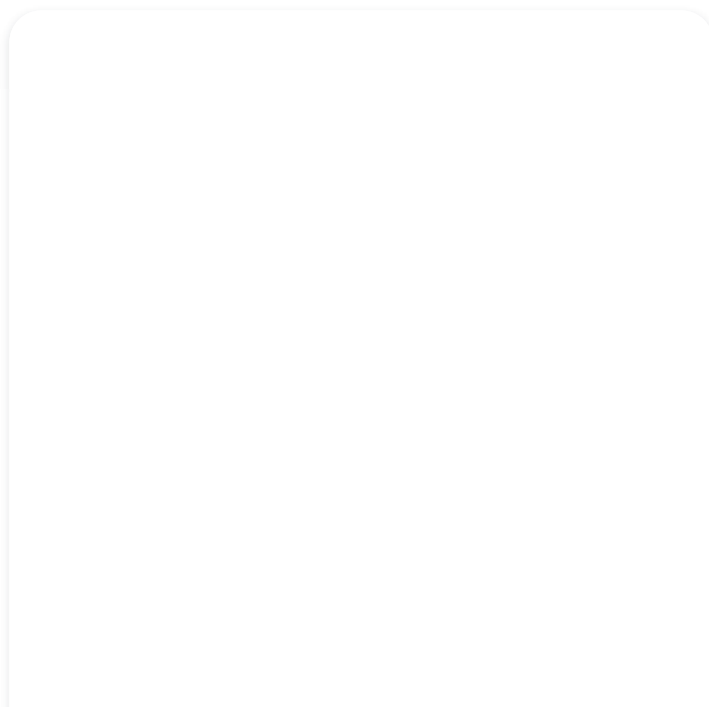
Three fire engines were called and the large rubbish fire was extinguished "relatively quickly," Langford said. There were no reported injuries.

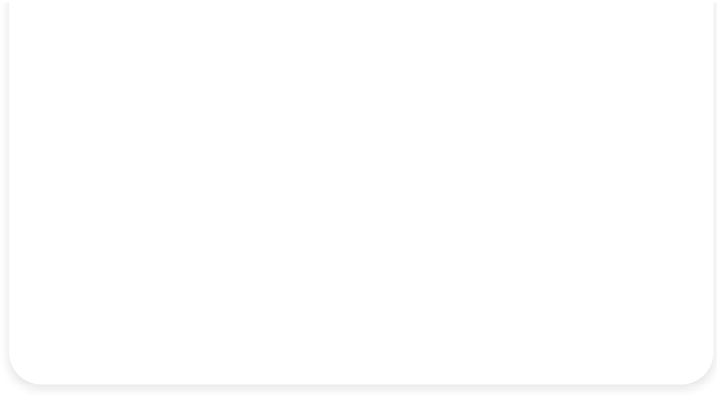
Initial air sampling showed no toxic materials released in the air, he said.

RMG said in a statement that the metal shredder "was not operating prior to or during the incident due to maintenance. ... We are investigating possible causes and we are fully cooperating with City officials."

As of Tuesday afternoon, RMG had not filed its full application to receive its final permit, a city spokesman said.

Brett Chase's reporting on the environment and public health is made possible by a grant from The Chicago Community Trust.





Feature

Facilities on Fire

Detect and destroy hot spots before the flames take over

In 2018 371 waste and recycling industry fires were reported in Canada and the U.S., including a major fire at a recycling facility outside Calgary in July.

However, that number is likely low. According to Ryan Fogelman, vice-president of strategic partnerships at Michigan-based Fire Rover, the real number may be over 1,800.

It's no surprise that number of fires at waste and recycling facilities is higher now compared to years past. Increased summer temperatures may be a factor, says Fogelman, but mainly it's larger volumes of material due to growing population rates and China's National Sword policy restricting waste imports.

Increasing numbers of small, hard-to-detect lithium-ion batteries in everything from greeting cards to Christmas sweaters and disposable electronics like Apple earbuds – which each have three – compound the problem. They cause up to half of recycling facility fires.

Fire detection basics

There are only a couple proven ways to detect a fire or pre-fire hot spots. Bryan Staley, president and CEO at the California-based Environmental Research & Education Foundation (EREF), says he's heard of some firms posting a 'watchperson' after hours to watch for fire-starts.

Fogelman, however, believes thermal cameras are a necessity, "but you need to use top-of-the-line thermal cameras that can sense temperature differentials." He points out that there are many sources of heat in a waste or recycling facility – equipment running hot for example, and some places use heat in



Many of North America's 1,800-plus recycling and waste facility fires every year are preventable, with the right technology.

their processes – and that software programs associated with thermal cameras are not yet at the level where they can definitively ‘decide’ in all cases when a fire is close to starting or has started.

“Each facility is generally a very complex environment in terms of heat, so you need human verification of what the camera is picking up,” Fogelman says. “With our system, we get many, many alerts every day analyzed by our team. There are numerous false alarms but it’s better to be safe than sorry.”



In these side-by-side shots of a recycling yard, the right-hand image shows the bright heat signatures as seen through an infra-red camera.

His company sells fire detection and suppression systems specifically for the waste and recycling sector. They use the FLIR A310F thermal camera that can detect and pinpoint abnormal heat sources down to the size of a pixel. And that means temperature accuracy within two degrees Fahrenheit.

It has installed systems at over 100 facilities in the USA since 2015 with no major fire incidents at any of them since, and is about to sell its first two systems in Canada, in Edmonton.

Facilities do sometimes have sprinklers installed, but if a sprinkler system is set up so that the structural columns of the facility and workers and /firefighters are protected, the amount of heat required to set it off would mean a fire is already well under way.

Even if a sprinkler system is placed to detect the heat of a fire start, Fogelman does not believe currently marketed systems are sufficient. He typically recommends the use of a pre-wetting foam agent, possibly in combination with water spray that employees can manually or remotely apply.

Staley notes that in addition to foam and water sprinklers, he has heard of facilities isolating a hot or burning mass by pulling it away using machinery, or “if the fire is not on a tipping floor and is away from good access to water, some fires are controlled/extinguished by placing soil on them.”

Success story

At Sweden’s Jönköping Energi, which burns waste and biomass to make electricity, spontaneous combustion is a 24/7 threat in its storage areas. “Apart from the environmental consequences and the obvious safety risks for people at the plant, a fire outbreak in a waste bunker can be a very costly affair. If

a fire should break out, we need to shut down the plant immediately,” says Magnus Olsson, the company’s plant manager. “These shutdowns cost us quite a lot of money, up to half a million Swedish Crowns a day.”

The plant was using an aspiration-based smoke detection system. It pulls in air from the environment, which is then analyzed for the presence of smoke.

But the system was not fast enough. In fact, for this system to generate an alarm, smoke actually has to make physical contact with the smoke sensor, which is usually installed high up in the ceiling of the waste bunker. By then, a fire will already have developed into something uncontrollable.

A new tender was put out for fire detection and suppression. A contract was awarded to Termisk Systemteknik, a distributor of FLIR thermal imaging cameras and provider of fire detection systems. They installed two FLIR A615 cameras in protective housings mounted on pan tilt systems, one at each end of the bunker. They are controlled via dedicated TST Fire software from Termisk.

When a hot spot is detected by one of the two cameras, the other camera is directed at the hot spot as well. The TST Fire software then calculates the coordinates of the hot spot, based on the combined thermal images, and an alarm is generated. Upon activation in the waste bunker control room, the water canon is directed at the detected hot spot and the fire is extinguished.

“A critical factor for putting out a fire is to have an early response. And that we can achieve with the FLIR cameras. We can even put out a fire before it starts,” says Robert Berger from the fire protection solution company Incendium, which is supplying the fire extinguishing system for Jönköping.

When detection fails

No matter what the cause of a fire, most waste disposal and recycling companies don’t focus on detection and what to do during the first ten minutes after that, before the fire fighters arrive.

Employees should be trained to prepare for the arrival of firefighters.

Fogelman says employees should be trained to prepare for the arrival of fire-fighters, part of a larger ‘combinational approach’ to fire risk that Fogelman created with Jim Emerson, from a firm called Starr Technical Risk Agency. Employees should be ready to connect fire hoses to water, roll out hose and so on.

Insurance angle

Some or all of these actions will not only greatly reduce the chance of major fire, but also may mean better evaluations from insurance firms.

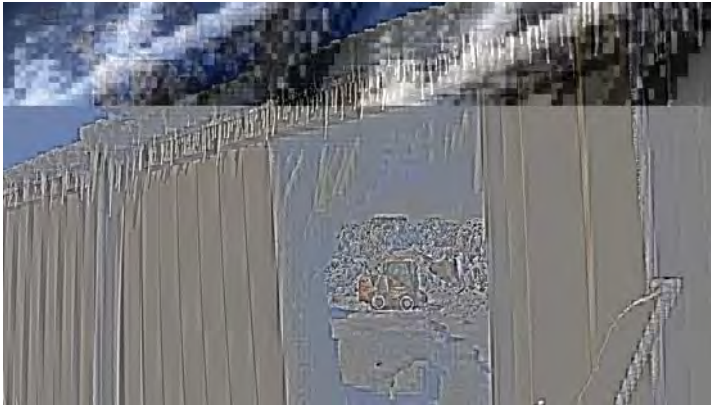
“Insurance companies are running from this industry because of the fire risk, so taking these approaches may keep you insured,” Fogelman says.

“I highly recommend that you engage your insurance provider early in the process of assessing and developing a fire protection strategy. It puts you in the best place possible for understanding which investments in equipment, training and tactics make the most sense for your operation and will give you the most gain in terms of lower insurance and preventing fires. This is especially true if you have multiple facilities with multiple types of risks.” 🗨️

Environment

As fire continues, state halts most Northern Metal operations in Becker

Kirsti Marohn Collegeville, Minn. February 21, 2020 9:52 p.m.



By Thursday, firefighters had created an access point to reach the pile of cars that caught fire Tuesday morning at Northern Metal Recycling in Becker. Paul Middlestaedt for MPR News

Update: 9:20 p.m.

The Minnesota Pollution Control Agency on Friday ordered Northern Metal Recycling to stop accepting scrap metal at its Minneapolis and Becker, Minn., sites until it corrects fire code violations and submits a damage assessment and a plan for storing vehicles.

The order effectively halts most of the company's Becker operations before they could begin. It comes as piles of scrapped vehicles at the company's new recycling facility in Becker continue to burn for the fourth straight day, and air pollution specialists monitor for potentially hazardous substances.

A plume of smoke from the fire has raised concerns among local residents about whether the air is safe to breathe.

Northern Metal moved to Becker at the end of 2019 from its former location in north Minneapolis, where it had a fraught relationship with local residents and state pollution officials.

The company faced air quality permit violations and was accused of submitting inaccurate emissions data to the state. It agreed to pay a fine and move its shredding operations out of Minneapolis last year, but continues to store vehicles and other scrap metal at the site.

MPCA spokesperson Darin Broton said the fire at Northern Metals' Becker site prompted city fire officials in Minneapolis to inspect the company's site in their city. They cited Northern Metal for numerous fire code violations related to not having an adequate water supply or access for emergency vehicles.

The agency ordered the company to stop accepting any scrap metal at its Minneapolis site until it submits plans to the MPCA for how to store vehicles and other debris while also protecting human health and safety.

The agency's order said that both the Becker fire and the Minneapolis violations demonstrate that Northern Metal "does not have metal collecting and storage practices in place at either location that protect the health and welfare of Minnesota residents."

The MPCA sent its order to Northern Metal on Friday. In addition to the prohibition on accepting scrap at its Minneapolis location, the company must also make changes at its new facility in Becker:

- The company must stop accepting any scrap metal at the Becker location until it completes an environmental damage assessment of the area affected by the fire, and the MPCA approves it.
- Northern Metal also must submit a cleanup plan to the MPCA for how it will remove all contaminated ash, water, soil and other debris leftover from the fire — not just at the recycling plant, but also in the wider Becker community.
- In addition, the company must submit a plan for how it will store scrap metal and other debris at the Becker site in the future to protect human health and the environment.

The company had not yet begun operations in Becker when the fire began, but had been collecting vehicles onsite and had just received required state and local permits. The MPCA order prohibits Northern Metal from operating its shredder until the fire is fully extinguished and investigators have a chance to determine what likely caused the blaze.

The company also must take action to control “fugitive dust” — tiny particles created by ash and fire debris — from becoming airborne or being tracked off the site by vehicles.

Northern Metal COO Scott Helberg issued a statement protesting the MPCA’s findings released Friday:

“The company worked closely with the MPCA to obtain all necessary permitting approvals. To be clear: the Northern Metals Recycling facility in Becker has never been operational. The shredder has yet to be turned on and its installation is ongoing. Nevertheless, the facility is otherwise in strict compliance with all applicable requirements.”



Water used to fight the fire at Northern Metal Recycling in Becker quickly turned to ice over the crushed metal cars which created a barrier making it more challenging to extinguish the flames. Photographed on Thursday. Paul Middlestaedt for MPR News

Questions about air quality

The order comes as the MPCA and Northern Metal both have had contractors at the Becker site assessing the air quality.

MPCA contractors started sampling the air on Thursday for volatile organic compounds and metals. The agency said initial results it received Friday afternoon showed nothing unusual. Results for lead testing were expected later Friday. In addition, MPCA staff used monitors to test for particulate matter, which showed levels similar to the metro area.

According to Becker police, the fire at the recycling plant flared again late Thursday, sending smoke over the city once more.

Members of the Minnesota Hazardous Materials Emergency Response Team were called to conduct a third round of air testing for chemicals that would likely make people sick, such as carbon monoxide or

sulfur dioxide, but did not detect any. The MPCA air samples detect a broader range of chemicals.

Gov. Tim Walz said Friday that Northern Metal should be held accountable for any possible violations.

During a discussion at the University of Minnesota's Humphrey School, Walz said he is often criticized for some of the state's regulations on businesses. But companies that handle potential pollutants, he said, should be closely monitored.

"This is that fine line that we have these things in place," he said, "the government as a regulator in working with businesses to ensure worker safety and children's safety and ensure public safety."

According to Becker police, firefighting efforts at the recycling plant have been turned over to a private company. The fire has been reduced to a few smoldering spots and could be extinguished by the end of the weekend, police said.

To print the document, click the "Original Document" link to open the original PDF. At this time it is not possible to print the document with annotations.

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June 15, 2020

Illinois EPA
Attn: Jeff Guy, Hearing Officer
P.O. Box 19276
1021 North Grand Avenue
Springfield, IL 627-94-9276

Submitted Via Email: epa.publichearingcom@illinois.gov

Re: Public Comments on the Draft Permit for General III, LLC, 11600 S. Burley, Chicago, IL 60617, Application No. 19090021, I.D. No. 031600SFX

To Whom It May Concern:

We write to oppose the permitting of yet another heavy industrial facility – in this case of a notorious polluter relocating from the well-off, White Lincoln Park community that has ejected it – in Chicago’s Southeast Side environmental justice community, due to a long list of legal and technical failures in the permitting process and Draft Permit for General III, LLC (“Draft Permit” “GIII”), culminating in the likely violation of air quality standards by the proposed new metal shredding facility. As set forth below, these failures provide ample ground for or compel a permit denial. At a minimum – which in itself is not sufficient to rectify the many shortcomings in this proceeding, including the application shortfalls – the agency must postpone its permit decision and/or substantially revise the Draft Permit to create robust and objective requirements that are enforceable as a practical matter.

These comments are submitted on behalf of the Natural Resources Defense Council and our roughly 3 million members and activists, including approximately 10,000 members and activists in the City of Chicago, a number of whom reside on the Southeast Side in close proximity to 11600 S. Burley, the location for the proposed new metal shredding facility. The Southeast Environmental Task Force (“SETF”) and the Southeast Side Coalition to Ban Petcoke support these comments as well. SETF’s mission is to ensure a healthy and safe environment for its residents, to preserve regional ecological resources and to achieve a sustainable economy that enhances local communities. The Southeast Side Coalition to Ban Petcoke is a community-based organization dedicated to the health, safety and welfare of the people who live, work and recreate in the Calumet region. Because of the scope of the shortcomings in this proceeding and Draft Permit, and due to the local, state and federal COVID-19 emergency and civil unrest occurring as the comment period went forward, it was not feasible for these aligned organizations to coordinate fully on a single set of comments.¹ Consequently, additional comments that are also

¹ The submission of these comments should not be interpreted by IEPA as indicating there was little to no impact of these dual emergencies on the drafters and their ability to meaningfully participate on behalf of their clients. Instead, the emergencies resulted in reduced work hours and otherwise challenging working conditions for multiple members

supported by NRDC will also be submitted by these organizations focusing on other and related aspects of the permitting process and Draft Permit.

I. Introduction

At its core, the proposed permitting of GIII is yet another failure of the Illinois Environmental Protection Agency (“IEPA”) to fulfill its duties to protect the health and welfare of the state’s residents, in particular to uphold its responsibilities to environmental justice communities like the Southeast Side. IEPA recognizes that

‘Environmental Justice’ is based on the principle that all people should be protected from environmental pollution and have the right to a clean and healthy environment. Environmental justice is the protection of the health of the people of Illinois and its environment, equity in the administration of the State’s environmental programs, and the provision of adequate opportunities for meaningful involvement of all people with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.²

The specific goals of IEPA’s environmental justice policy are as follows:

- to ensure that communities are not disproportionately impacted by degradation of the environment or receive a less than equitable share of environmental protection and benefits;
- to strengthen the public’s involvement in environmental decision-making, including permitting and regulation, and where practicable, enforcement matters;
- to ensure that Illinois EPA personnel use a common approach to addressing EJ issues; and
- to ensure that the Illinois EPA continues to refine its environmental justice strategy to ensure that it continues to protect the health of the citizens of Illinois and its environment, promotes environmental equity in the administration of its programs, and is responsive to the communities it serves.³

of the team, including experts, due to, e.g., child care obligations and other work-from-home hurdles like limited home-office capacity; increased competing obligations as team members supported community clients with needs made even more pressing by the emergencies; and delays in responses requesting relevant information from several agencies and businesses themselves facing reduced capacity due to the emergencies. As a result, the team had to make difficult decisions about where and how to allocate reduced capacity, and whether and how to move forward without some important information, resulting in comments that are not as comprehensive as they would otherwise have been without these two massive emergencies. These limitations compound the insufficiencies of the public process for this environmental justice community, as discussed elsewhere in our collective comments with respect to participation by community members themselves.

² Ex. 1, IEPA, “Environmental Justice,” Illinois.gov, <https://www2.illinois.gov/epa/topics/environmental-justice/Pages/default.aspx> (last visited June 13, 2020).

³ Ex. 2, IEPA, “Environmental Justice Policy,” Illinois.gov, <https://www2.illinois.gov/epa/topics/environmental-justice/Pages/ej-policy.aspx> (last visited June 13, 2020).

Yet here, IEPA has in fact devalued the community's participation and its health and welfare in numerous ways, exercising its discretion over and over in favor of permitting a demonstrated polluter. This is not the just and equitable process or outcome that IEPA purports to uphold.

Instead, IEPA is proposing to approve a synthetic minor source air construction permit for GIII, a new 1,000,000 tpy metals recycling facility on Chicago's Southeast Side. The Southeast Side is a recognized environmental justice community where heavy industry pushes up against dense residential neighborhoods, situating a myriad of hazards next to low-income communities of color, including their homes, parks, and schools. The waterfront of the Calumet River here – with back-to-back industrial sites and their dilapidated metal buildings, open piles of waste and scrap and crumbling artificially built, poorly-maintained banks – is in stark contrast to Chicago's Riverwalk and the greenery and boathouses on the city's Northside.

Over the past several years, advocate-residents of this community have fought long and hard to clean up the many threats to their health and well-being by taking on mountains of petcoke, clouds of neurotoxic manganese dust and a second disposal facility for contaminated sludge and soil contaminated from years of steel company toxic dumping, among the many threats facing this community. Historically the Southeast Side has faced a much longer list of polluters, including the steel mills that left a legacy of contaminated soil and decades of exposure to a range of carcinogenic and neurotoxic pollutants.

It is against this backdrop that the Illinois EPA is proposing to grant a permit to construct yet another large heavy industrial site at 11600 S. Burley. This site is already the home to at least four other recycling operations affiliated under the Reserve Management Group umbrella ("RMG," doing-business-as South Chicago Property Management, "SCPM," hereinafter collectively referred to as RMG or RMG-SCPM), which themselves have been operating illegally without required local and state approvals for years and have been cited and/or found liable by the City for other environmental violations. The site is directly on the Calumet River, a mere 500 feet from the American Zinc Recycling facility and several bulk material handlers. Other significant polluters in the more immediate area where this relocated facility is planned include PVS Chemicals, Watco, Cargill and KCBX to name a few, along with the Shroud Superfund site.

The site is roughly a third of a mile from Washington High School, Washington Elementary School and Rowan Park, along with one of the few shopping plazas still serving this heavily burdened community. Already yet another recycling facility is being proposed by RMG-SCPM immediately to the East of the proposed GIII, bringing this single source even closer to schools and people's homes. Nearly 7,000 people live within one mile of 11600 S. Burley, of whom 72% are of Hispanic origin, 2% are African-American, and 31% are Other/Multi-racial; roughly 40% of the households within one mile make less than \$50,000 per year.⁴ According to USEPA's

⁴ See Ex. 3-4, USEPA, "Detailed Facility Report for Napuck Salvage, 11600 S. Burley Ave.," Enforcement and Compliance History Online, <https://echo.epa.gov/detailed-facility-report?fid=110046596750#pane3110046596750>

EJSCREEN, the site ranks in the 91st to 99.8th percentiles for all Census Block Group EJ Indexes, with most scores above the 97th percentile.

Moreover, this is not just any “new” facility – Illinois EPA’s proposed permit would enable the relocation of General Iron, a notorious scrap metal recycler currently located in the city’s well-off, predominantly White Lincoln Park community, to this environmental justice community. General Iron has long been the source of community complaints about noxious, burning metallic odors, explosions, auto shredder “fluff” dispersing into the community, other fugitive dust, operating outside of approved hours, and on and on. Until recently, complaints against this politically-connected business went largely unheeded under Mayor Emanuel’s time in office. As public pressure mounted in 2016 to 2019 to get General Iron out of Lincoln Park with the proposed Lincoln Yards development and rezoning of the North Branch of the Chicago River, the Mayor’s Office behind closed doors facilitated an agreement whereby General Iron would leave the higher income and largely white Northside Lincoln Park neighborhood by 2020 and relocate to the Southeast Side environmental justice community.

While Mayor Lightfoot’s election in 2019 did not change the overall trajectory of this agreement, more proactive inspection and enforcement actions of General Iron at its current Lincoln Park site by the Chicago Department of Public Health (“CDPH”) beginning in late 2019 has documented almost to a tee the issues of which the Northside community has complained for years, and resulted in numerous notices of violation, the majority of which await hearing due to a halt in administrative hearings during the COVID-19 pandemic. The most recent violation stems from a massive explosion on May 18, apparently originating in the new pollution control equipment installed by General Iron as a result of a U.S. Environmental Protection Agency (“U.S. EPA”) enforcement action, that knocked out the controls, flattened buildings, and left the facility currently unable to operate.

GIII would join at least four other co-located facilities at 11600 S. Burley, itself an allegedly-remediated site contaminated by the LTV Steel Company, and other co-located and/or adjacent related facilities. For years, these metals facilities owned and operated by the RMG-SCPM have been flying under the radar without attention from environmental regulators or enforcers despite a number of community complaints and the environmental justice nature of the location. Even with this relatively low profile and lack of agency attention, these RMG facilities have been shown to have violated local and state environmental laws, including admitted failures to obtain proper local and state air approvals and instances of fugitive dust beyond the facility boundaries. Moreover, CDPH’s inspections database contains a disturbing narrative documenting a wider range of problems and likely environmental infractions at these sites and potentially others owned and operated by SCPM over the years, many of which appear ongoing today.

[\(last visited June 13, 2020\)](#). Expanding the radius to three miles sees a shift to a greater percentage of African-American residents and lower percentage of residents of Hispanic origin, while increasing the percentage of households making less than \$50,000 to nearly 60%.

The problems documented at General Iron and its business partner RMG-SCPM are not new or unique to their recycling facilities. Communities living with metals recycling facilities have long protested their many impacts, yet the industry has flown under the regulatory and enforcement radar. Of late, other cities and states have stepped up and done important work documenting, describing and addressing the air, water and soil impacts of metals recycling facilities.⁵ In at least one instance, in neighboring Minnesota, proactive monitoring and enforcement by the state environmental agency resulted in the shut-down of a problematic facility in a Minneapolis community not unlike the Southeast Side, and a better controlled replacement facility built 45 miles outside of the city and away from a densely-populated, low-income community of color threatened by its hazardous emissions.

The Illinois EPA has the opportunity to join these other agencies as a leader in protecting the public health and welfare of Illinois residents, in particular those living in environmental justice communities like the Southeast Side. Instead, IEPA is proposing a permit that ignores the reality of metals recycling facilities and reflects an outdated, unenforceable approach to controlling air pollution, signaling that the agency has learned nothing from our collective experience with petcoke and manganese and yet again is turning a blind eye to environmental justice issues in Illinois.

II. The Draft Permit Should Not Issue As-Written Given the Long Histories of Environmental Noncompliance by Both Companies

Given General Iron and RMG's long and disturbing history of noncompliance with air and other environmental requirements, including repeat offenses related to the shredder and fugitive dust as recently as this spring, IEPA should deny approval of the permit. At minimum based on this record, IEPA should ask Governor Pritzker to postpone the statutory permit decision deadline and declare the permit application incomplete, require the applicant to submit required additional information, and substantially revise the (otherwise deficient, as taken up elsewhere in our collective comments) Draft Permit. Section 39(a) sets forth the following with respect to IEPA's authority to consider noncompliance in its permitting decisions, as well as its general authority to impose conditions as necessary to accomplish the purposes of the Act:

In making its determinations on permit applications under this Section the Agency may consider prior adjudications of noncompliance with this Act by the applicant that involved a release of a contaminant into the environment. In granting permits,

⁵ For a summary of impacts from metals recycling facilities and efforts in California, Houston and Minneapolis, *see* Ex. 5, Comments on Proposed Rules for Large Recycling Facilities, submitted by Southeast Environmental Task Force, the Chicago South East Side Coalition to Ban Petcoke, Little Village Environmental Justice Organization, and the Natural Resources Defense Council, to the Chicago Department of Public Health on June 21, 2019, available at https://www.chicago.gov/content/dam/city/depts/cdph/InspectionsandPermitting/Comment_NRDC_SETF_SSCBP_LVEJO_6-21-19.pdf; *see also* Ex. 6, Attachments to June 21, 2019 comments on Proposed Rules for Large Recycling Facilities.

the Agency may impose reasonable conditions specifically related to the applicant's past compliance history with this Act as necessary to correct, detect, or prevent noncompliance. The Agency may impose such other conditions as may be necessary to accomplish the purposes of this Act, and as are not inconsistent with the regulations promulgated by the Board hereunder.

415 ILCS 5/39(a). As discussed below, this language consists of three separate sentences recognizing and delineating three areas of IEPA authority and discretion to ensure that the agency's permitting actions uphold the Act's express requirements and purpose. Together, they map out significant authority to take into account an applicant's environmental track record and to otherwise issue permits with stringent requirements. Contrary to IEPA staff public statements during the comment period, IEPA is not limited to considering the permit based solely on the application.⁶ Nor is IEPA's ability to take noncompliance into account in permitting limited to the "narrow exceptions" claimed and described by the agency. Instead IEPA has ample authority to consider the applicant's history of noncompliance in this permitting action, as set forth below, and to otherwise require controls and compliance measures beyond the minimum expressed in the Act and implementing regulations. Moreover, IEPA should exercise this discretion in this case to protect the Southeast Side, an already overburdened environmental justice community, from yet another polluting facility that well-off Lincoln Park has ejected.

⁶ See, e.g., Ex. 7, Maxwell Evans, "Explosion, City Shutdown Won't Stop State EPA From Letting General Iron Move to East Side," Block Club Chicago, May 26, 2020, available at <https://blockclubchicago.org/2020/05/26/explosion-city-shutdown-wont-stop-state-epa-from-letting-general-iron-move-to-the-east-side/> (quoting IEPA spokesperson Kim Biggs that "[p]ast or ongoing compliance issues *must* be addressed through the [IEPA's] compliance and enforcement programs," not the permit review process; that "[t]his stems from past court rulings holding that permitting is no substitute for enforcement"; and that "[t]he Agency *must not* deny or condition a permit decision based upon allegations that a source is violating, or has violated, applicable requirements.") (emphasis added). See also Ex. 8, email from Brad Frost, Manager of Community Relations, IEPA, to Nancy Loeb, Counsel for the Southeast Side Coalition to Ban Petcoke, Keith Harley, Counsel for the Southeast Environmental Task Force and Meleah Geertsma, Counsel for NRDC, June 5, 2020 (asserting that "Agency review *does not* look to past practices or conduct at the source (or the same source at another location) but, rather, considers if the applicant's emission units or equipment that are being constructed or operated will comply with such requirements prospectively *based on information contained within the application* for permit).

An applicant's past or on-going compliance issues *must* instead be addressed through the Agency's compliance and enforcement programs. The distinction stems from past court rulings holding that permitting is no substitute for enforcement, and that the Agency must not deny or condition a permit decision based upon allegations that a source is violating, or has violated, applicable requirements.

Narrow exceptions will exist in the case of an applicant that has been previously adjudicated of violations that relate to either an environmental release or to prior experience in waste management operations, clean construction or demolition debris fill operations, or tire storage site management. These exceptions are found in Sections 39(a) and (i) of the Environmental Protection Act," (emphasis added) (citing *IEPA v. PCB*, 252 Ill. App3d 828 (3rd Dist. 1993), *ESG Watts v. PCB*, 286 Ill. App3d 325 (3rd Dist. 1997); *Grigoleit v. EPA*, PCB No. 89-184 (November 29, 1990), and *Martell v. Mauzy*, 511 F. Supp. 729 (N.D. Ill. 1981).").

A. IEPA Should Deny the Permit Based on Admitted and Adjudicated Violations of Environmental Requirements by General Iron and RMG, Part of These Companies' Long Histories of Noncompliance.

IEPA has the authority to deny an air permit based on past adjudications of noncompliance with the Act and should do so in this case, given a history of admitted, uncontroverted noncompliance with state air approval requirements by RMG-SCPM and adjudicated environmental violations by both companies involved in this venture obtained through the City of Chicago's enforcement actions and administrative hearings process. Under 415 ILCS 5/39 (a), "[i]n making its determinations on permit applications" IEPA "may consider prior adjudications of noncompliance with this Act by the applicant that involved a release of a contaminant into the environment." Thus, IEPA has the discretionary authority to deny a permit application on the basis of prior violations that have been adjudicated against a permit applicant. IEPA should do so in this case given the existence of such prior violations and to produce a just outcome for the Southeast Side environmental justice community.

First, RMG-SCPM, an entity involved in the business venture backing the proposed new facility and that operates significant facilities adjacent to the proposed GIII, has admitted to IEPA its noncompliance with the Act with respect to the failure of several of the current facilities at 11600 S. Burley to obtain proper state air approvals.⁷ This admission constitutes an uncontroverted instance of noncompliance with the Illinois Environmental Protection Act, the further adjudication of which in front of a court or administrative judge is not necessary to ensure that the company's due process rights have been met. Furthermore, the failure to obtain proper state air approval is no mere paper violation, but instead has resulted in the company in fact releasing unpermitted amounts of pollution to the environment.⁸

Moreover, the noncompliance by these facilities appears to have been going on for years and was only brought forth by the companies during the GIII permitting because it was inevitable that it would be discovered. It was grossly unfair and contrary to the Act to offer these companies enforcement protections related to these uncontroverted instances of noncompliance, as set forth in our prior letter to IEPA.⁹ Likewise, it would be grossly unfair and contrary to the Act to now claim that the company cannot be held accountable in this permitting action for its *self-disclosed, uncontroverted* noncompliance. This is especially true where the company did not in fact qualify

⁷ See Ex.9, Letter from Hal Tolin, South Chicago Property Management, Ltd., to IEPA Bureau of Air, November 1, 2019 (stating that during a meeting between IEPA and SCPM, IEPA staffer Eric Jones recommended that "a voluntary self-disclosure be submitted to the compliance unit to address the discovery of the requirement to obtain a Lifetime Operating Permit for the SCPM entities" and that "[t]his letter constitutes the SCPM Entities self-disclosure under Section 42(i) of the [Act].") The letter goes on to erroneously claim that SCPM meets the nine criteria set forth by the Act for penalty reduction.)

⁸ This is in contrast to, e.g., a failure to submit a required report where the report itself demonstrates compliance with pollution limits and control obligations, which may not constitute noncompliance involving a release of a contaminant into the environment for purposes of Section 39(a).

⁹ See Ex. 10-15, email and attachments from Meleah Geertsma, NRDC, to Bob Bernoteit and Chris Pressnall, IEPA, December 18, 2019.

for a penalty reduction under 415 ILCS 5/42(i) because of existing community complaints and evidence that the facilities also had violated other air requirements in the past several years as a result of its failure to obtain approvals. On this basis alone, the IEPA has the authority to deny a permit for the proposed GIII facility.

Second, both General Iron and RMG have been held liable by the City of Chicago, through its enforcement process including adversarial administrative hearings, for, *inter alia*, the following air quality-related violations: releasing prohibited air pollution, unlawful fugitive dust emissions, violating permit conditions, operating without a permit and nuisance – as well as other violations involving releases of contaminants to the environment. The text of Section 5/39(a), the overall structure of the air regulatory and enforcement scheme set forth in the Illinois Environmental Protection Act, and the federal Clean Air Act, support if not compel recognizing such adjudicated violations stemming from enforcement by a local environmental agency as a basis for IEPA denying a permit.¹⁰ This is especially true where, as here, the local agency in fact has deep experience and expertise in air regulation and enforcement; the local agency in fact holds

¹⁰ In the past, IEPA has taken the position, citing no authority and without further analysis, that it may only deny a permit under 415 ILCS 5/39 (a) if there is an adjudicated liability finding by the Illinois Pollution Control Board or a court. *See* Ex. 16, IEPA, Responsiveness Summary, Issuance of a Construction Permit Sterigenics U.S. LLC – Willowbrook I, September 20, 2019, at pp. 68-69, fnt 6, available at <https://www2.illinois.gov/epa/topics/community-relations/sites/ethylene-oxide/Documents/Responsiveness%20Summary%20Final.pdf>. There is nothing in the statute or in the case law to support this limited reading of IEPA’s authority under Section 39(a). Indeed, such a narrow reading would lead to a self-perpetuating cycle – where IEPA fails to exercise its enforcement discretion, it would also tie its hands in the permitting process. This appears to be exactly what is occurring here: to our knowledge, IEPA has chosen not to conduct inspections or commence enforcement proceedings against General Iron or RMG over the past decade or has at most conducted limited investigations that have failed to remedy the ongoing problems, despite the facilities’ long history of explosions and fires, chronic air quality violations, City reports demonstrating problems with equipment and operations at the facilities, decades of citizen complaints, and history of illegally operating without a permit. Further, if IEPA now claims that it is unable to deny the permit based on lack of violations adjudicated by the Pollution Control Board or a court, this is symptomatic of IEPA’s choice not to invest its resources in inspecting and enforcing the law against these companies. It would be absurd and a violation of IEPA’s responsibility to act equitably in its activities for an environmental justice community to be denied fair application of the law simply because the Agency chooses not to enforce the laws it is charged with enforcing.

Nor is this gap in enforcement unique to these companies, though General Iron presents a particularly egregious case. IEPA has dramatically downsized its staff in recent years, causing reductions in inspection and enforcement activities. *See* Ex. 17, Mark Templeton, Robert Weinstock, Elizabeth Lindberg, Mary Gade, and Doug Scott, Policy Analysis: Protecting the Illinois EPA’s Health, so that It Can Protect Ours (Nov. 2019), available at <https://www.law.uchicago.edu/files/IEPA%20Report%20FINAL%2011.21.19.pdf>. IEPA inspections of air-polluting facilities have declined 81 percent since 2003. *Id.* at 2. The number of enforcement cases referred to the Attorney General have also significantly declined in recent years. *Id.* Given the number and intensity of air pollution sources located in environmental justice communities in Chicago and Illinois more generally relative to better-off communities, this burden falls particularly heavily on EJ communities and failure to recognize adjudicated enforcement actions by local government authorities would deny these communities the protections to which they are entitled by the law. Indeed, in the past several years, the community, City and USEPA have been left to police pollution on the Southeast Side, addressing petcoke and manganese and identifying multiple facilities operating without state permits, due to IEPA’s absence in its role of primary environmental regulator and enforcer.

an air enforcement delegation agreement with IEPA; the local agency has in fact been acting as the responsible, primary air enforcer in IEPA's absence; the adversarial process in fact provided the alleged violator a number of ways to present its case to an impartial arbiter; and the adjudicated instances of noncompliance are in fact for violations that are in substance virtually identical to parallel provisions of the Act itself and implementing state air regulations, and on subjects directly relevant to the permitting at hand. To hold the contrary would devalue a critical partner in air pollution regulation and enforcement recognized by the Act, while prioritizing polluters over the Act's purpose "to restore, protect and enhance the quality of the environment, and to assure that adverse effects upon the environment are fully considered and borne by those who cause them." *See* 415 ILCS 5/1(b); *see also id.* at 5/1(c) ("The terms and provisions of this Act shall be *liberally construed* so as to effectuate the purposes of this Act as set forth in subsection (b) of this Section," (emphasis added)).

One of the central purposes of the Illinois Environmental Protection Act is to ensure coordination and aggressive control of pollutants across multiple levels of government. The statute provides that IEPA is "to encourage and assist local governments to adopt and implement environmental protection programs consistent with this Act." 415 ILCS 5/2 (a)(iv). Chicago has adopted provisions in its municipal code and agency regulations that regulate air pollution and fugitive dust, along with other environmental issues.¹¹ Indeed, air quality regulation in the United States *originated* in local Chicago legislation back in 1881, pre-dating the state's scheme by many years.¹² The importance of local government in the regulation of air quality is not only explicitly recognized by the Illinois Environmental Protection Act, but is also set forth in the Congressional findings and declaration of purposes in the federal Clean Air Act: "The Congress finds... that air pollution prevention... and air pollution control at its source is the primary responsibility of State and *local* governments...". *See* 42 U.S.C. § 7401(a)(3) (emphasis added).

Thus, it is entirely consistent with the Act to recognize that IEPA may exercise its discretionary authority to deny permits on the basis of adjudicated noncompliance with local air regulations, because those local air regulations are recognized and encouraged by the Act itself, thus rendering adjudicated local violations "noncompliance with this Act" under Section 39(a).¹³

¹¹ *See* Title 11 of the Chicago Municipal Code, available at https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2495150; *see also* various environmental rules and regulations available on CDPH's website, available at https://www.chicago.gov/city/en/depts/cdp/supp_info/healthy-communities/doe_ordinances_rulesandregulationsandsupportingdocuments.html.

¹² *See* Ex. 18, Stern, Arthur (1982), History of Air Pollution Legislation in the United States, Journal of the Air Pollution Control Association, 32:1, 44-61, DOI: 10.1080/00022470.1982.10465369, available at <https://www.tandfonline.com/doi/pdf/10.1080/00022470.1982.10465369>.

¹³ This interpretation of Section 39(a) is consistent with the Act's emphasis on local agency implementation of the environmental protection program, as well as the structure of Section 39 and the Act's specific provision in Section 39(i) allowing for consideration of adjudicated violations of local laws in the context of permitting for waste facilities. Sections 39(a) and 39(i) each allow for permits to be denied based on adjudicated noncompliance. Section 39(i) specifically calls out federal, state and local regulations, making clear that the Act does consider noncompliance with local regulations as proper for IEPA's consideration in permitting decisions. Section 39(a), in turn, refers to adjudicated violations of the Act broadly, without specifying the level of government that must

Such an interpretation also is not in conflict with case law (predating the current Section 39(a) language) that adjudicated findings of liability may form the basis of a permit denial, and which do not otherwise discuss local ordinance violations or constrain the venue for providing due process that applicants must receive on the enforcement side. *ESG Watts, Inc. v. Pollution Control Bd.*, 286 Ill.App.3d 325, 335 (3rd Dist. Ill. 1997) (upholding an agency’s denial of a permit for adjudicated violations of the law, and where agency did not rely on unadjudicated violations in denying the permit); *Environmental Protection Agency v. Pollution Control Bd.*, 252 Ill.App.3d 828, 830 (3rd Dist. Ill. 1993) (agency improperly used permit denial process in place of enforcement procedure when it denied permits solely on the basis of alleged violations). In contrast, nowhere does the Act expressly state that IEPA cannot consider adjudications of local air ordinances as a basis for denying a permit under Section 39(a), as we understand IEPA has claimed.

Moreover, here IEPA has entered into an air delegation agreement with the City of Chicago, formalizing CDPH’s role as an enforcement partner in carrying out the Act. The delegation agreement enumerates CDPH’s responsibilities, requiring them to assist IEPA with the state agency’s enforcement actions, conduct inspections, note violations of state law (including fugitive dust provisions), respond to citizen complaints, and keep records of inspections and violations.¹⁴ This delegation to local authority is in keeping with the Illinois Environmental Protection Act, which provides that IEPA may enter into written delegation agreements with local governments for administering the Act, delegating all or portions of its inspecting, investigating and enforcement functions, subject to IEPA review. 415 ILCS 5/4 (g), (r). Thus, IEPA has in effect “deputized” CDPH to act in its stead in a number of activities related to

adjudicate the violation. This broader statutory language should be read to encompass local adjudicated violations of air regulations as well, given the statutory scheme for air regulation set forth in the Act and the Clean Air Act. *See Michigan v. Env’tl Protection Agency*, 135 S.Ct. 2699, (2015) (where the Supreme Court found it was unreasonable for U.S. EPA to conclude that “cost” was irrelevant to its analysis of whether it was “necessary and appropriate” to regulate power plants – even though the statutory language did not include the word “cost,” it was found unreasonable for EPA not to consider cost because “appropriate” was broad enough to encompass cost, and cost was enumerated as a factor in other parts of the statute). It would be improper to read limiting language into Section 39(a), because 39(a) is a catchall provision encompassing permitting broadly, including permitting where local government may not play a recognized significant role as regulator and enforcer (in contrast to the Illinois Environmental Protection Act’s and the Clean Air Act’s schemes for addressing air pollution). Such addition of language that the legislature omitted in this broad provision would also go against the legislature’s clear directive to liberally construe the Act to effect its purpose of environmental protection and ensuring that “adverse effects upon the environment are fully considered and borne by those who cause them.” *See* 415 ILCS § 5/1(b) and (c).

¹⁴ Ex. 19, Two Year Intergovernmental Agency Agreement Between Illinois Environmental Protection Agency (Agency) and City of Chicago, Department of Public Health (Contractor), Revised Agency Procurement No. FA-19202 (Mar. 20, 2019). We note that while the numbered paragraphs spelling out these enforcement roles fall under Section B in the agreement, where Section B includes language pertaining to three specific source categories, CDPH has weighed in that the intent of the agreement is for CDPH to carry out the numbered activities more generally and not solely with respect to those three categories. In the words of a CDPH attorney, “The numbered paragraphs list source investigations we are obligated to assist IEPA with to support their enforcement actions, whereas the categories in the preceding paragraphs refer to routine inspections.” *See* Ex. 20, Email from Jennifer Hesse, Staff Attorney, CDPH, to Meleah Geertsma, NRDC, June 9, 2019.

enforcement, further solidifying the local agency's importance in the Act's statutory scheme for ensuring protection of air quality.

In addition, in all instances where General Iron and RMG were found liable for violations, they had an opportunity to contest these violations at a hearing, with ample due process protections. Chicago's Department of Administrative Hearings provides an opportunity for parties to present their case at a hearing, including presentation of testimony and witnesses, before an impartial administrative law officer that issued findings; in addition, this process affords a right to seek judicial review in response to the liability findings. Chicago Municipal Code, §§ 2-14-010, 2-14-070, 2-14-076. These findings that General Iron and RMG have violated environmental laws come after the companies have had ample opportunity to contest these findings in accordance with due process. *Martell v. Mauzy*, 511 F.Supp. 729, 744 (N.D. Ill. 1981) (due process requires permit applicants be afforded with a hearing before a permit can be denied based on unadjudicated violations, to give an opportunity to contest the alleged violations); *Wells Mftg. Co. v. IL EPA*, 195 Ill.App.3d 593, 597 (1st Dist. Ill. 1990) (permit applicant must be allowed to submit evidence during the application process to contest alleged violations).

In sum, CDPH's enforcement activities are a critical part of the state-local partnership expressed in the Illinois Environmental Protection Act (as well as the local-state-federal partnership expressed in the Clean Air Act), and recognition of this important role warrants treating the violations of local ordinances and rules in this case as constituting "noncompliance with [the Illinois Environmental Protection Act]," consistent with the legislature's clear directive to construe the Act broadly to protect the environment and make polluters bear the cost of their pollution.¹⁵ Given the expertise and experience in environmental regulation and enforcement held by CDPH; CDPH's actions as the primary air regulator and enforcer in Chicago, including under an express delegation agreement with IEPA; and the process afforded to alleged violators by the Chicago Department of Administrative Hearings, liability findings adjudicated through the City's process thus may and should be relied upon by IEPA when it is determining whether to deny a permit under Section 5/39(a).

The nine liability findings adjudicated by the City over the past 18 years demonstrate that General Iron and RMG have a history of failing to comply with the Act. Their permit should be denied on that basis alone. Table 1 below describes RMG and General Iron's past adjudicated noncompliance history according to the City's enforcement database and CDPH inspection reports.¹⁶

¹⁵ Further support for this interpretation comes from Section 5/39(a)(v), which recognizes that the task of protecting the environment is a shared one necessitating participation in enforcement by multiple stakeholders, and that such shared responsibility can help alleviate burdens on enforcement agencies (and so by extension any one enforcement agency such as IEPA) ("The General Assembly finds... that in order to alleviate the burden on enforcement agencies, to assure that all interests are given a full hearing, and to increase public participation in the task of protecting the environment, private as well as governmental remedies must be provided...").

¹⁶ Many of the citations where the facilities were found liable involved additional citations that further illustrate the effect of the illegal conduct, but were dropped as "nonsuits" through the City's adjudication process. See Exhibit 21,

Table 1. Adjudicated Findings of Liability Against RMG and General Iron.

Date of Violation	Address & Company	Ticket No.	Code Violation	Disposition	Summary of problem based on inspection report notes	Inspection ID
6/27/2019 ¹⁷	11600 S Burley - Reserve Marine Terminals	E0000 35474	11-4-2520 Recycling fac permit req'd, permit violation of special condition #32	LIABP LEA	Fugitive dust emissions and failure to control dust	678670
1/26/2012	1909 N Clifton – General Iron	E0000 26603-10	11-4-030 Failure to comply with permit	LIABP LEA	n/a	not included in inspection database ¹⁸

spreadsheet compiled from CDPH’s Environmental Enforcement Database, generated by searching for “1909 N Clifton,” downloaded on June 12, 2020, database available at <https://data.cityofchicago.org/Environment-Sustainable-Development/CDPH-Environmental-Enforcement/yqn4-3th2/data> (hereinafter “City Enforcement Data for 1909 N Clifton Ave”); Exhibit 22, spreadsheet compiled from CDPH’s Environmental Enforcement database, generated by searching for “11600 S Burley,” downloaded on June 12, 2020, database available at <https://data.cityofchicago.org/Environment-Sustainable-Development/CDPH-Environmental-Enforcement/yqn4-3th2/data> (hereinafter “City Enforcement Data for 11600 S Burley Ave”); Exhibit 23, spreadsheet compiled from CDPH’s inspection report database, generated by searching for “1909 N Clifton,” downloaded on June 12, 2020, database available at <https://data.cityofchicago.org/Environment-Sustainable-Development/CDPH-Environmental-Inspections/i9rk-duva/data> (hereinafter “CDPH Inspection Reports for 1909 N Clifton Ave”); Exhibit 24, spreadsheet compiled from CDPH’s inspection report database, generated by searching for “11600 S Burley,” downloaded on June 12, 2020, from <https://data.cityofchicago.org/Environment-Sustainable-Development/CDPH-Environmental-Inspections/i9rk-duva/data> (hereinafter “CDPH Inspection Reports for 11600 S Burley Ave”).

¹⁷ There is a notable gap in City enforcement against the General Iron facility, coinciding with Mayor Emanuel’s time in office. This gap should not be interpreted as seven years during which the facility operated without issues; instead, it should be read in light of the significant shortfalls in even City environmental enforcement during the Emanuel years. A September 2019 audit by the City’s Office of Inspector General found deficient City air pollution inspections during a portion of the Emanuel administration. *See* Ex. 25, City of Chicago, Office of Inspector General, Chicago Department of Public Health Air Pollution Enforcement Audit (Sept. 2019), available at <https://igchicago.org/wp-content/uploads/2019/09/CDPH-Air-Pollution-Enforcement-Audit.pdf>. The report found that CDPH fails to ensure that violations identified by inspectors are resolved. *Id.* at 4. It also found that inspections are infrequent, making it likely that undiscovered violations are occurring. *Id.* *See also* Ex. 26, Brett Chase, “Emanuel Soft on Chicago Polluters Despite Tough Talk, Better Government Association, February 22, 2019, available at <https://www.bettergov.org/news/emanuel-soft-on-chicago-polluters-despite-tough-talk/>.

With respect to General Iron, a search of the CDPH database for complaints turns up a number of community complaints about odors (“an awful burning smell,” “very strong chemical odors”), having to close windows and having trouble breathing due to facility impacts, dust/smoke, loud crashing noises and vibrations that shake homes, operation outside of permitted hours and so on, from roughly 2012 through CDPH’s more aggressive enforcement starting in December 2019. *See* Ex. 27, Spreadsheet compiled from CDPH’s Environmental Complaints database, generated by searching for “1909 N Clifton” and selecting entries for complaints that occurred between 2012-2019, data last downloaded on June 8, 2020, database available at <https://data.cityofchicago.org/Environment-Sustainable-Development/CDPH-Environmental-Complaints/fypr-ksnz/data>.

¹⁸ Based on the timing of this liability finding in relation to the enforcement action brought against General Iron by U.S. EPA in 2011-2012, we presume that this finding is related to the uncontrolled shredder emissions and visible emissions beyond the fence line that were at the core of that action. *See* Ex. 28, *In the Matter of General Iron Industries*, Administrative Order, EPA-5-12-113(d)-IL-04 (June 29, 2012), at par. 19-22.

6/21/2010	1909 N Clifton – General Iron	24036	7-28-080 Nuisance in connection with a business	Liabile	Blue smoke escaping from shredder, blowing offsite	DOEINS4 1711
9/28/2009	1909 N Clifton – General Iron	23915	7-28-080 Nuisance in connection with a business	Liabile	Failure to control dust	DOEINS4 1689
5/27/2009	1909 N Clifton – General Iron	20386	7-28-080 Nuisance in connection with a business	Liabile	Shredded material falling into the river	DOEINS41 680
4/24/2009	11600 S Burley - Scrap Metal Services	10879	11-4-2520.	Liabile	Operating without a permit	DOEINS11 638
7/22/2008	1909 N Clifton – General Iron	10950	11-4-030B Failure to comply with permit stipulation #24	Liabile	No control measures had been taken to control debris from falling into sewer, as evidenced by manholes over sewer basins caked with mud and other debris	DOEINS41 658
10/4/2005	1909 N Clifton – General Iron	7981	11-4-2410B Failure to comply with permit special condition #25	Liabile	Failure to repair hole in pavement	DOEINS41 587
1/2/2002	1909 N Clifton – General Iron	261	(former code section) 11-4- 630 Air Pollution Prohibited	Liabile	Open fire released smoke into the atmosphere	DOEINS41 514

As laid out above, the Act provides for recognition of adjudicated violations of local air ordinances and regulations in denying permits under Section 5/39(a) generally speaking. That the specific local violations at issue here are directly analogous to substantive provisions in the Illinois Environmental Protection Act lends further support that these are “adjudications of noncompliance with this Act” and thus a basis for IEPA exercising its discretion to deny this permit. Past adjudicated city code violations by both General Iron and RMG correspond to analogous provisions of the Illinois Environmental Protection Act as follows:

General Iron

- 2010 liability finding for violating Chicago Municipal Code section 7-28-080, Nuisance in connection with a business, was due to blue smoke being emitted from the shredder and blowing offsite.¹⁹ The finding corresponds to the IL Environmental Protection Act’s prohibition on unauthorized air pollution (415 ILCS 5/9(a)) and visible emissions beyond the fenceline (35 IAC 212.301), as well as potentially the 30% opacity limit.

¹⁹ See Ex. 23. Inspection Reports for 1909 N Clifton, Inspection ID DOEINS41711 (June 21, 2010).

- 2009 liability finding for violating Chicago Municipal Code section 7-28-080, Nuisance in connection with a business, was based on fugitive dust and failure to operate dust controls, as well as plumes of blue smoke coming from the shredder creating a haze in the yard and migrating off-site.²⁰ These violations again correspond to the Illinois Environmental Protection Act’s prohibition on unauthorized air pollution (415 ILCS 5/9(a)) and the prohibition on visible emissions beyond the fenceline of the facility (35 IAC 212.301), as well as potentially the 30% opacity limit.
- Liability finding for failure to comply with permit condition #24 for May 2009 incident where shredded material was falling in the river from barge loading, again corresponding to the prohibition on visible emissions beyond the fenceline. This local violation also aligns with prohibitions on unpermitted discharges to water and on open dumping.
- 2008 liability finding for failure to comply with permit condition #24 re material in sewer. This violation potentially corresponds to the Part 212 Visible and Particulate Matter Emissions to the extent that the accumulated material deposited in the sewer from the air and/or was the result of deposited air emissions washing into the sewer via facility water use or stormwater.
- 2005 liability finding for failure to comply with permit condition #25 re pavement issue. This violation corresponds to the Part 212 Visible and Particulate Matter Emissions requirements, given that maintenance of paved roads is a control measure for fugitive dust.
- 2002 liability finding for air pollution prohibited under former Chicago Municipal Code section 11-4-630 corresponds to the IL Act’s prohibition on unauthorized air pollution (415 ILCS 5/9(a)) and possibly on visible emissions beyond the fenceline (35 IAC 212.301). There, the inspection report indicated release of smoke into the atmosphere from an open fire.²¹

RMG

- In 2019, RMG’s Reserve Marine Terminals (“RMT”) facility was found liable under Chicago Municipal Code section 11-4-2520 for violating its permit condition #32.²² That permit condition states that RMT “shall control and suppress dust and other air-borne materials created by Facility activities so that the off-site migration of these materials does not occur.”²³ The condition further provides that dust control measures may include, but are not limited to, water suppression, sheltering dust-creating activities from the wind or suspending such activities during high wind periods, and enclosing/containerizing

²⁰ See *id.*, Inspection ID DOEINS41689 (Sept. 28, 2009).

²¹ *Id.*, Inspection ID DOEINS41514 (Jan. 2, 2002).

²² Ex. 22, City enforcement data for 11600 S Burley, violation dated June 27, 2019.

²³ Ex. 29, City of Chicago Department of Administrative Hearings, *City of Chicago v. Reserve Ftl, LLLC*, Findings, Decisions & Order, Docket #19DE000186 (September 6, 2019), attachment consisting of City of Chicago Class II-B Recycling Facility Permit (ENVREC102879) for Reserve Marine Terminals, dated June 7, 2016, at page 7 of 10, Cond. 32.

materials that are susceptible to becoming windborne. A June 2019 inspection revealed fugitive dust *migrating off the site* from the barge loading operations, and additional windborne particulate matter from a pile of metal scrap.²⁴ During the inspection, dust control measures were not being utilized. The fugitive dust emissions and failure to utilize dust control correspond to violations of the Illinois Environmental Protection Act's prohibition on unauthorized air pollution, as well as the prohibition on visible emissions beyond the fenceline and potentially the 30% opacity limit.

- The Scrap Metal Services facility, which appears to have been an owner of operations at 11600 S. Burley prior to RMG (and whose liability finding we cite to the extent it indicates RMG took on operations of an unpermitted facility), was found liable for operating without a permit in 2009. This failure is analogous to a failure to obtain proper air approvals under the Act, 415 ILCS 5/9, an infraction which was in fact the basis for RMG-SCPM's admission of noncompliance and an IEPA Notice of Violation ("NOV") issued to RMG as part of the South Chicago Property Management facilities at 11600 S. Burley a decade later in December 2019.²⁵

IEPA should deny the GIII permit application based on these adjudications of noncompliance finding that General Iron and RMG have previously been responsible for numerous prohibited releases of air pollution and other environmental infractions over a pro-longed period, demonstrating an inability and/or unwillingness to comply with laws intended to protect communities from environmental harms.

B. Given the COVID-19 Federal, State and Local Emergency, IEPA Should Postpone Making Its Determination on the Permit Until the 33+ Violations Alleged by CDPH in the Last 6 Months Have Gone Through the Administrative Hearings Process.

Even if IEPA declines to recognize the above long list of adjudicated violations as a basis for denying the current permit application, IEPA should work with the Governor's office to postpone a permit decision until the 33+ violations alleged by CDPH in the last six months have gone through the City's administrative hearing process, given delays in those hearings due to COVID-19. CDPH has issued a slew of Notices of Violation to General Iron in recent months, covering unauthorized emissions, smoke, explosions, fugitive dust from material handling and the shredder, and auto fluff escaping from the bounds of the facility and entering neighboring communities. CDPH cited General Iron with at least 33 municipal code violations between December 2019 and March 2020.

²⁴ Ex. 24, Inspection Reports for 11600 S Burley, Inspection ID 678670.

²⁵ See Ex. 30, IEPA Violation Notice A-2019-00200, issued to South Chicago Property Management regarding sources at 11600 S. Burley Avenue, December 20, 2019. We note that IEPA appears to have been poised to provide enforcement protections to RMT prior to our flagging that such leniency was inappropriate under the Act. See Ex. 10-15, email of Meleah Geertsma, NRDC, to Bob Bernoteit, IEPA, December 18, 2010, and attachments (including explanation of why the Section 42(i) factors for granting enforcement protection were not met).

Given the standard timeline for a Chicago administrative hearing, but for the COVID-19 Emergency, the vast majority of these NOV's likely would have gone through the hearing process to a decision by now. However, enforcement procedures for these alleged violations have been on hold due to COVID-19 since March, resulting in rescheduling of the hearing dates for these NOV's from this spring to future dates to be determined as Chicago's Department of Administrative Hearings reopens.²⁶ Given the magnitude, repeated nature and severity of the recent citations against General Iron, and their direct relationship to past infractions and the sources, emissions and controls at issue in this permitting, IEPA should delay permitting of General III until liability findings are resolved for alleged violations. Table 2 below illustrates the numerous recent citations against General Iron, which generally align with the state prohibitions on air pollution and on visible emissions beyond the fence line, as well as other environmental infractions, as described regarding the older violations. Moreover, the NOV's pertain to emission sources that the applicant is proposing to operate in largely the same fashion at the new facility, down to the regenerative thermal oxidizer ("RTO") that it intended to move directly to the new site.²⁷

Table 2. Notices of Violation Issued Against General II since December 2019.

Date of Violation	Ticket No.	Code Violation	Disposition	Summary of problem based on inspection report notes	Inspection report ID
3/19/2020	E000034390	11-4-730 ²⁸ Air Pollution Prohibited	Unresolved	Untreated emissions escaping the shredder, black smoke escaping the shredder. Auto fluff observed offsite. Odors.	11124169
3/19/2020	E000034390	11-4-760(a) Handling of material susceptible to becoming windborne	Unresolved	Auto fluff observed offsite.	11124169

²⁶ Several of the NOV's listed 3/26/2020 as a hearing date, one listed 4/30/2020, and several list 7/9/2020 as a hearing date. *See also* Ex. 31, Emails among Meleah Geertsma and David Graham, CDPH Deputy Commissioner, and Jennifer Hesse, CDPH Staff Attorney, April 40 to May 12, 2020 (noting that administrative hearing dates have been postponed to be responsive to COVID-19 and that hearing officer decisions typically issue "immediately" after the hearing).

²⁷ With respect to the RTO, as discussed elsewhere in our comments and in addition to the uncontrolled emissions described in the late 2019 and early 2020 CDPH NOV's, General Iron on May 18 experienced a massive explosion originating from the RTO that rendered the control equipment and other portions of the facility inoperable. Also as set forth elsewhere in our comments, that explosion renders the current permit application incomplete. In addition, to the extent that the City's enforcement proceedings related to the May explosion are also delayed due to COVID-19, IEPA should again postpone a permit decision to allow for completion of these proceedings.

²⁸ Note that the City's enforcement database lists violations of Municipal Code section 11-4-730 as "Surfacing of lofs and roadways," whereas the CDPH inspection reports cite "Air pollution prohibited." Municipal Code section 11-4-730 states: "It shall be unlawful within the City of Chicago for any person to cause, suffer or allow the emission of air pollution; provided, however, emissions in compliance with state or federal law or regulations shall not constitute air pollution." In summarizing cited violations in this comment letter, we've described violations of Municipal Code section 11-4-730 as "Air pollution prohibited" in contrast to the enforcement database's description that mischaracterizes these violations as related to surfacing.

3/19/2020	E000034391	11-4-030(b) Violating any condition imposed by the permit, special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration	Unresolved	Misting cannons were not in operation.	11124169
3/19/2020	E000034391	7-28-080 Nuisance in connection with a business	Unresolved	Odors & emissions, see above	11124169
3/9/2020	E000034395	11-4-730 Air Pollution Prohibited	Unresolved	Untreated emissions escaping the top of shredder. Odors.	11152408
3/12/2020	E00003438	11-4-030(b) Violating any condition imposed by the permit, special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration	Unresolved	Strong odors. Particulates in the air. Auto fluff observed offsite. Misting cannons not in operation.	11208389
3/12/2020	E000034397	11-4-730 Air Pollution Prohibited	Unresolved	See above.	11208389
3/12/2020	E000034397	7-28-080 Nuisance in connection with a business	Unresolved	See above.	11208389
3/12/2020	E00003438	11-4-760 Handling of windborne material	Unresolved	See above.	11208389
3/9/2020	E000034395	7-28-080 Nuisance in connection with a business	Unresolved	Emissions & odors, see above	11152408
2/10/2020	E000034400	11-4-730 Air Pollution Prohibited	Unresolved	Explosion in shredder. Untreated emissions escaping top and side of shredder, and smoke from shredder. Odors. Auto fluff observed offsite. Fugitive dust observed onsite when workers disturbed material piles and moved materials to and from truck trailers.	10929879
2/10/2020	E000034400	11-4-760(a) Handling of material susceptible to becoming windborne	Unresolved	Auto fluff observed offsite. Fugitive dust observed onsite when workers disturbed material piles and moved materials to and from truck trailers.	10929879

2/10/2020	E000034577	11-4-030(b) Violating any condition imposed by the permit, special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration	Unresolved	See above. Misting cannons were not being operated.	10929879
2/10/2020	E000034577	7-28-080 Nuisance in connection with a business	Unresolved	Odors & emissions, see above	10929879
1/27/2020	n/a	11-4-030 Violation Penalty	Unresolved	No corresponding inspection report	
1/27/2020	n/a	7-28-080 Nuisance connect w/ business	Unresolved	No corresponding inspection report	
1/27/2020	n/a	11-4-760 Handling of windborne material	Unresolved	No corresponding inspection report	
1/27/2020	n/a	11-4-730 Air Pollution Prohibited	Unresolved	No corresponding inspection report	
1/23/2020	E000035590	7-28-080 Nuisance in connection with a business	Unresolved	Untreated emissions escaping top and side of shredder. Odors.	10881195
1/23/2020	E000035590	11-4-730 Air Pollution Prohibited	Unresolved	Untreated emissions escaping top and side of shredder. Odors.	10881195
1/13/2020	E000035587	11-4-730 Air Pollution Prohibited	Unresolved	Untreated emissions escaping top and side of shredder. Odors.	10836335
12/23/2019	E000035577	11-4-760(a) Handling of material susceptible to becoming windborne	Unresolved	Auto fluff observed offsite. Fugitive dust observed onsite when workers disturbed material piles and moved materials to and from truck trailers.	10767158
12/23/2019	E000035577	11-4-730 Air Pollution Prohibited	Unresolved	Untreated emissions escaping top and side of shredder and migrating offsite. Odors. Also see above.	10767158
12/23/2019	E000035578	11-4-030(b) Violating any condition imposed by the permit, special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration	Unresolved	See above. Misting cannons were not being operated.	10767158

12/18/2019	E000034125	11-4-760(a) Handling of material susceptible to becoming windborne	Unresolved	Auto fluff observed offsite. Fugitive dust observed onsite when workers disturbed material piles and moved materials to and from truck trailers, and dust observed on vehicles parked offsite.	1494955
12/18/2019	E000034125	11-4-730 Air Pollution Prohibited	Unresolved	Untreated emissions escaping top and side of shredder. Also see above.	1494955
12/18/2019	E000035576	11-4-030(b) Violating any condition imposed by the permit, special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration	Unresolved	See above. Misting cannons were not being operated, leading inspector to believe reasonable measures to control dust from blowing offsite were not being taken	1494955
12/16/2019	E000034122	11-4-760(a) Handling of material susceptible to becoming windborne	Unresolved	Auto fluff observed offsite. Fugitive dust observed onsite when workers disturbed material piles and moved materials to and from truck trailers.	10716916
12/16/2019	E000034123	11-4-030(b) Violating any condition imposed by the permit, special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration	Unresolved	See above. Misting cannons were not being operated, leading inspector to believe reasonable measures to control dust from blowing offsite were not being taken	10716916
12/16/2019	E000034122	11-4-730 Air Pollution Prohibited	Unresolved	Untreated emissions escaping top and side of shredder. Also see above.	10716916
12/10/2019 ²⁹	E000034116	11-4-760(a) Handling of material susceptible to becoming windborne	Unresolved	Untreated emissions escaping top and side of shredder and migrating offsite. Odors.	10708652
12/10/2019	E000034116	11-4-730 Air Pollution Prohibited	Unresolved	Dust observed onsite and migrating offsite when workers disturbed material piles and moved materials to and from truck trailers	10708652

²⁹ Chicago's Enforcement Database lists 3 violations occurring on December 10, 2019. However, the CDPH Inspection Report database lists 6 violations occurring. If all 6 violations are accounted for, the number of violations cited by CDPH between December 2019 and March 2020 would total 36.

12/10/2019	E000034117	11-4-030(b)(2) Violating any condition imposed by the permit, special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration	Unresolved	Misting cannons were not in operation.	10708652
12/10/2019	E000034120	11-4-730 Air Pollution Prohibited	Unresolved	Untreated emissions escaping top and side of shredder and migrating offsite. Odors.	10706274
12/10/2019	E000034120	11-4-760(a) Handling of material susceptible to becoming windborne	Unresolved	Dust observed onsite and migrating offsite when workers disturbed material piles and moved materials to and from truck trailers	10706274
12/10/2019	E000034121	11-4-030(b)(2) Violating any condition imposed by the permit, special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration	Unresolved	See above. Misting cannons were not being operated, leading inspector to believe reasonable measures to control dust from blowing offsite were not being taken	10706274

If adjudicated against the facility, these violations would demonstrate an even stronger basis for IEPA to deny the GIII permit. Because the hearings on them have been delayed by the COVID-19 emergency, IEPA should delay its permitting decision until CDPH resolves the pending citations against General Iron, and to the extent it has not already done so, initiate a state investigation of all these instances.

C. If IEPA Fails to Deny the Permit or Postpone Its Decision, It Must Substantially Revise and Strengthen the Draft Permit to Ensure Compliance with the Act in Light of the Companies’ History of Noncompliance.

If IEPA refuses to exercise its discretion to deny the permit based on admitted environmental violations and those adjudicated by the City of Chicago or postpone its decision until the pending CDPH NOV’s have been resolved, it should at the very least substantially strengthen the permit based on the City actions and additional evidence establishing the companies’ history of noncompliance with the Act, as set forth below and elsewhere in these and partners’ comments. IEPA has broad authority and indeed a duty to impose permit conditions related to General Iron’s and RMG’s past compliance history to prevent noncompliance at the GIII facility. As noted above, in granting permits, IEPA “may impose reasonable conditions specifically related to the applicant’s past compliance history with this Act as necessary to correct, detect, or prevent noncompliance.” 415 ILCS 5/39 (a). The plain language of this portion of Section 5/39(a) clearly

states the authority of IEPA to consider past violations in imposing permit conditions without reference to “adjudication” of the past violations.³⁰ Again, IEPA should not read limitations into this broad language that the legislature deemed not to include. Thus, IEPA may consider evidence of noncompliance short of adjudicated violations in *granting* a permit.³¹ Such strengthening of the permit is “necessary to . . . prevent noncompliance” here, given the long history of both companies’ noncompliance consisting of numerous NOV’s, settlement agreements, inspection reports and other evidence of noncompliance, including potentially ongoing violations, and the environmental justice implications of the facility’s relocation to Chicago’s Southeast Side from Lincoln Park.

Specifically, should it proceed with granting the permit, IEPA should deem the following history of noncompliance grounds for substantially strengthening the Draft Permit:

- RMG-SCPM’s admission of noncompliance for failing to obtain required air approvals;
- The City liability findings against General Iron and RMG described above;
- The 33+ NOV’s issued by CDPH against General Iron in the last 6 months, as discussed above;
- CDPH’s inspection reports;
- U.S. EPA’s multiple enforcement actions against General Iron dating back to at least 2006 and resulting in several consent decrees/orders, including those related to knowingly disposing of appliances containing Class I and Class II refrigerant substances, uncontrolled shredder emissions that traveled beyond the fence line, and VOC and PM emissions from the shredder³²;
- U.S. EPA’s enforcement action against Chicago Rail and Port (located just North of 11600 S. Burley at 106th St. and the Calumet River) for fugitive dust violations resulting in exceedances of the PM₁₀ NAAQS, to the extent that Chicago Rail and Port is also an

³⁰ Indeed, in denying the KCBX Terminals construction permit several years ago, IEPA relied on observations made by field staff and citizen pollution complaints in determining that the permit application did not show compliance with Illinois fugitive particulate matter requirements. Ex. 32, Ill. Env’tl. Protection Agency, Permit Denial for Application No. 07050082, KCBX Terminals Company (Jan. 17, 2014). Evidence of noncompliance short of adjudicated violations is similarly relevant in this permitting context.

³¹ This is consistent with, for example, the Title V permitting context, where the 7th Circuit has recognized the discretion of IEPA to consider unadjudicated noncompliance when determining permit conditions. See *Citizens Against Ruining the Environment v. Env’tl Protection Agency*, 535 F.3d 670, 679 (7th Cir. 2008). As such, IEPA can and should consider evidence of noncompliance in various forms in formulating additional permit conditions to prevent future noncompliance.

³² See, e.g., Ex. 34, *United States v. General Iron Industries, Inc.*, Consent Decree, No. 04 C 6820 (N.D. Ill. July 24, 2006), available at <https://assets.documentcloud.org/documents/4329917/General-Iron-2006-CD.pdf>; Ex. 35, U.S. EPA, *In the Matter of General Iron Industries, Inc.*, Administrative Order, EPA-5-12-113(a)-IL-04, June 28, 2012, available at <https://assets.documentcloud.org/documents/4329919/General-Iron-2012-AO.pdf>; Ex. 36, U.S. EPA, *In the Matter of General Iron Industries, Inc.*, Administrative Order, EPA-5-19-113(a)-IL-08, August 20, 2019, available at https://www.epa.gov/sites/production/files/2019-08/documents/general_iron_industries_inc_aco.pdf.

SCPM company.³³ We note that U.S. EPA's NOV is based on fugitive dust events in December 2017 that occurred while Chicago Rail and Port was supposedly complying with a fugitive particulate operating program dated August 2017, an FPOP that is in many ways more robust and enforceable than the one proposed here (as discussed elsewhere in these comments³⁴;

- Any instances of noncompliance being investigated by IEPA itself; and
- Any other evidence of noncompliance available to agencies but not identified here or otherwise made available to the general public.

With respect to CDPH's inspection reports, Exhibit 33 provides a description of noncompliance noted by CDPH inspectors over the years, categorized by type of equipment. We include here excerpts from the deeply concerning operations of the General Iron and RMG facilities, highlighting a few of the more recent inspection reports organized in reverse chronological order³⁵:

General Iron

- ". . . odors were observed on Throop St and Wabansia Ave. It is a pungent and unpleasant odor of burning, sweet metal with waves of an unfamiliar odor similar to men's cologne. The same odors were observed onsite at GII LLC. Smoke and untreated emissions were observed escaping the shredder. Two misting cannons (West side of the shredder and East side of the shredder) were deployed during this inspection but with the wind direction, it did not seem to completely control windborne particulate and the untreated emissions that migrated offsite. An enforcement action is already pending for these issues."³⁶ (April 28, 2020, post-RTO installation) (MDW temperature high 75 and ave. 64.2; wind speed max. 18 mph and ave. 9.9 mph)
- "While canvassing the area surrounding GII, LLC on March 12, 2020, strong odors were observed at the following intersections: Kingsbury St, Cortland St and Clybourn Ave, Racine Ave, Cortland St. It is a pungent odor of sweet, burning metal. When observing GII LLC from Kingsbury St [and] Cortland St, the odors were very strong and particulate was blowing directly at me since the wind was coming from the Southeast. I could not

³³ See Ex. 37, U.S. EPA, *In the Matter of Chicago Rail and Port, LLC*, Notice of Violation, EPA-5-18-IL-10, April 20, 2018, available at https://www.epa.gov/sites/production/files/2018-06/documents/chicago_rail_and_port_llc_nov.pdf.

³⁴ See Ex. 38, Chicago Port and Rail, LLC, Operating Program for Fugitive Particulate Matter Control, August 2017 (see enforceability section for further discussion of this FPOP). The FPOP lists "South Chicago Property Development" as the owner/operator of this facility, and we raise the issue here due to the similarity in name to South Chicago Property Management. We were not able to otherwise verify whether Chicago Port and Rail is in fact part of South Chicago Property Management, an issue which we are asking IEPA to resolve. Regardless of ownership, Chicago Rail and Port's experience with failure to control fugitive dust and NAAQS exceedances while under a fugitive particulate operating program should be considered as general engineering information on the effectiveness of control measures proposed in this permitting, as discussed below.

³⁵ Temperatures and wind speeds provided in this section were obtained from Weather Underground, wunderground.com, for Midway Airport.

³⁶ Ex. 23, Inspection Report for 1909 N Clifton, Inspection ID 11491696.

fully inhale nor could I keep my eyes open at this location. When leaving the area after the inspection, I could feel my nose throbbing and chest discomfort. Auto fluff/auto shredder residue was also observed in the public way . . . Misting cannons were observed to not be in operation at the time of the inspection.”³⁷ (March 12, 2020, post-RTO installation) (MDW temperature high 56 and ave. 46.8; wind speed max. 21 mph and ave. 11.2 mph)

- “While canvassing the area surrounding GII, LLC on March 19, 2020, odors were observed on Cortland St between Elston Ave [and] Clybourn Ave. It is a pungent odor of sweet, burning metal that burns my nostrils and makes it uncomfortable for me breathe in. When observing the shredder from across the North Branch Chicago River on Throop St and the Home Depot parking lot (1232 W North Ave), untreated emissions were observed escaping the shredder. Black smoke was also observed periodically escaping the shredder. Auto fluff/auto shredder residue was observed at the intersection of Clifton Ave and Marcey St, on both the PAWS Chicago training center property (1933 N Marcey St) and the Lock Up Self Storage property (1930 North Clybourn Ave).”³⁸ (March 19, 2020, post-RTO installation)
- “Untreated emissions were observed escaping the top and the sides of the shredder. I also observed smoke leaving the shredder and traveling through the property across from the North Branch Chicago River. Auto fluff/auto shredder residue was observed on the property directly Southwest and across the North Branch Chicago River . . . Fugitive dust was also observed onsite when workers disturbed material piles and moved materials to and from truck trailers. Misting cannons were observed to not be in operation to control airborne particles at the time of the inspection.”³⁹ (February 10, 2020, post-RTO installation) (MDW temperature high 36, ave. 30.65 and low 27; wind speed max. 14 mph and ave. 7.8 mph)
- "During the entire time of my inspection, untreated emissions were observed escaping the top and side of the shredder"⁴⁰ (January 23, 2020, post-RTO installation)
- “Untreated emissions were observed escaping the top and side of the shredder. It looked like smoke was leaving the shredder too. The shredder is not an enclosed piece of equipment. It does contain a hood to capture the emissions and process them through a regenerative thermal oxidizer (RTO) and a wet scrubber to remove volatile organic compounds (VOCs), hazardous air pollutants (HAPs), and other airborne solvents. Being able to observe emissions escaping the shredder leads me to believe that the equipment capturing the emissions is insufficient. Consequently, this does not allow the recently installed air pollution control equipment to remove the emissions since they are escaping at the shredder before the treatment process.”⁴¹ (January 13, 2020, post-RTO installation)

³⁷ *Id.*, Inspection ID 11208389.

³⁸ *Id.*, Inspection ID 11124169.

³⁹ *Id.*, Inspection ID 10929879 (NOVs issued).

⁴⁰ *Id.*, Inspection ID 10881195 (NOV issued).

⁴¹ *Id.*, Inspection ID 10836335.

- “Observing auto fluff in the public way and fugitive dust without operating misting cannons leads me to believe that reasonable measurements were not and are not being taken to ensure dust, debris, and dirt won't migrate off site and into the public way.”⁴² (December 23, 2019) (MDW temperature high 53 and low 36; wind speed max. 15 mph)
- "Fugitive dust without operating misting cannons leads me to believe that reasonable measurements are not being taken to ensure dust, debris, and dirt won't migrate off site and into the public way."⁴³ (December 10, 2019) (MDW temperature high 24 and low 16; wind speed max. 17 mph and ave. 14 mph)
- "Dust was also observed on the vehicles parked on the Southeast side of Clifton Ave between Marcey St Kingsbury St, which is diagonally across from GII, LLC. Misting cannons were observed to not be in operation to control airborne particles at the time of the inspection. Observing auto fluff in the public way and dust on the vehicles diagonally across from GII LLC without operating misting cannons leads me to believe that reasonable measurements were not and are not being taken to ensure dust, debris, and dirt won't migrate off site and into the public way."⁴⁴ (December 18, 2019) (MDW temperature high 27 and low 14; wind speed max. 17 mph and ave. 9.8 mph)
- "Fugitive dust observed onsite when disturbing material piles . . . Misting cannons were observed to not be operated at the time of inspection nor was a water truck wetting the streets. Dust was observed on Kingsbury and Wisconsin being kicked up from the trucks from General Iron."⁴⁵ (October 8, 2019) (MDW temperature high 71 and low 50; wind speed max. 9 mph) "I spoke to the facility manager at the PAWS facility directly across the General Iron at the intersection at Clifton Marcey. He informed me that they have to change the HVAC filters weekly since the debris caused by General Iron's shredder and material piles. Misting cannons were observed to not be operated at the time of inspection nor was a water truck wetting the streets."⁴⁶ (September 25, 2019) (MDW temperature high 79 and ave. 66; wind speed max. 17 mph and ave. 13.2 mph)
- “I spoke to Jim and he informed me that there was an explosion in the shredder during the morning hours between 7:30 AM [and] 7:40 AM. He said this is a common occurrence.”⁴⁷ (February 10, 2020)
- “Odors of a sweet smelling chemicals and metals were observed. It burned and inflamed my nostrils to the point of throbbing inside my nostrils.”⁴⁸ (July 30, 2019, pre-RTO installation)
- "The inspectors met with General Iron safety manager Jeff Jones, and a discussion was held concerning airborne emissions and health and safety surrounding the plant. Jones

⁴² *Id.*, Inspection ID 10746578.

⁴³ *Id.*, Inspection ID 10706274 (NOV issued).

⁴⁴ *Id.*, Inspection ID 1494955 (NOV issued).

⁴⁵ *Id.*, Inspection ID 10208629.

⁴⁶ *Id.*, Inspection ID 10039135.

⁴⁷ *Id.*, Inspection ID 10929879.

⁴⁸ *Id.*, Inspection ID 9495131.

stated that air monitoring, wetting, sweeping and all of the safety and cleanliness actions for the plant are in use. The facility operates almost continuously and some debris will migrate despite best efforts, according to Jones."⁴⁹ (June 26, 2019)

- "While there, a truck arrived and was still parked on the street when smoke began to come from some of the scrap on the truck and continued as it entered the site gate . . . General Iron personnel unloaded the smoking scrap and used extinguishers to put out the fire. Their yard manager rejected the truck and did not allow them to leave any scrap."⁵⁰ (April 1, 2019)
- Inspector observed exhaust emissions "due to the constant in/out truck traffic."⁵¹ (February 10, 2017)
- Inspector "met JK to follow up due to an explosion incident on the previous day. he stated that they did have an explosion while feeding materials into the shredder. The operator cannot see that part of the shredder because it is covered by a hood so does not know what exploded. the operator heard and saw the explosion and responded by hitting the switch that dumps 90+ gallons of water under the hood."⁵² (September 13, 2017)

RMG

- "The pavements are in need of attention, potholes and pooled water are evident."⁵³ South Shore Recycling (March 13, 2020)
- "The pavement in the outdoor storage area needed improvement due to potholes and standing water."⁵⁴ Regency Technologies (March 13, 2020)
- "Fugitive dust was observed when personnel would drive motor vehicles on the dry roadways and open areas, and when material piles were disturbed. Fugitive dust created was not above opacity limitations and it did not leave the site. It was concluded that they will repair the roadways since they were completely covered in dirt/debris and they will need to spray material piles to control fugitive dust when they are moving the material piles."⁵⁵ Southshore Recycling (October 23, 2019) (MDW temperature ave. 50.3; wind speed max 15 mph and ave. 9.2 mph)
- Inspector observed "plume of windborne particulate matter from barge loading, across the Calumet River." When inspector arrived at Reserve Marine Terminals, "I observed plume of windborne particulate matter from barge loading operations of metal scrap, with heavy duty loading machine. There was no dust control and suppression measure observed; for dust and air-borne materials, during this loading operation . . . I observed the plume of windborne particulate matter from the barge loading operations of metal

⁴⁹ *Id.*, Inspection ID 9203598.

⁵⁰ *Id.*, Inspection ID 8429665.

⁵¹ *Id.*, Inspection ID 2380409.

⁵² *Id.*, Inspection ID 1140048.

⁵³ Ex. 24, Inspection Reports for 11600 S. Burley, Inspection ID 1480496.

⁵⁴ *Id.*, Regency Technologies, Inspection ID 1481242.

⁵⁵ *Id.*, Southshore Recycling, Inspection ID 1348397.

scrap migrating off-site . . . I observed plume of windborne particulate matter from pile of metal scrap processing”⁵⁶ Reserve Marine Terminals (June 27, 2019) (MDW temperature high 90, ave. 77.9; wind speed ave. 9 mph and max. 21 mph)

- “There were 2 drums of oil stored in the open air with no secondary containment . . . There was a trailer with oil in it and the ground outside the trailer was oil-stained . . . There was a generator in use that apparently was leaking because there was absorbent material on the ground around it.”⁵⁷ Reserve Marine Terminals (April 11, 2019)
- “The main issue is the potholes that span the length of the road through the middle of the site.”⁵⁸ Reserve Marine Terminals (February 11, 2019)
- “The exterior portion was full of materials and previous[l]y-noted waste (piles of dirt with metal intermingled, wood) remained and weeds were still growing among the scrap. JH was to have addressed these by reinspection but improvement had not gotten to a very noticeable point.”⁵⁹ South Shore Recycling (September 17, 2018)
- “They had a fire a few months ago in the plastics bay. RT said that the cause of the fire had not been determined but that it had probably been from a battery that was supposed to have been removed inside of the building.”⁶⁰ Regency Technologies (July 12, 2018)
- “In the interior, batteries were stored without the protective layer as required in special permit condition #17. The cardboard used was not long enough to cover the edge of one layer of batteries . . . The exterior portion was full of materials but also waste. A pile of CD debris (dirt, broken concrete) was among the metal scrap . . . The material storage/processing areas needed to be cleaned up, with metal removed from the ground and pavement leveled.”⁶¹ Regency Technologies (May 11, 2018)
- “OEMC first notified CDPH via SMS at 12:01 about the fire in Regency Technologies . . . At 15:30 CDPH engineer arrived to the scene, where CFD was still ceasing the fire of recyclable plastic material . . . stored outside . . . HCN was 30 ppm, VOC was 40 ppm, CO was 17-25, O2 was 20.7 . . . Fire was completely secured around 16:45.”⁶² Regency Technologies (May 7, 2018)
- “Some of the materials? Piles are confined by concrete blocks but some not. Some of the pavement is more dirt than anything else, caused by continuous traffic by trucks and the machines used onsite for processing.”⁶³ Reserve Marine Terminals (August 18, 2017)

⁵⁶ *Id.*, RMT, Inspection ID 678670. We also note that in late June of 2019, between June 26 and 28, David Graham, CDPH Deputy Commissioner, called Meleah Geertsma to discuss high intensity torch cutting occurring at 11600 S. Burley. Deputy Commissioner Graham described large stationary torches being used to disassemble rail cars, resulting in large plumes of black smoke.

⁵⁷ *Id.*, RMT, Inspection ID 1356396.

⁵⁸ *Id.*, RMT, Inspection ID 1323300.

⁵⁹ *Id.*, South Shore Recycling, Inspection ID 1273325.

⁶⁰ *Id.*, Regency Technologies, Inspection ID 1247508.

⁶¹ *Id.*, Regency Technologies, Inspection ID 1228033.

⁶² *Id.*, Regency Technologies, Inspection ID 5647187.

⁶³ *Id.*, Reserve Marine Terminals, Inspection ID 1111122.

- “Upon arrival, I noted the damaged asphalt at the gate was even more damaged than previously noted, with a huge pool of water collected that must be inches deep at the center There were potholes evident along the interior haul road. ?RT was supposed to have written a pavement repair/maintenance plan but had not.”⁶⁴ Reserve Marine Terminals (May 1, 2017)
- “Upon arrival, I noted that the entry road had been partially wet (for dust control) but the center was dry and the wetting did not extend close to the street where trucks exited. At the entry gate, I noted very large potholes holding water He stated that they had recently gotten bids from pavement contractors to replace the damaged asphalt at the gate with asphalt. he will have a plan to either repair or replace the pavements by next inspection There were potholes evident along the interior haul road”⁶⁵ Reserve Marine Terminals (March 22, 2017) (MDW temperature high 45 and ave. 39; wind speed ave. 11.7 mph and max. 21 mph)
- “The pavement stills shows potholes and ponding throughout the site. RT showed me a large pile of asphalt grindings, told me that they were using it to make repairs to the road every day because their activity (shearing, breaking, hammering) combined with the truck traffic causes damage to all pavements – maintenance is a never-ending cycle.”⁶⁶ Reserve Marine Terminals (July 28, 2016)
- “There is no clear separation between the road and the materials storage/processing area. RT has yet to provide a pavement plan, this is also detailed in the permit. There is standing water in large pools along the road and among the piles, prevention of this is also detailed in the permit.”⁶⁷ Reserve Marine Terminals (March 11, 2016)
- “Defect notice[s] w[ere] issued for equipment without air pollution control permits” at Napuck Salvage, Reserve Marine Terminals, Regency Technologies, and South Shore Recycling.⁶⁸ (August 25, 2014)
- “On 12/20/12, Regency experienced a fire that damaged the roof. A part of the building had to be demolished and how has been completed. The facility is involved in cleanup and re-building and intends to re-open next week.”⁶⁹ Regency Technologies (February 6, 2013)
- “Inspector Lipman responded to a complaint regarding the non-permitted recycling facility located at 11600 S Burley. Upon arrival workers on the site were observed dismantling semi trailers using propane torches and saws . . . Corcoran stated that SMS planned on temporarily using the site for approximately 90 days for the purpose of dismantling the trailers and shipping different components to various recyclers. I

⁶⁴ *Id.*, Reserve Marine Terminals, Inspection ID 1065865.

⁶⁵ *Id.*, Reserve Marine Terminals, Inspection ID 1042897.

⁶⁶ *Id.*, RMT, Inspection ID 884332.

⁶⁷ *Id.*, RMT, Inspection ID 819289.

⁶⁸ *Id.*, Inspection ID 678745, 678669, 678675, 678673.

⁶⁹ *Id.*, Inspection ID 484287.

informed Corcoran that without a permit all processing operations would have to cease until proper permitting was attained.⁷⁰ Scrap Metal Services (April 24, 2009)

IEPA should craft permit conditions to prevent these types of violations from occurring or continuing at the S. Burley site, as set forth throughout these and our partners' comments.

Because many of General Iron's operations, pieces of equipment, and personnel will stay virtually the same when it moves over to the GIII site, it is imperative that IEPA impose new permit conditions to control emissions and address General Iron's long history of noncompliance. Likewise, as RMG is the named entity responsible for GIII, and given the evidence that RMG staff associated with poor operations in Chicago and in other states like Ohio will have significant responsibilities at GIII⁷¹, IEPA must impose new and stronger permit conditions to ensure compliance with the Act.

We note that, as laid out in our following comments on enforceability issues with the Draft Permit, the lack of practical enforceability on its own warrants significant revision and strengthening of the Draft Permit. Similarly, our comments lay out additional and independent bases for strengthening the Draft Permit in numerous ways, based on experience with other metals facilities as well as the experience here as evidence of general issues with metals facility operations that should be addressed in revised and improved permit provisions.

⁷⁰ *Id.*, Inspection ID DOEINS11638. Scrap Metal Services appears to be a prior business operating at the same address as the current RMG facilities. It is unclear to us whether any RMG agents were also involved in SMS; we are providing this report to the extent that it is indicative of operations that RMG later assumed from Scrap Metal Services at 11600 S. Burley.

⁷¹ Dennis Stropko's name appears on permit application materials for RMG-SCPM. According to CDPH's database, Mr. Stropko has a management role in at least Reserve Marine Terminals, which as described above was found liable by the City for dust infractions and to which IEPA has issued an NOV for failure to obtain required permits, and Regency Technologies, which CDPH inspection reports identify as having experienced a significant fire. *See, e.g.*, Ex. 24, CDPH Inspection Reports for 11600 S. Burley: Inspection ID 1228473 (May 11, 2018) (Reserve Marine Terminals); ID 1227642 (May 11, 2018) (Regency Technologies). Mr. Stropko was also called out by the plaintiffs in an Ohio workplace injury lawsuit involving an explosion at an RMG recycling facility that left a worker permanently disfigured, where Mr. Stropko served as safety manager. *See* Brief of Plaintiff-Appellants, Darrell and Pam Hornyak, *Hornyak v. Reserve Alloys, LLC*, 2016 WL 7626325 (Ohio App. 8 Dist.) (no. CV-14-829052), 2016 WL 6206637 (describing multiple failures to post and train workers in safety protocols related to shredder operation; citing to Mr. Stropko's deposition in stating "Despite their purported investigation, no one at Reserve Alloys was able to explain why the shredder had exploded leaving a worker permanently scarred and disfigured" and finding that "Seemingly unconcerned with their inability to identify the cause of the catastrophe, the machine was promptly returned to operation without any meaningful changes"; and relying on expert testimony setting forth that "Defendant Reserve Alloys was aware of the shredding machine's propensity for explosions, and has identified a warning attached to the machine that the plant was routinely violating... [the expert] has concluded that the companies knew to a substantial certainty within the meaning of [relevant state law] that an injury would 'occur sooner or later.' ... He has explained that: 'This specific intent is established based upon numerous prior fires and incidents related to the operation of the equipment, knowledge of the likelihood of another fire and/or explosion, knowledge of the extreme danger posed to Mr. Hornyak and other employees, and instructions by management to Mr. Hornyak and other employees to directly violate the written warnings and instructions contained both on the equipment and in the manual.'")

III. The Draft Permit Cannot Issue As-Written Because Numerous Provisions Are Practicably Unenforceable.

The Draft Permit cannot issue as proposed because numerous terms and conditions are not practicably enforceable due to vagueness, inadequate testing/monitoring to ensure continuous compliance, and other related shortcomings. We focus here in particular on the Draft Permit's many shortcomings in ensuring continuous compliance with the Part 201.141 prohibition on air pollution and the Part 212 requirements for Visible and Particulate Matter Emissions. Additional enforceability issues are taken up in the following section on needed permit revisions.

More specifically:

- the fugitive dust provisions that the Draft Permit does include are insufficient in scope and unenforceably vague and lacking in sufficient monitoring, recordkeeping and reporting requirements to ensure continuous compliance;
- the Draft Permit relies heavily on a fugitive particulate operating program for which it establishes no objective standards of sufficiency, and also provides for the automatic updating of such operating program without public review, as well as the post-hoc submission of the required Contingency Plan, the contents of which are intended to become federally enforceable permit conditions; and
- the March 2020 fugitive particulate operating program that was made available for public comment, and so is presumably the current program for purposes of the Draft Permit based on the problematic automatic-update provision (despite the Draft Permit's reference to a December 2019 operating program that is not in the record made available to the public), is also insufficient in scope and unenforceably vague and lacking in sufficient monitoring, recordkeeping and reporting requirements to ensure continuous compliance.

To the extent that the Applicant has failed to provide IEPA with sufficient information to amend these shortcomings, IEPA must declare the application incomplete. Otherwise, IEPA must cure these issues before making a final permit decision as well as include the currently lacking requirements and specificity in any final permit.

The inadequacies of the Draft Permit's fugitive dust provisions that we lay out here stand on their own, warranting a substantial revision of the Draft Permit. However, we also call attention to the companies' records of noncompliance in controlling visible and particulate emissions as set forth above, which provide grounds for denying the permit on the basis that the companies have demonstrated that they cannot and will not sufficiently control their fugitive dust, including metallic fines and potentially hazardous auto shredder residue.⁷² As taken up elsewhere in these

⁷² See discussion of noncompliance above. The General Iron facility faces 33+ NOVs from CDPH over emissions from the very sources that are at issue in this permitting. The CDPH inspection record demonstrates that these problems – including failures to use spray systems for dust suppression at piles and vehicle loading, to sweep roadways, and to maintain paved conditions, among others, the very sources and controls proposed here – have been ongoing for years and appear to be unresolved at this time. At minimum, the companies' records of noncompliance provide additional grounds for greatly enhancing the stringency and enforceability of the Draft Permit's fugitive dust terms.

comments, PM₁₀ modeling (which the applicant and IEPA omitted without explanation) – using assumptions that account for some of the Draft Permit’s emission estimate and enforceability issues and reflect the industry’s and the companies’ demonstrated problems with continuously controlling fugitive dust – shows potential violations of the 24-hour PM₁₀ NAAQS from the proposed GIII.

A. A Permit Must be Practicably Enforceable – the Draft Permit is Not.

U.S. EPA has long been clear that practical enforceability is a critical requirement of control strategies under the Clean Air Act, including those implemented via State Implementation Plans. As it set forth back in 1992,

[t]he fundamental principles for SIPs/Control Strategy include: (1) baseline emissions from the source and the control measures must be quantified (specific amount of reductions can be ascribed to measures) (2) *measures must be enforceable (specify clear, unambiguous, and measurable requirements)* (3) source-specific limits must be permanent and reflect assumptions used in SIP demonstrations and contain means to track emission changes at sources and provide for corrective action.

57 F.R. 13498, 13567-13568 (April 16, 1992) (emphasis added). To be “federally enforceable,” the Draft Permit must “provide for limits that are enforceable as a practical matter.”⁷³ U.S. EPA has further explained that “Practicable enforceability” means that a permit’s provisions must specify:

A technically-accurate limitation and the source subject to the limitation; (2) the time period for the limitation (hourly, daily, monthly, and annual limits such as rolling annual limits); and (3) the method to determine compliance including appropriate monitoring, recordkeeping, and reporting.

73 Fed. Reg. 1570, 1573 (Jan. 9, 2008). Further, courts have held that to be practicably enforceable, a permit condition must: (1) provide a clear explanation of how the actual limitation or requirement applies to the facility; and (2) make it possible for the Cabinet, the U.S. EPA, and citizens to determine whether the facility is complying with the condition. *See, e.g., Sierra Club v. Ga. Power Co.*, 365 F. Supp. 2d 1297, 1308 (D. Ga. 2004) (citing *Sierra Club v. Public Serv. Co.*, 894 F. Supp. 1455, 1460 (D. Colo. 1995)). Consistent with these requirements, U.S. EPA has further explained that, “In addition to implementing appropriate compliance methods, the monitoring, recordkeeping, and reporting requirements must be *written in sufficient detail to*

⁷³ *See* Ex. 39, Memorandum from John Seitz, U.S. EPA, Dir. of Air Quality Planning and Standards, and Robert Ven Heuvelen, Office of Regulatory Enforcement, “Options for Limiting the Potential to Emit (PTE) of a Stationary Source Under Section 112 and Title V of the Clean Air Act,” January 25, 1995, at p3, available at <https://www.epa.gov/sites/production/files/documents/limit-pte-rpt.pdf>. We note that the fact that the primary pollutant of concern with the unenforceable fugitive provisions – particulate matter – is not the same pollutant as the one otherwise exceeding the federal major source thresholds absent federally enforceable limits on PTE (VOCs) is immaterial with regards to the need to ensure that all provisions of the Draft Permit are practicably enforceable, given the Clean Air Act’s in-for-one-in-for-all approach to applicability.

allow no room for interpretation or ambiguity in meaning. Requirements that are imprecise or unclear make compliance assurance impossible.”⁷⁴ Terms that are ambiguous on their face include “if necessary.”⁷⁵ Along these lines, U.S. EPA has made clear that simply citing to use of “reasonable precautions” for control of fugitive dust is insufficient.⁷⁶ Finally, as these authorities lay out, a permit limit without sufficient monitoring, recordkeeping and reporting to ensure continuous compliance with that limit is also practicably unenforceable.

As set forth below, the Draft Permit falls far short of establishing practicably enforceable limits in numerous ways.

B. Summary of the Draft Permit’s Inadequate Treatment of Fugitive Sources of Emissions.

The Draft Permit describes the Hammermill Shredder System, Ferrous Material Separate System, and Non-Ferrous Material Separation Systems as subject to 35 IAC Part 212 Subpart B for Visible Emissions. More specifically, the Draft Permit lists the following as applicable SIP requirements:

- 30% opacity limit under Section 212.123(a), with an exception for opacity of greater than 30 percent but less than 60% for a period or periods aggregating 8 minutes in any 60-minute period under Section 212.123(b); and
- a prohibition on visible emissions beyond the fenceline from any process, including material handling or storage activity, under Section 212.301⁷⁷, except when wind speed is greater than 25 mph pursuant to Section 212.314⁷⁸.

The Draft Permit also indicates that the source is subject to 35 IAC Part 212 Subpart U for Additional Control Measures. Also, while not explicitly stated in the Draft Permit or permitting materials, IEPA functionally applied the prohibition on air pollution contained in the Act and IEPA’s regulations to the facility through the air quality modeling analysis, the results of which are a stated basis for issuance of the Draft Permit.⁷⁹ IEPA should make explicit in the Draft Permit that the prohibition on air pollution applies to this facility, that the air quality modeling demonstration is the analysis that IEPA undertook to assess compliance with this provision, and

⁷⁴ Ex. 40, Attachment to Letter from Bharat Mathur, U.S. EPA Region 5, to Robert F. Hodanbosi, Ohio EPA, dated November 21, 2001 (emphasis added), available at <https://books.google.com/books?id=UCZlx8GagzwC&pg=PA19&lpg=PA19&dq=Mathur+Hodanbosi+letter+November+21,+2001+Ohio+Title+V&source=bl&ots=hqoKoMIbVp&sig=ACfU3U18m5tNWeKvDQ3mGzOYbD8ayah9fA&hl=en&sa=X&ved=2ahUKEwiwaDtveXpAhWQm-AKHS3DDXwQ6AEwAHoECAoQAQ#v=onepage&q=Mathur%20Hodanbosi%20letter%20November%2021%2C%202001%20Ohio%20Title%20V&f=false> (pdf exhibit also provided).

⁷⁵ See *Id.*

⁷⁶ Ex. 41, *In re Scherer Steam-Electric Generating Plant, et al.*, Order on Petition Nos. IV-2012-1–IV-2012-5 (April 14, 2014), at pp. 18-19, available at https://www.epa.gov/sites/production/files/2015-08/documents/ga_power_plants_response2012.pdf.

⁷⁷ See Draft Permit at 3, Cond. 3(b) and (c).

⁷⁸ See Draft Permit at 7, Cond. 8(a).

⁷⁹ See Draft Permit at 2, Cond. 1(e).

as set forth below revise the Draft Permit to include objectively enforceable specific terms that ensure the level of control claimed in the modeling analysis.

The Draft Permit describes the source's systems as including multiple material handling or transfer steps that have the potential to generate fugitive dust, as follows:

- Hammermill Shredder: two conveyors (at least part of which appear to be located outside of the shredder enclosure from the renderings submitted by GIII in the City's zoning process, referenced elsewhere in these comments)
- Ferrous Material Separation System: 70 conveyor transfer points; ASR stacking conveyor; and barge, rail car, and truckloading;
- Non-Ferrous Material Separation System: 99 material transfer points.⁸⁰

We note at the outset that the descriptions of the Ferrous and Non-Ferrous Material Separation Systems on page 1 of the Draft Permit are inconsistent with the emission limits for these Systems contained on pages 14-16, Conditions 12(d) and 12(e).⁸¹ IEPA must correct all descriptions and ensure that all emissions estimates, modeling based on those estimates, and proposed limits and monitoring, recordkeeping and reporting requirements encompass all proposed emission sources/units associated with their respective Systems.

In terms of proposed conditions to control fugitive emissions, the Draft Permit is exceedingly thin and vague, largely consisting of general restatements of regulatory provisions rather than case-by-case, objectively enforceable permit condition for the proposed GIII. The Draft Permit also relies in large part on a "fugitive particulate operating plan" to provide the specificity that the Draft Permit itself does not include, yet the fugitive particulate operating plan perpetuates the same vague and unenforceable approach, while creating confusion and conflict with (and so within, due to the operating program's incorporation into the Draft Permit) the Draft Permit.

More specifically, fugitive emission conditions are limited to the following:

- In **Condition 9**, boilerplate restatements of Section 212.701(a)'s requirement to prepare and submit "contingency measure plans reflecting the PM10 emission reductions set forth in [Section 212.703]" at a future date and restatement of the process set forth in 212.704 pertaining to exceedances of the NAAQS for PM10;
- In **Condition 10**, vague, general control obligations for storage piles, roadways, vehicle loading and unloading, and other transfer points that simply list available control

⁸⁰ See Draft Permit at 1, description of emission sources and/or air pollution control equipment.

⁸¹ More specifically, both System descriptions on page 1 omit stockpiles, though the Condition 12 emission limits list stockpiles associated with these Systems (7 and 13 stockpiles for the Ferrous Separation and Non-Ferrous Separation Systems, respectively). The description of the Ferrous System on page 1 includes barge, rail car and truck loading, consistent with the application (*see* Section 2.2 describing the Ferrous System), but the Condition 12 limits on pages 14-15 list only truck and barge loading, not rail car. The page 1 description of the Non-Ferrous System omits vehicle loading all together, though the Condition 12 limits on pages 15-16 includes truck loading. We also note here that these descriptions omit torch cutting, an omission that we address elsewhere in these comments.

measures in the alternative and state that control shall be done “in accordance with” a required operating program, for which Condition 10 lays out minimum requirements, along with incorporation by reference of a December 2019 fugitive particulate operating program and a provision for updating the operating program and incorporating it into the permit;

- In **Condition 11**, a vague requirement to take “appropriate and necessary” reactive steps to address odor nuisances that do occur, without any monitoring/reporting to help prevent/detect odors prior to reaching nuisance levels or ensure that any mitigation taken is in fact working;
- In **Condition 12**, hours of operation limits and monthly/annual tonnage limits based on throughput and emission factor calculations that apply to various fugitive emission sources at the Ferrous Material Separation Process and Non-Ferrous Material Separation Process, including conveyor transfer points, vehicle loading (but not unloading) and stockpiles;
- In **Condition 13**, a restatement of Section 201.282 that confusingly includes a directive that sources “shall” conduct testing, followed by a permissive clause that IEPA “may” require an owner or operator to conduct testing and a clause that IEPA “shall have the right” to conduct tests at IEPA’s request;
- In **Condition 14**, cross references to the methods for conducting monitoring and testing of various emissions sources set out in Sections 212.107 to 212.110, including methods for visible emissions and opacity;
- In **Condition 16**, a requirement that the source measure the PM, PM10, PM2.5, lead and manganese emissions from the Non-Ferrous Material Separation System within 60-days after the Hammermill Shredder first processes raw material; required methods for such testing, including use of Method 9 for opacity and Method 22 for visible emissions; requirements to submit a testing plan and written notification of testing; a clause discussing delay of testing; a requirement to submit a final testing report within 60 days of completing the testing; and a statement that satisfactory completion of the testing so as to demonstrate compliance is a prerequisite to issuance of an operating permit.
- In **Condition 19**, restatements of general recordkeeping requirements for Visible and Particulate Matter Emissions pursuant to Section 212.110(e) that a source retain testing records onsite for “at least three (3) years after the date a test is performed.”
- In **Condition 21**, additional recordkeeping requirements, including keeping a copy of the fugitive particulate operating program and “a record of activities completed according to” that program, along with a requirement that all such records by “retained at a readily accessible location at the source or at least five (5) years from the date of entry” and shall be made available upon request by IEPA or U.S. EPA; and
- In **Condition 22**, a general requirement to give notice of testing for PM to demonstrate compliance and a requirement for submission of a report regarding periods during which

any process emission unit was in operation when air pollution control equipment was not in operation or was not operating properly upon request by IEPA.⁸²

- In **Condition 25**, a requirement to submit a report to IEPA “[i]f there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit or otherwise.”

The shortcomings in these provisions are as follows.

C. The Draft Permit Excludes Objective, Practicably Enforceable Control Measures, Monitoring and Reporting Necessary to Ensure Continuous Compliance with Applicable Requirements.

The Draft Permit recognizes that the source is subject to the prohibition on visible emissions beyond the fenceline, the 30% opacity limit, and the mass balance emissions limits contained in Condition 12, and should recognize that the source is subject to the prohibition on air pollution as well. However, the Draft Permit fails to ensure that these requirements will be met, and its broad provisions that lack the requisite specificity are grossly insufficient to protect the public and the environment from air pollutants as required by Federal and State law. In sum, the Draft Permit is utterly lacking in any control requirements and monitoring, recordkeeping and reporting requirements sufficient to ensure compliance with these limits by various “fugitive” sources on an ongoing, continuous basis.

a. Failure to ensure compliance with the prohibition on air pollution.

The general prohibition on air pollution is applicable to this proposed new source, and so IEPA must both acknowledge its applicability in the Draft Permit and include objective terms to ensure ongoing compliance with this requirement. As noted above, IEPA functionally applied the limit to the proposed GIII through its evaluation of air quality modeling impacts. Yet nowhere in the Draft Permit does IEPA recognize that the air quality modeling was conducted pursuant to the prohibition on air quality. Nor does the Draft Permit include any terms and conditions sufficient to demonstrate ongoing compliance with the prohibition, such as a requirement to comply with the assumptions in the air quality modeling (as noted throughout our comments, the Draft Permit’s terms and conditions do not accurately reflect or otherwise ensure the emissions estimates and level of control used in the air quality modeling) or ground-based continuous monitoring of PM and HAPs.

b. Failure to ensure compliance with the 30% opacity limit.

The Draft Permit functionally excludes fugitive sources of emissions from the Section 212.123 opacity-based limit, despite the applicability of this provision to fugitive as well as process

⁸² It is unclear why Condition 22 is written only to require notice of testing for PM to demonstrate compliance (and subsequent reporting only if requested by EPA) during periods when *process* units are operating but air pollution control equipment is not. This requirement to do testing of emissions during outage of control equipment should apply across the board to all sources of PM covered by various limits, including fugitive sources. Also, reporting of the results should be mandatory, not only on IEPA request.

emission units. Section 212.123 on its face applies to “All Other Emission Units” that are not otherwise subject to limits contained in Section 212.122 (which sets forth limits for certain fuel combustion units). *See* 35 IAC 212.123(a). The Act and State Implementation Plan, in turn, broadly define “emission unit” as follows: “any part or activity of a stationary source that emits or has the potential to emit any air pollutant,” 415 ILCS 5/39.5, 35 IAC 211.1950, consistent with federal law. Nevertheless, the permitting materials collectively fail to apply and ensure compliance with the Section 212.123 opacity limit as applied to fugitive sources.

The Draft Permit generally states that the three Systems, and so by extension the material handling/fugitive sources associated with them, are subject to the 30% opacity limit and exceptions to it.⁸³ Yet the Draft Permit nowhere explicitly acknowledges the applicability of the 30% opacity limit specifically to emission units that are sources of fugitive emissions. Nor does the Draft Permit include any express requirement to do opacity testing of fugitive sources (or other process sources for that matter) to ensure compliance with this applicable limit. As discussed below, the fugitive particulate operating program that the Draft Permit incorporates by reference itself omits fugitive sources from the 30% opacity requirement.

c. Subjective control requirements.

With regard to control requirements, the Draft Permit states multiple control options in the alternative – without any basis for determining which control must be used, or which control will ensure compliance with which of the several applicable limits. The Draft Permit furthermore employs vague language to describe the frequency with which the controls must be used and the operating and other conditions under which a control or controls must be used. Overall the Draft Permit defers all specificity of fugitive emission control obligations to the fugitive particulate operating program.

For example:

- Condition 10(a) provides that “[a]ll storage piles of materials which are located within the source’s property shall be sprayed with a surfactant *or* water, *or* treated by an *equivalent method*, in accordance with the operating program required by Condition 10(e).” (emphasis added).
- Similarly, Condition 10(b) states that “[a]ll normal traffic pattern access areas surrounding storage piles and all normal traffic pattern roads and parking facilities which are located on the source’s property shall be paved *or* unpaved areas [sic]⁸⁴ shall be treated with water, oils *or* chemical dust suppressants in accordance with the operating program required by Condition 10(e). All paved areas shall be cleaned *as needed* in accordance with the operating program required by Condition 10(e). All areas treated

⁸³ *See* Cond. 3.a and 3.b.

⁸⁴ We note that there appears to be a grammatical error in Cond. 10(b) – it may be that the provision omits an “and” between “unpaved areas” and “shall be treated.”

with water, oils, *or* chemical dust suppressants shall have the treatment applied, *as needed*, in accordance with the operating program required by Condition 10(e).”

Conditions 10(c) (unloading and transport of materials collected by pollution control equipment) and 10(d) (various processes and material transfer points) follow this same format, listing controls in the alternative and leaving further explication, including choice among the controls and frequency of use and under what conditions, to the fugitive particulate operating program.

Nor does the Draft Permit create any substantive, objective standards by which Illinois EPA will judge whether the submitted fugitive particulate operating plan is in fact “designed to limit fugitive particulate matter emissions to ensure compliance with applicable limits and standards,” as provided in Condition 10(e), including the prohibition on air pollution, the prohibition on visible emissions beyond the fenceline, and the 30% opacity limit. Again, rather than imposing objectively enforceable requirements, the Draft Permit simply and circularly restates the general regulatory requirement that the fugitive particulate operating program ensure compliance.

d. Virtually non-existent testing and monitoring requirements.

Furthermore, the only testing required by the Draft Permit to demonstrate compliance with the visible and particulate emissions limits for fugitives is a one-time, initial test supposedly conducted within 60 days of the Hammermill Shredder start-up, pursuant to Condition 16. “Supposedly” because Condition 16(e) discusses allowed delays of testing, with no factors that must be met to justify a delay, no requirement that IEPA consider those factors and approve or deny the delay, and no outer limit on how long the testing delay can last.⁸⁵ Condition 13, in turn, contains general and conflicting language that functions only as an assertion of IEPA’s authority to require or itself conduct testing, rather than an actual, objectively enforceable requirement to in fact *do* any testing, beyond what’s called for in Condition 16. Conspicuously missing from the Draft Permit is any requirement to conduct ongoing, periodic testing or monitoring of any sort to ensure continuous compliance over time and a variety of real-world conditions, and particularly with respect to fugitive dust sources, with the prohibition on air pollution, the prohibition on visible emissions beyond the fenceline, or the opacity limits.

e. Virtually non-existent recordkeeping and reporting requirements.

Nor does the Draft Permit contain sufficient recordkeeping and reporting requirements to ensure that IEPA can determine compliance, let alone so that members of the public can enforce the permit as a practical matter, a critical component of a practicably enforceable permit. The insufficiencies in control obligations and monitoring and testing in both the Draft Permit, as set out above, and the fugitive particulate operating program, as set forth below, carry through to

⁸⁵ Cond. 16(g) includes a statement that satisfactory completion of the initial test is a prerequisite to issuance of an operating permit, which in theory could set an outer boundary on delays. However, given IEPA’s practice of sitting on permit applications for extended periods of time while it allows sources to continue operating, such as is the case with General Iron whose operating permit application has been in front of IEPA since 2005, we have concerns that testing may be delayed indefinitely.

render the recordkeeping requirements insufficient to create practicably enforceable permit terms. In addition, outside of the initial test report to IEPA, the Draft Permit requires no mandatory reporting whatsoever, such as a monthly or annual report certifying as to any exceedances or other irregularities or the lack thereof, other than (uncertified) event-related deviation reporting, leaving identification of exceedances or deviations entirely up to the applicant. Instead, the source need only hold various records in the event that IEPA or USEPA requests those records.

Nor are even the recordkeeping obligations practicably enforceable. Both Condition 19 and Condition 21 require that records be kept for “at least” a period of time, itself rendering the time period unenforceable at the upper end (is destruction of records after eight years a violation? Six years? Ten?). Moreover, these two conditions contain inconsistent lower bounds – three years and five years – with respect to specific records, including the fugitive particulate operating plan and records of activities conducted pursuant to it, again rendering the retention provisions unenforceable.

f. Improper automatic approval of the Fugitive Particulate Operating Program and post-hoc submission and approval of a Contingency Plan.

Finally, with respect to the fugitive particulate operating program, the Draft Permit contains an automatic-updating provision that both carries through the lack of objective standards from Condition 10(e) discussed above and further undermines the public review purpose behind the environmental justice process being undertaken by IEPA. Condition 10(i) provides as follows:

The Fugitive Particulate Operating Program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with Condition No. 10(e) and (f) and shall be submitted to the Illinois EPA within thirty (30) days of such amendment. Any future revision to the Fugitive Particulate Operating Program made by the Permittee during the permit term is automatically incorporated by reference. In the event that the Illinois EPA notifies the Permittee that further information regarding the revision to the Fugitive Particulate Operating Program is needed, the Permittee shall respond to the notice within thirty (30) days of receipt of notification.

Not only does this provision again include no objective standards by which the (amended) fugitive particulate operating program will be evaluated, the public will have no opportunity to review and weigh-in on such amended programs. *See Waterkeeper Alliance, Inc. v. U.S. E.P.A.*, 399 F.3d 486, 498-504 (2d Cir 2005) (holding that EPA violated the Clean Water Act in adopting a rule that “effectively shield[ed]” site-specific permit conditions set out in nutrient management plans “from public scrutiny and comment...” and criticizing the agency for failing to provide for public participation in the development and enforcement of nutrient management plans because those plans “embody all the relevant ‘site specific nutrient management practices,’ [and thus] are a *sine qua non* of the ‘regulation, standard, plan, or program’ ...established to regulate land application discharges”); see also *Sierra Club Mackinac Chapter v. Dep't of Env'tl.*

Quality, 277 Mich. App. 531, 533-34 (Mich. Ct. App. 2008). This omission renders the Draft Permit unenforceable as a general matter, and also undermines IEPA’s environmental justice policy by insulating subsequent fugitive particulate operating programs from public scrutiny.

Similarly, the Draft Permit improperly allows for the post-approval submission of the Contingency Plan required under Subpart U.

D. The March 2020 Fugitive Particulate Operating Program Fails to Acknowledge Applicable Legal Requirements, Creates Conflicts with the Draft Permit into Which it is Incorporated, and is Otherwise Unenforceable as a Practical Matter.

While the March 2020 Fugitive Particulate Operating Program (“FPOP”) includes slightly more detail than the Draft Permit itself, it outright excludes applicable legal requirements and hence measures for ensuring compliance with them, and itself suffers from significant enforceability problems. As the Draft Permit relies on the fugitive particulate operating program to correct its own insufficiencies, these shortcomings again render the Draft Permit unenforceable as a practical matter and otherwise insufficient to ensure compliance with all applicable requirements. Specific shortcomings include, but are not limited to, the following:

- a. *Exclusion of fugitive emission units from the 30% opacity limit contained in Section 212.123.* The application mischaracterizes Section 212.123 as follows: “Section 212.123(a) prohibits the emission of smoke or other particulate matter from any *process* source to exceed 30% opacity.”⁸⁶ The FPOP repeats this misstatement of Section 212.123 by recognizing only the applicability of the prohibition on visible emissions beyond the fenceline contained in Section 212.301 to fugitive sources.⁸⁷ Nor does the FPOP include any mention of opacity limits as applicable to fugitive sources, let alone actual monitoring of opacity using Method 22 at each source of fugitive emissions to ensure compliance with this applicable provision.⁸⁸ Indeed, the word “opacity” is only used three times in the operating program, in each case to explain that certain point sources that do have opacity limits are not in fact fugitive sources.⁸⁹ This omission/mischaracterization creates a conflict with the Draft Permit, which as discussed above appears to recognize the applicability of 212.123 to fugitive emission units.
- b. *Failure to recognize the applicability of the prohibition on air pollution contained in 415 ILCS 5/9(a).* Similarly, the FPOP nowhere recognizes the applicability of the prohibition on air pollution set forth in 415 ILCS 5/9(a), either to the facility as a whole or to fugitive emissions in particular. To the contrary, the FPOP characterizes itself as a “voluntary” program because the source is not otherwise covered by the express requirement to

⁸⁶ September 2019 Application at 39 (emphasis added).

⁸⁷ FPOP at Section 1.2, “Illinois Environmental Protection Agency – Fugitive Emission Regulatory Requirements.”

⁸⁸ See, e.g., FPOP at Section 3.1(A)(i), describing visual observations of the raw material unloading and handling areas for the presence of Visible Emissions and excluding any opacity monitoring.

⁸⁹ See FPOP at Section 1.3, “Definition of Visible Emissions”; Section 4.5.2, “Shredder Emission Control System”; and Section 4.5.3, “Non-Ferrous Processing Building Baghouse.”

prepare such a plan contained in Section 212.302. As a result, the FPOP creates a conflict with the Draft Permit with respect to the applicable legal requirements and on this basis alone must be amended. Moreover, even assuming that the FPOP contained practicably enforceable limits on fugitive emissions, which it does not, nowhere does the FPOP attempt to demonstrate how the proposed measures in fact will ensure that fugitive sources will not cause levels of air contaminants that are injurious to human, plant, or animal life. The program solely focuses on the prohibition of visible emissions beyond the fence line, which is at best a very rough proxy for PM or air toxics particles in the air. Experience at other nearby facilities like KCBX and S.H. Bell (as discussed elsewhere in these comments) demonstrate that continuous ambient air monitoring is necessary to ensure that facilities are not causing or contributing to levels of PM and/or air toxics that exceed the NAAQS or other health-based thresholds, in particular with respect to fugitive emissions.

- c. *Mischaracterization of certain emission sources within the shredder enclosure as “fugitive” sources.* The FPOP mysteriously claims that the three conveyors located within the shredder enclosure and uncaptured emissions from the shredder itself constitute “potential sources of fugitive emissions,”⁹⁰ in contrast to shredder emissions within the enclosure that in fact end up captured by the hood setup. This claim ignores that such conveyor emissions and shredder emissions could “reasonably pass through a stack, chimney, vent, or other functionally equivalent opening,” see 40 C.F.R. 52.21(b)(20), such as if GIII had selected a fully enclosed shredder like the METSO design discussed elsewhere in these comments. Indeed, the “[t]he existence of collection technology in use by other sources in a source category creates a presumption that collection is reasonable.”⁹¹
- d. *Repeated use of “as needed” without further articulation of objective conditions that must be considered in determining when use of a particular control is required.* See, e.g., FPOP at p7 describing identification and control of Visible Emissions from raw material unloading and handling.
- e. *Failure to specify which specific sources/areas will be subject to which described controls.* See, e.g., FPOP at p8, stating that for Material Transfer Points, Dust Boss water atomizers “will be positioned to mist the facility areas with the highest potential for fugitive particulate,” without further defining which areas these are, and that “[s]elect conveyors that transfer streams containing significant amounts of light material that could

⁹⁰ See FPOP at Section 3.2, “Shredder Enclosure.”

⁹¹ See Ex. 42, EPA, Memorandum from John S. Seitz, Classification of Emissions from Landfills for NSR Applicability Purposes (Oct. 21, 1994), available at: <https://www.epa.gov/sites/production/files/2015-08/documents/emsnldfl.pdf>; see also Ex. 43, EPA, Memorandum from Thomas C. Curran to Judith M. Katz, Interpretation of the Definition of Fugitive Emissions in Parts 70 and 71 (Feb. 10, 1999) (interpreting the same definition of fugitive emissions in the context of Title V rather than NSR in order to find that emissions from certain printing industry and paint manufacturers could reasonably be collected and are therefore not fugitive), available at <https://www.epa.gov/sites/production/files/2015-07/documents/fug-def.pdf>.

easily become windblown will be equipped with covers,” without identifying which of the many conveyors at the three systems these are.

- f. *Failure to include available best management practices for fugitive dust minimization.* See, e.g., FPOP at p9, stating that “with the exception of the ... ASR stockpile, all stockpiles identified in facility emission estimates will have solid partitions on three sides.” We are extremely concerned that the applicant appears to be proposing to hold ASR of all sorts in entirely open piles, including piles within a very short distance of the Calumet River. Such open storage ignores that enclosure of such piles, including full enclosure as well as less protective covered enclosures designed to prevent material from becoming windborne⁹², is an available control option. Omission of these controls is disturbing considering both the relatively high toxicity of ASR and ASR’s propensity to become windborne due to its low density, and especially so given the track record of reported ASR dispersal into the community from the current General Iron site. As set forth elsewhere in these comments, such failures with respect to ASR render the Draft Permit insufficient to ensure compliance with all applicable laws and regulations. See also FPOP at p10, stating that “[t]he majority of the facility is paved with concrete *or* asphalt” (emphasis added), without acknowledging that the use of concrete for paved roadways is itself an important dust control measure as compared to using simply asphalt for paving, as discussed elsewhere in these comments.
- g. *Failure to include objective measures of frequency, timing, intensity and other measures of control use by which the actual use of a control will be evaluated.* See, e.g., FPOP at p8, describing simply that Dust Bosses will be positioned in various areas and that “[t]he water applied by the Dust Boss will increase the moisture content of the material being transferred to minimize the potential for Visible Emissions,” without describing the various moisture contents that need to be achieved for control of dust from various materials, or the duration and intensity of Dust Boss use to achieve such moisture levels. See also FPOP at p9, noting that Dust Boss will “mist stockpiles if Visible Emissions are observed,” which fails to require preemptive wetting by Dust Bosses or other wetting apparatus to prevent visible emissions in the first instance (such preemptive wetting is

⁹² CDPH’s June 2020 large recycling facility regulations require substantial control of ASR, in contrast to IEPA’s lax approach, see Ex. 44, CDPH Large Recycling Facility Rules at Section 4.4.2, available at https://www.chicago.gov/content/dam/city/depts/cdph/InspectionsandPermitting/CDPH%20Rules%20for%20Large%20Recycling%20Facilities_Issued%20June%205,%202020.pdf. IEPA should treat CDPH’s regulations as the floor for what must be required at GIII in this specific permit, consistent with CDPH’s statements in adopting the Rules that it retains the authority to impose more stringent controls in individual cases as needed to ensure protection of the environmental and public health. CDPH’s general fugitive dust regulations, in turn, require full enclosure of petcoke and manganese piles; rules adopted by the South Coast Air Quality Management District (“SCAQMD”) similarly require full enclosure of petcoke piles. See Ex. 45, CDPH Rules for Control of Emissions from Handling and Storing Bulk Materials at Sections 4.0 and 5.0, available at https://www.chicago.gov/content/dam/city/depts/cdph/InspectionsandPermitting/Control_EmissionsfromHandling&StoringBulkMaterials_January2019.pdf, and Ex. 46, SCAQMD Rule 1158 at Section (d)(2), available at <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1158.pdf>. That ASR can reasonably be stored in a full enclosure also renders emissions from ASR piles point source emissions, not fugitive emissions.

particularly critical for compliance in areas like the barge loading/riverfront area, where dust would be created essentially at the property boundary with the River and where, as discussed in these comments, RMT has already shown it cannot control fugitive emissions). *See also* FPOP at Section 4.3, page 15, vaguely stating that “[t]he deployment of Dust Bosses will be modified as may be required based on Facility operating experience.” *See also* FPOP at p3, noting that “the *vast majority* of the Facility is paved with concrete *or* asphalt pavement. The *limited* area that is not paved is covered with compacted asphalt grindings *or* similar materials” (emphasis added) and failing to provide any diagram of which paving materials are used in which specific areas. *See also* FPOP Section 4.4, page 15, described that paved and unpaved areas are “*routinely* treated using water application and sweeping unless observed pavement conditions indicate it is unnecessary, such as following a precipitation event” and that “application of water will be limited by *near* freezing temperatures,” (emphasis added). *See also* Section 4.4.1, page 15, stating that a water truck “will be used to *periodically* apply water” and Section 4.4.2, using similarly vague language to describe sweeping of paved areas. We note that the instances of vague language such as “routinely,” “periodically,” “on a regular basis,” etc., in the operating program are too numerous to list here.

- h. *Failure to require enforceable testing and/or monitoring to ensure that the facility in fact employs controls for fugitive emissions as necessary to comply with applicable limits.* Similar to the failure to provide objective standards by which to gauge proper use of a control, the FPOP fails to objectively describe the specific conditions under which the limited visible emissions testing will occur. *See e.g.*, FPOP at p8, stating that visual observations will be conducted “three times per day,” without specifying when, under what operating and weather/atmospheric conditions, and for what duration such observations will occur. Without such specificity, the operator could conduct three back-to-back observations at locations relatively far from the fenceline during non-operational times at low wind speeds and claim compliance with the express terms of this supposed monitoring requirement. The fugitive particulate operating program also contains a puzzling provision that describes additional visible emissions identification by “other employees” who are “trained to identify Visible Emissions,” but whose observations will NOT be recorded in the same format as the visible emissions monitoring by “designated trained personnel.” *See* FPOP at Section 4.1.1. Also as discussed above, the fugitive particulate operating program ignores the applicability of both the 30% opacity limit and the prohibition on air pollution, and so omits any testing and/or monitoring to ensure compliance with these limits.
- i. *Failure to require sufficient recordkeeping and reporting.* Similar to the control, testing and monitoring requirements, the recordkeeping and reporting requirements in the operating program are insufficient to ensure compliance with the applicable limits on air pollution, visible emissions, and opacity. Unsurprisingly given the vagueness of the monitoring requirements themselves, none of the logs require description of the operating

conditions or atmospheric/weather conditions at the time of observation so as to gauge whether deployment of the controls was in fact done during conditions that are likely to generate fugitive dust. Nor does the operating program require any additional reporting beyond the virtually non-existent reporting required by the Draft Permit.

In sum, neither the Draft Permit nor the fugitive particulate operating program nor the yet-to-be-submitted Contingency Plan contain any practicably enforceable limits on fugitive emissions. Drafting objectively enforceable fugitive dust permit requirements (not to mention objectively enforceable fugitive dust regulations) that demonstrate compliance with the prohibitions on air pollution and visible emissions beyond the fenceline, as well as the 30% opacity limit, is entirely feasible, as demonstrated by the efforts of CDPH and SCAQMD.⁹³ Nor need or can the applicant and IEPA wait until the facility is actually operating to cure these many shortcomings: the vast majority of the vague and subjective conditions in the Draft Permit and operating program can and should be addressed now in order to render the Draft Permit practicably enforceable. (We also restate our concern that IEPA's track record of substantially delaying issuance of operating permits – such as the 15 years that it has sat on General Iron's operating permit – render a commitment to address issues in the operating permit meaningless).

For example, and as discussed in more detail elsewhere in these comments, the reporting requirements can be increased to regular, certified reports that are made publicly available. Monitoring and testing can be made continuous, ongoing obligations accompanied by additional specificity as to the operating conditions and atmospheric/weather conditions under which they must take place. The applicant can include specificity on the operations that are expected to generate more fugitive emissions, and specificity on the controls to be deployed to these areas and specifics on how they will be deployed. And as taken up below, control can be built into the front end design instead of relying on subjective work practice standards that fail in fact to be employed or to otherwise ensure control and compliance with limits over a range of real-world conditions. We note that a number of the enforceability issues in the Draft Permit – such as the lack of ongoing testing and monitoring requirements, and the virtually nonexistent reporting obligation – extend to process sources as well. For these reasons, the Draft Permit cannot issue as written.

IV. IEPA Cannot Issue the Draft Permit Without Substantial Revision to Create Objective Control and Compliance Obligations that In Fact Result in Robust, Enforceable and Continuous Control of Facility Emissions.

Throughout these comments, we have provided numerous reasons why the Draft Permit cannot be issued as written, including the companies' long and ongoing history of noncompliance with the Act with respect to numerous relevant sources/operations, including but not limited to the

⁹³ See CDPH and SCAQMD rules cited above; see also Ex. 47, S.H. Bell, Fugitive Dust Plan, November 2017, available at https://www.chicago.gov/content/dam/city/depts/cdpH/environmental_health_and_food/SH_BellFugitiveDustPlan_Nov2017.pdf.

shredder itself, roads, piles, transfer points, and vehicle loading⁹⁴; deficient and unenforceable control obligations; and insufficient testing and monitoring, in turn further weakened by poor recordkeeping and reporting, compounding enforceability issues. Each of these justifications stands on its own requiring denial, postponement, and/or significant revision of the Draft Permit. Collectively, they showcase how far IEPA has to go to ensure it is protecting the health and wellbeing of Illinois residents in this environmental justice community. As stated at the public hearing, this is petcoke all over again.

In this section, we provide additional comment on the various sources and issues in the Draft Permit that need to be addressed before IEPA approves any construction permit for GIII, as well ways that IEPA must revise the Draft Permit to address them.⁹⁵ In addition to the prior discussion of IEPA's authority under Section 5/39(a), we reiterate here that IEPA has broad authority under that provision to "impose such other conditions as may be necessary to accomplish the purposes of this Act" that are not inconsistent with the regulations promulgated by the Illinois Pollution Control Board. IEPA should embrace this authority to produce a more just outcome consistent with its commitment to environmental justice and its environmental justice policy. We also note that to the extent the application failed to provide information needed for this additional review and revision, IEPA must declare the application incomplete.

A. IEPA Must Revise the Estimated Emissions for the Hammermill Shredder and Strengthen Control Requirements, Testing, Monitoring and Recordkeeping and Reporting Obligations for It, and Modify Air Quality Modeling Accordingly.

The Draft Permit cannot issue as proposed because the applicant's and IEPA's emissions estimates for the proposed hammermill shredder, hood and controls significantly underestimate the likely actual emissions from this configuration, due to their failure to account for substantial uncontrolled emissions that will exit the partially enclosed shredder and escape the hood prior to the pollution controls. This underestimation of actual shredder emissions also renders unsupported the air toxics modeling on which the Draft Permit is based, as the modeling relies on the artificially high level of control claimed by the applicant. It also provides further grounds for requiring PM₁₀ modeling to ensure protection of the NAAQS.

The high levels of control claimed by the applicant might be supportable if GIII were employing a fully enclosed design with a metal bonnet for ensuring shredder emissions route to the control

⁹⁴ In this section, we rely on the history of control at General Iron and the RMG facilities from two distinct viewpoints: (1) as this history pertains to their specific noncompliance, and (2) as general data on experience in the industry with the use and effectiveness of the proposed controls. With respect to this second viewpoint, such field experience with controls is routinely relied upon by permitting officials in gauging which controls to require, their expected effectiveness in fact, and what limits to include in a permit, for instance in the Best Available Control Technology analysis. This information similarly is relevant to IEPA's permitting decision here, regardless of whether IEPA determines to adhere to its exceedingly narrow interpretation of the agency's authority to consider past/ongoing noncompliance in the permitting context.

⁹⁵ Expert engineering analysis for these comments was provided by Dr. Ranajit Sahu. See Ex. 48, Resume of Dr. Ranajit Sahu, PH.D, QEP, CEM, January 2020.

device, such as the METSO Landsmann ZZ design being deployed in Europe.⁹⁶ However, the application describes the shredder as being located within a “partial enclosure with... a vented metal roof,” outfitted with a “capture hood” for routing shredder emissions to the RTO and scrubber (with the RTO itself being transferred from the General Iron site, noting that such direct transfer is now impossible due to the RTO explosion).⁹⁷ While the applicant has claimed Trade Secret protections for the design renderings of the shredder – a claim that is in conflict with U.S. EPA’s policy for treating “emission data” as subject to public disclosure notwithstanding trade secret claims⁹⁸— resulting in IEPA’s redaction of the design information from the application, GIII did submit a rendering of the shredder in the Chicago zoning process that confirms the roof will have a significant grate at the top and multiple openings along the bottom⁹⁹.

Given these openings and the proposal to use a flexible hood to route emissions to the controls, it is incorrect to assume, as the applicant and IEPA do, that all of the PM and VOM that will be generated due to the violent shredding operations will be contained and directed to the particulate control equipment and RTO. Some portion of the pollutants generated will escape the enclosure and capture setup as emissions from the shredding operation as a whole, in spite of the water spray that is typically used within the shredder enclosure.

The capture efficiency of the rubber-lined conceptual enclosure (in combination with wet suppression for PM) is unlikely to exceed 50% as an engineering judgement. It could be even lower given the high degree of wear of this type of enclosure over time, which makes the

⁹⁶ See, e.g., Ex. 49, R&R Beth, “Seattle & Iron shredder dedusting system – pressure at bonnet and airflow references,” at p2 (rendering of a METSO car shredder in Gotzis, Germany). The METSO Lindemann ZZ series is described by METSO as “state-of-the-art,” see Ex. 50, METSO website page for Lindemann ZZ, available at <https://www.metso.com/products/shredders/metal-shredders/lindemann-zz-shredders/>. We present this information not as a full endorsement of the METSO design, but to illustrate that significantly more protective shredder designs employing full enclosure are in fact available for this new facility. To the extent that such shredders require a cleaner, more specific feedstock on the front end than the design proposed by the applicant, IEPA should require enforceable feedstock sorting and cleaning as needed to enable use of better controlled shredder designs.

⁹⁷ Application at Section 2.1.

⁹⁸ The Clean Air Act provides that “emission data” “shall” be disclosed, regardless of whether it would otherwise be granted trade secret protection. See 42 U.S.C. § 7414(c). Federal regulations broadly define “emission data” as any “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics . . . of any emission which has been emitted,” or information necessary to determine the characteristics of any emissions which “under an applicable standard or limitation” a source may emit, or even “[a] general description of the location and/or nature of the source.” 40 C.F.R. § 2.301(a)(2)(i). “Emission data” is to be interpreted comprehensively, to fulfill the public purposes of the Act and regulations. In the context of a federally-enforceable synthetic minor permit, IEPA should ensure that its interpretation of trade secret protections comports with this longstanding federal interpretation of emission data. Here, the shredder design – in particular the location and extent of openings in the enclosure – is important information for accurately assessing shredder emissions and should be disclosed to the public. The failure to disclose renders the record on which the Draft Permit is based incomplete and the shredder emissions estimates further unsupported.

⁹⁹ See Ex. 51, excerpts from Exhibit C to GIII’s application to the City of Chicago Zoning Board of Appeals for a Special Use Permit, obtained through a Freedom of Information Act Request to the Chicago Department of Planning and Development (application stamped as received March 5, 2019) (full document available upon request). While we obviously do not know the design and level of detail in the shredder and other systems renderings provided by the applicant to IEPA, we note that the provision of these renderings to the Department of Planning and Development apparently without trade secret claims, and the Department’s subsequent dissemination of the renderings in response to a FOIA request, appear to further undermine the trade secret claims in this permit proceeding.

effectiveness over the long-term even more questionable, and the potential for irregular use of wet suppression (see below with respect to General Iron’s and RMG’s track record with wet suppression). Moreover, this relatively low capture efficiency of the hood calls into question the applicant’s assertion that the VOM 81% control requirement in 35 IAC 218 Subpart TT does not apply, and similarly if the requirement does apply, whether the control scheme proposed in fact achieves at least the required 81% control.

Adding to this engineering assessment, significant field evidence exists that the “capture” hood does not in fact achieve the high level of capture and thus control claimed by the applicant and assumed by the Draft Permit. The hood structure at the current General Iron location has been reported as allowing significant emissions to escape before they enter the control devices. CDPH inspectors have observed “untreated emissions” and sometimes smoke escaping the top and sides of the shredder on numerous occasions.¹⁰⁰ Indeed, CDPH inspectors have noted that the emission controls do not appear to be working because of the flawed design of the shredder, and that the shredder has a hood but is not fully enclosed¹⁰¹, causing emissions to escape the shredder before the treatment process and rendering the RTO and scrubber ineffective for those escaped emissions.¹⁰² As one inspector stated in January 2020, “[b]eing able to observe emissions escaping the shredder leads me to believe that the equipment capturing the emissions is insufficient.”¹⁰³ In addition, inspectors have noted emissions from the RTO¹⁰⁴ and excessive emissions from the scrubber stack.¹⁰⁵

In order to ensure achievement of the very low level of emissions claimed by the applicant and assumed/relied upon in the Draft Permit, IEPA must require GIII to employ a fully enclosed shredder design with no openings, such as the METSO design described above and being deployed in Germany and Belgium. While add-on controls to a shredder enclosure with significant openings may have been appropriate for an existing shredder like the General Iron facility (though as noted above, such a design likely is causing violations with several state and local air requirements at that facility), there is no justification for employing such a design at an entirely new facility to be located in an already-overburdened environmental justice community.

If the applicant and IEPA determine such a fully enclosed design is infeasible, they must fully explain this determination on the record and provide further measures to continuously and

¹⁰⁰ See Ex. 23, CDPH Inspection Reports for 1909 N. Clifton: Inspection ID 11152408 (Mar. 26, 2020); ID 11124169 (Mar. 20, 2020); ID 10929879 (Feb. 11, 2020); ID 10881195 (Jan. 31, 2020); ID 10836335 (Jan. 23, 2020); ID 10767158 (Jan. 10, 2020); ID 10746578 (Jan. 7, 2020); ID 10716916 (Dec. 31, 2019); ID 10708652 (Dec. 29, 2019); ID 10706274 (Dec. 27, 2019); ID 1494955 (Dec. 18, 2019); ID 10639264 (Dec. 11, 2019); ID 10573289 (Dec. 2, 2019); ID 10462386 (Nov. 15, 2019); ID 10292164 (Oct. 28, 2019); ID 10208629 (Oct. 18, 2019); ID 10461347 (Nov. 15, 2019); ID 1010782 (Oct. 7, 2019); ID 10039135 (Oct. 1, 2019); ID 10047093 (Oct. 1, 2019); ID 9802564 (Sept. 5, 2019); ID 9495131 (Aug. 1, 2019); ID 493751 (Apr. 29, 2013); ID 457763 (Oct. 31, 2012).

¹⁰¹ See *id.*, Inspection Reports: Inspection ID 10836335 (Jan. 23, 2020); ID 10767158 (Jan. 1, 2020); ID 10708652 (Dec. 29, 2019); ID 10461347 (Nov. 15, 2019); ID 10047093 (Oct. 1, 2019).

¹⁰² See *id.*, Inspection Reports: Inspection ID 10746578 (Jan. 7, 2020); ID 10716916 (Dec. 31, 2019); ID 10706274 (Dec. 27, 2019); ID 1494955 (Dec. 18, 2019).

¹⁰³ See *id.*, Inspection Report Inspection ID 10836335 (Jan. 23, 2020).

¹⁰⁴ See *id.*, Inspection Reports: Inspection ID 11001377 (Feb. 26, 2020); ID 1501827 (Jan. 30, 2020); ID 1469863 (Jan. 16, 2020); ID 1451164 (Nov. 5, 2019); ID 9895600 (Sept. 16, 2019).

¹⁰⁵ See *id.*, Inspection Report ID 9935298 (Sept. 19, 2019).

stringently control the emissions that will escape the shredder, the enclosure, and the hood capture setup as proposed. In particular, additional VOM measures may be needed in order to meet Subpart TT's 81% control requirement (additional feedstock cleaning measures are one additional front end VOM control that may significantly reduce VOM from the shredder and so that should be considered). Such measures must be accompanied by robust recordkeeping and mandated reporting obligations to ensure the continuous and proper use of any "work practice" measures required for emissions that will escape the enclosure and capture/control setup.

Monitoring of uncontrolled emissions must be included along with this design as well to ensure actual use of such measures and compliance with the applicable requirements, including the prohibition on air pollution. Such monitoring should consist of ground-based continuous VOM monitoring, such as with the AERARAE monitors previously deployed by CDPH to gauge VOM levels at the General Iron facility, and ground-based continuous PM monitoring (similar to the fence-line monitoring required by CDPH under its local rules for fugitive emissions from material handling and for large recycling facilities,¹⁰⁶ positioned specifically to gauge uncontrolled PM from the shredder), as well as FLIR monitoring as discussed elsewhere in our collective comments. The Draft Permit should require at least monthly, and preferably real-time, reporting of this monitoring data to be made public on IEPA's website, for overall enforceability, as well as due to both the poor performance of the hood at the General Iron facility and the proposed location of the proposed new facility in an environmental justice community. In addition, the Draft Permit should require upfront provision of "stack" testing protocols for the Hammermill Shredder, and mandatory repeat testing on a quarterly, with requirements to do regular feedstock characterization testing and conduct emissions testing with significant changes in the feedstock. Such mandatory repeat testing is also needed given the likely deterioration of the hood over time.

As noted above, it is not clear whether the proposed less protective partially-enclosed-shredder-and-hood design comports with VOC requirements as a threshold matter. If the applicant and IEPA determine that it does and persist with the proposed less protective design without additional PM controls, the applicant and IEPA must revise the emissions calculations for the shredder and all aspects of the permit materials that rely on them, including the air quality modeling demonstration. With respect to estimating PM emissions for purposes of PTE and air quality modeling, little test data is available on PM emissions from uncontrolled autobody shredders. The only data available date back to the late 1990s, contained in an industry report (Institute of Scrap Recycling Industries, ISRI) not publicly available. However, using that industry data, the Ohio EPA has estimated that uncontrolled PM emissions from a car shredder would be 39.06 tons/year for a shredder, Omnisource, with a throughput of 720,000 tons/year of auto bodies.¹⁰⁷ In the present instance, scaling to 1,000,000 tons/year of operation expected at GIII at its new location, the uncontrolled PM emissions are expected to be 54.25 tons/year, rounded to 54 tons/year. Speciation of this into PM10 and PM2.5 could be attempted but with no

¹⁰⁶ See CDPH's regulations discussed and cited above.

¹⁰⁷ See Ex. 52, Ohio EPA, Draft Air Pollution Permit-to-Install and Operate, Permit Number P0103630, July 31, 2008 ("Omnisource Permit").

real test data or other support. For now, we assume that all these uncontrolled PM emissions are total PM as well as PM10 and PM2.5.

Based on the above, our engineering assessment supports a value of 27 tons/year as uncontrolled PM/PM10/PM2.5 emissions for the shredding operation. The balance of the emissions – *i.e.*, 27 tons/year – are assumed to pass through the PM pollution control device as well as the RTO. A control efficiency of 90% of the emissions that in fact are captured and routed to the RTO and scrubber would be appropriate based on prior engineering experience, especially assuming typical maintenance of the PM control device and some additional PM generation in the RTO. Overall, the PM emissions from the shredder are calculated to be roughly 29.7 tpy for purposes of PTE and air quality modeling.

In addition to revision of the emission estimates, controls and compliance measures for the shredder discussed above, the Draft Permit must be revised to include monitoring to ensure compliance with the operational hours limit on the shredder. Condition 12(a)(i) contains hours of operation limits for the various systems/sources, including the hammermill shredder. However, the Draft Permit lacks monitoring and recordkeeping/reporting requirements to ensure compliance with and enable enforcement of these limits on the hours of operation. With respect to the shredder, noise monitoring can and should be used to track shredder operations on a continuous basis for purposes of determining compliance with the limit on hours of operations. Conversely, without such monitoring, the limit on hours of operation are unenforceable, further rendering the emissions calculations and air quality modeling unsupported.

Such monitoring is further warranted given the numerous complaints by residents of Lincoln Park that General Iron began operations early in the morning before its permitted start time.¹⁰⁸

B. IEPA Must Impose Conditions to Prevent Auto Fluff from Migrating Offsite.

IEPA has a duty to ensure that the proposed facility will not cause or threaten air pollution, which encompasses airborne pollutants like auto shredder residue. Also as described elsewhere in our collective comments to IEPA and in our rulemaking comments to CDPH, auto shredder residue (“ASR” or “auto fluff”) is a potential hazardous material, is highly prone to becoming windborne, has been documented escaping numerous metals recycling facilities across the country, and has been identified as the source of soil contamination in communities surrounding metals recycling facilities.¹⁰⁹ In its airborne state, ASR poses a number of health risks to people,

¹⁰⁸ Ex. 27, CDPH Complaints for 1909 N Clifton: Complaint ID 600794213 (Mar. 9, 2020); ID 600793596 (Mar. 6, 2020); ID 600792608 (Mar. 4, 2020); ID 600792219 (Mar. 3, 2020) (“Loud crushing noise awakened at 2:45 AM and continue until 4 AM very disturbing also horrible gassy odors that make us choke and cause a headache”); ID 600789502 (Feb. 24, 2020) (“They are crushing cars at 4 AM creating loud noise and waking up the neighbors” and “emitting a toxic gas odors that overwhelms in my house”); ID 600760890 (Dec. 2, 2019); ID 600747372 (Nov. 4, 2019); ID 600738064 (Oct. 21, 2019); ID 600665670 (June 26, 2019); *see also* Ex. 23 CDPH Inspection Reports for 1909 N Clifton: Inspection ID 11154818 (Mar. 26, 2020); ID 11154697 (Mar. 26, 2020); ID 11154566 (Mar. 26, 2020); ID 11152408 (Mar. 26, 2020); ID 11154864 (Mar. 26, 2020); ID 11001377 (Feb. 26, 2020); 10461347 (Nov. 15, 2019); 7134833 (Oct. 11, 2018); 1204508 (Jan. 25, 2018); 3247181 (June 20, 2017); ID 3180215 (June 12, 2017); ID 7743 (Oct. 16, 2013).

¹⁰⁹ *See* Ex. 5, NGO Large Recycling Rule Comments, at pp. 4, 16 (footnote 46), and 19-21; *see also* Ex. 53, Supplemental Comments on Proposed Rules for Large Recycling Facilities, submitted by Southeast Environmental

including eye irritation, allergic reaction, and cancer.¹¹⁰ Again this record alone warrants IEPA including more stringent measures for controlling air releases of auto fluff into the environment, which in this case includes the Calumet River to the West (roughly 500 feet from the proposed ASR open storage area based on facility diagrams in the application) as well as the neighboring residential community.

Here in Chicago, we again see General Iron's poor track record, which provides further support for requiring stringent control of ASR. CDPH has observed ASR on nearby properties and across the river from General Iron, including several recent instances in 2020, and as far back as 2012.¹¹¹ In 2020, fugitive auto fluff from the facility led CDPH to issue several Notices of Violation. Lincoln Park residents have reported finding auto fluff a significant distance from the General Iron facility.

Despite this record, as noted here and elsewhere in our collective comments, the Draft Permit and fugitive particulate operating program are shockingly silent on controls for ASR, and appear to allow open piles of ASR within a short distance of the Calumet River and roughly a half mile from Rowan Park and Washington High School. IEPA should instead require full enclosure of all ASR handling, including conveyors, transfer points, and piles. Regular (at least monthly) testing of ASR should also be required to characterize the content of the material, which may vary significantly with feedstock. If full enclosure of ASR storage and handling is determined infeasible, IEPA must at minimum require significant enclosure of these operations (such as with roofed and sided enclosures), robust and objective dust suppression measures, stringent recordkeeping and reporting for any such suppression measures, and regular moisture content testing and recordkeeping for ASR of sufficient frequency to demonstrate continuous compliance over a range of ASR content and handling conditions. While our primary concern in this proceeding is with ASR in its airborne state, we note that robust enclosure of ASR can also prevent or minimize water contamination and soil contamination from ASR, providing further justification for requiring such control measures here.¹¹²

Task Force, the Chicago South East Side Coalition to Ban Petcoke, Little Village Environmental Justice Organization, and the Natural Resources Defense Council, to the Chicago Department of Public Health on Dec. 19, 2019 and exhibits 6 to 10 to these comments; Ex. 54, Comments on Amended Rules for Large Recycling Facilities, submitted by Natural Resources Defense Council on May 22, 2020, pp. 5-6, available at [https://www.chicago.gov/content/dam/city/depts/cdph/InspectionsandPermitting/Additional%20Comments%20from%20NRDC%20\(witth%20attachment%20but%20without%20Excel%20exhibits\)%205-22-20.pdf](https://www.chicago.gov/content/dam/city/depts/cdph/InspectionsandPermitting/Additional%20Comments%20from%20NRDC%20(witth%20attachment%20but%20without%20Excel%20exhibits)%205-22-20.pdf).

¹¹⁰ See, e.g., Ex. 55, Gerdau, Material Safety Data Sheet, Material Name: ASR, available at https://www2.gerdau.com/sites/default/files/downloadable_files/Automobile%20Shredder%20Residue%20ASR%20MSDS%20NA%202-15-12.pdf.

¹¹¹ Ex. 23, CDPH Inspection Reports for 1909 N. Clifton: Inspection ID 11124169 (Mar. 20, 2020); ID 10929879 (Feb. 11, 2020); ID 10767158 (Jan. 10, 2020); ID 10716916 (Dec. 31, 2019); ID 1494955 (Dec. 18, 2019); ID 9495131 (Aug. 1, 2019); ID 450164 (Aug. 9, 2012); ID 416450 (Jan. 26, 2012).

¹¹² We strongly urge IEPA to require stringent controls of ASR via its waste and stormwater authorities, and to consider all modes of ASR release and so impacts in its evaluations.

C. IEPA Must Impose Objective, Stringent Measures to Control Fugitive Dust from Other Sources Such as Piles, Transfer Points, Vehicle Loading/Unloading, and Roadways.

Metals facilities, like other material handling facilities, have issues with controlling fugitive dust from general material handling, including from piles when worked by construction vehicles, from vehicle loading and unloading, from conveyor drop points, and so on.¹¹³ There is anecdotal understanding in the material handling industry that workers do not like using misting cannons and water spray trucks, given that they can be soaked in the process as well. In other instances, lack of sufficient mobile wetting or other dust suppression equipment to address all dust-generating activities at a facility results in a degree of control at one source while another source goes uncontrolled in another area of the facility. Or mobile dust suppression equipment is not used at all, due to the delays its limited availability can create for facility operations. These factors lead to general underuse of wetting and other dust suppression methods, compounded by inadequate monitoring, recordkeeping and reporting requirements that fail to ensure that dust suppression controls are in fact used to prevent and otherwise control fugitive dust.¹¹⁴ Nor are wet or other suppression systems particularly effective at dust control under a full range of conditions. In addition to the temperature limitations of some such controls, wind conditions including wind direction can significantly undermine their effectiveness, including at levels below the regulatory 25 mph wind threshold.¹¹⁵ Similar problems with regular maintenance and dust control arise with roadways in particular in this industry, a general engineering issue due to the intensity of heavy vehicle use on plant roads and the stress put on paving surfaces.

¹¹³ See Ex. 5, NGO comments to CDPH on Rules for Large Recycling Rules, at 13 (describing photos of brown dust from vehicle working of piles at metals facilities in Houston). See also Ex. 56, Scott McGlothlin, Clearing the Air, Recycling Today, February 2, 2011, available at <https://www.recyclingtoday.com/article/january-scrap-metal-supplement-clearing-the-air/> (describing various material handling operations at metals recycling facilities and their potential to create dust).

¹¹⁴ See, e.g., Ex. 57, Comments of NRDC, SETC, and the Coalition to Ban Petcoke to CDPH, Watco Transloading, LLC, Variance Request, October 16, 2017, at pp. 21-22 (describing CDPH inspection reports of the precursor Kinder Morgan facility, where inspectors logged numerous failures such as lack of road watering, poor logging of water application, and creation of dust by truck wheels, including track-out), available at https://www.chicago.gov/content/dam/city/depts/cdpH/environmental_health_and_food/PubCom_NRDC_SETF_SS_CBP_ComWatcoVarReq_10162017.pdf; Ex. 58, Comments of the Coalition to Ban Petcoke, SETF, and NRDC to CDPH, Watco Terminal and Port Services April 24, 2019 Variance Request, at pp3-4 (describing ongoing failures to control dust at the Watco facility, including particularly egregious dust issues and failures to use control equipment at one loading building), available at https://www.chicago.gov/content/dam/city/depts/cdpH/InspectionsandPermitting/PublicCom_NGOCOM_Watco_VarReq_6282019.pdf; Ex. 59, CDPH Inspection Reports for the Kinder Morgan and Watco facility at issue in these variance proceedings. See also Ex. 37, USEPA, In the Matter of Chicago Rail and Port, LLC, Notice of Violation EPA-5-18-10, April 20, 2018, available at https://www.epa.gov/sites/production/files/2018-06/documents/chicago_rail_and_port_llc_nov.pdf; Ex. 60, USEPA, In the Matter of KCBX Terminals Company, Notice of Violation EPA-5-15-08, April 28, 2015, available at <https://www.epa.gov/sites/production/files/2015-04/documents/kcbx-nov-20150428.pdf>.

¹¹⁵ See, e.g., Ex. 23, CDPH Inspection Reports for 1909 N Clifton, Inspection ID 11491696 (“Two misting cannons (West side of the shredder and East side of the shredder) were deployed during this inspection but with the wind direction, it did not seem to completely control windborne particulate and the untreated emissions that migrated offsite.”)

Once again, General Iron’s and RMG’s histories of noncompliance – specifically with failing to employ basic measures like wetting to a range of sources and to properly apply such methods where used, as well as failing to maintain roads in paved, clean condition – are in keeping with these generally recognized issues, bolster concerns with fugitive dust from multiple sources at the proposed new facility, and highlight inadequacies in the Draft Permit and fugitive particulate operating program as well as the air quality modeling demonstration. In many instances at the two sites, fugitive dust has been observed visibly escaping from dry material piles and when materials are moved around the site, including during periods when suppression methods are not being employed. As mentioned above, failure to suppress fugitive dust and creation of visible emissions beyond the fenceline has been the basis of several recent NOV’s issued by CDPH. A more in-depth accounting of such issues, and necessary measures for addressing them, follows.

Failure to deploy wetting and similar dust controls. We incorporate prior discussion of CDPH inspection reports evidencing fugitive dust issues here and provide this additional summary/characterization. There have been a number of occasions where CDPH inspectors noted fugitive dust and/or dry conditions onsite at General Iron, and yet misting cannons were observed to not be in operation.¹¹⁶ Likewise, during some inspections the water truck was not in operation where dry conditions were present.¹¹⁷ Moreover, failing to use adequate wetting methods has been documented for *over a decade* at General Iron, despite repeated warnings to employ suppression methods. In a September 2009 inspection, the CDPH inspector noted as follows: “When I arrived I found that the water they were supposed to be using on the pile was not on. This is something that I and other inspectors have warned them about in the past. Their permit states that they need to use the water on an as needed basis and from what I observed it was needed.”¹¹⁸ A decade later during two October 2019 inspections, reports state “[f]ugitive dust observed onsite when disturbing material piles . . . Misting cannons were observed to not be operated at the time of inspection nor was a water truck wetting the streets. Dust was observed on Kingsbury and Wisconsin being kicked up from the trucks from General Iron.”¹¹⁹ These observations were repeated yet again several months later in January 2020 on a day with temperatures ranging from 41 to 55 degrees, when a CDPH inspector reported “[o]bserving auto fluff in the public way and fugitive dust without operating misting cannons leads me to believe that reasonable measurements were not and are not being taken to ensure dust, debris, and dirt won’t migrate off site and into the public way.”¹²⁰

¹¹⁶ *Id.* CDPH Inspection Reports: ID 11152408 (Mar. 26, 2020); ID 11124169 (Mar. 20, 2020); ID 10929879 (Feb. 11, 2020); ID 10767158 (Jan. 10, 2020); ID 10746578 (Jan. 7, 2020); ID 10716916 (Dec. 31, 2019); ID 10708652 (Dec. 29, 2019); ID 10706274 (Dec. 27, 2019); ID 1494955 (Dec. 18, 2019); ID 10639264 (Dec. 11, 2019); ID 10573289 (Dec. 19, 2019); ID 10578242 (Dec. 2, 2019); ID 10462386 (Nov. 15, 2019); ID 10292164 (Oct. 28, 2019); ID 10208629 (Oct. 18, 2019); 10039135 (Oct. 1, 2019); ID 10022352 (Sept. 30, 2019); ID 9935298 (Sept. 19, 2019); ID 1235829 (Apr. 25, 2018); ID 842777 (Apr. 25, 2016).

¹¹⁷ *See id.*, CDPH Inspection Reports: ID 10639264 (Dec. 11, 2019); ID 10039135 (Oct. 1, 2019); ID 9495131 (Aug. 1, 2019); ID 1411656 (June 21, 2019); ID 1391614 (June 14, 2019).

¹¹⁸ *Id.*, Inspection ID DOEINS41689 (Sept. 28, 2009).

¹¹⁹ *Id.*, Inspection Reports: Inspection ID 10039135; ID10208629.

¹²⁰ *Id.*, Inspection ID 10746578 (Jan. 7, 2020) (emphasis added).

Similarly, during the June 27, 2019 inspection that led to a CDPH NOV and adjudicated liability finding against Reserve Marine Terminals, the inspector reported a failure to employ wetting controls and fugitive dust at the barge loading operations on the facility's border on the Calumet River:

I observed plume of windborne particulate matter from barge loading operations of metal scrap, with heavy duty loading machine. *There was no dust control and suppression measure observed; for dust and air-borne materials, during this loading operation . . .* I observed the plume of windborne particulate matter from the barge loading operations of metal scrap migrating off-site . . . I observed plume of windborne particulate matter from pile of metal scrap processing.¹²¹

Such failure to employ wetting measures (and otherwise control fugitive dust) at General Iron and the RMG-SCPM facilities has been noted by CDPH inspectors across a range of temperature and wind conditions, including those well above freezing and well below the state's high wind threshold, at a range of sources from roads to piles.¹²² Past inspection reports demonstrate that misting cannons are also not operated at near freezing temperatures, as personnel wait to utilize water misters until it is warmer than 34 degrees.¹²³ Nor are fugitive emissions otherwise being controlled at such near-freezing temperatures, with methods that can be deployed at or below such temperatures, though such measures appear to be needed given visible emissions on days when temperatures dropped below freezing as described in these comments.

In other instances, CDPH inspectors have observed windborne material and lack of barriers to prevent the material from blowing off the facility grounds.¹²⁴ CDPH has also documented dust escaping from General Iron's dumpster for the wire shred line, and holes and defects in the dumpster.¹²⁵ And, CDPH has documented defects in the plastic flaps along General Iron's conveyor, leading material to bounce out and enter the river or become airborne.¹²⁶

Despite these engineering and overall practical realities and history at the two companies' sites, as well as the enforceability issues with limits on fugitive sources taken up in the section of these comments on unenforceability, the Draft Permit is based on assumption of robust and aggressive

¹²¹ *Id.*, Inspection ID 678670.

¹²² See CDPH inspection report quotes from General Iron and RMG inspections elsewhere in these comments.

¹²³ See Ex. 23, CDPH Inspection Reports for 1909 N. Clifton, Inspection ID 1231335 (Apr. 17, 2018) ("the water truck is in use but at the site the water misters were not. . . . I met Jeff (manager) he told me that they would wait until it is warmer than the current 34 degree temperatures to begin watering the pile"); see also *id.*, Inspection Report, ID 7183644 (Oct. 17, 2018) ("I called the facility, found that the water used for dust suppression was operational. They had failed to use it during early yesterday hours when temperatures were near freezing.").

¹²⁴ See *id.*, Inspection Reports: Inspection ID 1432160 (Aug. 1, 2019); ID 9495131 (Aug. 1, 2019); ID 1313012 (Nov. 1, 2018); ID 1223308 (Feb. 8, 2018); ID 1208846 (Feb. 8, 2018); ID 1207398 (Jan. 31, 2018); ID 1174349 (Dec. 7, 2017); ID 1137460 (Oct. 30, 2017); ID 830775 (Mar. 31, 2016).

¹²⁵ See *id.*, Inspection Reports: Inspection ID 1528963 (Aug. 1, 2019); ID 1372015 (May 4, 2019); ID 1332401 (Mar. 22, 2019); ID 1246527 (June 28, 2018); ID 1229400 (May 9, 2018); ID 1214005 (Mar. 14, 2018); ID 1187038 (Jan. 31, 2018); ID 1081440 (June 20, 2017); ID 829790 (Mar. 31, 2016); ID 715706 (Dec. 7, 2015); ID 712767 (Nov. 3, 2015).

¹²⁶ See *id.*, Inspection Reports: Inspection ID 830775 (Mar. 31, 2016); ID 804947 (Dec. 7, 2015); ID 712835 (Nov. 3, 2015); ID 533176 (Nov. 4, 2014); ID 520589 (Apr. 24, 2014).

use of wetting methods to control a range of fugitive dust sources, including those associated with the Ferrous and Non-Ferrous Material Separation Systems. In order to claim such aggressive control and low emissions, as well as to ensure compliance with the prohibition on air pollution and visible emissions beyond the fenceline, as well as the opacity limit, IEPA must revise the Draft Permit to include robust, specific and objectively enforceable control requirements, monitoring and recordkeeping/reporting requirements for fugitive sources of dust like piles, conveyors, and transfer points.

The most obvious available control that ensures continuous minimization of fugitive emissions from a number of sources over a range of conditions is full enclosure.¹²⁷ Enclosure is an effective control for fugitive dust during high wind periods and low temperatures, when regulations and IEPA practice give facilities a pass from the prohibition on visible emissions beyond the fenceline and spraying, *see, e.g.*, 35 IAC 212.304. Enclosure thus is critical for ensuring compliance with the prohibition on air pollution that is not subject to such exceptions, as is evidenced by Chicago Rail and Port's PM₁₀ emissions in December 2017 on high wind days, as discussed above. IEPA should require evaluation and deployment of full enclosure for conveyors¹²⁸, vehicle loading/unloading¹²⁹, piles, and other transfer points associated with all three Systems, given that General Iron and RMG have demonstrated they are not capable of or are unwilling to consistently control such sources using wetting and other work practice measures.

To the extent that IEPA determines that full enclosure is not feasible for certain sources, determinations that it must support in the record, it must enhance wetting and other work practice requirements in the Draft Permit to ensure that these measures in fact happen in a manner that minimizes dust and otherwise ensures compliance with the prohibition on air pollution and visible emissions, as well as the opacity limit. First, the Draft Permit (or the FPOP, if IEPA continues to rely on this deficient approach) must specify where specifically the Dust Bosses will be deployed and under what operating and weather conditions, rather than the exceedingly vague description in the FPOP narrative and "anticipated" Dust Boss locations provided in Figure 4-1. For instance, IEPA should require that Dust Bosses "shall" be used at all times during active working of piles and vehicle loading, as opposed to allowing for use of this equipment "as

¹²⁷ We note, as discussed with respect to conveyors within the shredder enclosure, that sources that can in fact be enclosed are not properly considered sources of fugitive emissions and their emissions count towards the major source thresholds for facilities like GIII.

¹²⁸ *See, e.g.*, Ex. 61, California DTSC, "Evaluation and Analysis of Metal Shredding Facilities and Metal Shredder Wastes," (Draft) January 2018, at 36-37 (describing enclosure of conveyor systems at Sims Metal Management in the Bay Area, to address fugitive PM and light fibrous material emissions), available at <https://dtsc.ca.gov/wp-content/uploads/sites/31/2017/01/Metal-Shredder-Analysis-DRAFT.pdf> (as included in exhibits to NGO Comments on CDPH's Large Recycling Rules). As explained in the enforceability section of these comments, the FPOP is exceedingly vague and unenforceable regarding which conveyors will be enclosed at the facility and with what kind of enclosures. The applicant and IEPA must require full enclosure for the conveyors that will carry material with the potential to generate dust and specify exactly which conveyors these are and where they are located.

¹²⁹ CDPH's Bulk Material Rules require truck and railcar loading/unloading of coke and coal to be conducted in full enclosures, *see* Section 3.0(12) and (13).

needed” or only after the fact if visible emissions are identified.¹³⁰ This approach eliminates any vagueness or uncertainty around whether wetting and similar methods must be used in a given case based on subjective operator judgment or vague, inadequate visible emissions testing. It also better ensures that the facility will in fact have sufficient wetting equipment available for all dust-generating sources and activities. IEPA also should require use of dry fogging systems at low temperatures when regular wetting procedures cannot be deployed effectively, again to ensure compliance with the prohibition on air pollution that contains no exceptions for temperature.¹³¹ Robust logging and at least monthly reporting of control measure use must also be required, with such reports made publicly available on IEPA’s website given the location of the facility in an environmental justice community and the deplorable company history on use of wetting and other work practice controls.¹³²

In addition, IEPA must clarify that the opacity limit contained in Section 212.123 applies to all sources of fugitive emissions, and require ongoing, regular and at least monthly opacity monitoring at each fugitive emission source and reporting of such opacity monitoring to ensure compliance with this limit. At least monthly opacity monitoring is warranted given the significant variability in wind directions and intensity from month to month in this area, as discussed below with respect to roadway emissions. Such opacity monitoring should include methods for assessing opacity during nighttime hours, given that the opacity limit contains no exceptions for hours of the day; the facility's operating hours under the Draft Permit include hours during which the facility will be operating during non-daylight hours; and it is feasible to develop a nighttime opacity monitoring protocol, as demonstrated by the Evraz Rocky Mountain Steel facility in Pueblo, Colorado (also known as the CF&I Steel facility). The visible emissions monitoring proposed in the fugitive particulate operating program similarly needs significant modification to include specificity in the sources/areas where such testing/monitoring will be conducted, as well as the operational and atmospheric/weather conditions under which it will occur, to ensure monitoring of those sources with the potential to cause a violation of the prohibition on visible emissions beyond the fenceline.

Finally, IEPA must require fenceline continuous monitoring of PM and metals to ensure compliance with the prohibition on air pollution over all conditions and considering the aggregate impact of multiple fugitive and point sources at GIII and the co-located facilities, as well as the history of noncompliance of these sources and the proposed location in an environmental justice community which already experiences the highest levels of several airborne heavy metals in the state including those associated with metals facilities, according to

¹³⁰ See FPOP at Section 3.1(B)(i), Section 3.4(B)(i).

¹³¹ See, e.g., Ex. 47, S.H. Bell, Fugitive Dust Plan, November 2017, at 6 (“Use of dry fogging unit to control fugitive dust, appropriate for use in freezing temperatures; dry foggers have a special air-atomizing nozzle that produces a dry fog consisting of ultra-fine water droplets which wet the dust particles and increase the weight to allow settling.”), available at https://www.chicago.gov/content/dam/city/depts/cdph/environmental_health_and_food/SH_BellFugitiveDustPlan_Nov2017.pdf.

¹³² Notably, the FPOP for the Chicago Rail and Port facility requires monthly as well as annual reporting, see Ex. 38.

IEPA's own air quality monitoring reports. As noted above, fence-line monitoring data at the Chicago Rail and Port facility demonstrated that the facility caused or contributed to PM₁₀ NAAQS violations, even where the facility was supposedly operating in compliance with its fugitive particulate operating program. The same is true for KCBX and S.H. Bell., the latter with regards to neurotoxic manganese. Such continuous monitoring therefore is critical to ensuring not only that a facility is in fact complying with its permit and enforceable fugitive particulate operating program, including the prohibition on air pollution. The data from the continuous monitors again should be made publicly available on a timely basis, at least monthly.

As noted in the section on enforceability, there is no justification for delaying such analysis and specificity until a later date, after construction. Indeed, such decisions go to the heart of the design that will be constructed, and deferral renders the current permit unenforceable and thus legally insufficient.

In addition, we again raise concern that segmenting of the permitting for this single source may be resulting in a failure to account for the vehicle loading and unloading emissions that will occur at 11600 S. Burley as a result of the addition of GIII. The GIII application is exceedingly vague as to vehicle loading and unloading, with a few scattered references to these activities, including a statement that “[m]aterial from the ferrous stockpiles are loaded into barges, rail cars or trucks for off-site shipment to customers,”¹³³ and visible emissions monitoring of the barge loading area¹³⁴. Yet there is little to no discussion of controls to be used for rail or barge loading, or even confirmation that rail and/or barge loading occurs on the GIII property as opposed to at its RMG neighbors or Calumet Transload Railroad (or even Calumet River Terminals to the North, which we understand IEPA has looked into as a possible single source with Calumet Transload Railroad). The materials are even silent to a large extent on truck loading. The applicant and IEPA should provide clarification of where such vehicle loading and unloading of GIII-related materials will occur and how such operations will be controlled (as noted above, loading of at least trucks and railcars should occur in enclosures), and include objective, enforceable requirements for continuous control and monitoring of emissions from vehicle loading/unloading of GIII materials wherever such activity occurs on the 11600 S. Burley campus or adjacent site as part of a true “single source” analysis and permitting.

Failure to maintain intact paved roads. Chronic and severe issues with maintaining paved surfaces have also been documented at both General Iron and more prominently the RMG facilities. In 2015 to 2017, General Iron had significant paving issues that took years to remedy, despite many inspections and discussions of how to fix these issues.¹³⁵ The paving record at the RMG S. Burley facilities is even more extreme, with facility managers recognizing that

¹³³ Application at 14.

¹³⁴ FPOP at Section 3.9.

¹³⁵ Ex. 23, CDPH Inspection Reports for 1909 N. Clifton: Inspection ID 1432160 (Aug. 1, 2019); ID 1061585 (June 20, 2017); ID 1011476 (Jan .11, 2017); ID 1001811 (Oct. 31, 2016); ID 882010 (July 27, 2016); ID 830775 (Mar. 31, 2016); ID 711215 (Sept. 30, 2015); ID 708237 (Aug. 27, 2015); ID 700925 (July 16, 2015); ID 499636 (May 21, 2013).

maintaining intact pavement is a virtually impossible task.¹³⁶ These issues apparently arise in large part due to use of solely asphalt for roadways, instead of more robust concrete or other available materials like rubber and plastic liners. They are compounded by chronic failures to timely repair the damaged pavement, in many cases with damage going for years before repair (only for the repaired areas to deteriorate once again).

The issues with maintaining paved surfaces in intact and clean condition at RMG are as follows,¹³⁷ further supporting that the Draft Permit is based on unrealistic assumptions about emissions from paved roads, must be revised to strengthen control and compliance provisions, as well as air quality modeling, and should be revised to take into account the full impact of the RMG-SCPM and other appropriate facilities as part of the “single source” of which the proposed GIII would be a part.

Reserve Marine Terminals

Beginning in 2014, City inspections note materials intermingling with dirt at the Reserve Marine Terminals site. In 2015, inspectors continued to note piles of dirt containing metal and muddy standing water, and commented that the facility must address pavement issues in a pavement plan. In 2019, city inspectors were still telling staff at the facility that they should have a written pavement plan.

The heavy machinery and truck traffic at the Reserve Marine Terminals site has been observed to cause chronic damage to all pavements at the site. City inspectors have noted in several inspections that “maintenance is a never-ending cycle.”¹³⁸ Indeed, despite weekly application of asphalt, pavement issues have persisted over the years, including many observations of potholes and large pools of water throughout the property. On June 28, 2017, an inspector noted that “some of the pavement is more dirt than anything else, caused by continuous traffic by trucks and the machines used onsite for processing.”¹³⁹ The pavement problems have contributed to dust issues at the property, including observations of fugitive dust during an October 2019 inspection when vehicles were driven on the main roadways and open areas. The site also appears to pose danger of contamination in the river, with one instance where large potholes holding several gallons of water were observed near the river.

¹³⁶ The issues with paving at the RMG-SCPM facilities in the CDPH inspection record are accompanied by reference to significant piles of metallic fines and metallic fines mixing in with dirt. Given this history and the broader history of the LTV contamination at the site, we are very concerned with assumptions regarding soil/silt content that rely on composite averages from onsite sampling. The applicant should disclose the full onsite sampling results, including the results for each sample and the range of values obtained, for further analysis of the impact of varying soil content on air emissions.

¹³⁷ Information in tables from Ex. 24, CDPH Inspection Reports for 11600 S. Burley and Ex. 62, CDPH Inspection Reports for 11610 S. Ave. O.

¹³⁸ Ex. 24, CDPH Inspection Reports for 11600 S. Burley, RMT, Inspection ID 884332.

¹³⁹ *Id.*, RMT, Inspection ID 1111122.

Date of inspection	Inspection notes re pavement issues at Reserve Marine Terminals
10/14/2014	Photo A: material piles extend all the way back to the treeline and materials intermingle with the dirt.
5/6/2015	Findings: site being cleaned up. Piles of dirt that also contain metallic are scattered throughout
11/19/2015	Photo A) one of several mixed materials (dirt, metal fragments) piles scraped from the ground that must be processed (segregated metal from dirt). Photo B) muddy ground with standing water []also an issue that must [be] addressed in a pavement plan
1/28/2016	Photo A) Area where the berm has been removed to place a charging station for the machines[.] The area needs to be scraped and the ground cleared of materials that are impregnating it . . . Photo B) pile of mixed materials (metals, dirt) that needs to be screened to remove metals[.] This is the largest of a few piles in this section of facility
3/11/2016	There is no clear separation between the road and the materials storage/processing area. RT has yet to provide a pavement plan, this is also detailed in the permit. There is standing water in large pools along the road and among the piles, prevention of this is also detailed in the permit.
4/8/2016	The pavement shows ponding throughout the site. RT states that types of activity (crushing, breaking hammering []all with machines) combined with the heavy machinery in use causes the damage to the roadway, they are constantly adding asphalt to maintain pavements but it's a never-ending cycle
5/11/2016	The pavement still shows ponding throughout the site. RT states that they are generating a pavement plan and schedule. The activity (crushing, breaking, hammering[.] All with machines) combined with the truck traffic causes damage to all pavements, maintenance is a never-ending cycle.
6/28/2016	As we toured the site, we discussed options to meet requirements for proper paving, dust control, and trackout . . . [tour w/ management]
7/28/2016	The pavement still shows potholes and ponding throughout the site. RT showed me a large pile of asphalt grindings, told me that they were using it to make repairs to the road every day because their activity (shearing, breaking, hammering) combined with the truck traffic causes damage to all pavements - maintenance is a never-ending cycle.
9/23/2016	The pavement still shows potholes and throughout the site several huge piles of asphalt grindings are onsite to use for continual repair to site pavements. On the southern boundary, materials are being processed in an area which is uneven and more dirt than asphalt.
11/18/2016	Previous findings: pavement potholes throughout the site. Current findings: pavement potholes remain throughout the site but they are filled with available asphalt on a weekly basis. There are large potholes near the river holding several gallons of water
1/23/2017	Previous findings: pavement potholes throughout the site. Current findings: pavement potholes remain throughout the site but they are filled with available asphalt on a weekly basis. There are large potholes near the river holding several gallons of water

3/22/2017	Upon arrival, I noted that the entry road had been partially wet (for dust control) but the center was dry and the wetting did not extend close to the street where trucks exited. At the entry gate, I noted very large potholes holding water He stated that they had recently gotten bids from pavement contractors to replace the damaged asphalt at the gate with asphalt. he will have a plan to either repair or replace the pavements by next inspection There were potholes evident along the interior haul road
5/1/2017	Upon arrival, I noted the damaged asphalt at the gate was even more damaged than previously noted, with a huge pool of water collected that must be inches deep at the center There were potholes evident along the interior haul road. []RT was supposed to have written a pavement repair/maintenance plan but had not. He will have that down by reinspection.
6/28/2017	There were large potholes evident along the river wall
8/18/2017	Some of the materials piles are confined by concrete blocks but some not. Some of the pavement is more dirt than anything else, caused by continuous traffic by trucks and the machines used onsite for processing. Pavements are supposed to be maintained on a rotating basis by the addition of asphalt grindings.
9/25/2017	There were large potholes evident in the haul road and the auxiliary roads branching off of it. RT stated that they filled potholes on [‘]as needed[’] Basis but that method did not appear to be effective. I asked that he set up a schedule for maintenance of these and he agreed to.
2/6/2018	I spoke to RT about the pavement plan/schedule that they should have in place[.] He told me that their safety representative had quit but they had just hired another and this one would be responsible for it
3/28/2018	There were potholes and standing water evident along the interior road.
5/11/2018	There were potholes throughout the site[.] DS committed to a paving plan that would maintain pavements on a scheduled basis. There is a dirt berm used to separate the terminal materials that also has waste (plastic, wood) in or on top of it
11/6/2018	The main issue is the potholes that span the length of the road through the middle of the site.
2/11/2019	The main issue is the potholes that span the length of the road through the middle of the site . . . I told Trivosonno that they should 1) have a written pavement maintenance plan and 2) a written plan showing the watering of the roads.
10/23/2019	Fugitive dust was observed when personnel would drive motor vehicles on the dry roadways and open areas, and when material piles were disturbed . . . It was concluded that they will repair the roadways since they were completely covered in dirt/debris and they will need to spray piles to control fugitive dust when they are moving the material piles.

South Shore Recycling

Beginning in 2015, City inspections noted soil contamination including metals mixed into the soil at the South Shore Recycling facility, requiring pavement to be added to the site. Paving progressed slowly, with inspections revealing standing pools of water at the site in 2016 and 2017, and limited progress on paving, particularly in the Northern portion of the site and the area East of the main door. In 2018, an inspector noted that the pavement is “in great need of repair,”

with potholes and standing water present. Additional inspections noted the presence of weeds and piles of dirt mixed with metal and other debris. In 2019, inspectors noted the need to level and compact the asphalt.

Recently, in October 2019, CDPH inspectors noted that there was dirt and debris all over the roadway leading to fugitive dust leaving the site. The most recent inspection in March 2020 revealed standing water and potholes, and a crack in the drainage grate.

Date of Inspection	Inspection notes re pavement issues at South Shore Recycling
7/23/2015	Photo A: scrap pile where the ground is covered with steel plate. Photo B: scrap area where pavement is cement. Photo C: area (which is dirt) will be scraped to remove contaminants . . . Outdoor storage area to be upgraded, proper pavement added
11/19/2015	Photo A: area of cement and dirt/mud. This area will be paved but not soon since their pavement plan starts on the western side and this is the eastern end. Photo B: pile of mixed materials (metal, dirt) that will be processed to remove contaminants and reclaim metal.
1/28/2016	Photo A: metal materials frozen in the dirt[.] This to be cleaned up at the spring thaw and materials must be stored in proper, dedicated areas. Photo B: Device for evacuating refrigerants[.] Staining on the ground is evidence of leaks. This activity will be moved to impermeable pavement.
3/11/2016	The area JH had committed to cleaning and pavement has been cleared of most of the materials but steel turnings have been deposited here instead of the turningspad on the other side of the road. Apparently this had been done by workers at the neighboring RMT facility, possibly due to the delineation between the 2 sites being unclear. This will be addressed immediately. The materials storage area has not been improved noticeably since the last inspection. in addition to materials, the ground also has singles on it that were apparently blown off the roof
4/8/2016	Previous findings: metal materials (turnings) deposited here instead of the turnings pile. Dirt area with scrap and roof debris on the ground . . . Metal materials (turnings) had been removed. The dirt area with scrap and roof debris had been cleaned up, gravel laid. The outdoor western storage area had been cleared of material and they will continue moving east, cleaning and laying asphalt.
5/11/2016	The presence of pooled water shows that paving had not progressed as much as JH had committed to[.] He stated that the machine they use to move materials actually also damages the pavement. He will look into an alternate method/machine and will pay more attention to maintaining the existing pavement by leveling it, on a schedule
6/8/2016	The paving improvement in the Northern portion has not progressed as much as expected . . . There is still uneven ground with standing water present
7/28/2016	Previous findings: standing water in areas showed poor drainage. Current findings: The paving improvement in the northern portion has progressed but not as much as expected . . . uuneven ground with standing water present. [JH committed to address a specific portion of this area by 1st removing magnetic materials then using a screener to remove other contaminants from the dirt. Then he will level and pave the area with asphalt.

9/23/2016	<p>Previous findings: The paving improvement in the Northern portion had progressed but not as much as expected. [JH was to increase his efforts to pave this area. Uneven ground with standing water present. [JH had committed to address a specific portion of this area by 1st removing magnetic materials then using a screener to remove other contaminants from the dirt. Then he will level and pave the area with asphalt . . . Current findings: The paving improvements in the Northern portion had progressed, there is added asphalt and the standing water is no longer evident. The next area to address is the adjacent area, where the gathered metals will be processed and the ground cleaned with the magnet. Asphalt will then be added and compacted.</p>
11/18/2016	<p>Previous findings: The paving improvements in the northern portion had, with added asphalt. The next area to address is the adjacent area, where the gathered metals will be processed and the ground cleaned with the magnet. Asphalt will then be added and compacted. Current findings: The paving improvements in the Northern portion had not progressed, but efforts had been redirected to the inbound scrap dropoff, where metal plates had been added as a ground cover. They will return to the pavement improvements. There is a wastepile (from scraping the pavement) of dirt with metal intermingled</p>
1/23/2017	<p>No improvement was noted in the outdoor area, cleanup efforts being hampered by the snow and cold</p>
3/22/2017	<p>The exterior needed a lot of improvement. Material piles were on the ground which is mostly dirt with some asphalt in places, some cement in others. Because of the mud and dirt, I've asked JH to begin cleaning, levelling, and paving. He will start in the portion east of the main door and proceed to the first set of blocks. He will focus in this area and only move to the next adjacent (east) area once completed. . . . The cleaning and pavement improvement is needed throughout the site.</p>
5/1/2017	<p>The exterior shows improvement but still need a lot more. Material piles had been moved from about half of the portion east of the main door in preparation for pavement improvement. Some asphalt grindings had been put down but they have not been compacted and the other metal must be relocated in order to do this completely. JH will focus in this area. On the other side (west) of the main door is material storage where metal plates are use as pavement and it is flooded because the ground underneath needs to be levelled. I told JH that he might have to remove these if they are judged inappropriate for pavement.</p>
6/28/2017	<p>The exterior portion east of the main door shows improvement but that apparently stopped before completing the pavement to the point agreed on (to the blocks). The area on the other side of the interior road is uneven ground with potholes and standing water. There are asphalt grindings but they are not being used.</p>
8/18/2017	<p>The addition of pavement in the exterior portion east of the main door has continued but has not reached the point agreed on (to the blocks). There are now trailers parked on the area where asphalt has been recently added. There remains an area needing pavement in between these trailers and the cement boundary blocks to the east.</p>
9/25/2017	<p>The area needing to be cleaned had been completed. The much cleaner area still needs the pavement levelled and that will be done after the last materials have been processed. The next area to be addressed is about halfway done[.] There remained trailers and other materials to be processed, then the pavement can be levelled.</p>
3/28/2018	<p>The pavement is in great need of repair, with potholes and standing water evident</p>

5/11/2018	The exterior portion was full of materials but also waste. A pile of CD debris (dirt, broken concrete) was among the metal scrap The material storage/processing areas needed to be cleaned up, with metal removed from the ground and the pavement levelled.
7/12/2018	The exterior portion was full of materials but also waste (piles of dirt with metal intermingled, wood) and weeds are growing among the scrap
9/17/2018	The exterior portion was full of materials and previous[1]-noted waste (piles of dirt with metal intermingled, wood) remained and weeds were still growing among the scrap[.] JH was to have addressed these by reinspection but improvement had not gotten to a very noticeable point.
11/6/2018	The road pavements were full of potholes I recommended that they address the uneven pavements before placing new materials here.
7/26/2019	In the exterior, they had added separation to the unload area between individual peddlers. The asphalt pavement needed to be levelled and compacted.
9/10/2019	the asphalt pavement still needed to be levelled and compacted
10/23/2019	Fugitive dust was observed when personnel would drive motor vehicles on the dry roadways and open areas, and when material piles were disturbed . . . It was concluded that they will repair the roadways since they were completely covered in dirt/debris and they will need to spray piles to control fugitive dust when they are moving the material piles.
3/13/2020	In the exterior, the onsite drain does have a proper filter in place but the grate has a large crack in it. []JH will replace it. The pavement needs attention, potholes and pooled water are evident

Regency Technologies

City inspections have identified chronic pavement issues at Regency Technologies since at least 2017. City inspectors have consistently noted damaged pavement, potholes, standing water, and flooding due to uneven pavement. The most recent inspection in March 2020 illustrates that the pavement insufficiencies remain ongoing.

Date of inspection	Inspection notes re pavement issues at Regency Technologies
1/23/2017	The outdoor area pavement is in need of repair, as shown by pooled water
5/1/2017	The area around the outdoor bays . . . Is flooded. They have put down steel plates as a form of pavement. I told RT that this is not acceptable and they must choose another (i.e. stone, asphalt)
6/28/2017	The area around the outdoor bays . . . That was flooded and had steel plates down as a form of pavement was no longer flooded and gravel had been used to fill the potholes.
3/28/2018	The pavement is damaged, in need of repair
5/11/2018	The pavement is damaged, in need of repair
7/12/2018	The pavement that had previously been damaged is in better condition, having asphalt added to the low spots.

4/11/2019	The outdoor storage area includes 3 bays . . . And all bays had been overfull but they were now not. The pavements were damaged and potholes had collected water
6/13/2019	The outdoor storage bays . . . Were flooded with water ?RT had said that this would be addressed by reinspection. Today he told me that 1) he had added asphalt but this is a low spot in this area, and 2) recent heavy rains had flooded the area again.
7/26/2019	The outdoor storage bays . . . Had damaged pavement. This was similar to the last inspection and RT had said that this would be addressed. Today he told me that he had added asphalt but this was a high traffic area and he would continue maintaining the ground.
3/13/2020	The pavement in the outdoor storage needed improvement due to potholes and standing water

Napuck Salvage of Waupaca

At the Napuck facility, City inspections have noted damaged pavement and potholes. In numerous instances, City inspections have noted wastes, dirt piles, and materials being stored on the ground instead of on proper pavement.

Date of inspection	Inspection notes re pavement issues at Napuck
2/28/2005	paving could use an upgrade, too much mud.
7/23/2015	Photo A) materials stored on ground which is dirt not cement, asphalt, gravel etc. Photo B) materials stored on ground, building conditions (walls) deteriorating. Photo C) materials pile not confined/controlled.
10/15/2015	Photo A) Outdoor storage has only partial containment, materials spreading to grass/dirt area.
3/11/2016	Right outside the West building, a metal pipe containing some sort of oil was protruding from the ground. The pipe is connected to something underground (possibly a UST), but RT is unaware of what . . . On the Eastern boundary, materials (engines) are normal stored on cement but today some are on the ground, which is dirt - not acceptable pavement.
4/8/2016	The pipe has been exposed and found to be a part of now-defunct railroad mechanisms that have been covered over with asphalt.
6/28/2016	The abundance of materials have been removed and processed, except for some dirt piles that must be processed. Then the area will be magneted and screened to remove metals, and graded.
7/28/2016	In the Northern area, the ground has large depressions holding water and weeds are excessive. RT has one pile of asphalt ready, says he will need 5-6 more loads to make repairs.

11/18/2016	The large area after the ramp (from where materials are stored) has potholes that need addressed.
1/23/2017	Previous findings: The large area after the ramp (from where materials are stored) had potholes that need addressed Current findings: The area remains unchanged.
5/1/2017	The Western area is flooded because of the damaged pavement . . . There is an area of dirt pavement where metal fragments are being stored.

Given the recognized engineering issues with maintenance of paved surfaces with such high intensity heavy vehicle use; the vagueness of GIII’s application regarding which paving materials will be used in what areas and for what percentage of paved surfaces; and the extensive evidence that General Iron and RMG-SCPM are not in fact maintaining paved surfaces, it is entirely unreasonable to assume intact pavement and the high levels of control used in the paved roads emission calculations for GIII. The applicant and IEPA thus must revise the emission estimates and control, testing/monitoring and recordkeeping/reporting requirements.

It is possible to conduct complex emissions estimates, as a function of wind speeds, based on currently used approaches – however, doing so requires making significant additional assumptions regarding so-called silt loading, efficacy of watering or other dust control measures, frequency of maintenance, and other factors for which the application and IEPA do not provide information. In light of this gap, the approach used by applicant and IEPA is inappropriate. Instead, the emissions estimates should use a simplified fugitive dust estimate employing AP-42 Section 13.2.3 for Heavy Construction Operations. In the aggregate, operations at a typical shredding and recycling facility are not dissimilar, in terms of the ability to generate dust from exposed sources, including unpaved and partially paved/deteriorated surfaces. The emission factor recommended is 1.2 tons/acre/month. Annual emissions can be estimated using estimates of potentially erodible acreage. To allow for a portion of the area which might be paved with more robust materials like concrete, we recommend that this emission factor be applied to the rest of the total GIII acreage at the rate of 1.2 tons/acre/month.

Conversely, in order to claim the high levels of control for roadways that is the basis for the Draft Permit, including the air quality modeling, IEPA must substantially revise the Draft Permit (and fugitive particulate operating program) to require that all paved roads use robust, long-lasting and relatively low-maintenance materials such as concrete; to employ objective requirements for maintenance of those roads, such as time period within which any deterioration will be correct; to include objective, practicably enforceable requirements for sweeping and wetting, including recordkeeping and mandated at least monthly reporting; and to address the points raised above regarding control and compliance measures for other fugitive sources that equally apply to roadways. Regarding enforceable requirements for sweeping and wetting, again the SCAQMD and CDPH rules both require sweeping at least every 4 hours or 100 trucks, but not less than once daily.¹⁴⁰ These rules also employ additional measures for surface maintenance

¹⁴⁰ See Ex. 44, CDPH Rules for Large Recycling Facilities, at Section 4.14; Ex. 46, SCAQMD Rule 1158 at Section (d)(7)(B).

and cleaning, including a prohibition on accumulation of material, removal of any material spills of more than a certain amount within one hour, material moisture content requirements, and silt limits.¹⁴¹ In addition, the CDPH rules recognize the applicability of an opacity limit to roadways and require at least quarterly opacity testing to ensure compliance with this limit.¹⁴² The Draft Permit should do at least the same in this individual permitting, again based on the poor track record of these companies and the proposed location in an already-overburdened environmental justice community.

We also note here heightened concern over the combined impact of multiple co-located facilities, again emphasizing the need to in-fact consider the facilities as a single source in permitting. Due to the proximity of the facilities, fugitive dust from inadequate paving and contaminated soil at one facility is likely to create issues at the others. Thus, even IF the proposed GIII employs concrete roads throughout its new facility and in fact aggressively controls dust on paved roads, dust related to the documented poor paving at the other -SCPM facilities is likely to end up on GIII's roadways, impacting emissions from the GIII roadways.

The GIII site would be located between existing facilities at the 11600 S. Burley Avenue site, directly south of the Reserve Marine Terminal scrap processing and material storage site and north of South Shore Recycling and Regency Technologies (see Figure 1 and Figure 2 below).¹⁴³ The FESOP application materials for the RMG-SCPM facilities identify roadway emissions as the primary source of emissions from these facilities, noting that, as discussed above, the emissions estimates from RMG-SCPM are significant underestimations given the abysmal paving conditions and failed paving maintenance at these sites.

¹⁴¹ See Ex. 46, SCAQMD Rule 1158 at Section (d)(7).

¹⁴² See Ex.44, CDPH Rules for Large Recycling Facilities, at Sections 4.7.4 and 4.7.5.

¹⁴³ Ex. 63, Lifetime Operating Permit Application, Supplemental Document, S. Chicago Property Mgmt. Ltd., 11600 S. Burley Ave., Chicago, IL 60617 (Nov. 26, 2019) ("RMG FESOP Application"), at p. 16, Figure 1; RK & Associates, Inc., General III, LLC, Fugitive Particulate Operating Program (Mar. 20, 2020), Figure 2-2.

Figure 1. Map of Existing RMG-SCPM Facilities at 11600 S. Burley.

Figure 1: General Location Map

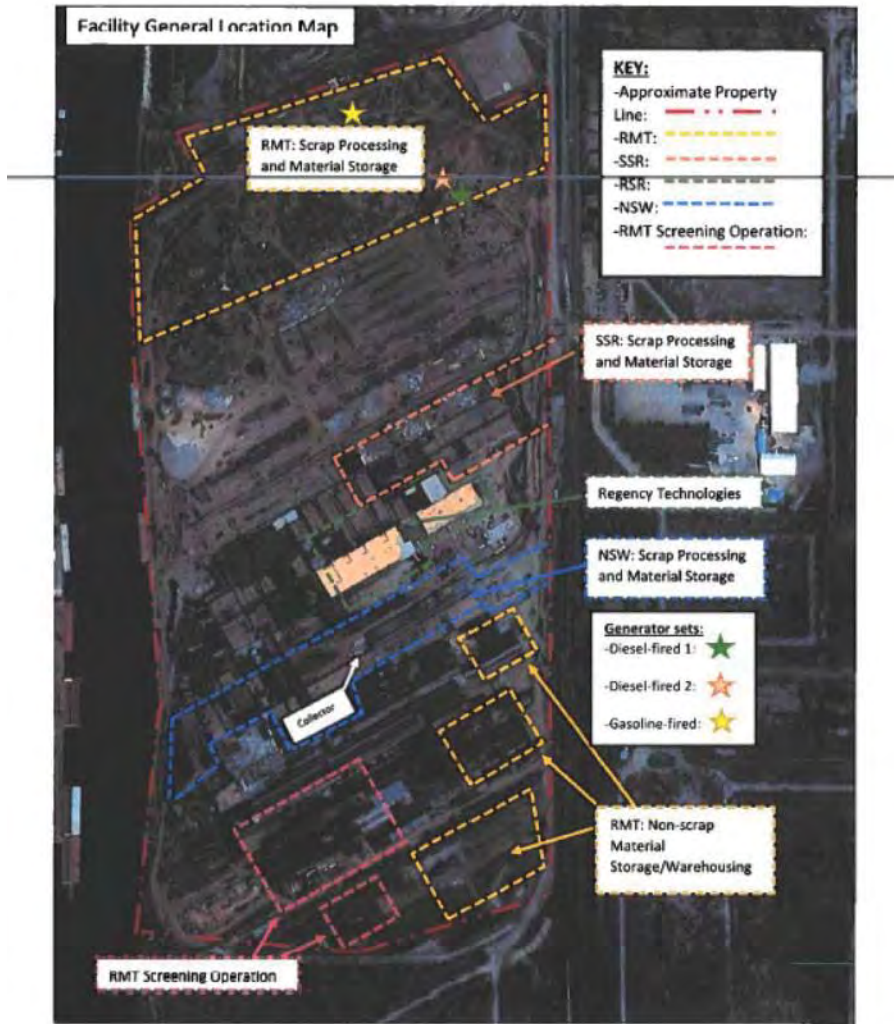


Figure 2. Proposed General Iron III Facility Location.

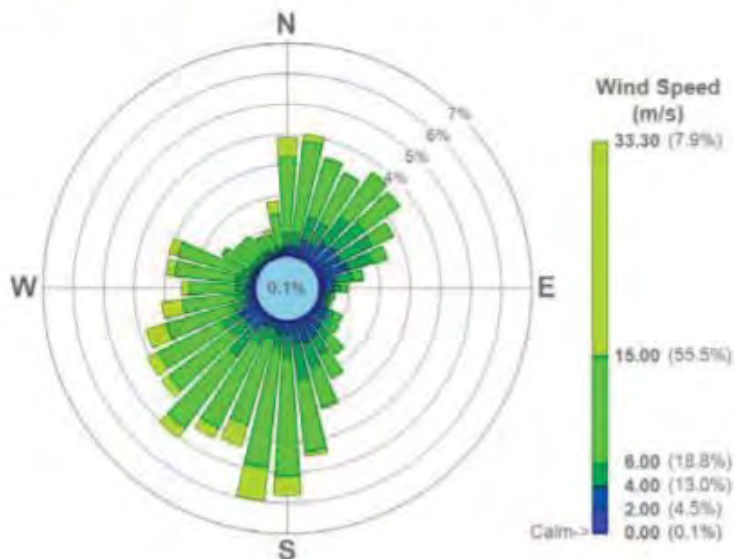


Because all the facilities are in close proximity to each other running North-to-South, fugitive roadway emissions are likely to be redistributed between the facilities by the wind. The predominant wind direction is from the South and Southwest.¹⁴⁴ Strong winds also blow from the

¹⁴⁴ Ex. 64, Iowa Environmental Mesonet, Iowa State University, Wind Roses for Midway Airport, Jan. 1, 1970 to Dec. 2, 2019, available at http://mesonet.agron.iastate.edu/sites/windrose.phtml?station=MDW&network=IL_ASOS.

North and Northeast.¹⁴⁵ Data collected from a nearby facility located at 10730 Burley Avenue demonstrates this pattern on an annual basis (Figure 3).¹⁴⁶

Figure 3 - Combined 2015-2016 Windrose Derived from Meteorological Data collected at KCBX South Terminal (10730 Burley Ave.)



As shown in Figures 1 and 2, South Shore Recycling, Regency Technologies, and a portion of the RMT facility lie directly South of the proposed GIII facility, and thus fugitive dust from those facilities would blow toward the GIII site when the wind is coming from the South. Likewise, dust generated by the GIII facility would usually blow into the RMT scrap yard directly north of the site, which given the poor conditions at RMT would then likely be reentrained and deposited on the neighborhood around Rowan Park and Washington High School.

When the wind is blowing from the North, the fugitive emissions from RMT scrap yard would blow into the GIII site. Dust generated by GIII, in turn, would blow into properties located south of the GIII site, where it may again blow into the Calumet River and onto adjacent facilities to the South, given the chronic paving issues with the existing RMG-SCPM facilities.

¹⁴⁵ Ex. 64, Iowa Environmental Mesonet, Iowa State University, Wind Roses for Midway Airport, Jan. 1, 1970 to Dec. 2, 2019, available at http://mesonet.agron.iastate.edu/sites/windrose.phtml?statio=MDW&network=IL_ASOS; Ex. 65, Xact Metals Study: Southeast Chicago, report prepared by Motria Caudill, field monitoring data from Dec. 12, 2014 to July 23, 2015, Appendix D to 2017 Watco Variance Request, available at https://www.chicago.gov/content/dam/city/depts/cdph/environmental_health_and_food/ExhibitsA_EtoWatcoVarianceRequest.pdf.

¹⁴⁶ Ex. 66, Watco Variance Request, (July 31, 2017), at 28, Figure 3, available at https://www.chicago.gov/content/dam/city/depts/cdph/environmental_health_and_food/VarReqfromWatcoTransloadingLLC_2926E126thSt.pdf.

We also note here that the Westerly winds evident from wind roses provide concern for roadway-related fugitive dust from all of the facilities blowing into the shopping and residential area to the East of 11600 S. Burley.

D. IEPA Must Account for, and Include Stringent Limits on, Torch Cutting.

The Draft Permit cannot issue as proposed because it does not properly estimate emissions from torch cutting associated with the proposed GIII and fails entirely to include any requirements to control air pollution from this dangerous process, which is associated with substantial emissions of heavy metals and which has been identified as the source of increased cancer risk at some metals facilities based on ambient monitoring. Again, we raise concerns that the failure to in-fact consider the multiple facilities at 11600 S. Burley obscures the true impact of these co-located, interconnected operations.

Torch cutting is used in the recycling process to break apart large metal pieces, to reduce larger sized scrap to smaller sizes suitable for shredding. Torch cutting typically uses gas, but torches may also use plasma or powder.¹⁴⁷ Torch cutting vaporizes metal, resulting in airborne toxic metals - as well as dust and opacity - and, depending on the type of torch used, may create large amounts of smoke and noise.¹⁴⁸ Torch cutting is especially concerning because it generates fine particulate matter air pollution (PM 2.5).¹⁴⁹ Even short term exposure to particulate matter air pollution is associated with morbidity and mortality, especially with respect to fine particulate matter (PM 2.5).¹⁵⁰ Moreover, airborne metals generated by torch cutting include nickel, cadmium, hexavalent chromium, and copper, all of which are carcinogenic.¹⁵¹ In a study based on monitoring at five recycling facilities in Houston, researchers concluded that the increased cancer risk from ambient air concentrations of these metals generated at the recycling facilities ranged from 1 case in 1 million to 8 cases in 10,000.¹⁵² Torch cutting also generates hazardous lead dust.¹⁵³

¹⁴⁷ Ex. 67, OSHA, Guidance for the Identification and Control of Safety and Health Hazards in Metal Scrap Recycling at 9-10 (“OSHA Guidance”), available at <https://www.osha.gov/Publications/OSHA3348-metal-scrap-recycling.pdf>.

¹⁴⁸ Ex. 67, OSHA Guidance, at p11; *see also* Ex. 68, Michigan Department of Environmental Quality, Violation Notice to RJ Industrial Recycling (May 25, 2016), available at https://www.deq.state.mi.us/aps/downloads/SRN/N7885/N7885_VN_20160525.pdf.

¹⁴⁹ Ex. 69, L. Raun, K. Pepple, D. Holyt, D. Richner, A. Blanco, and J. LI, *Unanticipated potential cancer risk near metal recycling facilities*, Environmental Impact Assessment Review 41 at 71 (2013) (“Raun, et. al.”).

¹⁵⁰ *Id.* at 71; *see also, e.g.*, Ex. 70, World Health Organization, “Health Effects of Particulate Matter Policy implications for countries in eastern Europe, Caucasus, and central Asia” at 6 (2013), available at http://www.euro.who.int/_data/assets/pdf_file/0006/189051/Health-effects-of-particulate-matter-final-Eng.pdf (“The health effects of inhalable PM are well documented. They are due to exposure over both the short term (hours, days) and long term (months, years) and include: • respiratory and cardiovascular morbidity, such as aggravation of asthma, respiratory symptoms and an increase in hospital admissions; • mortality from cardiovascular and respiratory diseases and from lung cancer.”).

¹⁵¹ Ex. 69, Raun et. al, at 73.

¹⁵² *Id.* at 75.

¹⁵³ Ex. 71, New York State Dept. of Health, *Metal Recycling Industry Project*, available at

Again, experience with RMG-SCPM indicates that torch cutting activities at the facilities are generating significant air pollution and have been occurring in violation of local and likely state requirements. As described elsewhere in these comments, in late June 2019, CDPH Deputy Commissioner Dave Graham described to Meleah Geertsma an inspection during which he observed the use of large stationary torches at Reserve Marine Terminal to disassemble railcars in the yard, resulting in large black plumes of smoke. At the time, these torches were not registered with the City, nor did RMT have a state air permit or other approval for its operations as a whole, nor was it employing any pollution controls for the open-air torch cutting.

Despite these well-known hazards of torch cutting, and the likelihood that GIII will depend on torch cutting conducted somewhere at 11600 S. Burley or an adjacent property to process its 1,000,000 tons of scrap, nowhere does the GIII application or Draft Permit include torch cutting. Instead, the application simply notes in a vague and suspect way that “[t]he following activities, potentially associated with the operation of metal recycling facilities, are not included in this permit application: Torch Cutting...”.¹⁵⁴ At the same time, the RMG FESOP application for the 11600 S. Burley RMG-SCPM facilities that do and will conduct torch cutting (a) omits any discussion of increased torch cutting expected as a result of the GIII, and (b) asserts that torch cutting is an “exempt activity” pursuant to 35 IAC 201.146(aa).¹⁵⁵ RMG did include torch cutting in its estimate of PTE, but even those estimates were faulty.¹⁵⁶ RMG considered only emissions from burning of fuel for the torch, and did not consider the volatilization of metals from the torching itself, which as described above poses the greatest health hazard to the nearby community as demonstrated by field monitoring studies.¹⁵⁷

Moving forward, IEPA must address in this permitting action whether GIII’s operation will require additional torch cutting to be conducted by facilities encompassed in the single source at 11600 S. Burley. In addition, the applicant and IEPA must properly estimate emissions from torch cutting at the single source taking account of the impacts of volatilization of metals and not simply gas combustion.

Limited data is available on the more complete emissions from torch cutting. One available emission factor is 0.06 lb/hr for cutting clean steel, based on ISRI data, which has been employed by the Ohio EPA in permitting a metals recycling facility.¹⁵⁸ The Draft Permit again omits torch cutting entirely, and so from the hours of operation limits in Condition 12(a). Without any formal limits on when torch cutting is allowed to occur, we made an assumption that torch cutting/sizing operations will in fact occur 25% of the time, *i.e.*, for 2,190 hours per year. Again because the Draft Permit is silent on torch cutting and given evidence that torch cutting at the RMG facilities occurs outside, we also assume that all torch cutting occurs outdoors – *i.e.*, not indoors, subject to some type of “control” efficiency. Using this calculation,

https://www.health.ny.gov/environmental/workplace/metal_recycling/metal_recycling_report.htm

¹⁵⁴ September GIII Application at p 19, Section 2.7, “Excluded Activities.”

¹⁵⁵ See Ex. 63, RMG FESOP Application, at 5.

¹⁵⁶ See *id.*, at Appendix A, Section A5.

¹⁵⁷ *Id.*

¹⁵⁸ See Ex. 52, Omnisource Permit.

the estimate of PM emissions for torch cutting associated with the proposed GIII facility (assumed to be PM10 and PM2.5) is 131.4 lb/year or 0.066 tons/year, substantially higher than the amount provided in the RMG FESOP application. At the same time, it is possible that, with multiple torch cutting stations or operations, the actual hours per year of torch cutting at GIII may be considerably greater than the 2,190 hours/year assumed above, and thus PM and metals emissions from torch cutting may be substantially higher as well.

After having properly estimated emissions from torch cutting, the applicant and IEPA must include in the Draft Permit control and compliance measures for torch cutting that will occur at the single source as a result of GIII. Contrary to RMG's assertion, torch cutting should not be treated as exempt under 35 IAC 201.146(aa). Torch cutting is distinct from simple "cutting," which is potentially exempt under Section 201.146(aa) (if additional conditions are met) and considered a presumptively "insignificant" activity under Section 201.210. Unlike other forms of cutting, torch cutting of metals results in significant emissions of hazardous air pollutants. On this basis alone, Illinois regulations recognize that the activity is significant. *See* Section 201.210(a)(2) and (3), listing as potentially insignificant emission units that emit below certain lbs/hr and tpy thresholds "*and* that do not emit any air pollutant listed as hazardous" (emphasis added). Furthermore, the regulatory history of Section 201.210 points to insignificant activities being minor sources of air pollution that do not contribute significantly to the health and environmental goals underlying Title V of the Clean Air Act. *See* 415 ILCS Section 5/39.5(5)(w).¹⁵⁹ In contrast, as detailed above, torch cutting at recycling facilities contributes significant hazardous air pollution in communities located nearby, and research indicates that increased fine size particulate matter generated by torch cutting increases cancer risk in those communities. Further, testimony during the IPCB Rulemaking by an Illinois EPA representative strongly suggested that even presumptively insignificant activities that in fact have a significant environmental impact may and should be controlled as part of IEPA permitting.¹⁶⁰

Nor again can IEPA defer addressing torch cutting to some later post-construction date, as steps for minimizing torch cutting implicate the overall design of the facility.¹⁶¹ One control measure for torch cutting is to prohibit onsite torch cutting at the single source given its location within a dense residential and environmental justice community, which would require outsourcing of cutting to a facility that is located further from residential areas and/or that itself has indoor facilities or otherwise more robustly controlled facilities for such cutting.¹⁶² Other specific

¹⁵⁹ *See also* Illinois Pollution Control Board Rulemaking R94-14 (June 1994) ("IPCB Rulemaking") available at <https://pcb.illinois.gov/Cases/GetCaseDetailsByID?caseID=4982>.

¹⁶⁰ *Id.*, Ex. 72 Testimony of Christopher Romaine *during* IPCB Rulemaking at 8-9 (June 1994) ("Based on the list of insignificant activities submitted in a CAAPP application, the Agency or USEPA may find during the course of permitting that an activity should not qualify as insignificant.")

¹⁶¹ *See, e.g.*, Ex. 73, Metal Air Pollution Partnership Study, 2018 MAPPS Report for South Park near Allied Alloys, at 7 (discussing voluntary steps to reduce torch cutting from facility identified as posing an elevated cancer risk to the community, including adding additional processing equipment to reduce torch cutting and outsourcing majority of torch cutting while evaluating other technology to further reduce metal emissions), available at https://sph.uth.edu/research/centers/swcoeh/mapps/MAPPS_Layreport_AA_F103118.pdf.

¹⁶² *See id.*

controls that must be considered are a requirement to conduct torch cutting indoors onsite, except in exceptional, pre-defined, circumstances; a requirement that the structures in which torch cutting is conducted be fully enclosed, well-ventilated, and fitted with robust air pollution controls¹⁶³; requirements related to fire prevention and control¹⁶⁴; and reporting and monitoring requirements, including continuous ambient monitoring of PM and HAPs in the vicinity of torch cutting activities to ensure compliance with the prohibition on air pollution and mandated, at least monthly public reporting of such monitoring.

E. IEPA Must Impose Additional Permit Conditions to Prevent Fires and Explosions.

As set forth in our comments on CDPH's proposed rules for Large Recycling Facilities, which we incorporate in full in these comments to IEPA, metals facilities in general are prone to fires and explosions, which in turn can have profound negative impacts on air quality immediately surrounding these facilities and at even greater distances, in addition to posing other safety hazards.¹⁶⁵ This industry-wide problem stands on its own as reason for IEPA to include additional terms in the Draft Permit to address risk of fire and explosion and their impacts on air quality.

The need for additional measures for preventing and minimizing the impacts of fires and explosions is bolstered by General Iron's and RMG's history of such events. On May 18, 2020, a major explosion and fire occurred at General Iron.¹⁶⁶ This is not the first explosion or fire at General Iron. Just a few months ago in February 2020, there was an explosion in the shredder, leading to a citation of unauthorized air pollution.¹⁶⁷ When CDPH responded to the scene, they were told by General Iron Environmental Manager Jim Kallas that such explosions are "a common occurrence."¹⁶⁸ In 2015, there was an incident involving loud explosions and a fire, sending huge plumes of smoke into neighboring communities.¹⁶⁹ According to CDPH, the fire

¹⁶³ Of note, the Ohio EPA has issued a permit-to-install to Reserve FTL for a torch cutting area at one of its other facilities, consisting of a three-walled enclosure equipped with baghouse. *See* Ex. 74, Ohio EPA, Final Permit to Install issued to Reserve FTL, LLC, DBA Reserve Iron Ohio, issued May 7, 2012 (naming Dennis Stropko, also associated with the 11600 S. Burley facilities), available at http://web.epa.state.oh.us/dapc/permits_issued/589801.pdf. We present this permit not as a full endorsement of its terms (as noted above, other facilities have outsourced torch cutting almost entirely where they were located in a dense residential EJ community), but to show that permit control requirements and limits can be applied to torch cutting operations like those that are occurring and will occur at 11600 S. Burley.

¹⁶⁴ *See id.* At 1(b)(2)(d)(ii) (requiring good operating practices to minimize accidental fires, which "shall" include (but are not limited to) "cutting metal that is clean of any oils(s) [sic] or other combustible fluids, the minimization of flame impingement with the ground, and the use of appropriately sized cutting torches.")

¹⁶⁵ *See* Ex. 5, NGO Large Recycling Rule Comments, at p4-5
https://www.chicago.gov/content/dam/city/depts/cdph/InspectionsandPermitting/Comment_NRDC_SETF_SSCBP_LVEJO_6-21-19.pdf

¹⁶⁶ Ex. 75, Hannah Alani, Colin Boyle, "Major Explosion at General Iron Scrap Plant Rocks Neighborhood, Company Suggests 'Potential Sabotage,'" Block Club Chicago (May 18, 2020, 9:33 A.M.), <https://blockclubchicago.org/2020/05/18/major-explosion-and-fire-at-general-iron-scrap-plant-rocks-neighborhood/>.

¹⁶⁷ Ex. 23, CDPH Inspection Reports for 1909 N. Clifton, Inspection ID 10929879 (Feb. 11, 2020).

¹⁶⁸ *Id.*, Inspection Report, Inspection ID 10929879 (Feb. 11, 2020).

¹⁶⁹ Ex. 76, Alex Nitkin and Alisa Hauser, "After Explosions at Extra-Alarm Scrap Yard Fire, Ald. Calls for Its Closure," dna info Chicago (Dec. 6, 2015, updated 6:49 P.M.), <https://www.dnainfo.com/chicago/20151206/lincoln-park/lincoln-park-fire-causes-explosions-dark-plumes-of-smoke-sunday-morning>.

was caused by a spontaneous combustion of a materials pile¹⁷⁰; as described in our rulemaking comments to CDPH, such fires can have profound negative impacts on short-term air quality. And in 2002, an open fire released smoke at the General II site, leading to a liability finding that the facility had unlawfully released air pollution.¹⁷¹

In 2019, a truck caught fire as it entered the site gate.¹⁷² Another 2015 incident involved a fire in a trailer.¹⁷³ CDPH inspectors have also documented unsafe storage conditions at the General Iron site and issued numerous warnings.¹⁷⁴ In 2010 inspections, an inspector noted dangerous storage of fuel, explosive material, propane tanks, exposed batteries, etc. General Iron has also had several warnings about how to properly store pressure vessels and has repeatedly done this incorrectly.¹⁷⁵

The Draft Permit is decidedly lacking in any terms to address these very real threats to air quality from fires and explosions. Additional measures should include a mandate to employ infrared cameras that can sense hot spots in material piles and other operations before fires occur, to aid in fire prevention. The Draft Permit should also require detailed and objective requirements with respect to sorting of incoming material and storage of pressure vessels. Given the recent explosion that knocked out the RTO, destroyed buildings and equipment and ignited fires at the site, the Draft Permit should also require incorporation of the manufacturers' specifications and safety protocols for operating the RTO, accompanied by enforceable conditions mandating compliance with these specifications and protocols. This information furthermore should be reported at least monthly to IEPA and IEPA should commit to creating online, timely access to the data (*i.e.*, post all reports within 2 weeks of receipt). Air quality modeling should also reflect the short-term impacts on air quality from fires at metals facilities, particularly with respect to daily- and sub-daily time periods.

F. IEPA Must Impose Conditions that Prevent Odors.

The Draft Permit cannot issue as written due to its failure to ensure compliance with the prohibition on air pollution, which, as set forth elsewhere in our collective comments, specifically encompasses odors. Odors are one of the regularly occurring complaints of neighbors of metals recycling facilities. To quote one resident, "... people around here know the scent of shredded metal. Anyone who lives with it on a daily basis knows it's a heavy, putrid smell."¹⁷⁶

¹⁷⁰ Ex. 23, CDPH Inspection Reports for 1909 N. Clifton, Inspection ID 804947 (Dec. 7, 2015); ID 802128 (Dec. 6, 2015).

¹⁷¹ Ex. 21, City Enforcement Data for 1909 N. Clifton, violation dated 1/2/2002.

¹⁷² Ex. 23, CDPH Inspection Reports for 1909 N. Clifton, Inspection ID 8429665 (Apr. 1, 2019).

¹⁷³ *Id.*, Inspection Report, Inspection ID 805587 (Dec. 11, 2015).

¹⁷⁴ *Id.*, Inspection Reports: Inspection ID 842777 (Apr. 25, 2016); ID DOEINS41724 (Dec. 21, 2010); ID DOEINS41696 (Jan. 19, 2010).

¹⁷⁵ *Id.*, Inspection Reports: Inspection ID 1479398 (Jan. 9, 2020); ID 1268331 (June 28, 2018); ID 1239682 (May 9, 2018); ID 830775 (Mar. 31, 2016).

¹⁷⁶ Ex. 77, Marissa Evans, *North Minneapolis residents welcome shutdown of metal shredder*, Minneapolis Star Tribune, September 30, 2019, available at <https://www.startribune.com/north-minneapolis-residents-welcome-shutdown-of-metal-shredder/561642752/>.

General Iron is no exception to these odor issues. The facility has generated strong metallic odors in the community on many occasions, often leading residents and CDPH inspectors alike to complain that the odors are so strong they impair breathing. On many occasions, including *after* installation of air pollution controls required by the U.S. EPA enforcement action, CDPH has observed strong odors on site at the General Iron facility and in the surrounding neighborhoods.¹⁷⁷ Many times, these odors are so strong that they cause discomfort and difficulty breathing.¹⁷⁸ CDPH’s recurring description of the odor is “a pungent odor of sweet metal that burns my nostrils” and on several occasions the inspector has noted that the odor “makes it uncomfortable and difficult for me to fully inhale,”¹⁷⁹ or “uncomfortable to breathe in.”¹⁸⁰ On one occasion, an inspector noted that the odor “burned and inflamed my nostrils to the point of throbbing inside my nostrils.”¹⁸¹ CDPH inspectors have continued to cite uncomfortable odors during some of their most recent inspections in May 2020, as described earlier in these comments. General Iron has generated countless complaints from nearby residents about strong odors emanating from the facility. This record demonstrates that such odors meet the definition of air pollution, in that they are injurious to human health and unreasonably interfere with the enjoyment of life or property.

Given the general issues with odors associated with metal shredding facilities, and the history of odor issues at General Iron, IEPA must impose additional permit conditions to ensure that Southeast Side neighbors, including those that use the Calumet River, are not subjected to odors that impact their health and wellbeing. Full enclosure of facility operations as set forth above, including the shredder and various handling processes (functionally creating prohibitions on conducting various operations outdoors) will likely address sources of odors to some degree as well.¹⁸² In addition, IEPA should include specific odor management provisions in the Draft Permit, including use of available odor monitoring systems.

Failure to control odors from the proposed GIII as air contaminants also undermines the Clean Water Act’s “national goal” to achieve, “wherever attainable,” water quality which provides “for

¹⁷⁷ Ex. 23, CDPH Inspection Reports for 1909 N Clifton: Inspection ID 11152408 (Mar. 26, 2020); ID 11124169 (Mar. 20, 2020); ID 10929879 (Feb. 11, 2020); ID 10881195 (Jan. 31, 2020); ID 10836335 (Jan. 23, 2020); ID 10767158 (Jan. 10, 2020); ID 10759746 (Jan. 9, 2020); ID 10746578 (Jan. 7, 2020); ID 10716916 (Dec. 31, 2019); ID 10708652 (Dec. 29, 2019); ID 10706274 (Dec. 27, 2019); ID 1494955 (Dec. 18, 2019); ID 10639264 (Dec. 11, 2019); ID 10573289 (Dec. 2, 2019); ID 10578242 (Dec. 2, 2019); ID 10462386 (Nov. 15, 2019); ID 10287548 (Oct. 28, 2019); ID 10208629 (Oct. 18, 2019); ID 10103209 (Oct. 7, 2019); ID 10103782 (Oct. 7, 2019); ID 10039135 (Oct. 1, 2019); ID 10047093 (Oct. 1, 2019); ID 10022352 (Sept. 30, 2019); ID 9935709 (Sept. 19, 2019); ID 9935298 (Sept. 19, 2019); ID 9901819 (Sept. 17, 2019); ID 9839788 (Sept. 10, 2019); ID 9839718 (Sept. 10, 2019); ID 9807607 (Sept. 6, 2019); ID 9808727 (Sept. 6, 2019); ID 9802564 (Sept. 5, 2019); ID 9747470 (Aug. 29, 2019); ID 9495131 (Aug. 1, 2019).

¹⁷⁸ *See id.*

¹⁷⁹ *Id.*, Inspection Report, Inspection ID 11142508 (Mar. 26, 2020).

¹⁸⁰ *See, e.g., id.*, Inspection Reports: Inspection ID 10881195 (Jan. 31, 2020); ID 11124169 (Mar. 20, 2020).

¹⁸¹ *Id.*, Inspection Report, Inspection ID 9495131 (Aug. 1, 2019).

¹⁸² *See, e.g.,* Ex. 78, Rebecca Plevin, *Air district takes action against smelly Paramount metal plant*, Southern California Public Radio KPCC, June 14, 2017 (describing steps taken to address odors, including stopping outdoor grinding and sealing the grinding building), available at <https://www.scpr.org/news/2017/06/14/72900/air-district-takes-action-against-smelly-paramount/>.

recreation in and on the water.” *See* 33 U.S.C. § 1251(a) and (c).¹⁸³ The odors from metals recycling facilities like the proposed GIII that are located on the waterfront directly impact air quality over and around waterways, acting as a deterrent of recreational water users.¹⁸⁴ The Calumet River in fact is used for recreational purposes, such as boating, despite the heavy industrial use of the River. It is highly likely that recreational users of the Calumet River – which is already negatively affected by waterfront odors – will be even more severely limited by the additional uncontrolled odors from the GIII facility and related operations. Conversely, recreational use of the Calumet River would be substantially higher if odors from industrial uses on the waterfront were reduced, which in turn would drive improvements in water quality under the Clean Water Act and yet more recreational use. Ensuring equitable recreational use of the Calumet River is also an environmental justice issue, given that ejection of industrial users along the North Branch of the Chicago River is enabling more recreational use on that other part of the Chicago Area Waterways System, creating further disparities in achievement of the Clean Water Act’s goals.

V. IEPA Cannot Issue the Draft Permit Because the Applicant’s and Agency’s Own Air Quality Modeling Demonstrates the Proposed GIII Will Violate the Prohibition on Air Pollution – Even Without Correcting for Numerous Deficiencies in the Modeling and Health Assessments.

IEPA cannot issue the Draft Permit because, using the applicant’s and IEPA’s own air quality modeling on which the permit relies to model omitted PM₁₀ and short-term manganese impacts, the proposed GIII will result in unacceptable impacts to air quality in violation of the prohibition on air pollution.¹⁸⁵ Moreover, the air quality modeling analysis fails to reflect the enforceability and other shortcomings described above and in this section – instead assuming exceedingly high levels of control and so low emissions that are neither in keeping with practical reality nor required by the Draft Permit in practicably enforceable terms – and contains unsupported and/or inappropriate assumptions as discussed below, further rendering the Draft Permit unsupported. These issues are taken up in reverse order in the following comment. In addition, there are numerous shortcomings in the overall assessment of health risks from the proposed GIII above and beyond this modeling critique that further render the Draft Permit unsupported.

¹⁸³ This same undermining of the Clean Water Act also occurs due to PM and metals air pollution over the River more broadly, especially with regards to short-term exposures that can have significant impacts on health.

¹⁸⁴ For example, in early May 2018, Meleah Geertsma of NRDC experienced putrid odors from metal scrap handling by a facility or facilities located at 106th St. and the Calumet River. The smell was a mix of strong metallic odors and other chemical smells. A representative of Senator Durbin’s office was on the boat as well, along with a community resident and an NRDC colleague of Meleah’s. *See* Ex. 79-82, Photographs of metal scrap loading along the Calumet River, taken by Meleah Geertsma, May 2, 2018.

¹⁸⁵ Air quality modeling expert analysis for these comments was provided by Todd Cloud, *see* Ex. 83, Resume of Todd Cloud, March 2019.

A. Emissions Estimates Used by the Applicant and IEPA in the Air Quality Modeling Demonstration are Unsupported and Otherwise Inappropriate.

Shredder fugitive emissions. As discussed elsewhere in these comments, the proposed hammermill shredder will not be a completely enclosed operation. Therefore, the applicant's assumption that 100% of the particulate matter generated will be captured and controlled is not correct.¹⁸⁶ As described above, a significant portion of the particulate matter generated will escape the openings in the shredder enclosure and capture hood. Our revised engineering estimate of shredder emissions that should be used in revised air quality modeling is (at least) 27 tpy of unaccounted for particulate matter emissions. *Unless and until the shredder fugitive emissions are quantified and included in the metals and particulate matter modeling, the application materials before the agency cannot be relied upon for permit issuance.*

Conveyor emission factors. The applicant provided detailed particulate matter emission calculations regarding the ferrous material processing emissions.¹⁸⁷ These particulate matter emission calculations largely rely upon AP-42, Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing. The emission factor tables in AP-42, Section 11.19.2 provide two factors (controlled and uncontrolled) with controlled factors applicable to operations utilizing wet suppression. The controlled factors reflect an approximate 95% reduction in emissions due to wet suppression. The applicant (in a series of footnotes to Table A-2) assumes that a natural moisture content above 1.5% allows the use of the controlled factors without wet suppression equipment in operation. The reviewer does not concur with this approach. There is nothing magical about a 1.5% moisture content that immediately affords 95% reduction in fugitive dust emission generating potential equivalent to wet suppression. Depending on the material involved, significant fugitive dust emission generating potential can exist at moisture contents significantly in excess of 1.5%. *Unless and until the conveyor emission calculations are corrected and the revised estimates included in the metals and particulate matter modeling, the application materials before the agency cannot be relied upon for permit issuance.*

DC01 grain loading. The non-ferrous material processing system includes a fines processing system controlled by four dust collectors. Three of the dust collectors vent indoors with the fourth venting to atmosphere. The applicant estimates particulate matter emissions from the fourth dust collector (DC-01) utilizing the potential airflow and an assumed exit loading of 0.005 grains per cubic foot (gr/cf).¹⁸⁸ A more appropriate grain loading to estimate particulate matter emissions from DC-01 is in the range of 0.04 gr/cf, nearly 8 times higher than the applicant proposes. The applicant's proposed 0.005 gr/cf factor is simply not tenable given the type of collection systems in use at these types of operations nationwide. The applicant's proposed 0.005 gr/cf factor represents the pinnacle of particulate control from a state of the art, brand new baghouse equipped with polyester filter bags and reverse jet pulse cleaning. Absent substantial justification and documentation, the usual and customary factor of 0.04 gr/cf should

¹⁸⁶ See Revised Air Dispersion Modeling Report, February 12, 2020, at Table A-2.

¹⁸⁷ See *id.*

¹⁸⁸ See *id.* at Table B-4a.

be utilized. *Unless and until the DC-01 emission calculations are corrected and the revised estimates included in the metals and particulate matter modeling, the application materials before the agency cannot be relied upon for permit issuance.*

Vehicle traffic emissions. In most (if not all) particulate matter modeling demonstrations involving vehicle traffic, satisfactory results depend almost entirely upon the manner in which wind driven particulate matter emissions emanating from erodible surfaces are (a) calculated and (b) modeled. The original modeling report describes in general terms the manner in which vehicle traffic emissions were calculated. See Section 2.4, Air Dispersion Modeling Report (January 24, 2020). The revised modeling report describes in general terms the manner in which the vehicle traffic emissions were modeled. See Section 3.9.2, Revised Air Dispersion Modeling Report (February 12, 2020). The actual emission calculations themselves are found in Section 3.5 of the September 2019 application (Table 3-5A).

First, it is not appropriate here to distinguish among paved roads, unpaved roads, and other erodible surfaces. As discussed above, due to their inherent nature, including movement of heavy duty vehicles, it is very difficult to maintain intact (i.e., paved) surfaces at shredder operations unless they are all concrete or similarly lined. Compacted earth and asphalt paving cannot usually withstand the constant wear and tear without significant and ongoing maintenance, further exacerbated by weather such as at the Chicago location. As a result, even paved areas can deteriorate and become sources of fugitive dust, especially under increasing wind conditions.

Second, vehicle traffic emission factors are complex and involve multiple assumptions and caveats regarding wind speeds, silt loading, efficacy of watering or other dust control measures, frequency of maintenance, etc. A more robust and appropriate approach given general engineering knowledge/experience, the history of failed paving at General Iron and the RMG-SCPM facilities and the vagueness of pavement-related requirements in the Draft Permit and FPOP is to use a simplified fugitive dust estimate, taken from AP-42 Section 13.2.3 Heavy Construction Operations. In the aggregate, operations at a typical shredder are not dissimilar, in terms of the ability to generate dust from exposed sources, including unpaved and partially paved/deteriorated surfaces. The recommended emission factor is 1.2 tons/acre/month. Annual emissions can be therefore estimated using estimates of potentially erodible acreage. To allow for a portion of the area which might be paved (assumed to be 20%), we suggest that this emission factor be applied to the rest (i.e., 80%) of the total GII acreage at the rate of 1.2 tons/acre/month. *Unless and until the vehicle traffic emission calculations are provided for review and comment, the application materials before the agency cannot be relied upon for permit issuance.*

B. Modeling Inputs/Assumptions Used by the Applicant and IEPA are Unsupported and Otherwise Inappropriate.

Meteorological datasets. Two National Weather Service (NWS) meteorological datasets were used in the modeling demonstration. Surface data was taken from the Midway Airport (Station ID 14819) in conjunction with coincident air sounding data from Davenport, Iowa (Station ID

94982) for the years 2012 through 2016. In general, use of one year of onsite meteorological data is the preferred approach in U.S. EPA modeling guidance. Use of five years of “off-site” meteorological datasets may be used *unless* (1) specific terrain, coastal proximity, or other unique geographical issues make such data unsuitable and/or (2) “on-site” meteorological datasets are available. In this case, given the proximity of the site to Lake Michigan and the Calumet River (and all of the unique wind patterns that result therefrom) and the availability of surface data from three meteorological stations in close proximity to the site (KCBX¹⁸⁹, S.H. Bell¹⁹⁰, and Watco Terminal¹⁹¹), use of the surface data from the Midway Airport (Station ID 14819) cannot be supported. *Unless and until the modeling is revised to include the surface data from the local meteorological stations, the application materials before the agency cannot be relied upon for permit issuance.*

Volume source representations. With the exception of the regenerative thermal oxidizer (RTO) and DC-01, all of the proposed emission generating activities are treated as a volume sources.¹⁹² Volume source representation for air dispersion modeling purposes is a complex combination of location, release height, initial lateral dimensions, and initial vertical dimensions. However, because the applicant redacted the process flow diagrams from the original modeling submittal, this reviewer cannot vet the volume source representations so made. The applicant based its process flow diagram redactions on trade secret grounds, which as discussed above is in conflict with federal Clean Air Act policy on treatment of “emission data,” even assuming the validity of the trade secret claim (which is dubious). And while the applicant does provide some information about the location of the haul roads, the depiction is spartan at best.¹⁹³ *Unless and until all volume source representations can be fully vetted, the application materials before the agency cannot be relied upon for permit issuance.*

Co-located sources. In a letter report dated March 13, 2020, emissions were identified and quantified for no less than four (4) operations co-located with the applicant’s proposed operations. Collectively referred to as the South Chicago Property Management (SCPM) operations, the March 13, 2020 letter report identifies and quantifies over 15 tpy of additional particulate matter emissions not modeled for the proposed GIII, the vast majority of which are vehicle traffic emissions. Given the fact that it is the wind driven particulate matter emissions emanating from erodible surfaces that are largely driving the modeled NAAQS violations (described below), the deplorable condition of the roads at these facilities as evidenced in CDPH’s inspections database and as reflected in the revised modeling presented here, and

¹⁸⁹ See Ex. 84, USEPA, KCBX Fenceline Air Monitoring Data, available at <https://www.epa.gov/petroleum-coke-chicago/kcbx-fenceline-air-monitoring-data#meteo>.

¹⁹⁰ See Ex. 85, USEPA, S.H. Bell Chicago Air Monitoring Data, available at <https://www.epa.gov/il/sh-bell-chicago-air-monitoring-data>.

¹⁹¹ See Ex. 86, USEPA, Watco Terminal and Port Services, available at <https://www.epa.gov/il/watco-terminal-and-port-services#data>.

¹⁹² See Revised Air Dispersion Modeling Report, February 12, 2020, at Section 3.9.1.

¹⁹³ See Air Dispersion Modeling Report, January 24, 2020, at Appendix C-1.

furthermore that IEPA should have considered these SCPM facilities and possibly others together with the proposed GIII as a “single source” as set forth elsewhere in these comments, the failure to include these emission along with the proposed GIII’s emissions cannot go unresolved. *Unless and until all particulate matter emissions from the co-located operations are included in the modeling, the application materials before the agency cannot be relied upon for permit issuance.*

C. Based on the Applicant’s Own Emissions Estimates and Modeling, the Proposed GIII Will Result in Exceedances of the PM₁₀ NAAQS and Unacceptable Short-Term Manganese Impacts, Even Without Correcting for the Above Deficiencies.¹⁹⁴

Manganese. Based on the applicant’s own emission calculations and modeling approach, and setting aside all of the above-enumerated necessary revisions, impacts of manganese (Mn) exceed the 8-hour Reference Exposure Level (REL) of 0.17 micrograms per cubic meter (ug/m³) established by the California Office of Environmental Health Hazard Assessment (OEHHA).¹⁹⁵ **See Figure 1.**¹⁹⁶ *Unless and until Mn impacts (including regional sources such as the significant known sources of fugitive manganese along the Calumet River that are not reflected in IEPA’s inventory) can be shown to reside below 0.17 ug/m³ (8-hour average), the application materials before the agency cannot be relied upon for permit issuance. This is especially true given the long history of manganese issues in this environmental justice community.*

24-hour PM₁₀ NAAQS. The applicant and IEPA completely omitted PM air quality modeling without explanation, despite the prohibition on air pollution, which encompasses causing or tending to cause air pollution in violation of the National Ambient Air Quality Standards. Based on the applicant’s own emission calculations and modeling approach, and setting aside all of the above-enumerated necessary revisions, impacts of particulate matter less than 10 microns in aerodynamic diameter (PM₁₀) (added to background) exceed the 24-hour National Ambient Air Quality Standard (NAAQS) of 150 ug/m³. **See Figure 2.**¹⁹⁷ *Unless and until PM₁₀ impacts (including background) can be shown to reside below 150 ug/mg (24-hour average), the application materials before the agency cannot be relied upon for permit issuance.*

Other air toxics. The applicant proposes to control emissions from the hammermill shredder with a combination roll-media particulate filter and regenerative thermal oxidizer (RTO) followed by a packed tower scrubber. The presence of the RTO indicates high levels of volatile organic compounds (VOC), organic hazardous air pollutants (HAP), and other air toxics not

¹⁹⁴ For modeling files supporting this analysis, see Ex. 87 for PM₁₀ and Ex. 88 for manganese.

¹⁹⁵ See Ex. 89, California Office of Environmental Health Hazard Assessment, TSD for noncancer RELs, Appendix D. Individual Acute, 8-hour, and Chronic Reference Exposure Level Summaries, December 2008 (updated July 2014) (“OEHHA REL for Manganese”), at p429, available at <https://oehha.ca.gov/media/downloads/crn/appendixd1final.pdf>.

¹⁹⁶ Ex. 90, Figure 1, Mn Impact Contour Plot, 8-hour average of 0.17 ug/m³.

¹⁹⁷ Ex. 91, Figure 2, PM₁₀ Contour Plot, 24-hour average of 150 ug/m³.

considered in the modeling demonstration on file. The HAP and air toxics emissions emanate from the paints and solvents and other organic material on the metals fed to the shredder. *Unless and until all reasonably identified HAP and air toxics are identified, quantified, and modeled, the application materials before the agency cannot be relied upon for permit issuance.*

D. Additional Deficiencies in the Health Assessment Undertaken by the Applicant and IEPA Render the Assessment Unsupported and Otherwise Insufficient to Ensure Protection of Air Quality.

In addition to such deficiencies in the air quality modeling presented above, we provide these comments on the use of the modeling data to assess risks to health and well-being posed by the proposed GIII. We support IEPA's investigation into the air toxics impacts of this facility on air quality and health, which we believe is solidly grounded in, and indeed generally necessary to fulfill, the agency's duty to ensure that the proposed facility will not result in air pollution in violation of 415 ILCS 5/9(a). However, in addition to omitting PM₁₀ modeling without explanation, nowhere does the applicant or IEPA explain the rationale for selecting Wisconsin's air toxics approach among the many state air toxics programs available, including those that are more current, comprehensive/robust, and protective of public health. Nor does IEPA take account of multiple other aspects of risks to health and welfare that are needed to assess impacts from the proposed GIII in this particular setting.

A full analysis of the approach taken by the applicant and IEPA and available alternatives was not feasible within the allotted comment period, especially in light of the dual COVID-19 and civil rights emergencies. We provide the following short list of high-level issues identified in the health analysis:

- As discussed above, failure to assess PM₁₀
- Failure to fully justify use of the Wisconsin approach for air toxics, versus other available approaches for assessing air toxics in states such as Michigan, Minnesota, Ohio, California, and Texas
- Failure to assess the combined impacts of multiple metals and other hazardous air pollutants ("HAPs") from the proposed GIII, with respect to the facility itself and in the context of the overburdened Southeast Side¹⁹⁸
- Failure to take into account non-cancer impacts of HAPs
- Failure to assess the impacts of VOCs along with metallic HAPs
- Failure to account for the toxicity of hexavalent chromium
- As discussed above, failure to evaluate available short-term health thresholds for certain HAPs, such as the 8-hour manganese threshold of 0.17 ug/m³ discussed above¹⁹⁹

¹⁹⁸ See, e.g., Ex. 92, Michigan Department of Environmental Quality, 48217 Community Air Monitoring Project, April 27, 2018 (discussing an additive approach for assessing combined impacts of HAPs), available at https://www.michigan.gov/documents/deq/deq-aqd-amu-48217_air_monitoring_report_621859_7.pdf.

¹⁹⁹ See Ex. 89, OEHHA REL for Manganese.

- Failure to accurately account for fugitive emissions from nearby facilities, given shortcomings in the state’s emissions inventory for such sources
- Failure to take into account the mobile source-related emissions from the many trucks, trains and barges that will accompany the proposed GIII and related sources
- Failure to evaluate other proposed and/or in-construction nearby sources of air pollution, such as a proposed new SCPM recycling facility immediately to the East of GIII²⁰⁰ and large warehousing facilities by developer NorthPoint that are slated to substantially increase heavy duty diesel truck emissions in the vicinity²⁰¹
- Failure to take into account the multiple pollutant exposures via air, water and soil; historic and existing health burdens; and sociodemographic characteristics of the impacted population, as they pertain to the overall cumulative vulnerability to impacts from air pollution that would be emitted from the proposed GIII²⁰²

IEPA must address at least these shortcomings in a revised assessment of whether the proposed GIII will run afoul of the prohibition on air pollution.

VI. Conclusion.

In sum, based on the above comments and others being submitted on behalf of SETF, the Coalition to Ban Petcoke and NRDC as well as other environmental and public health groups, the Draft Permit for the proposed massive new metal shredding facility in this already-overburdened environmental justice community cannot issue.²⁰³ IEPA owes a duty of care to all Illinois residents to ensure each person’s constitutional right to a healthful environment. It also has duties to uphold civil rights and equal protection of the law that require the agency to do more for overly burdened communities to ensure equitable enjoyment of that right. As set forth above, IEPA has ample authority to proactively protect the Southeast Side and must do so in this case in order to fulfill its many obligations under the Illinois Environmental Protection Act and other state and federal laws.

²⁰⁰ See Ex. 93, City of Chicago Department of Buildings, Chicago of Chicago DOB New Applications for Ward 10, March 11, 2020 (describing application for construction of a new \$9,000,000 Class IV-A recycling facility at 11554 S. Ave. O, proposed by Hal Tolin of SCPM).

²⁰¹ See Ex. 94, Alby Gallun, *Why this industrial developer is making a big – and risky – bet on the city*, Crain’s Chicago Business, March 22, 2019 (describing and providing map of new industrial park between 116th and 126th streets and Avenue O and the Calumet River), available at <https://www.chicagobusiness.com/commercial-real-estate/why-industrial-developer-making-big-and-risky-bet-city>.

²⁰² See Ex. 95, Rachel Morello-Frosch, et.al., *Understanding the Cumulative Impacts of Inequalities in Environmental Health: Implications for Policy*, Health Affairs 30, No. 5 (2011): 879-887, available at <https://www.healthaffairs.org/doi/pdf/10.1377/hlthaff.2011.0153>.

²⁰³ In addition to the above comments and cited sources, we are submitting additional correspondence with IEPA relevant to this permitting action to ensure a more complete record. See Ex. 96, various emails and attachments between IEPA and NRDC, SETF, and/or Coalition representatives.

Sincerely,

/s/ Meleah Geertsma

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(Joined by the Southeast Environmental Task Force and the Southeast Side Coalition to Ban
Petcoke)

January 14, 2021

Chicago Department of Public Health
333 S. State St., Room 200
Chicago, IL 60604

Submitted Via Email To: envcomments@cityofchicago.org

Re: Large Recycling Facility Permit Application, General III, LLC (d/b/a Southside Recycling), 11554 S. Avenue O – Chicago, Illinois

To The Chicago Department of Public Health:

The Natural Resources Defense Council (“NRDC”) writes to oppose the permitting of yet another heavy industrial facility – in this case of a metal shredding operation relocating from the well-off, White Lincoln Park community that has ejected it – in Chicago’s Southeast Side environmental justice community. This opposition is based on a long list of omissions, gaps and other deficiencies in Reserve Management Group’s (“RMG”) application for a recycling permit from the Chicago Department of Public Health (“CDPH”) for the proposed General III (d.b.a. Southside Recycling) facility at 11600 S. Burley (“General III”). These comments are supported by our partners the Southeast Environmental Task Force (“SETF”) and the Southeast Side Coalition to Ban Petcoke (“Coalition”), who are submitting additional application comments that NRDC supports and incorporates by reference as well.

We recognize and thank CDPH for its detailed application deficiency letter issued to RMG/General III on December 23, 2020 (“Deficiency Letter”), which focuses on requirements under the Rules. We support the items raised in this letter and provide related comments below. In addition to shortcomings under CDPH’s new Rules for Large Recycling Facilities (“Rules”), the application is deficient because it fails to provide critical information necessary for CDPH to carry out the full suite of the agency’s and the City’s legal duties to the Southeast Side community and city as a whole. As explained in more detail below and in comments on the application for the proposed General III submitted by SETF and the Coalition, these duties include the City’s obligations to comply with the federal Fair Housing Act and other civil rights laws, as well as to prevent open dumping and public nuisances, and to implement provisions of the City’s 2014 Recycling Facility Rules and Regulations that are still in effect.

Furthermore, while our organizations and members appreciate CDPH’s response to our concerns and its resulting efforts to regulate recycling facilities and to scrutinize the proposed General III, the Rules fail to expressly include a number of important environmental impacts of and issues associated with metals recycling facilities that we have raised with CDPH and the City repeatedly over the past several years. These impacts and issues include the need to treat adjacent, co-owned and operationally interconnected recycling facilities as a single entity for

permitting purposes to prevent improper segmenting that would allow concerning operations to circumvent permitting requirements; to assess and prevent air pollution hot spots and other impacts from diesel trucks serving such truck-intensive facilities; and to assess and require monitoring of toxic heavy metals¹ and other volatile organic compounds that such facilities emit. Again while we appreciate CDPH's statements that it understands/agrees with and will address a number of these issues in the future², we emphasize that CDPH is failing its duties to protect the public if it does not fully consider these issues *now* at this critical juncture for the proposed General III.

NRDC submits these comments on behalf of our organization and our roughly 3 million members and activists, including approximately 17,000 members and activists in the City of Chicago, a number of whom reside on the Southeast Side in close proximity to 11600 S. Burley, the location for the proposed new metal shredding facility. Regarding our partner organizations who join these comments, SETF's mission is to ensure a healthy and safe environment for its residents, to preserve regional ecological resources and to achieve a sustainable economy that enhances local communities. The Southeast Side Coalition to Ban Petcoke is a community-based organization dedicated to the health, safety and welfare of the people who live, work and recreate in the Calumet region. In addition to the specific comments raised here, we incorporate by reference our organizations' prior comments on metals recycling facilities to CDPH with respect to the Rules, as well as to the Illinois Environmental Protection Agency ("IEPA") regarding the air permit to construct for the proposed General III.³ These comments provide additional grounds

¹ At the outset, we raise particular concern with CDPH's lack of attention to heavy metals (and other hazardous air pollutants) with respect to the air pollution profile of recycling facilities. As we have noted in the past, the Rules should fully recognize and require the assessment of heavy metals and other HAPs as a baseline requirement. In addition, in its response to public comments from the December hearing regarding the long-term health impacts of exposure to PM10, CDPH only addressed impacts from a respiratory perspective, failing to acknowledge and describe the impacts to health from exposure to particulate toxic heavy metals that can have devastating impacts on neurological development and other bodily systems. We also note that coarse particles larger than PM10 can be of heightened concern to health where such particles contain heavy metals. This is because there is a direct exposure path from the nose to the brain, such that larger particles potentially result in a larger per-particle exposure. Metals facilities are associated with high levels of such larger particle size heavy metals. *See, e.g.*, Ex. 1, Minnesota Pollution Control Agency, "North Minneapolis Air Monitoring Project," <https://www.pca.state.mn.us/air/north-minneapolis-air-monitoring-project> (website providing information on the Northern Metals facility in Minneapolis exceeding the state's standard for total suspended particulate). We also note here the concern with manganese at the other RMG facilities that we raised in a January 8, 2021 email to CDPH.

² *See* CDPH, Official Response to Comments on Proposed Recycling Rules for Large Recycling Facilities, June 5, 2020, at p7 (regarding treating recycling facilities as a "single source"), available at <https://www.chicago.gov/content/dam/city/depts/cdph/InspectionsandPermitting/CDPH%20Response%20to%20Comments%20on%20Proposed%20Rules%20for%20Large%20Recycling%20Facilities%20-%20June%205,%202020.pdf>; CDPH Responses to questions raised at the hearing [for the proposed General III], at p1 (regarding future rulemaking regarding on-road mobile emissions sources and PM2.5), available at <https://www.chicago.gov/content/dam/city/sites/rgm-expansion/documents/CDPHRMGResponse.pdf>.

³ Ex. 2, Public Comment on the Draft Permit for General III, LLC, and supporting exhibits submitted by NRDC to IEPA, June 15, 2020 ("Comments to IEPA") (noting that we forwarded our comments and a link to the exhibits to CDPH on June 18, 2020); CDPH is in possession of our prior comments and exhibits to the agency on metals facilities, including supplemental comments and emails raising specific issues, which we incorporate by reference here.

for the concerns raised here, and thus additional grounds for CDPH to require information as part of fulfilling its duties. Ultimately, this information is necessary to ensure that any permit granted to GIII by CDPH will not endanger the Southeast Side community or cause a public nuisance. Absent submission and full consideration of this information, CDPH cannot issue a permit to General III.

To assist CDPH in its review of these comments, the following comments first take up issues not addressed in the Deficiency Letter, then raise additional deficiencies that fall under and/or overlap with the issues raised in the Deficiency Letter and that are supported by the provisions of the Rules cited in the Deficiency Letter. With respect to the latter, we provide additional bases for requesting the identified information where such bases extend beyond the Rule sections noted in the Deficiency Letter.

I. Legal Summary.

The more detailed legal comments on the General III application submitted by our partners set forth the City's and CDPH's duties and authorities that bear on this recycling permit process, including:

- the City's broad home rule authority that extends to environmental, safety, and public health matters;
- the exercises of that home rule authority in code provisions and local rules setting forth application requirements and the authority to deny applications that fail to meet such requirements, as well as the affirmative duty of applicants to demonstrate that they will operate in a manner that prevents public nuisance and protect public health, safety, and the environment;
- Illinois municipalities' authorities and duties to prevent nuisance; and
- the City's/CDPH's duties to uphold civil rights laws.

These duties and authorities provide ample ground and, in some cases, compel CDPH to require the information set forth below from the applicant, and to itself conduct necessary reviews, as prerequisites to making a determination on the proposed General III permit. Conversely, CDPH must deny a permit to the proposed General III if the applicant cannot or will not provide the required demonstration or otherwise fails the necessary analyses. We provide additional discussion of specific authorities/duties that are particularly relevant to specific application deficiencies below.

II. Deficiencies Not Included in CDPH's Deficiency Letter.

Civil Rights. As set forth in SETF's comments, CDPH must conduct an environmental justice analysis as part of this permitting process, pursuant to the City's civil rights obligations. The analysis should address whether the environmental consequences of the applicant's facility, viewed comprehensively and in the context of where it will operate, will cause or contribute to significant, adverse and disproportionate risks for local communities. Such an analysis should

also employ a cumulative impacts approach. As set forth in these comments, the current application is deficient in a number of respects necessary for conducting such an environmental justice analysis.

Diesel Truck Pollution. CDPH’s duties to prohibit nuisances, to protect the public from harmful air quality and to comply with civil rights obligations require it to evaluate diesel truck impacts during this process, when CDPH can address vehicle pollution through its authority to regulate vehicle-intensive facilities. Such evaluation is especially important for metals recycling facilities like the proposed General III, as demonstrated by recent monitoring studies of local air quality that associate metals recycling facilities with creation of diesel truck hot spots akin to those next to highways.⁴ Thus, in addition to the traffic study and stacking plan information required by CDPH (see below for additional comment), the applicant must provide a hot spot air quality modeling analysis, employing the onsite monitoring data discussed elsewhere in these comments and taking into account other truck-intensive developments in the area. This analysis must include both onsite diesel vehicles (which can be significant sources of air pollution) and those that move on and off the site.

PM2.5, TSP, and HAPs Air Quality Assessment and Monitors, Impacts from Fires and Other Catastrophic Events. The Rules require an “air quality impact assessment” and expressly lay out the minimum required elements of that study that focuses on PM10, making it clear that CDPH may require additional information/analysis.⁵ Given studies cited in these and our past comments to CDPH and IEPA that show hot spots of diesel pollution, larger particles and toxic heavy metals and other hazardous air pollutants (“HAPs”) attributable to metals recycling facilities; the compliance history of these operators; and the evolving understanding of the true impacts of metals facilities on local air quality, such additional analysis is necessary here to aid CDPH in fulfilling its duties to prevent nuisances and protect public health and the environment, as well as its civil rights obligations. Thus, as discussed in more detail below, the applicant must provide a full evaluation of total suspended particulate matter (TSP), including speciated fractions of metals and organics including diesel particulate matter, as well as the PM2.5 fraction of total suspended particulate matter, including proposals for siting monitors and collecting and evaluating air quality data for TSP and PM2.5. Given the risks of fires, explosions and equipment failures at metals facilities discussed here and in other comments to CDPH and IEPA, the air quality impact assessment must also include an evaluation of impacts to air quality from these and other non-standard operating conditions.

Other RMG Operations. Full descriptions of the other RMG operations at 11600 S. Burley – including Reserve Marine Terminals, South Shore Recycling, Napuck Salvage of Waupaca and

⁴ See, e.g., Ex. 3, David J. Miller, et al., “Characterizing Elevated Urban Air Pollutant Spatial Patterns with Mobile Monitoring in Houston, Texas,” *Environ. Sci. Technol.* 2020, 54, 4, 2133–2142, <https://pubs.acs.org/doi/10.1021/acs.est.9b05523>.

⁵ See Rules at Section 3.9.21 (“The Design Report for a Consequential Facility shall contain an air quality impact assessment that includes, but is not necessarily limited to...”).

Regency Technologies⁶ – including whether/how their operations have related and/or will relate to each other and the proposed General III, are necessary to determine whether such operations and General III are in fact a single recycling facility subject to a single recycling permit evaluation (and whether General III is in fact an expansion of the RMG operations, as it was treated during the zoning process). Such description is also necessary in general in order to determine the overall impact of these co-owned, co-located recycling operations on the surrounding community and any needed controls or other measures to ensure that they will not result in significant disparate cumulative burdens. Treating the operations as a single recycling facility for recycling permit purposes is not only necessary to accurately describe the operations and ensure facilities are not improperly circumventing regulation, but will also avoid complications with compliance and liability that might arise from so many co-located, largely-outdoor industrial operations (where attribution is more difficult than if they were more discrete, fully enclosed operations owned by wholly separate entities).

In addition to IEPA’s determination that the RMG S. Burley facilities and proposed General III constitute a single source for air permitting purposes, and the treatment of the facilities under one NPDES permit, evidence in CDPH’s records indicates that the RMG S. Burley operations are linked physically/operationally as recycling facilities. For instance, CDPH inspection records describe the facilities sharing equipment, as well as handling and further processing material from each other.⁷ It appears that the operations also share personnel. Furthermore, CDPH inspection reports indicate that the RMG S. Burley operations have undertaken work at their sites in conjunction with the proposed General III.⁸ As discussed in our comments to IEPA, it also appears that the other RMG operations undertake significant torch cutting, such as of railcars, raising a question that must be answered in this proceeding of whether the other RMG facilities

⁶ As we have noted elsewhere in our comments to agencies, there appears to be a fifth operation at the same site as well, which may be a Calumet Transload facility. Information on this facility’s operations must also be included in the General III application to the extent that the facility’s operations are connected to the RMG operations, e.g., if the facility provides or will provide material loading and/or transportation services to General III and/or any of the other RMG operations at the site.

⁷ See, e.g., CDPH Inspection Report ID# 1152450 (December 12, 2017, Regency Technologies uses the mobile refrigerant unit owned by South Shore Recycling); Inspection Report ID#s 700782 and 1187872 (May 5, 2015 and February 6, 2018, South Shore sends its auto scrap to Napuck and Regency sends its plastic to Napuck). (Given that CDPH is in possession of its own inspection reports, we are not separately providing such reports as exhibits to these comments. The same applies to other CDPH documents such as those posted on its website for Environmental Rules and Regulations.)

⁸ See, e.g., CDPH Inspection Report ID# 1356389 (April 11, 2019, South Shore added a cement dock “in preparation for the increase in peddlers that will result from the General Iron facilities addition to the area.”) It is unclear from the inspection reports whether the new Above Ground Storage Tank system installed by Reserve Marine Terminals in late 2020, described in a CDPH Inspection Report from October 30, 2020 (Inspection Report ID# 1599885), is related to the proposed General III; given the timing of installation, such relatedness is likely. We note that to the extent that the proposed General III is in fact an “expansion” of the RMG operations, CDPH must also determine whether any of the construction activities related to General III at the other RMG and/or General III sites violate the prohibition on construction of an expansion in advance of receiving a recycling permit for the expansion. See Rules at Section 3.0 (“An Expanding Facility must receive a permit for the Expansion *before* beginning construction or otherwise implementing the Expansion,” (emphasis added)).

will conduct torch cutting of materials that are then further processed by the proposed General III.

CDPH has stated that it acknowledges our concern about segmentation of recycling operations and approach to treating co-located, inter-dependent facilities as a “single source” for recycling permit purposes, but will take up this issue in future actions after it considers the General III application.⁹ However, CDPH does not need to amend its regulations (or seek a code revision) to undertake this critical analysis with regards to the proposed General III and the other RMG S. Burley facilities. The Code and CDPH’s regulations currently define “recycling facility” broadly and similarly require a “recycling facility” broadly defined to obtain a recycling permit.¹⁰ Thus the authority to take a “single source” approach already exists and such treatment may in fact be compelled: CDPH cannot adopt an interpretation of the recycling permit requirement that would allow operations to escape or circumvent the intent of the permitting requirement – to regulate the environmental impacts of such facilities – through segmentation. Nor does any provision of the Code expressly prohibit such an approach, and CDPH has the discretion to reasonably interpret code provisions relating to recycling permits to effect the intent of the code and to implement its broad authority/duty to protect public health and the environment.¹¹

Finally, the descriptions of the RMG S. Burley facilities and whether/how they will relate operationally to the proposed GIII must include the RMG facilities’ pre-and-post General III capacity. Such information is necessary to determine whether the proposed General III entails an expansion of the RMG S. Burley facilities under the Rules, i.e., if the creation of General III would enable one or more of the other RMG S. Burley facilities to increase their capacities by more than 10%.¹²

Full Characterization of All Auto Shredder Residue (Not Just Fluff). The Deficiency Letter requests waste characterization of fluff that is transported offsite. Characterization of the auto shredder residue (“ASR”) that will be handled onsite in the open air is critical as well, given that it is essentially untreated fluff plus nonferrous metals, so it poses similar (and potentially greater) threats to the surrounding community and environment as fluff. The current proposal is deeply concerning because it would allow ASR to be staged in an open pile and transferred to the

⁹ See CDPH, Response to Comments on Proposed Large Recycling Facility Rules, at p7, available at <https://www.chicago.gov/content/dam/city/depts/cdph/InspectionsandPermitting/CDPH%20Response%20to%20Comments%20on%20Proposed%20Rules%20for%20Large%20Recycling%20Facilities%20-%20June%205,%202020.pdf>.

¹⁰ See Chicago Municipal Code at §§ 11-4-120, 11-4-2510, and 11-4-2520; Rules at Section 2 (“recycling facility” is defined by 11-4-120).

¹¹ For instance, with respect to Chicago Municipal Code § 11-4-2540 regarding classes of recycling permits, CDPH can require operations like RMG’s to obtain a single recycling permit for the full operations and create subclasses of requirements that apply to portions of the facilities engaged in handling and processing certain classes of materials (where it is clear that such lines can be drawn, i.e., where there is not flow of materials of different classes between such operations and/or support operations occurring between them).

¹² See Rules at Section 2, Definitions (definition of “expansion”). Note that to the extent the Rules and/or Code contain requirements/standards that apply to recycling facility renewal permits, CDPH should interpret those requirements as applying to applications for expansions as well.

nonferrous process area and open storage bins using construction vehicles with minimal controls. It appears that such staging and handling will occur prior to any treatment of the material to reduce its hazard profile. Moreover, General Iron, including under RMG's ownership and management, has a history of poor control of ASR, increasing the need to closely scrutinize this portion of the proposed facility and ensure tight control (such as full enclosure of ASR at all points in the processing and handling). It appears from CDPH's inspection records that at least some of the RMG facilities at S. Burley have also generated/handled ASR in the past¹³, necessitating a full examination of this history for purposes of the current permitting process as part of the mandatory compliance history assessment discussed below.

Information on the ASR should include third-party-conducted, representative testing of ASR from General Iron (including samples that capture the range of feedstocks expected at the proposed facility over time), as well as a discussion of whether there will be any difference in operations and/or feed stream between General Iron and the proposed General III that might impact the expected ASR make-up.

To the extent not already requested by the Deficiency Letter, the applicant must provide a detailed discussion of the controls to be used on the ASR pile when worked by vehicles, as well as controls employed at the three-sided ASR storage bins that are part of/adjacent to the nonferrous process and during any vehicle working of material held in those bins. Additional comments on this issue are included below.

Finally, we note that the application should use terminology with respect to auto shredder residue that is consistent with that in the Rules. The Rules employ "Auto Shredder Residue" with a broad meaning, including variants such as "post-process Auto Shredder Residue." The current application uses varying terms, e.g., "shredder fluff" and "processed shredder residue" that may create confusion regarding the material at issue and its treatment by the rules.

(Non)compliance History. As noted in comments submitted by our partners, the 2014 Recycling Rules explicitly require the Commissioner to evaluate the applicant's history of compliance/experience in recycling or other waste handling operations.¹⁴ Such evaluation is broad, encompassing all federal, state and local laws, regulations and other legal requirements pertaining to any and all aspects of operating such a facility, including issues related to worker

¹³ See, e.g., CDPH Inspection Report ID# 707117 (entered for Reserve Marine Terminals from August 21, 2015, describing processing of vehicles "in their entirety" and "resulting fluff" being shipped to a landfill).

¹⁴ See 2014 Recycling Rules at Section 4.0. We also note that the compliance history assessment as described in Section 4 is not explicitly limited to a past three-year period and that there is nothing magical about a three-year timeframe as it relates to potential problems from the applicant (e.g., a serious compliance issue that occurred three years and a day ago may still be deeply concerning). Thus, CDPH should not treat the express language in Section 4.0(1) as drawing a bright line in time for purposes of the compliance review. This is especially true where, as here, there is evidence that the applicant continues to engage in behaviors similar to those underlying compliance issues dating back further than three years.

safety.¹⁵ In addition, the compliance inquiry by its terms is not limited geographically to operations that occur within the City of Chicago; instead, it attaches to the history of the “applicant, or any owner or officer of the applicant, or any person having control of applicant or any of its operations” with respect to recycling facilities broadly speaking. Given the scope of the required compliance inquiry and that RMG has operations in many different cities and states, CDPH should require the applicant to provide information sufficient to conduct this evaluation, including, at minimum, the compliance history of General Iron, all RMG operations at 11600 S. Burley, and of all entities under the RMG umbrella. This topic is taken up in more detail below with respect to specific topics (noting that CDPH may identify additional federal, state and/or local requirements that must be encompassed in the compliance review beyond the topics taken up in our comments).

Open Dumping. Federal and Illinois law prohibit “open dumping,” broadly defined to entail the “disposal” of solid or hazardous “waste” at a facility or site that is neither a sanitary landfill nor a hazardous waste landfill.¹⁶ The Chicago code likewise prohibits open dumping and broadly declares that “[d]isposal or treatment of any waste without a permit is hereby declared a nuisance.”¹⁷ Given the many ways in which the proposed facility threatens to release solid waste into the environment based on the current application; evidence in the record that General Iron and the RMG operations at 11600 S. Burley have likely engaged in open dumping¹⁸; and the compliance history requirement, CDPH cannot grant a permit based on the application in front of it. Instead, the applicant must provide information sufficient to demonstrate that the proposed General III will not result in open dumping. Specific required information going to open dumping is set forth below.

III. Deficiencies Related to Those Included in CDPH’s Deficiency Letter.

Item 1: Zoning Board Findings. In addition to the Zoning Board documents required by the Deficiency Letter, the applicant must provide its full application to the Zoning Board and related

¹⁵ See *id.* at 4.0(1) (evaluation’s scope inquires into violation of “any federal, state, or local laws, regulations, standards, permit conditions, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site...” (emphasis added)).

¹⁶ See 42 U.S.C. §§ 6945(a) and 6903(14); 415 ILCS 5/21(a) and 5/3.305.

¹⁷ See Chicago Municipal Code §§ 11-4-120 (“Open dumping” means the consolidation of waste from one or more sources at a disposal site that does not fulfill the requirements of a sanitary landfill; “Dispose” means to discharge, deposit, inject, dump, spill, leak or place any waste into or on any land or water or into any well so that such waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or be discharged into any water, including groundwaters,”) and 11-4-1500(b) (“No persons shall (1) cause or allow the open dumping of any waste, (2) abandon or dispose of any waste upon public property, except in a sanitary landfill approved by the Illinois Environmental Protection Agency and the Commissioner, (3) dispose, treat, abandon or transport any waste, except at a site or facility which meets the requirements of the Illinois Environmental Protection Act and which is permitted pursuant to this chapter,”) and (c). The Code also expressly recognizes that open dumping is grounds for revocation of a recycling permit. See Chicago Municipal Code § 11-4-1930(D).

¹⁸ CDPH inspection reports describe RMG operations at 11600 S. Burley as allowing material to accumulate on the ground, including one report that also describes processing of vehicles at the site. See, e.g., *supra*, CDPH Inspection Report for August 21, 2015. See also various discussions of and CDPH inspection reports documenting General Iron’s history with release of ASR, including fluff, to the surrounding environment.

documents, including a February 13, 2019 letter from Scott Borstein to Patrick Murphey regarding qualification as a Special Use instead of a mandatory waterway Planned Development. Moreover, given that this February 2019 letter discusses solely the *area* of the General III site relative to the other 11600 S. Burley recyclers, the applicant must provide additional information on whether General III's operations will be "subordinate in... extent" to the existing RMG uses at the property, including the relative amount of material that General III will handle and process compared to that handled and processed at the RMG facilities prior to General III's proposed addition. To our knowledge, such information was notably omitted in the request for a zoning determination that the proposed project could seek a Special Use approval instead of going through Planned Development review, rendering the determination that General III required a Special Use questionable and potentially providing grounds for revocation of the Special Use approval on the basis of false representation or mistake.¹⁹ The basis for requiring this information is the 2014 Recycling Rules' mandatory compliance review and the City's overall duty to ensure that entities are fully complying with and not circumventing land use and zoning requirements.

Item 2: Proposed Boundary of Site, Including Barge Area. Related to the above comment on the zoning approval, to the extent that the applicant intends to conduct barge loading and so must extend the facility boundaries to the River, the applicant and CDPH must determine whether such change to the facility boundary impacts the prior zoning determination(s) as part of the mandatory compliance review.²⁰ To the extent that General III will not conduct barge operations at the riverfront bordering on its portion of the site but will instead utilize the barge area(s) of one of the other RMG operations, like Reserve Marine Terminals, such interconnectedness/interdependence provides grounds for considering the operations as a single recycling facility for recycling permit purposes as discussed above.

Item 3: Pavement (activities over proposed gravel areas, pavement maintenance plan). In addition to the information required by the Deficiency Letter, as part of the mandatory compliance review, the applicant must submit information on RMG's history of poor pavement design and maintenance at its 11600 S. Burley operations, a description of which is included in our comments to IEPA. CDPH should require the same of General Iron. Maintaining the integrity of paved areas is an ongoing challenge at heavy-use industrial facilities such as the proposed General III. A combination of poor design, heavy use, weather-induced deterioration, and poor/inadequate maintenance causes paved surfaces to break and crack and lose effectiveness. This is evident, given the long history of pavement problems at the other RMG S.

¹⁹ See Chicago Municipal Code § 17-16-0505 (the Zoning Administrator may revoke any permit or other form of authorization required and issued under the Zoning Ordinance when s/he determines that "(1) there is a departure from the plans, specifications, or conditions required under terms of the permit, (2) the development permit was *procured by false representation* or was issued by mistake; or (3) any of the provisions of this Zoning Ordinance are being violated," (emphasis added)).

²⁰ See *id.*, regarding revocation of zoning approvals where there is a departure from the plans, specifications, or conditions required under terms of the permit.

Burley operations as set forth in our comments to IEPA. Moreover, more recent CDPH inspection reports since this summer indicate that the pavement problems are ongoing at these operations.²¹ In addition to the historic accounting, the applicant must submit an evaluation of whether alternative paving/cover materials and better designs with greater likelihood of withstanding heavy equipment over time and ensuring compliance with soil/air/water requirements related to ground cover than the selected materials are available, and if available why these materials were not selected. Such evaluation should take into account the geological conditions at the site.

Item 5: Water Usage. The applicant must include a description of the source of water to be used in all Dust Bosses, including its expected total dissolved solids (“TDS”), and an evaluation of how water source/composition will be taken into account in operation and maintenance of the Dust Bosses, including periodic testing of TDS along with cleaning to ensure that nozzles remain unblocked.

Item 6: Handling Capacity and Detailed Specs of All Structures and Fixed Equipment; O&M Plan (including welding); Estimate of Liquid and Solid Waste Generation from Devices. In addition to the information required by the Deficiency Letter, the applicant must provide one-hour and twenty-four-hour/daily maximum capacity/rate information for any and all equipment at the site, as well as for the site as a whole and in conjunction with any related/supporting activities undertaken at the other RMG facilities. Such information is necessary to ensure that the required air quality impact assessment properly accounts for short-term impacts on air quality (such as measured against the 24-hour PM10 and PM2.5 NAAQS), as short-term operations are highly likely to run at a higher capacity (and so higher emissions) than the simple average based on annual capacity assumed by the applicant. The applicant must also discuss whether its submitted emissions estimates (and so the modeling that employs the emissions estimates) reflect such short-term maximum capacities/rates. To the extent that the emissions estimates and air quality modeling do not reflect short-term maximum capacities/rates, the applicant must revise both the emissions estimates and air quality modeling to reflect these short-term periods to ensure protection of short-term air quality, along with the annual/long-term assessment.

The applicant must also provide detailed engineering drawings of the shredder and shredder enclosure, including plan, elevation, and isometric views, that make clear any and all openings in the shredder enclosure in all sides. Furthermore, the applicant must provide information on how the shredder and shredder enclosure design ensures the ability to maintain negative pressure within the structure. In addition, the applicant must include the engineering basis for sizing the air flow that will be evacuated to the air pollution control devices during shredding operations.

²¹ See, e.g., CDPH Inspection Report ID#s 1585460 (South Shore, December 4, 2020, “The pavement was still dirt and I had previously questioned the drainage of the one drain in this area,”) and 1566973 (Regency Technologies, September 11, 2020, “The pavement in the outdoor storage area was again in need of pavement repair due to potholes and standing water ?RT [sic] had repaired this recently but more repairs were now necessary,”).

To the extent that there are any openings in the solid enclosure, the applicant must describe whether any additional measures will be used to control any potential emissions from these areas if adequate negative pressures cannot be maintained within the entire enclosure.

The applicant must also provide a clear list of all conveyors at the site, identifying where they are located and which conveyors at each location will be “covered” and which will not. For each of the “covered” conveyors, the applicant must provide detailed engineering drawings, including cross-section views, that clearly show the degree to which each conveyor is covered/enclosed so as to prevent material from escaping the conveyor. The applicant must also provide drop heights from one conveyor to another, as applicable, and/or drop heights from or to a conveyor from other handling elements, in appropriately scaled drawings.

The applicant must provide detailed information on the disposal plan for each liquid or solid waste generated by or associated with processing and/or material handling, including composition information for the wastes (e.g., the expected content of material collected by any baghouses). Wastes, as we use the term here, are materials that cannot be used by General III onsite and therefore need to be sent elsewhere, including to related entities at the site such as the other RMG operations.

To the extent not already required by CDPH’s Deficiency Letter, the applicant must include a detailed description of controls on any manual sorting activities contemplated at the site.

Item 8: Inbound Loads and Staging/Screening Areas. In addition to the information required by the Deficiency Letter, the applicant must provide plan and elevation drawings of any bins or other storage or staging areas used for Auto Shredder Residue other than the covered post-processed ASR storage enclosure, e.g., what appear to be three-sided bins for ASR on the north portion of the Nonferrous Processing area.

The applicant must also confirm whether any ASR will leave the site without going through the Nonferrous Process, under either normal or exceptional operating circumstances (e.g., in the event that a portion of the Nonferrous Process is non-operative). If so, describe how such ASR will be handled onsite prior to shipping, the type of vehicle that will be used to ship, and vehicle loading processes and controls.

Item 9: NPDES Permit. In addition to the information required by the Deficiency Letter, the applicant must describe in detail the measures to be used to prevent material from washing into the water from land at the barge area, as well as remediation plans to address any material that washes into the water from land.

The applicant must also provide detailed information on barge handling areas at General Iron and the other RMG operations (and/or the fifth S. Burley operation, Calumet Transload), including the information requested above for the proposed General III and any inspection history related to the barge area, as part of the mandatory compliance assessment and to aid in determining whether General III and the other RMG operations constitute a single recycling facility.

Item 10: Stormwater Treatment Unit and Detention Ponds. Related to the likelihood of fires at the proposed facility (see comment on Items 26 and 27), and as evidenced by the February 2020 fire at the Northern Metals facility in Becker, Minnesota and its resulting contamination of onsite ponds²², the applicant must provide in its description of the stormwater and wastewater systems whether and how the systems are designed to address deposition/contamination of ponds from onsite fires.

Items 11 and 12: Stacking Plan of All Trucks and Vehicles During the Facility’s Peak Hours; Traffic Study. In addition to the information required by the Deficiency Letter, the applicant must describe in detail the expected volume and types of trucks at/that will deliver material to the site, especially in light of RMG’s recent purchase of the Windy City facility and its statements that the company will be transferring material in bulk from that facility to the proposed General III. Additionally, the applicant must provide a detailed description of road conditions where trucks will drive/stack, as well as a discussion of available measures to minimize truck combustion emissions and whether any will be employed at/by vehicles serving the proposed General III and other RMG operations.

The February 2019 traffic study submitted as part of the zoning process and previously provided to CDPH is nearly two years old and so, is too dated for present purposes given significant developments in this area in the past two years (including new truck-intensive land uses and physical/legal road modifications). The applicant must provide an updated traffic study that takes into account the adjacent/nearby Northpoint facilities and any other new and/or proposed developments served by trucks in the area, and that clearly describes the adjacent roads that trucks serving the facility will use, including their current legal status as public or private roads and any proposed or planned changes in legal status.²³

Pursuant to Section 4.14 of the Rules, the applicant must provide information on trucks routes, including those for trucks taking fluff to the Indiana landfill (also pursuant to area clean-up requirements, open dumping, public nuisance), and discuss whether and how it will monitor these routes for possible ASR deposition and reentrainment from trucks.

(See related comments on incorporation of diesel in the air quality assessment and vehicle operating plans.)

Item 13: Backup Calculations for Annual Liquid and Solid Waste Generation Rates, Refrigerants Recovered. In addition to the information required by the Deficiency Letter, the

²² See Ex. 4, Minnesota Pollution Control Agency, “Northern Metal Recycling (Becker),” <https://www.pca.state.mn.us/air/northern-metal-recycling-becker> (website containing information about the agency’s investigation of a massive fire at the new Becker facility, including contamination of onsite ponds with SVOCs, VOCs, total PCBs, and lead).

²³ The updated traffic study must take into account, for example, the 6 million square foot underground INVERT warehousing facility that we understand is being developed for underneath the RMG S. Burley site. See INVERT project page at <https://theinvertchicago.com/location/>. In addition, the traffic study must fully support any projected rate of traffic increase that it employs in light of this current and expected development activity in the area.

applicant must describe whether any refrigerant recovery for materials that General III processes will be conducted by one of the other RMG operations and/or with equipment owned by one of the other RMG operations. (*See* related comment on Item 6.)

Item 14: Stormwater Pollution Prevention Plan. In addition to the information required by the Deficiency Letter, the applicant must describe in detail any and all materials to be handled in the barge area and loaded onto barges, including composition data.

Item 16: Storage Tanks. As noted elsewhere in these comments, the other RMG operations have added storage tanks in the recent past. As part of the mandatory compliance assessment and determination of whether General III is a single recycling facility along with the other RMG operations, the applicant must include a description of whether storage tanks at any of the other RMG operations will be used to store liquids recovered during General III operations (as well as recovered from one or more of the other RMG operations) under normal or any other operating scenarios.

Item 17: Air Quality Impact Assessment. (*See* comments above regarding the necessary scope of the air quality impact assessment, including the need to ensure protection of short-term air quality.) At the outset, we note that even if revised air quality modeling demonstrates that the proposed General III will not cause or contribute to an exceedance of the PM10 NAAQS or otherwise adversely impact air quality (absolutely or relatively as the latter pertains to civil rights compliance), robust monitoring of the full suite of air pollutants expected from the facility is necessary to help ensure protection of public health and the environment. Robust monitoring is necessary because of the many enforceability issues raised in our comments to IEPA, which render the emission calculations unreliable/unlikely to represent actual operating conditions, as well as the overall issues with accurately estimating and modeling fugitive emissions, which are a primary concern at facilities like the proposed General III. In sum, CDPH should not allow the applicant to engage in minimal air quality monitoring based on its modeling demonstration, but must require robust monitoring to ensure that the facility does not in fact exceed the impacts projected by the modeling. Such robust monitoring is fully contemplated by the Rules²⁴ and is further supported by CDPH's duties to prevent nuisances and protect the environment, safety, and public health.

In addition, as a practical matter, the impacts of General III to air quality will be compounded by the RMG operations that share the site. Thus, regardless of whether the facilities required a single recycling permit as discussed elsewhere in these comments, the required air quality impact assessment for the proposed General III must take full account of the other RMG operations at 11600 S. Burley, as well as any additional operations at the site. More specific required items are as follows:

²⁴ *See, e.g.*, Rules at Section 4.7.7.2 and 4.7.7.3.

The applicant must conduct, provide and base its modeling studies on at least 12 months of onsite representative baseline air monitoring data for TSP, PM2.5, and associated HAPs given control of/access to the site well in advance of application. The monitors for such data collection must be situated so as to account for the other RMG facilities at the site, as well as surrounding nearby sources, and take into account meteorological conditions at the site.

With respect to the modeling demonstration and monitoring proposal, the applicant must provide monthly wind roses from onsite monitoring and nearby monitoring sites with publicly available data (like KCBX just to the north). The applicant must evaluate the number and placement of monitors relative to meteorological conditions, as well as given likelihood of the other RMG operations' emissions impacting/adding to those of General III (e.g., the applicant must include placement of North and South monitors) (see also above comments on the proposed General III and other RMG operations constituting a single recycling facility).²⁵

Again given access to the site well in advance of the application, the applicant must retain a third party to collect and provide representative onsite silt content data, including multiple samples as necessary to properly characterize the levels of silt at the site. The applicant then must use this onsite silt data in revised fugitive dust calculations.

The applicant must provide detailed information on the General Iron sampling that went into the General III metals emission calculations submitted to IEPA, including a map of sampled areas, the surface materials present, and what housekeeping measures were taken in those areas in advance of the sampling (and historically).

The applicant must retain a third party to collect onsite General III samples to be evaluated for metals content for use in emissions calculations (given the lack of data on current soil composition in the area and history of contamination, as well as history of the other RMG operations).

The applicant must provide detailed information on the sampling that went into South Chicago Property Management's ("SCPM") metals calculations provided to IEPA, including the same information as for the General Iron sampling. The applicant must retain a third party to collect onsite RMG/SCPM samples that do not composite samples for fugitive sources (as compositing for IEPA purposes likely "washed out" higher levels in sampled areas).

The applicant must explain whether the emissions calculations and modeled emissions in its revised air quality impact assessment reflect worst case emissions, e.g., emissions under high winds and/or near-freezing/freezing temperatures (as well as short-term maximum capacities/rates as discussed above). To the extent that the emissions calculations and modeled emissions do NOT reflect these real world conditions, the applicant must revise the modeling to reflect worst case emissions.

²⁵ See Comments to IEPA, at pp63-67.

The applicant must provide additional justification for the use of a 95% control factor for conveyor emissions absent wet suppression, based on 1.5% moisture content.²⁶

The applicant must provide detailed information on how it modeled paved and unpaved roads. The challenge of modeling the emissions and associated air quality impacts of haul roads has been a particularly vexing problem for years. An EPA-sponsored “Haul Road Workgroup” was formed in 2009 with a collection of federal, state, and local government dispersion modelers to examine and better understand haul road characterization issues and recommend a modeling methodology back to the broader dispersion modeling community. In 2012 the Haul Road Workgroup issued a “best practices guide” for modeling of haul road fugitive emissions in the AERMOD modeling system. The General III modeling report is utterly devoid of any real discussion regarding the modeling of the fugitive emissions from the onsite haul roads and how these modeling efforts comport with the relevant guidance. The 2012 Haul Road Workgroup “best practices guide” requires a number of data points (including vehicle height, width and length; type of roadway; roadway width, etc.) selection and supporting rationale for which no mention is made in the application. In addition, the modeling report fails to clearly identify the location of the roads and the nature of the hauling undertaken on them. Finally, the modeled emission rates are not summarized or correlated to the individual roads, making agency review impossible. The modeling should be resubmitted with all of these deficiencies corrected.

Regarding an updated HAPs analysis, the air quality impact assessment must: (a) justify the use of the Wisconsin air toxics rules versus other available state approaches, e.g., from Michigan, Minnesota, Ohio, California, and Texas; (b) include VOCs along with metallic HAPs; (c) conduct an assessment of the combined health impacts of the air toxics modeled; (d) account for non-cancer HAP impacts; (d) account for the toxicity of hexavalent chromium; and (e) evaluate results against available short-term health thresholds, such California’s 8-hour REL for manganese (and use onsite baseline data per the above).²⁷

The applicant must include a proposal for siting of additional monitors as discussed above. The siting of the monitors should be based on the revised modeling demonstrations once the haul road modeling and other deficiencies are remedied. We reiterate, however, that the modeling demonstration should not be used as a brightline test of whether and how many monitors must be installed and operated on an ongoing basis at the site, given the complexities and likely inaccuracies involved in modeling fugitive sources in particular.

Item 19: Peak Daily Quantities Accepted. In addition to the information required by the Deficiency Letter, the applicant must describe whether and how materials to be processed at General III will be accepted/staged/stored at one of the other RMG operations, and/or any other property owned by South Chicago Property Management in the vicinity, either before or after processing and under “normal” or emergency/exceptional operating conditions.

²⁶ See Comments to IEPA, at p74.

²⁷ See Comments to IEPA, at pp78-79.

Item 20: Documentation that Facility Can Determine and Record Amounts of Material Entering and Exiting. In addition to the information required by the Deficiency Letter, the applicant must describe the ability of all of the RMG operations at 11600 S. Burley to determine and record amounts of material entering and existing, as part of the assessment of whether the operations in fact constitute a single recycling facility (and conversely to ensure that they are able to demonstrate the separateness of their facilities over time if such independence is claimed).

Item 21: Demonstrate that Peak Capacity Can Process Anticipated Peak-Season Max Daily Quantities. The demonstration required by the Deficiency Letter must include the vehicle capacity to transfer and load material between process areas and into staging/storage areas, including from the ASR pile to the nonferrous process and nonferrous process bins (and include a description of how often the ASR pile will be worked/turned over). The demonstration must also include General III's maximum theoretical processing capacity on a daily and monthly basis, without any limitation on hours of operation, to determine whether it is likely that the applicant will ask for increased hours operation after its initial approval and how such increase would impact health and the environment. As discussed elsewhere in these comments, the air dispersion modeling must model the maximum short-term emission rates as well. The modeling, as submitted, models annual average emission rates.

In addition to the information required by the Deficiency Letter, the applicant must describe whether it will rely on any storage, staging, and/or processing capacity at the other RMG operations during "normal" or emergency/exceptional operating conditions.

Items 22 and 23: Health and Safety Plan, OSHA. Available public materials show issues with worker safety at both General Iron and the other RMG operations, including that the RMG facilities together account for among the highest total number of OSHA violations and fines of operations in the Calumet Corridor, according to research conducted by partners at the Metropolitan Planning Council. Specifically, it appears that RMG has had issues with exposure to lead and cadmium; failing to clean containers leading to explosion risks; and safety risks associated with portable ladders. A Google search of General Iron and RMG produces articles on workplace deaths and injuries, as well as private legal actions over retaliatory discharges for raising unsafe workplace conditions (such as extreme cold), along with records of workers compensation claims. Thus, in addition to the information required by the Deficiency Letter, the applicant must provide the Health and Safety Plans for General Iron and the RMG operations as part of the mandatory compliance review. In addition, the applicant must provide any and all documentation required by the General Iron and RMG Health and Safety Plans dating back to January 1, 2016, to the extent required to be retained by the companies. The applicant must also provide a detailed history of OSHA notices of violation, penalties paid, and corrective actions taken for General Iron and the RMG operations, as well as a detailed history of any private litigation or other legal claims brought against any entity under the RMG umbrella related to worker safety.

Items 26 and 27: Fire extinguishers, Thermal Infrared Detection Devices. Fires continue to be a major source of concern related to the proposed General III. General Iron and RMG have histories of fires at their facilities.²⁸ Indeed, only two months ago while under RMG’s control, the General Iron facility in Lincoln Park had a smoldering debris fire that sent a dark gray plume into the community, evidencing that this company, even today, cannot prevent fires at its operations.²⁹ It is critical that the proposed General III use a robust, integrated approach to fire prevention/response employing thermal infrared detection devices that incorporates trained, dedicated staff and detailed protocols for identifying hot spots that trigger a response and for the response itself. Merely having the cameras is not enough.³⁰ Even at facilities with infrared cameras, there is a significant risk of toxic fires, as seen by the massive fire in February at the brand-new Becker facility in Minnesota.³¹

In addition to the information required by the Deficiency Letter, the applicant must provide a detailed history of fires at General Iron and the RMG facilities, including any fires at RMG facilities located outside of Chicago. The history must include the source/cause of, response to, and duration of each fire, as well as any impact assessment conducted in conjunction with the fire. The history must also include a detailed description of any and all fire detection/prevention/response measures in place at the time of each fire, and an assessment of whether and how those measures differ from what will be employed at the proposed General III.

The applicant must also provide detailed information on: (a) how the proposed locations of the thermal infrared cameras will provide comprehensive coverage of all stockpile/yard operations with the potential for fires; (b) the reviewing/monitoring plan for data generated by the thermal infrared cameras, including training and staffing dedicated to reviewing such data; (c) protocols/metrics for determining whether a hot spot that requires response exists and protocols for such a response once triggered; and (d) fire evaluation and clean-up response in the event that a fire in the yard does in fact occur, including air quality evaluation, ash deposition evaluation onsite (including soil and water) and within the community/for the Calumet River/onsite/adjacent property owners, and ash/sludge/soil clean-up, including of water/retention treatment ponds.

²⁸ See Comments to IEPA at various.

²⁹ Ex. 5, Brett Chase, “Fire breaks out at General Iron week after company pays settlement to city over explosion,” *Chicago Sun-Times*, November 10, 2020, <https://chicago.suntimes.com/2020/11/10/21559380/general-iron-fire-lincoln-park-southeast-southside-recycling-metal>. Such low temperature fires can be more detrimental to air quality than high temperature, large burning fires, given the large number of partially combusted products of incomplete combustion. Local assessment of air quality impacts from such fires rarely if ever captures the true impact to air quality from the fires (see discussion of metal shredder fire impacts on air quality in our past comments to CDPH and IEPA).

³⁰ See Ex. 6, Emily Atkins & Treena Hein, “Facilities on Fire,” *Waste & Recycling Magazine*, May 14, 2019, <https://www.wasterecyclingmag.ca/feature/facilities-on-fire/>.

³¹ See *supra*, MPCA Becker website; Ex. 7, Kirsti Marohn, “As fire continues, state halts most Northern Metal operations in Becker,” *MPR News*, February 21, 2020, <https://www.mprnews.org/story/2020/02/21/as-fire-continues-state-halts-northern-metal-operations-in-becker>. According to Cory Boecker at the Minnesota Pollution Control Agency, the Becker Northern Metals facility employs thermal infrared cameras.

To the extent that any materials with the propensity for igniting or causing fires that will be handled or processed by General III will be handled, stored/staged and/or processed at one of the other RMG facilities at any point during the material's residence at the site, the applicant must provide all of this information for the RMG operations as well.

Items 29 and 30: Vehicle Operating Plans, Process Rates/Capacity. To the extent not already required by the Deficiency Letter, the applicant must provide information on the engine rating (Tier) of any and all vehicles that will serve the facility onsite and/or bring material to or away from the site, as well as the ownership or leasing status of each vehicle type. The applicant must also provide information on how fugitive dust will be controlled during vehicle operations involving handling of ASR, including how fluff will be loaded onto trucks and what kind of tarp will be used to cover fluff in trucks. In addition, with respect to the water trucks, the operating plan must include detailed information on whether (including under what operating and/or weather conditions), where and how the water trucks will be deployed to control fugitive dust, including how actual use of the trucks will be documented. (This information is also necessary with respect to the fugitive particulate operating program.)

Item 31: Waste Characterization of Shredder Fluff, Description of Treatment, Disposition at Landfill. Given the history of noncompliance and ongoing issues with auto shredder residue (including fluff) depositing in the Lincoln Park community even after the company settled CDPH's Notices of Violation over ASR, it is especially critical that a high level of scrutiny be paid to this portion of the proposed operations.

Thus, given the mandatory compliance review, the applicant must provide a full accounting of how General Iron handled ASR/fluff up until today, including a description of all staging and storage practices, controls employed, and transfer operations (including into vehicles), as well as ASR-related results of inspections (local/state/fed). In addition, CDPH's inspection reports indicate that RMG has generated/handled auto shredder residue in the past. Thus, the applicant must provide a full accounting of how RMG has generated/handled ASR/fluff, including the same information as for General Iron. The applicant must also compare such operations at General Iron and the RMG facilities to the proposed ASR-handling and/or treatment operations for General III.

In addition to describing treatment to reduce the hazardous properties of the ASR, the applicant must provide the expected efficacy of any such treatment in reducing hazardous properties prior to shipping the ASR offsite, and the basis for that expectation.

Item 32: Fugitive Particulate Operating Program. To the extent not already covered by the Deficiency Letter or other portions of these comments, the applicant must do the following with respect to the fugitive particulate operating program:

- Provide any and all fugitive particulate operating programs submitted to IEPA for the four other RMG/SCPM operations at the site, as well as for General Iron.

- Provide a detailed history on inspections and any compliance issues/notices related to fugitive dust control at General Iron and/or the other RMG operations.
- Provide a plan for dust control at below- and near-freezing temperatures.
- Provide a plan for dust control during periods of high winds, i.e., periods when average wind speeds exceed 15 miles per hour over two consecutive five minute intervals of time (as defined by CDPH's dust rules).
- Provide information on how the use of Dust Bosses will take into account wind direction and speed, as well as temperature; the source(s) of water for Dust Bosses and how water make-up might impact Dust Boss performance; the schedule for cleaning and testing Dust Bosses to ensure proper droplet sizing and mist formation; training for staff in proper use of Dust Bosses to ensure proper droplet sizing and mist formation and targeting of material with dust potential; and how use of Dust Bosses will be tracked to ensure they are actually being employed given history at General Iron with failure to use spray applications.
- Provide an opacity monitoring plan.
- Describe how the plan and schedule for patrolling and cleaning adjacent areas will include the Calumet River and adjacent/nearby industrial properties under different ownership, as well as the fluff truck routes beyond a quarter-mile radius.
- Evaluate loading of fluff onto trucks within an enclosure, including whether such an enclosed loading operation is feasible at General III and if so why such an enclosure is not being employed.
- Describe in detail how material will be handled and controlled in the barge loading area and during active barge loading operations, including how dust generation will be minimized and how material drop into the river will be eliminated during loading (and/or unloading, to the extent the proposed General III will receive material by barge), pursuant to the prohibitions on open dumping and nuisances. This information must include an evaluation of enclosure of barge loading operations, including whether such an enclosed loading operation is feasible at General III and if so why such an enclosure is not being employed. The description must also include evaluation of other available methods of loading barges and controlling fugitive emissions beyond the vehicle-based method included in the current application, such as telescoping chutes or other partially enclosed methods.

Item 33: Hours of Operation in Conflict with IEPA Permit. In addition to the information required by the Deficiency Letter, the applicant must provide a detailed history of any compliance issues regarding hours of operation imposed by local and/or state requirements at General Iron and/or other RMG operations. In addition, the applicant must describe how hours of operation will be tracked and recorded in order to ensure compliance with any limitations on hours of operation.

Item 34: Odor Control Plan. The applicant must include in the odor control plan odor inspections and investigations for the Calumet River adjacent to the site.

IV. Conclusion

For these reasons, the application for the proposed General III is deficient and CDPH must deny a permit unless and until the applicant can cure these deficiencies and demonstrate through the additional information that the proposed General III facility (and/or the single recycling facility that encompasses General III and the other RMG facilities) will operate without posing a threat of harm to the health, safety and welfare of the residents and workers on the Southeast Side.

Sincerely,

/s/ Meleah Geertsma
Meleah Geertsma
Senior attorney, Environmental Justice
Natural Resources Defense Council
On behalf of NRDC

CC:
Dave Graham, CDPH
Megan Cunningham, CDPH
Jennifer Hesse, CDPH
Mort Ames, Law Dept.
Jeffrey Levine, Law Dept.
Daniel Lurie, Mayor's Office
Angela Tovar, Mayor's Office
Candace Moore, Mayor's Office

From: Amalia NietoGomez [REDACTED]
Sent: Thursday, January 14, 2021 3:28 PM
To: envcomments
Subject: Re: RMG RECYCLING PERMIT
Attachments: ASE Comments on RMG permit 01-14-2021 final.pdf; ASE Supporting docs on RMG permit 01-14-2021 final.pdf

[Warning: External email]

Good afternoon.

Below are ASE's comments on RMG's Recycling Permit.

Attachments:

- ASE Comment letter on RMG's Recycling Permit
- ASE Supporting documents

Please let me know if you have any questions. I can be reached at 773-800-0322.

Amalia NietoGomez
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January 14, 2021

Email: envcomments@cityofchicago.org

Re: RMG RECYCLING PERMIT

To whom it may concern:

The Alliance of the Southeast (ASE) stands in solidarity with 10th ward South East Side residents against General Iron. We urge you to deny the permit for General Iron.

The Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

CDPH should consider more than “visible” particulate matter, but all the pollution released by RMG’s recycling facility (and co-located facilities), including PM 10 and PM2.5 emissions. CDPH should also assess the air quality impacts of emissions from trucks idling (and how long they are idling in front of and around the facility) and new truck traffic that will move through local communities to access the General III facility. RMG is putting our communities at risk by allowing dangerous pollution (PM 10 & PM 2.5) to be released so close to residences, schools, and parks.

- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
- Both the US EPA & World Health Organization (WHO) recognize PM 2.5 as more dangerous than PM10. Current regulations ban visible dust leaving the property, but place no restrictions on PM 2.5. This needs to change.
- A study conducted by George Washington High School, the high school directly across the road from RMG/General Iron, found winds from RMG’s location to blow Southwest to Northeast. With the wind pattern present, wind will carry pollutants directly to the learning environment of students and negatively impact their health.
- Both the WHO and the European Union Environmental Protection Agency recognize concentrations above 50µg/L as beyond both hourly and annual limit values, which are set to protect human health. By RMG/GII’s own estimation, their PM10 emissions could create an environment where the background PM10 in and around GWHS is as high as 106µg/L.
- The expansion of RMG’s operations would greatly increase truck traffic and significantly increase air pollutant emissions from diesel trucks. Traffic would increase from 200 trucks to 1400 trucks a week on local roads (based on comparison of current truck traffic near the RMG site to truck traffic at the General Iron’s Lincoln Park site), according to a survey by the Southeast Environmental Task Force (SETF).
- The expansion would greatly increase the number of trucks idling, which is one of the worst sources of air-born pollutants, because it’s not an efficient burn on the fuel. CDPH needs to look at the amount of diesel truck fumes and how long the trucks are idling at and around the General Iron III facility
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in:
 - higher asthma rates amongst adolescents,



- higher lung cancer rates,
- depression,
- lower academic performance, and a decreased life span.

Please see Chicago Air Quality and Health Index (Slide 10)

Please see attached Chicago Asthma, Cancer, and Chronic Disease maps (Slides 7, 8, & 9).

Please see Chicago Low Child Opportunity Area Index (Slide 11).

CDPH needs to expand the impact area for air pollution, to reflect the actual impact, taking into consideration how far particulate matter travels, weather conditions (including wind directions), and truck traffic. A facility like this should not be down the street from vulnerable schools, parks, and homes. The current permitting process allows 650 feet, which is less than 1/8 of a mile (1 city block). Air does not stay in a box. Just because something may follow city ordinance, does not mean it is safe. George Washington High School is less than 1 mile away. The nearest residence is ¼ mile away (2 city blocks). Finkl Steel, another company displaced from Lincoln Park and moved to the SE side, had an explosion in 2019, and set a nearby house on fire. That house was almost a 1/2 mile away. If burning slag can fly a 1/2 mile, surely asthma-causing pollutants can travel at least that far.

CDPH should assess the cumulative impacts of several related, co-located facilities. The permit application is based on an incorrect source determination that does not include all pollutant-emitting activities that are part of a single source. General III and the other facilities co-located at 11600 S. Burley are a single source, but are being segmented into constituent operations for permitting purposes.

ASE urges CDPH to conduct an environmental justice analysis as part of its permitting process. This analysis should address whether the environmental consequences of the applicant's facility, viewed comprehensively and in the context of where it will operate, will cause or contribute to significant, adverse and disproportionate risks for local communities. **ASE agrees with SETF's assertion that the city's history of ignoring the risks of significant, adverse and disproportionate harm in already susceptible, overburdened Chicago communities must be remedied beginning with CDPH's review of the present permit application.**

- 1. We urge the City to stop the environmental racism of putting toxic developments in minority and overburdened communities.** Moving an industrial facility's operations from a gentrified mostly white neighborhood to a mostly working-class community of color (majority Black, Latino, immigrant) that is already overcrowded with polluting industry is a prime example of environmental racism. RMG's proposed facility expansion will also disproportionately affect vulnerable populations (including children, pregnant women, elderly, and groups with high asthma and cancer rates). Policies are environmentally racist if they result in disparate outcomes, which is happening on Chicago's southeast side.

Please see attached maps for disparities along racial/ethnic lines,

Please see attached Cumulative Burden of Environmental Exposures map (Slide 3).

Please see attached Racial and Ethnic Composition Map (Slide 12)

CDPH must deny the permit if it is to be in compliance with the US Fair Housing Act. The City has a duty to foster integration and equitable development, as part of its agreements with US Dept. of Housing and Urban Development to receive block grants.

- The City is prohibited from engaging in actions that have the effect of discriminating on the basis of race, color and national origin. Pursuant to Title VI of the Civil Rights Act of 1964, no person in the United States shall, on the ground of race, color, or national origin,



be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity which receives federal financial assistance.

- ASE supports the complainants in the pending HUD action regarding the City's participation in facilitating the transfer of this operation from the northside to the southside.

2. The southeast side is already environmentally overburdened, and is a recognized Environmental Justice community. The limitations on visible air pollution do not address the cumulative environmental and health burdens the community already faces.

- Chicago's southeast side has 3 of the top 5 air polluting companies. Finkl Steel is the #1 air polluter in Cook County. Finkl Steel relocated to the SE side, after being displaced by the Lincoln Yards development. Soon after moving to the southeast side, a southside house caught on fire, as a result of an explosion at Finkl.
- The area is already environmentally overburdened. The 10th ward has 8 landfills, many of them toxic. In recent years, Chicago's southeast side has suffered from numerous health and environmental hazards, including contamination from petcoke, manganese, lead, and other metals and pollutants, on top of an even longer history of industrial contamination.
- There is no reason that a company with a history of air pollution violations (cited by the Illinois Environmental Protection Agency, as well as the City of Chicago), should be considered for an already environmentally overburdened community.

Please see attached Hazardous Air Pollutants map (Slides 4 & 5).

CDPH should expressly state its reservation of rights to revoke the permit based on evidence of non-compliance. Many of the same people who ran General Iron in Lincoln Park would run RMG's proposed facility, and the proposed facility poses many of the same types of impacts that the General Iron facility has created at its current location. CDPH should require the permit applicant to anticipate and have a fully realized plan to address non-compliance, and CDPH should be prepared to revoke the permit if noncompliance persists.

Additionally, CDPH should not issue a permit without answers on whether the pollution control equipment that is being transferred to the General III worked effectively at General Iron, esp. when the General Iron's facility has already had an explosion and a fire in the last year.

- RMG has owned and operated the General Iron facility in Lincoln Park for more than a year now. During that time, General Iron has experienced explosions that caused the City to shut the operation down for several months, led to dozens of citations for violations, and just last month experienced fires in outdoor piles of waste that required the Chicago Fire Department's involvement to put them out.
- The City's own inspection reports also show that RMG has for years failed to keep its facilities properly paved (with issues noted as recently as this October), posing risks of heavy metals getting into the soil and water and contaminated dust getting into the air. It also pled liable for an air quality violation at its barge area last summer.
- Illinois EPA cited RMG last fall with flying under the radar without proper permits and approvals; RMG also lacked City approvals for some of its equipment and activities, such as torch cutting massive rail cars in the open air, an activity which produces clouds of black smoke. And RMG pled liable and paid a fine for illegal industrial dust at its barge area in June of 2019; the City's inspection report for this incident notes that the company was employing no dust control measures during active barge loading.



We, as part of Chicago's southeast side, are tired of being the dumping ground for the City of Chicago. This is not just an environmental justice issue, but also a racial justice issue. Lincoln Park residents have complained for years about the pollution from General Iron. Lincoln Park residents were able to downgrade their manufacturing corridor. But, on the southeast side, despite community opposing RMG's new recycling facility, and other polluting companies, these companies are continuing to move here.

We can't both recognize Chicago southeast side communities as environmental justice communities, and still allow polluting companies and with environmental violations, like RMG/General Iron, to move here. What we need are environmentally sustainable developments that promote the health of our communities (includes social, economic, environmental) and racial equity. RMG does not meet these goals. (For reference on community priorities, see Good Neighbor Policy at: www.asechicago.org/good-neighbor.)

We need policies to take into account the cumulative burden to the community, previous violations/citations issued, community complaints, and whether the development will be in an environmental justice community. And, these need to apply to RMG's permitting process. There's no reason that a company with a history of air pollution violations should EVER be considered for an overburdened community.

Moreover, with Covid-19, it's more important than ever that our communities are not left behind and that developments help our recovery, not worsen our health and enable environmental racism. The same southeast side communities that are environmentally overburdened, are the same communities more negatively impacted by Covid-19. Companies, like RMG, who pollute our air, land, and water, make the population less able to fight and survive when health challenges come up, like Covid-19, which disproportionately affect people with pre-existing conditions (like asthma, COPD, cancer, heart disease).


Please see Covid-19 Racial Disparities, Chicago Covid-19 Case Counts and Test Positivity, Chicago Mortality Rate (Slides 13-15)

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air. If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

The Alliance of the SouthEast (ASE) is a multicultural, interfaith, and intergenerational alliance consisting of churches, schools, businesses, and community organizations that prioritize grassroots participation to address the challenges facing the neighborhoods of southeast Chicago. ASE's mission is to build the capacity of leaders, organizers, and associations in order to carry out community and social change.

If you have any questions or follow up, I can be reached at 773-800-0322.

Sincerely,


Amalia Nieto Gomez
Executive Director

Enclosed: ASE Supporting docs on General Iron permit 01-14-2021

Environmental Justice is Racial Justice.

Equitable development:

General Iron's impact on environmentally overburdened on Chicago's Southeast side

Prepared by: Amalia NietoGomez

Executive Director, Alliance of the SouthEast (ASE)



•Contact info: 773-221-8908 (office), amalia@asechicago.org

Website: www.asechicago.org

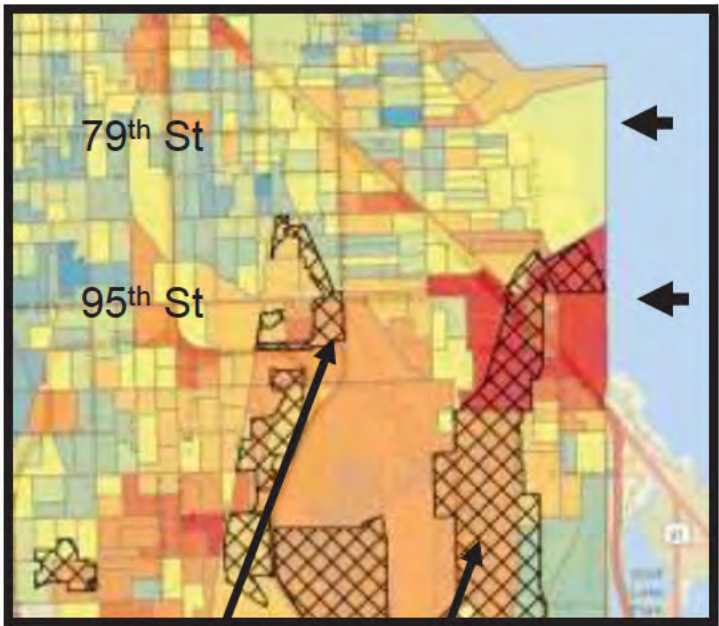
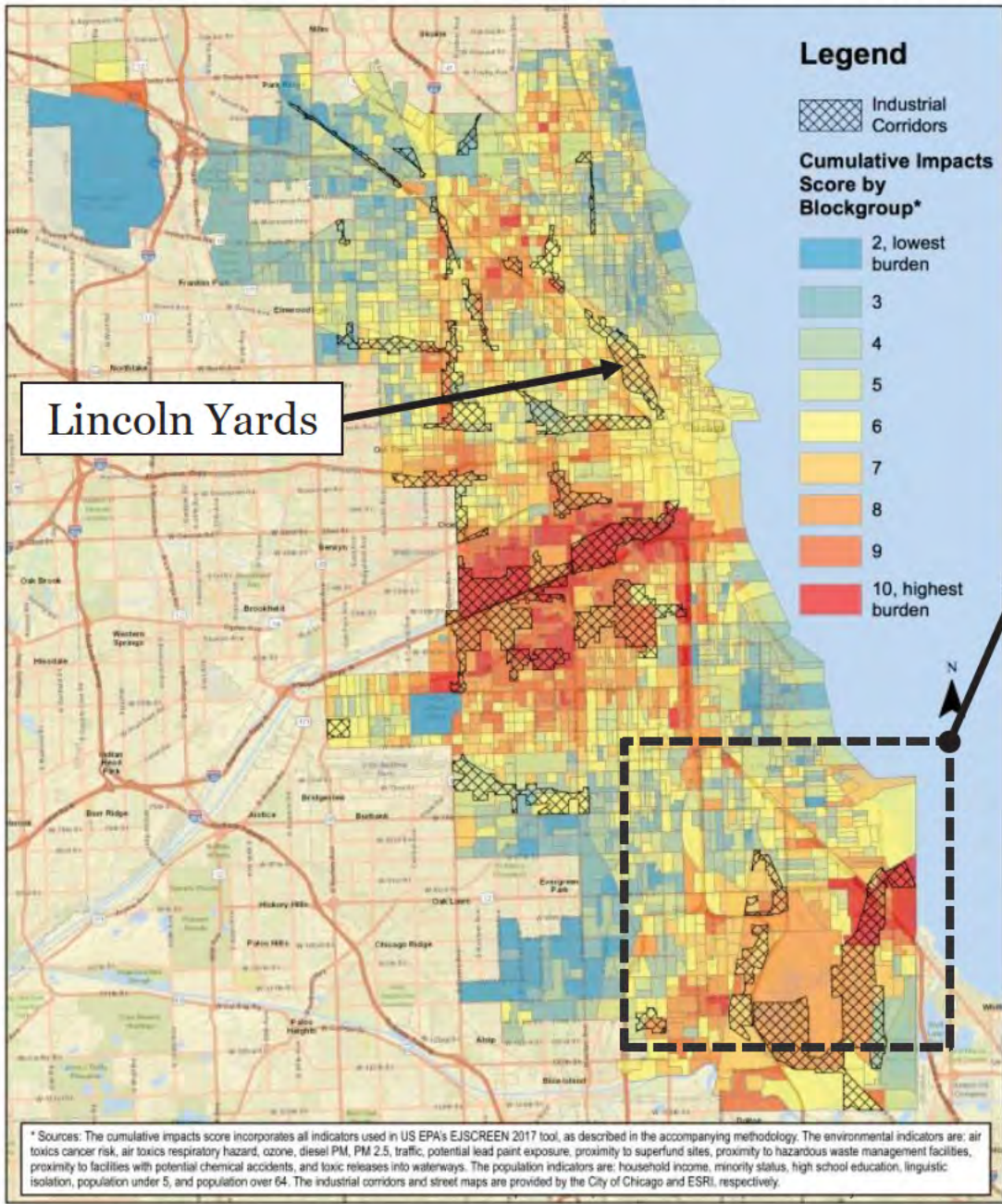
Equitable Development: SE Side- Environmentally Overburdened



Chicago's southeast side

- Home to generations of steel workers- residents who built downtown Chicago.
- The area is already environmentally overburdened.
- The 10th ward has 8 landfills, many of them toxic.
- A number of current and proposed projects are toxic & impact the health of nearby residents (e.g. General Iron & Confined Disposal Facility (CDF)).

Cumulative Burden of Environmental Exposures & Population Vulnerability in Chicago



0 5 10 20 Miles

Environmentally Overburdened



Chicago's southeast side has **3 of the top 5 air polluting companies:**

#1: Finkl Steel- #1 air polluter in Cook County- relocated to the SE side, after being displaced by the Lincoln Yards development. Also, a southside house caught on fire, after an explosion at Finkl.

 **CBS Chicago** NEWS WEATHER SPORTS VIDEO BEST OF MORE

CBS2
ON AIR

illinois.pd
42

South Side House Catches Fire After Explosion At Nearby Finkl Steel Plant; 'They Saw Fireballs'

-CBS2, 04-17-19

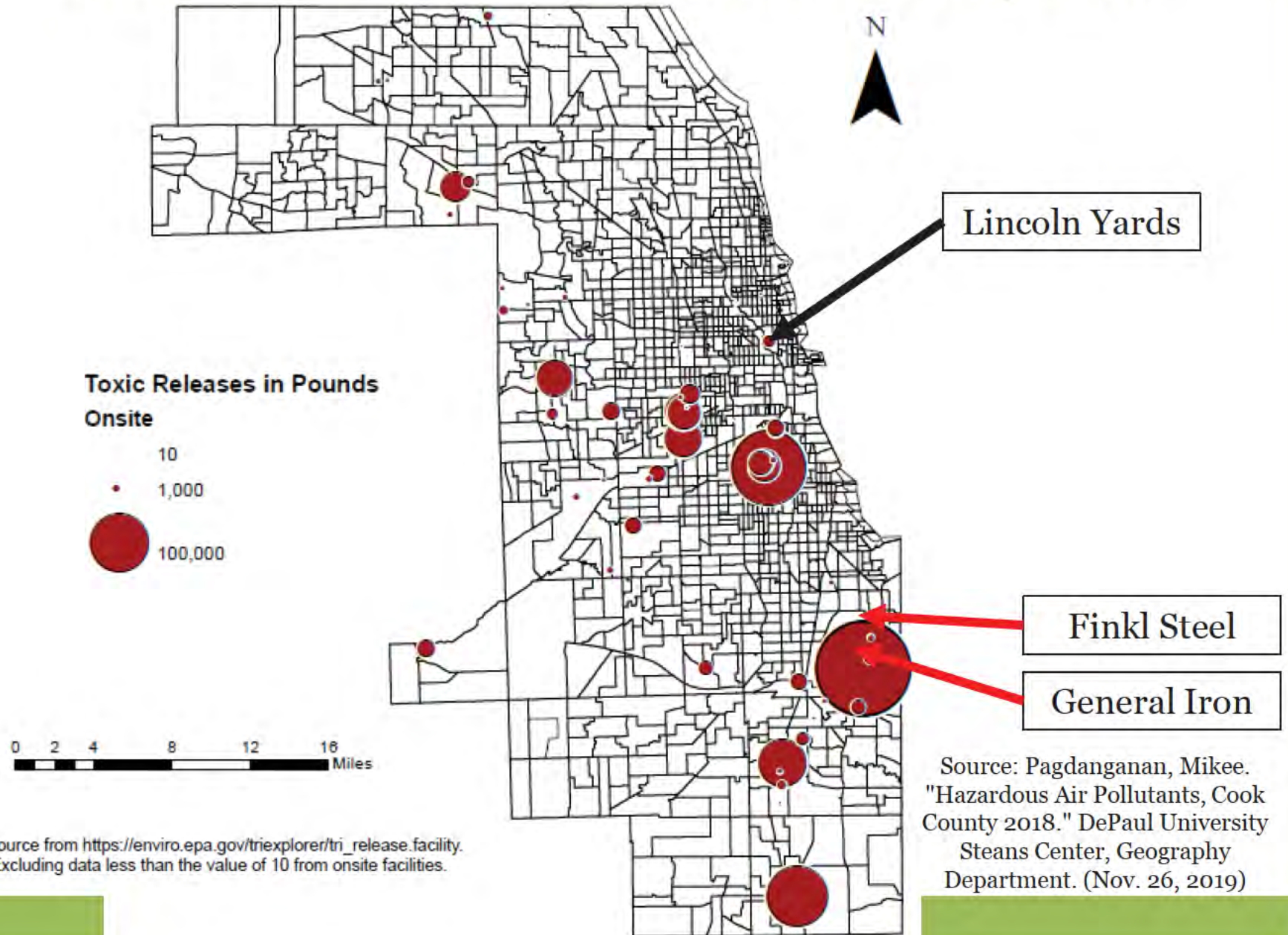
<https://chicago.cbslocal.com/2019/04/17/explosion-house-fire-finkl-steel-burnside/>

#2 Arcelormittal (Riverdale)

#4 Ford Motor Company

Source: Pagdanganan, Mikee. "Hazardous Air Pollutants, Cook County 2018." DePaul University Steans Center, Geography Department. (Nov. 26, 2019) Pg. 2

Hazardous Air Pollutants, Cook County 2018



*Source from https://enviro.epa.gov/triexplorer/tri_release.facility.
Excluding data less than the value of 10 from onsite facilities.

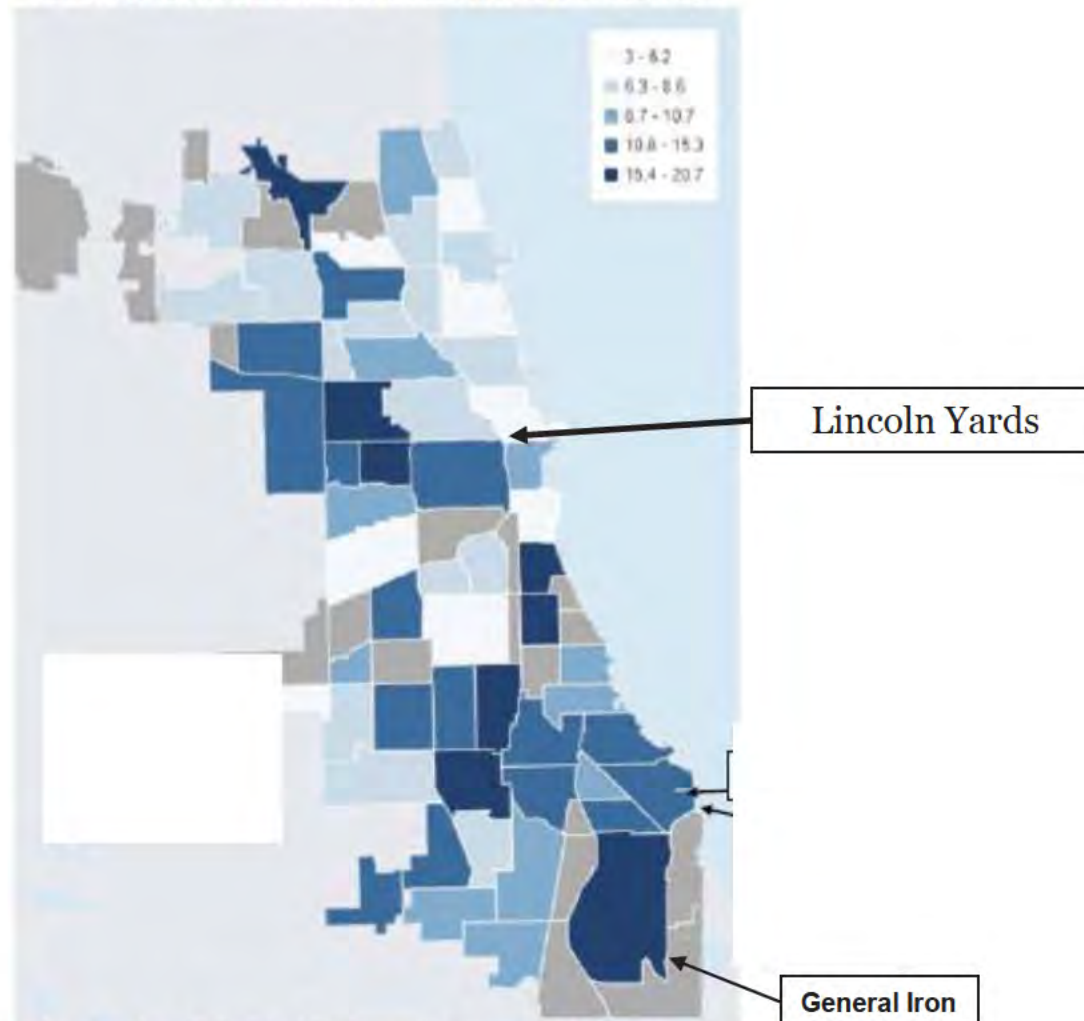
Equitable Development: SE Side- Health Impacts



- The southeast side is already environmentally overburdened, exposed to numerous contaminants, and have high cancer and asthma rates.
- Air pollution, environmental burdens, & cancer and asthma rates as well as divestment are concentrated in African American and Latino communities.

Asthma

ADULTS WHO HAVE BEEN DIAGNOSED WITH ASTHMA, 2015-2017



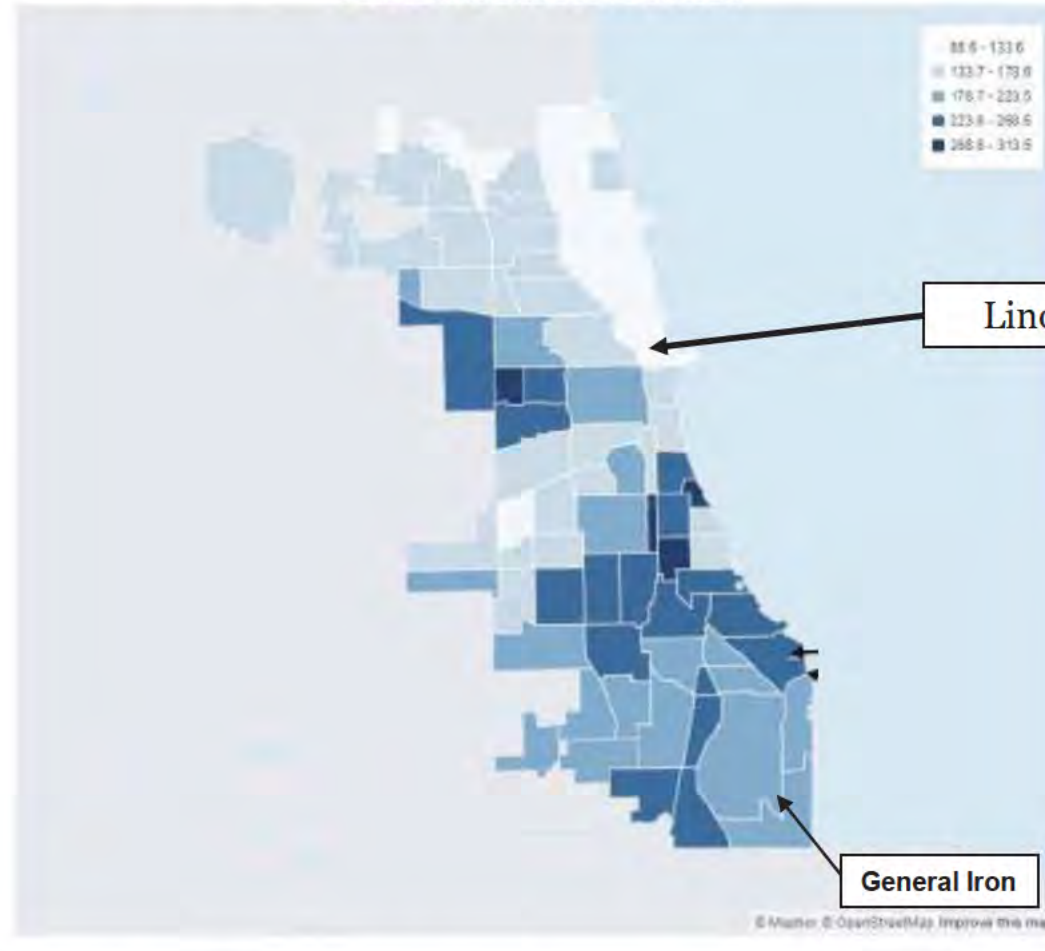
Asthma rates for nearby, impacted community areas: Chicago's asthma rate for 2017 was 9.1.

Comparatively, South Chicago has an asthma rate of 14.4. South Deering has an asthma rate of 20.7. Hegewisch and East Side data were not available.

Source: Chicago Health Data. "Asthma: Adults who have been diagnosed with asthma." Chicago Health Atlas. Website accessed: 08/01/19. <https://www.chicagohealthatlas.org/indicators/asthma>

Cancer deaths

PEOPLE WHO DIED DUE TO CANCER



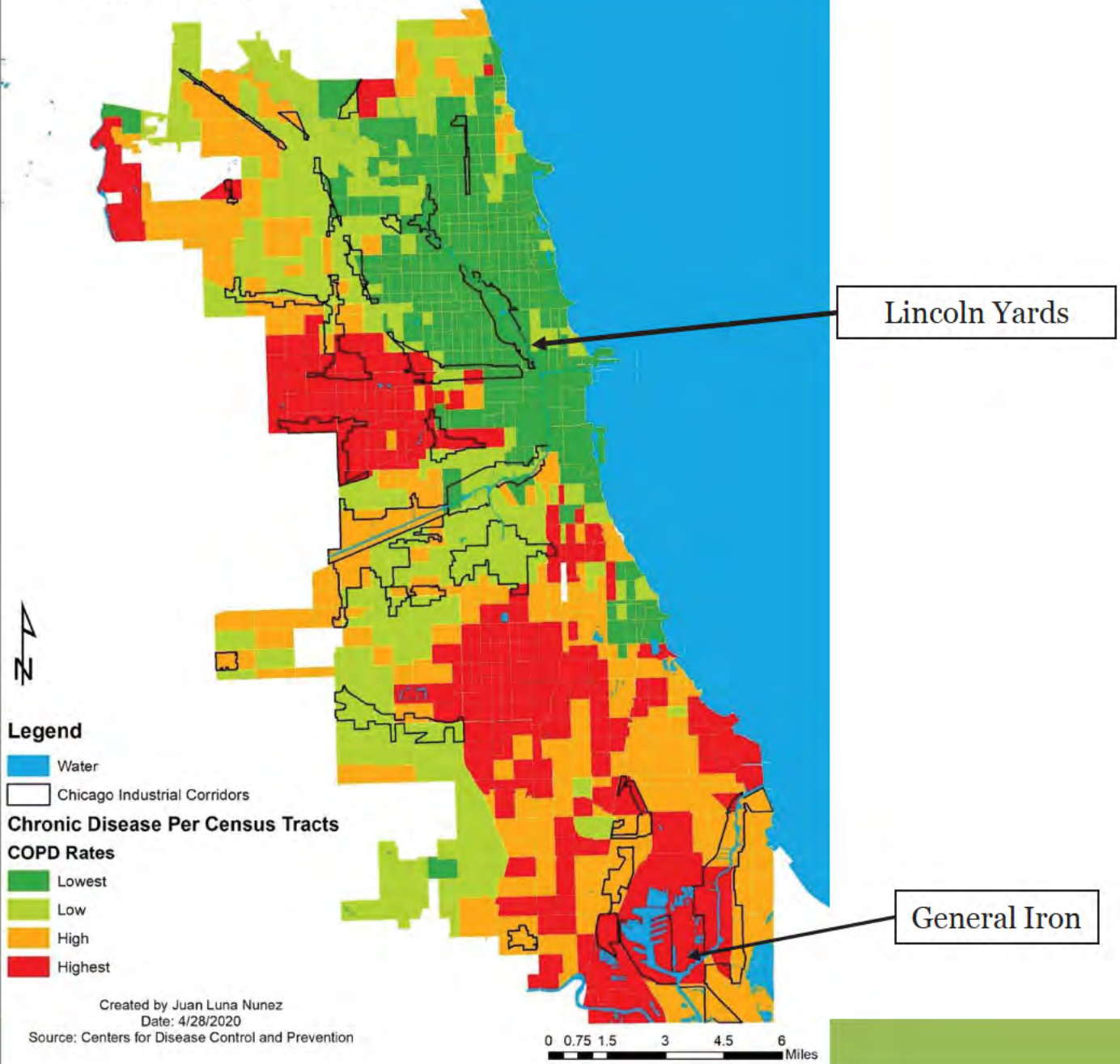
Cancer death rates for nearby, impacted community areas:

Chicago's cancer death rate for 2017 was 179.2.

Comparatively, South Chicago has a cancer death rate of 229.0. South Deering has a cancer death rate of 220.5. East Side and Hegewisch had cancer death rates of 189.0 and 197.9 respectively.

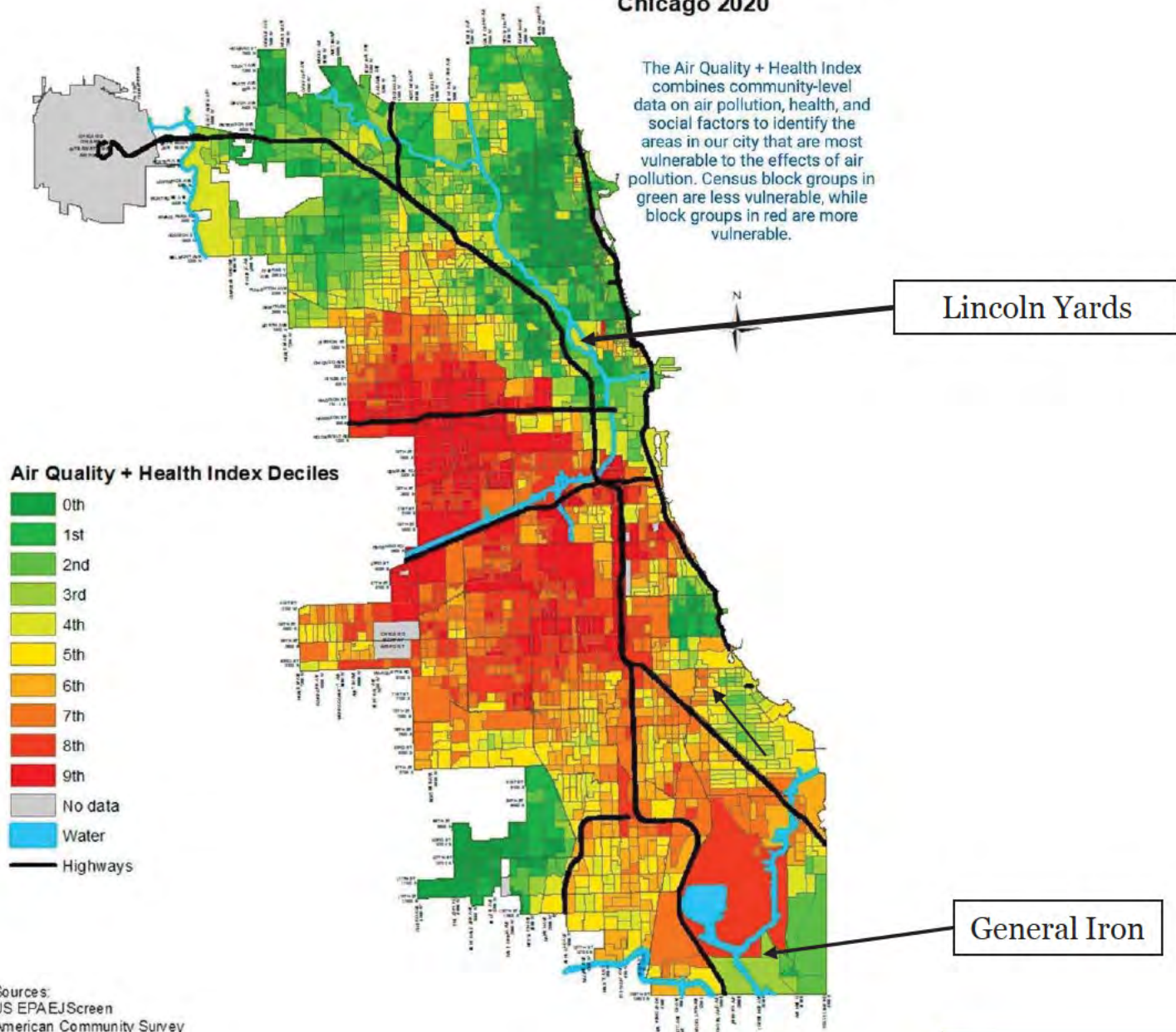
Source: Chicago Health Data. "Cancer deaths: People who died due to cancer." Chicago Health Atlas. Website accessed: 08/01/19. <https://www.chicagohealthatlas.org/indicators/cancer-deaths>

Chronic Disease Rates



Air Quality and Health Index, Chicago 2020

The Air Quality + Health Index combines community-level data on air pollution, health, and social factors to identify the areas in our city that are most vulnerable to the effects of air pollution. Census block groups in green are less vulnerable, while block groups in red are more vulnerable.



Lincoln Yards

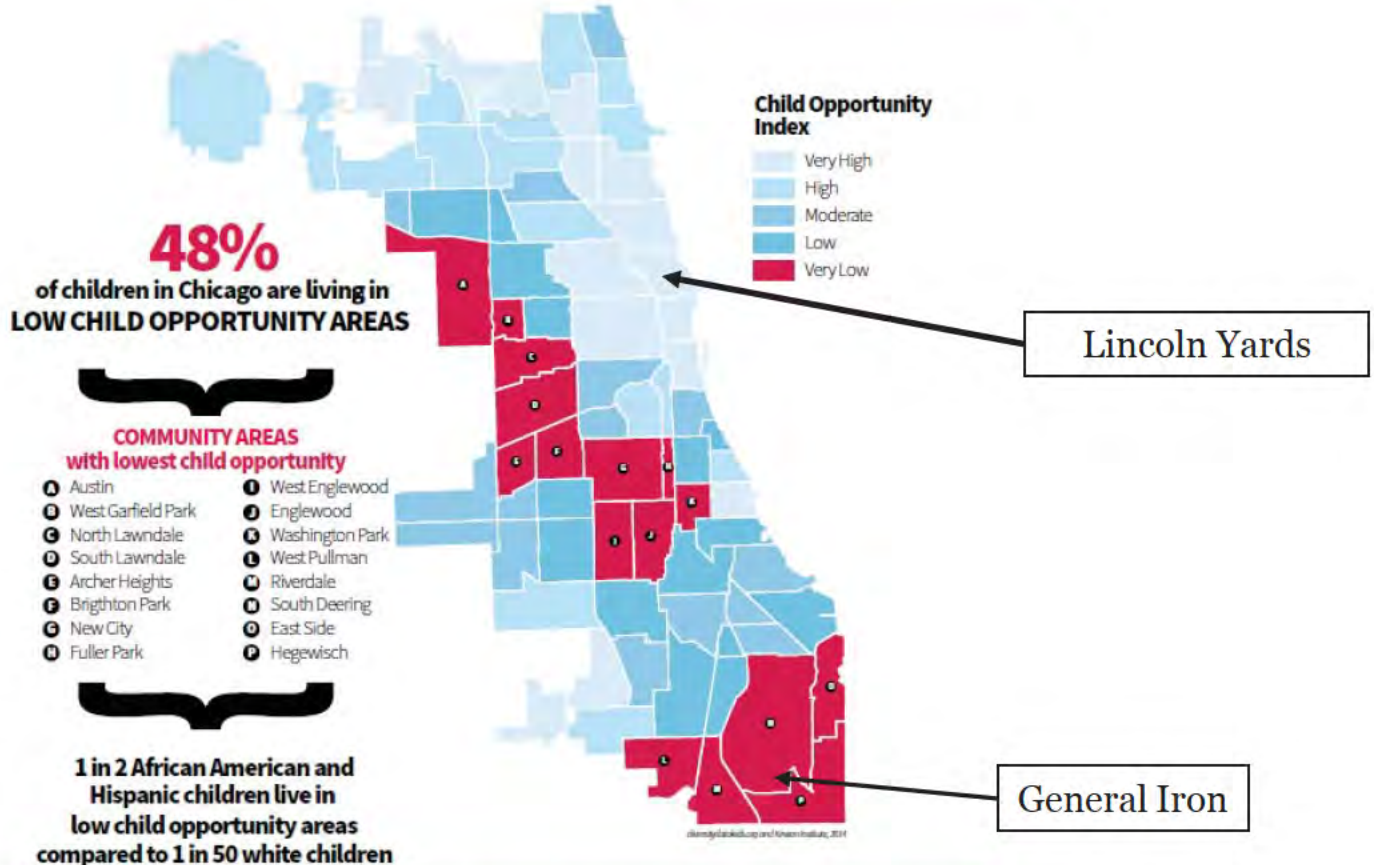
General Iron

Air Quality + Health Index Deciles

- 0th
- 1st
- 2nd
- 3rd
- 4th
- 5th
- 6th
- 7th
- 8th
- 9th
- No data
- Water
- Highways

Sources:
 US EPA EJScreen
 American Community Survey
 US CDC 500 Cities
 IDPH Vital Statistics
 Various years combined, 2011-2018

Created by Office of Epidemiology,
 Chicago Department of Public Health, January, 2020

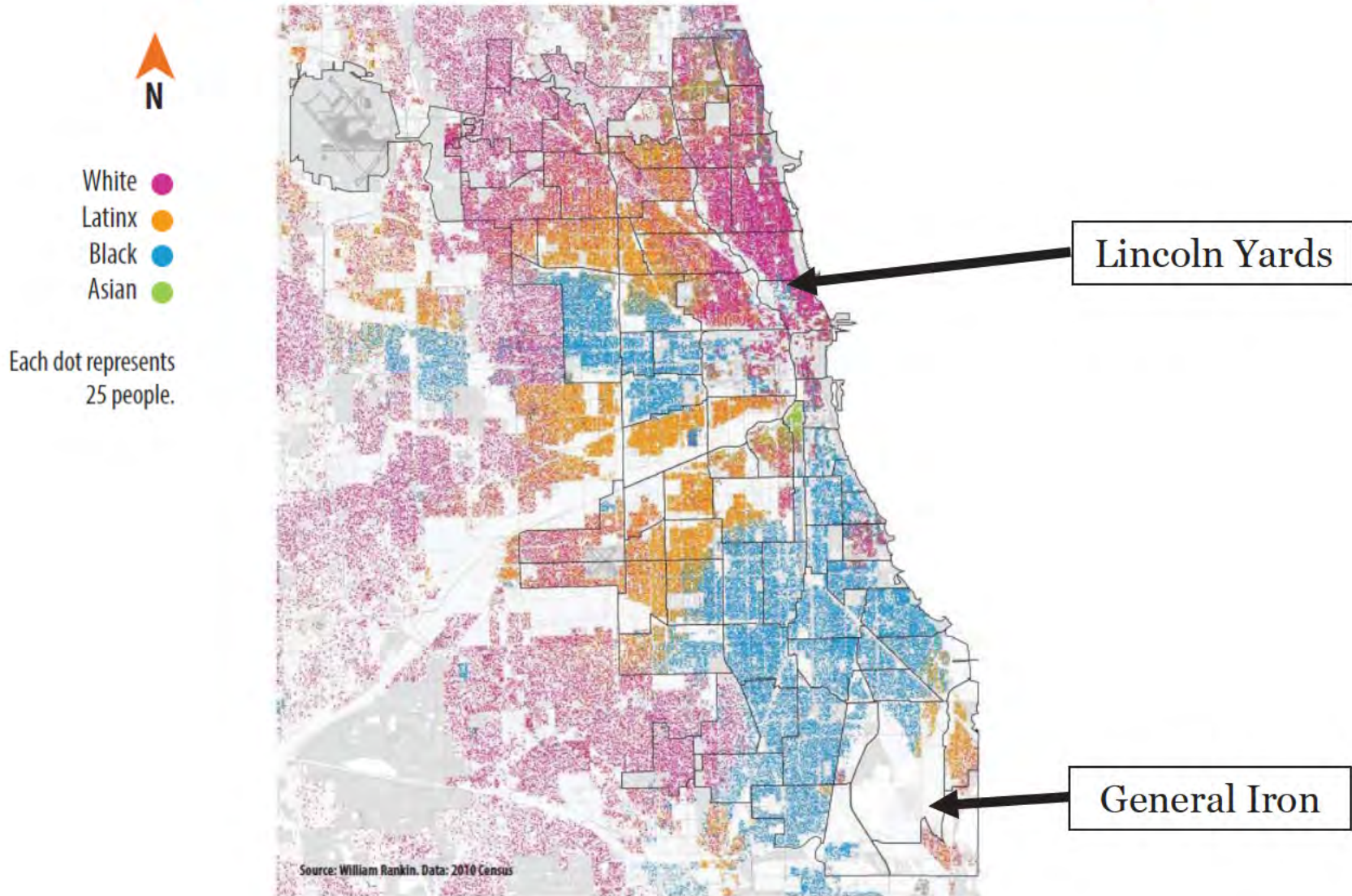


The Child Opportunity Index measures community characteristics that influence a child's health and development. These features are organized into three overarching domains of opportunity: educational, health and environmental, and social and economic. All of these factors are combined into a relative, composite measure of overall opportunity for children living within a particular community.

- Components of the Child Opportunity Index**
- Educational*
- Adult educational attainment
 - Student (school) poverty rate
 - Reading proficiency rate
 - Math proficiency rate
 - Early childhood education neighborhood participation patterns
 - High school graduation rate
 - Proximity to high-quality early childhood education centers
 - Proximity to early childhood education centers of any type

- Health & Environmental*
- Retail healthy food index
 - Proximity to toxic waste release sites
 - Volume of nearby toxic release
 - Proximity to parks and open spaces
 - Housing vacancy rates
 - Proximity to health care facilities
- Social & Economic*
- Neighborhood foreclosure rate
 - Poverty rate
 - Unemployment rate
 - Public assistance rate
 - Proximity to employment

THE RACIAL AND ETHNIC COMPOSITION OF CHICAGOLAND, 2010



Hendricks, Kasey; Amanda E Lewis, Ivan Arenas, & Deana G. Lewis, "A Tale of Three Cities: The State of Racial Justice in Chicago Report." University of Illinois: Institute for Research on Race and Public Policy. (May 19, 2017) , p. 23

Equitable Development: SE Side- Health Impacts



Pollution and Covid-19

- The same southeast side communities that are environmentally overburdened, are the same communities more negatively impacted by Covid-19.
- Companies, like RMG, who pollute our air, land, and water, ***make the population less able to fight and survive when health challenges come up, like Covid-19***, which disproportionately affect people with pre-existing conditions (like asthma, cancer, heart disease).

Commentary: COVID-19 Racial Disparities

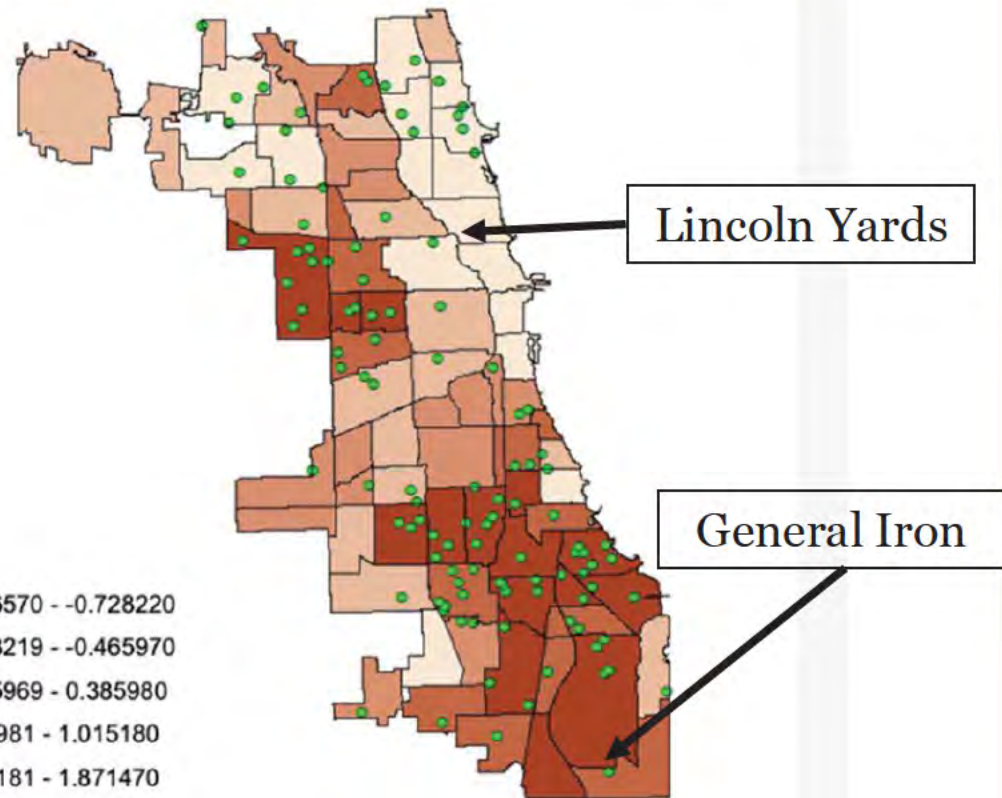
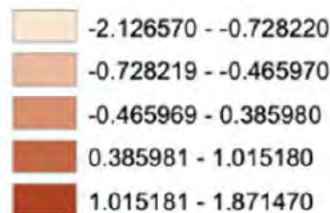
Alexis Grant and Jeni Hebert-Beirne, PhD, SPH Collaboratory for Health Justice | Posted on April 23, 2020



Risk scores by zip code

As of April 6, 2020

Locations of COVID-19 fatalities represented by green dots



While we may all be in this pandemic together, public health professionals knew, communities of color would bare a disproportionate burden of the effects of COVID-19. To track the effects of systemic racism, public health experts examine data on infection and hospitalizations by race/ethnicity. On Monday, April 6, we finally saw these figures for Chicago, and they were not surprising.

Source: <https://publichealth.uic.edu/news-stories/commentary-covid-19-racial-disparities/>

CHICAGO COVID-19: New Case Counts by Zip code

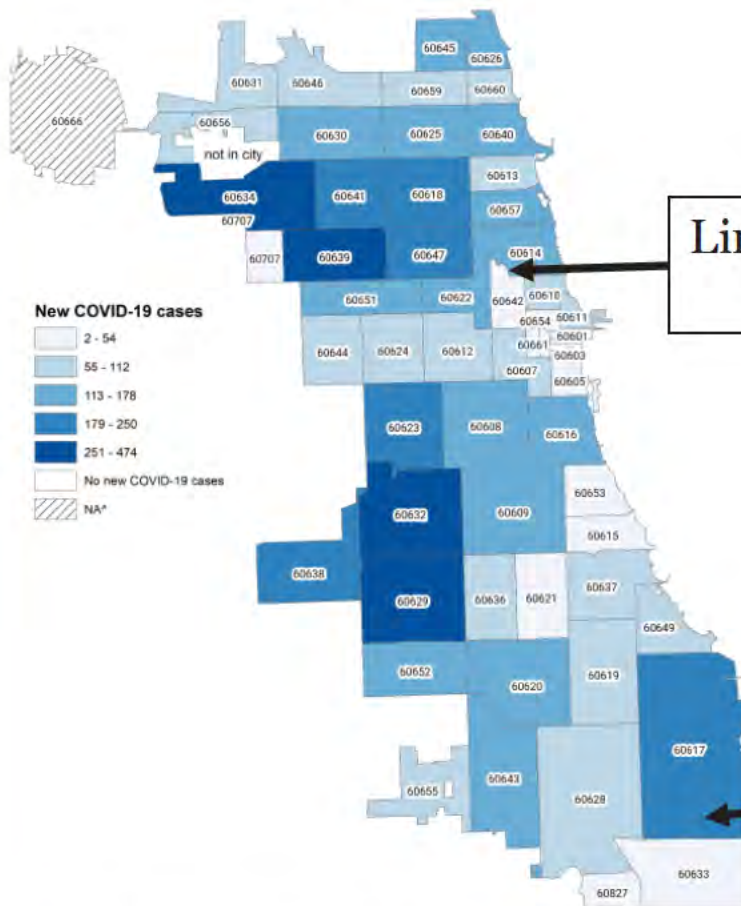
January 7, 2021

Newly Confirmed COVID-19 Cases by Chicago zip code n=7,217
week ending January 2, 2021

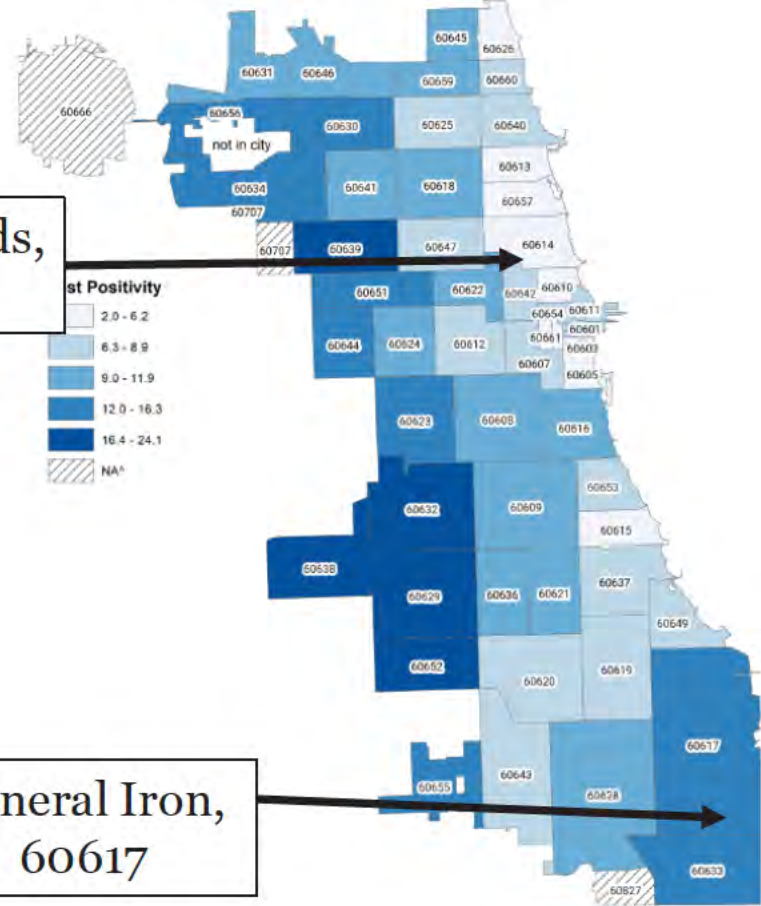
CHICAGO COVID-19: Test Positivity by Zip code

January 7, 2021

COVID-19 Test Positivity by Chicago zip code
Week ending Saturday January 2, 2021



Lincoln Yards,
60614



General Iron,
60617

*Please note that 7,217 COVID-19 cases out of 7,261 COVID-19 cases had a valid Chicago zip code.
*Zip codes with no population.
Data Source: Providers reporting to CDPH through the Illinois National Electronic Disease Surveillance System



*Zip code with no population, zip codes extend beyond Chicago boundary
Data Source: Providers reporting to CDPH through the Illinois National Electronic Disease Surveillance System

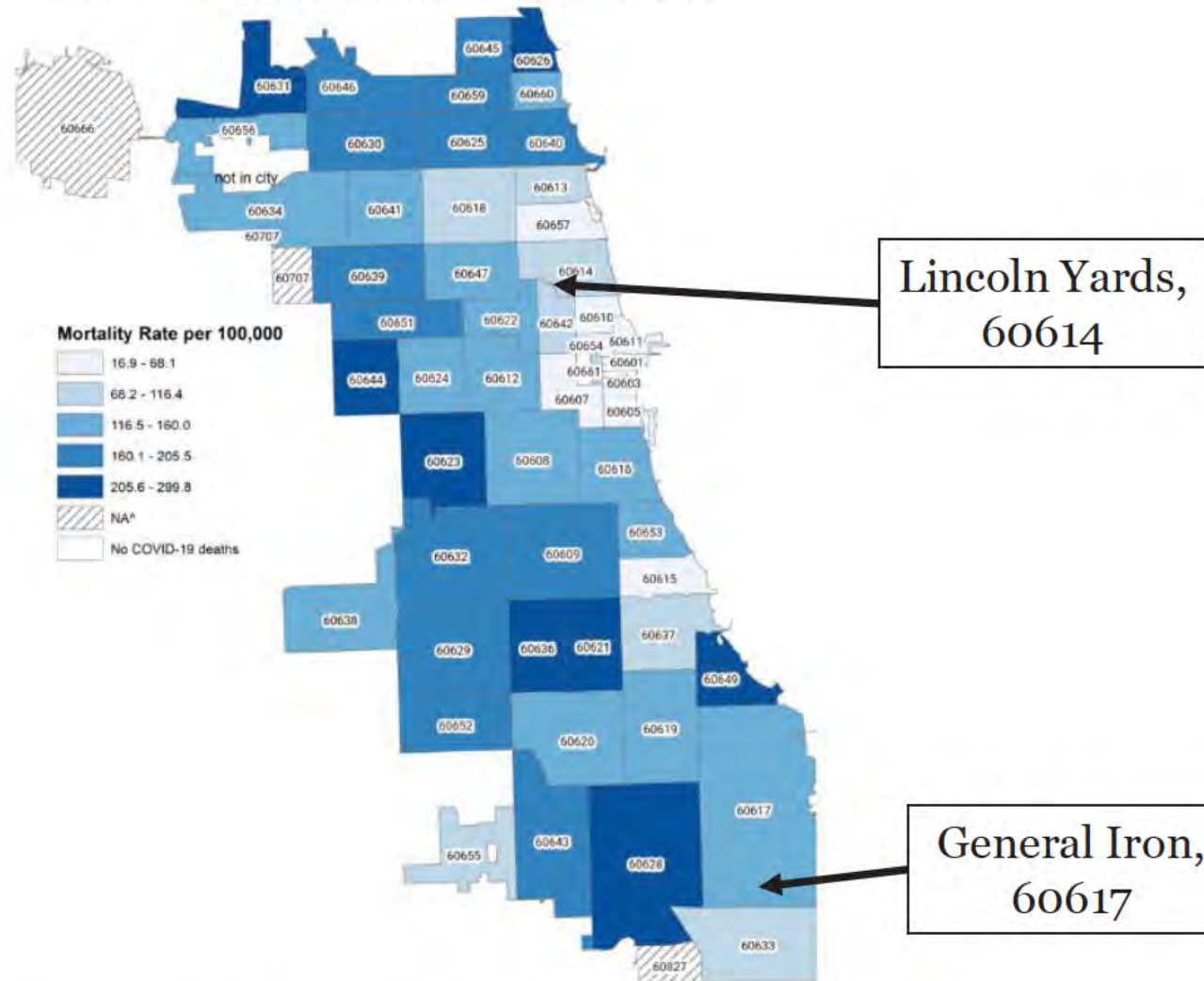




CHICAGO COVID-19: Mortality Rates by Zip code

January 7, 2021

COVID-19 Mortality Rate per 100,000 population by zip code among Chicago residents N=4,206* through January 6, 2021



Note: *The map includes 4,206 of the 4,258 COVID-19 deaths confirmed by laboratory testing and zip codes with mortality rates shown.
*Rates for zip codes with very small underlying populations or where population extend outside the city are not shown.
Data Source: Illinois National Electronic Disease Surveillance System, Cook County Medical Examiner's Office, IDPH Vital Records
There are deaths from COVID-19 that remain unreported or under investigation that are not reflected on this map.

Equitable Development: SE Side- Environmentally Overburdened



General Iron

- Lincoln Park residents have been complaining for years about the environmental impacts of General Iron, esp. air & noise pollution.
 - The company has had a number of EPA violations.
 - It would greatly increase truck traffic and significantly increase air pollutant emissions from diesel trucks.
 - From 200 trucks to 1400 trucks a week on local roads.
- Both companies (RMG & General Iron) had fatalities last 2 years, raising questions on worker safety conditions.

Summary



- We are tired of being the dumping ground for the City.
- We are fighting environmental racism.
 - *(See previous maps for disparities, along racial/ethnic lines).*
- We urge the City of Chicago to deny the RMG Recycling Permit.

From: Leuise Crumble [REDACTED]
Sent: Thursday, January 14, 2021 3:25 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Leuise Crumble

[REDACTED]
Chicago, IL 60624

From: Richard Swanson [REDACTED] >
Sent: Thursday, January 14, 2021 3:27 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Richard Swanson
[REDACTED]
Brookfield, IL 60513

From: Sandra Laase <[REDACTED]>
Sent: Thursday, January 14, 2021 3:36 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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I STRONGLY OPPOSE THE RELOCATION OF GENERAL IRON TO THE SOUTHEAST SIDE. IF IT WASN'T SAFE ON THE NORTH SIDE, IT IS NOT SAFE ON THE SOUTHEAST SIDE. To approve the permit is ENVIRONMENTAL RACISM! Do the right thing: DENY THE PERMIT!

Thank you for your consideration,

Sincerely,
Sandra Laase

[REDACTED]
Chicago, IL 60646

From: Paul Cooper [REDACTED]
Sent: Thursday, January 14, 2021 3:39 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Paul Cooper

[REDACTED]
Evanston, IL 60201

From: Ellen Moderhack [REDACTED]
Sent: Thursday, January 14, 2021 3:43 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Ellen Moderhack

[REDACTED]
Chicago, IL 60625

From: John Weber [REDACTED]
Sent: Thursday, January 14, 2021 3:48 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
John Weber

[REDACTED]
Park Forest, IL 60466

From: Robert Yancey <[REDACTED]>
Sent: Thursday, January 14, 2021 3:51 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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Thank you for your consideration,

Sincerely,
Robert Yancey

[REDACTED]
SORENTO, IL 62086

From: Linda Waycie [REDACTED]
Sent: Thursday, January 14, 2021 3:56 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Linda Waycie

[REDACTED]
Mt Prospect, IL 60056

From: Chuck Stark [REDACTED] >
Sent: Thursday, January 14, 2021 4:04 PM
To: envcomments
Subject: Deny the Permit for Reserve Management Group

[Warning: External email]

To Whom it May Concern,

My name is Chuck Stark. I am a science teacher at George Washington High School. I stand in solidarity with the South East Side residents who are calling for this final permit to be denied.

On page 4 of the City of Chicago Air Quality and Health Report, published this year 2020, the city acknowledges the dangers of air pollution and the disproportionate impact on neighborhoods of color:

“Air pollution is harmful to Chicago residents’ health and quality of life. Exposure to pollutants such as ozone and PM2.5 is associated with increased risk of lung irritation, respiratory problems, cardiovascular disease, asthma, cancer, and early death. PM2.5 pollution, which can penetrate deep into the lungs, is particularly damaging. Our estimates suggest that 5% of premature deaths in Chicago each year can be attributed to exposure to PM2.5.

Communities with low socioeconomic status and high rates of chronic health conditions are especially vulnerable to the impacts of air pollution. In Chicago, with its history of segregation and disinvestment in Black and Latinx communities, the differences between neighborhoods can be stark. Some communities have rates of poverty, cardiovascular disease, and chronic obstructive pulmonary disease (COPD) that are ten times greater than others. Structural racism and economic hardship contribute to this gap, making it more likely for certain people to live in polluted communities and less likely to have access to health care and good jobs that can mitigate negative impacts.”

The expansion of RMG’s facilities, a half mile from George Washington High School, will contribute to more PM2.5, being released in to the already overburdened air surrounding the school and neighborhood. Why do the students at GWHS and the mostly Latinx families in the SE side of the city have to pay the cost of this recycling service? Why should they have more particulate matter penetrate deep in their lungs so the rest of the city can enjoy the benefits of metal shredding? This is what environmental racism looks like.

You still have a chance to do the right thing: to protect and to fight with the residents of the South East Side, not against them.

We deserve clean air. Deny the final permit.

Sincerely,

Chuck Stark

From: Ariana Bancu [REDACTED] >
Sent: Thursday, January 14, 2021 4:05 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Ariana Bancu

[REDACTED]
Chicago, IL 60618

From: Connie Schmidt [REDACTED] >
Sent: Thursday, January 14, 2021 4:05 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Connie Schmidt

[REDACTED]
Warrenville, IL 60555

From: June Rosner [REDACTED]
Sent: Thursday, January 14, 2021 4:07 PM
To: envcomments
Cc: info@fotp.org
Subject: General Iron

[Warning: External email]

If the City of Chicago allows General Iron to relocate on the city's 10th Ward, I will be shocked and disappointed with Mayor Lori Lightfoot and her administration. I supported Mayor Lightfoot because she told me she was going to put an end to Chicago's corrupt political system. General Iron has been a part of that system for years and is responsible for major pollution damaging the health of thousands of Chicagoans. So powerful is General Iron that no politician would take them on.

Mayor Lightfoot can. Will she?

June ROSNER.

Lincoln Park

Sent from my iPhone

From: Emily Reusswig [REDACTED] >
Sent: Thursday, January 14, 2021 4:14 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Emily Reusswig

[REDACTED]
Chicago, IL 60660

From: Steven Serikaku [REDACTED]
Sent: Thursday, January 14, 2021 4:20 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Steven Serikaku

[REDACTED]
Chicago, IL 60660

From: Juli Litzkow [REDACTED] >
Sent: Thursday, January 14, 2021 4:22 PM
To: envcomments
Attachments: IMG_3129.jpeg

[Warning: External email]



January 14, 2020

Dr. Allison Arwardy
Commissioner of the Chicago
Department of Public Health

Dear Dr. Arwardy,

Friends of the Parks (FOTP) is an Illinois not-for-profit organization founded in 1975 and dedicated to promoting healthy parks in the City of Chicago. Our goals include ensuring park lands are equitably distributed and managed across the city in a way that supports healthy

--

Juli



From: Jenny Hansen [REDACTED] >
Sent: Thursday, January 14, 2021 4:28 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side. We don't want their toxic pollution here!

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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Thank you for your consideration,

Sincerely,
Jenny Hansen

[REDACTED]
Chicago, IL 60615

From: Julilitzkow [REDACTED] >
Sent: Thursday, January 14, 2021 4:25 PM
To: envcomments
Subject: Please Deny Permit!!

[Warning: External email]



January 14, 2020

Dr. Allison Arwardy
Commissioner of the Chicago
Department of Public Health

Dear Dr. Arwardy,

Friends of the Parks (FOTP) is an Illinois not-for-profit organization founded in 1975 and dedicated to promoting healthy parks in the City of Chicago. Our goals include ensuring park lands are equitably distributed and managed across the city in a way that supports healthy



As such, we write to you regarding the pending air pollution control permit filed by Reserve Management Group (RMG) for the purpose of relocating General Iron's recycling operations to the Southeast Side at [11600 S. Burley Avenue](#). FOTP urges you to consider the following factors and deny this permit. The City of Chicago should not facilitate the relocation of dangerous operations that offer environmental threats to the 10th Ward, an already overburdened Environmental Justice



The proposed relocation site of General Iron by its parent company RMG, to [11600 S. Burley Avenue](#), is within walking distance of Rowan Park. Rowan Park is adjacent to George Washington High School and serves as space for high school students to participate in recreational activities. Additionally, Rowan Park is a key gathering place for the 10th Ward community, where residents regularly visit for their physical and mental health--and especially now, amidst a pandemic in which more people



This is not the first instance of the City of Chicago being complacent in allowing polluters to be sited near local parks. Finkl Steel moved its operations to Burnside within a couple of blocks of Burnside Park and Byrnes Park, and the MAT Asphalt plant continues to emit fumes on McKinley Park. Low-income communities and communities of color that we now find are experiencing particularly high rates of COVID-19 are bearing the brunt of these poor decisions, and their health and well-being continue to be threatened. The



to turn a blind eye to the issue of environmental threats being located near parks, including this most timely issue on the Southeast Side.

The science behind the pollution putting the Southeast Side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into the environment from RMG/General Iron and put resident's lung health and immune systems at risk and further compromise the health of the 10th Ward community



targets respiratory systems.

- George Washington High School conducted a study that found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, wind will carry pollutants directly to the learning environment of students and towards community members using Rowan Park.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air



- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased lifespan.

The Southeast Side historically has battled petcoke and manganese, to name a few. Just recently, arsenic



Meanwhile, the Confined Disposal Facility at the confluence of the Calumet River and the lakefront is leaking PCBs, mercury, arsenic, and lead back into our water supply, an issue which the Army Corps of Engineers tried to keep from public view.

As all of Chicago has seen, the operations at the General Iron site in Lincoln Park have led to an explosion in May 2020 and a fire in November 2020. Lincoln Park residents have long monitored bad smells, questionable dust, and other



threat to their health and safety out of their neighborhood. So we believe that Southeast Side residents have good reason to be concerned. We stand in solidarity with 10th Ward residents in saying that if it isn't good enough for Lincoln Park, it isn't good enough for the predominantly Latino and African-American 10th Ward.

We see this as a great opportunity for the City of Chicago to go back to the drawing board and create environmentally just policies that uplift our overburdened communities. Again, we respectfully



that it isn't good enough for
Lincoln Park, it isn't good enough
for the predominantly Latino and
African-American 10th Ward.

We see this as a great opportunity
for the City of Chicago to go back
to the drawing board and create
environmentally just policies that
uplift our overburdened
communities. Again, we respectfully
request that CDPH deny the permit
to operate a large recycling facility
in the 10th Ward.

Sincerely,

Juli

From: Foluke Akanni [REDACTED] >
Sent: Thursday, January 14, 2021 4:31 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Foluke Akanni

[REDACTED]
Chicago, IL 60606

From: Karen Butler [REDACTED] >
Sent: Thursday, January 14, 2021 4:39 PM
To: envcomments
Subject: Deny Approval for General Iron

[Warning: External email]

Good afternoon.

General Iron's parent company, RMG, needs the final stamp of approval from the Chicago Department of Public Health before moving its scrap metal shredder from Lincoln Park to the 10th Ward, close to neighborhood parks and schools.

I urge you not to approve operations at the new location. Of particular concern is the fact that the company will emit particulate matter of a type that is harmful to human health. This type of activity is too polluting to be allowed to begin operating at a site close to parks and schools.

Sincerely,
Karen Butler

Karen

From: Linda Gonzalez [REDACTED] >
Sent: Thursday, January 14, 2021 4:42 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,
Linda Gonzalez, LCSW
A New World Bread, LLC

Sincerely,
Linda Gonzalez
[REDACTED]
Chicago, IL 60617

From: Jack Bizot [REDACTED]
Sent: Thursday, January 14, 2021 5:05 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Jack Bizot

[REDACTED]
Oak Park, IL 60302

From: Rod Fletcher [REDACTED] >
Sent: Thursday, January 14, 2021 5:06 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Rod Fletcher

[REDACTED]
Urbana, IL 61802

From: Car Notorangelo <[REDACTED]>
Sent: Thursday, January 14, 2021 5:09 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Car Notorangelo

[REDACTED]
Homewood, IL 60430

From: emily beaufort [REDACTED] >
Sent: Thursday, January 14, 2021 5:09 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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This should also never be put on the west side of Chicago.

Thank you for your consideration,

Sincerely,
emily beaufort
[REDACTED]
chicago, IL 60624

From: Karen McGinnis [REDACTED]
Sent: Thursday, January 14, 2021 5:10 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

Stop the crap! Keep it in your Own yard.

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Karen McGinnis

[REDACTED]
Midlothian, IL 60445

From: M Daniel [REDACTED]
Sent: Thursday, January 14, 2021 5:14 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
M Daniel

[REDACTED]
Chicago, IL 60611

From: Bill Theisen [REDACTED]
Sent: Thursday, January 14, 2021 5:14 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Bill Theisen

[REDACTED]
Northbrook, IL 60062

From: Roberta Kessler [REDACTED] >
Sent: Thursday, January 14, 2021 5:16 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Roberta Kessler
[REDACTED]
Crest Hill, IL 60403

From: Sophia Vela [REDACTED] >
Sent: Thursday, January 14, 2021 5:17 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Sophia Vela
[REDACTED]
Chicago, IL 60617

From: Morgan Snedden <[REDACTED]>
Sent: Thursday, January 14, 2021 5:19 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Morgan Snedden

[REDACTED]
Monee, IL 60449

From: Rebecca Ratliff [REDACTED]
Sent: Thursday, January 14, 2021 5:23 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground, particularly while we are in the midst of handling a virus which we now understand has more severe outcomes for those in heavily polluted environments.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Rebecca Ratliff

[REDACTED]
Chicago, IL 60640

From: Kalina Malyszko [REDACTED]
Sent: Thursday, January 14, 2021 5:23 PM
To: envcomments
Cc: info@fotp.org
Subject: re: RMG relocation near Rowan Park

[Warning: External email]

January 14, 2020

Dr. Allison Arwardy
Commissioner of the Chicago Department of Public Health

Dear Dr. Arwardy,

Friends of the Parks (FOTP) is an Illinois not-for-profit organization founded in 1975 and dedicated to promoting healthy parks in the City of Chicago. Our goals include ensuring park lands are equitably distributed and managed across the city in a way that supports healthy communities and a healthy environment.

As such, we write to you regarding the pending air pollution control permit filed by Reserve Management Group (RMG) for the purpose of relocating General Iron's recycling operations to the Southeast Side at 11600 S. Burley Avenue. FOTP urges you to consider the following factors and deny this permit. The City of Chicago should not facilitate the relocation of dangerous operations that offer environmental threats to the 10th Ward, an already overburdened Environmental Justice community.

The proposed relocation site of General Iron by its parent company, RMG, to 11600 S. Burley Avenue, is within walking distance of Rowan Park. Rowan Park is adjacent to George Washington High School and serves as space for high school students to participate in recreational activities. Additionally, Rowan Park is a key gathering place for the 10th Ward community, where residents regularly visit for their physical and mental health--and especially now, amidst a pandemic in which more people than ever are turning to outdoor spaces to socially-distance.

This is not the first instance of the City of Chicago being complacent in allowing polluters to be sited near local parks. Finkl Steel moved its operations to Burnside within a couple of blocks of Burnside Park and Byrnes Park, and the MAT Asphalt plant continues to emit fumes on McKinley Park. Low-income communities and communities of color that we now find are experiencing particularly high rates of COVID-19 are bearing the brunt of these poor decisions, and their health and well-being continues to be threatened. The City of Chicago must not continue to turn a blind eye to the issue of environmental threats being located near parks, including this most timely issue on the Southeast Side.

The science behind the pollution putting the Southeast Side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into the environment from RMG/General Iron and put resident's lung health and immune systems at risk and further compromise the health of the 10th Ward community amidst a pandemic that targets respiratory systems.
- George Washington High School conducted a study that found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, wind will carry pollutants directly to the learning environment of students and towards community members using Rowan Park.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased lifespan.

The Southeast Side historically has battled petcoke and manganese, to name a few. Just recently, arsenic and lead were found in children's baseball fields in the area. Meanwhile, the Confined Disposal Facility at the confluence of the Calumet River and the lakefront is leaking PCBs, mercury, arsenic, and lead back into our water supply, an issue which the Army Corps of Engineers tried to keep from public view.

As all of Chicago has seen, the operations at the General Iron site in Lincoln Park have led to an explosion in May 2020 and a fire in November 2020. Lincoln Park residents have long monitored bad smells, questionable dust, and other concerns associated with this operation and organized to get this threat to their health and safety out of their neighborhood. So we believe that Southeast Side residents have good reason to be concerned. We stand in solidarity with 10th Ward residents in saying that if it isn't good enough for Lincoln Park, it isn't good enough for the predominantly Latino and African-American 10th Ward.

We see this as a great opportunity for the City of Chicago to go back to the drawing board and create environmentally just policies that uplift our overburdened communities. Again, we respectfully request that CDPH deny the permit to operate a large recycling facility in the 10th Ward.

Sincerely,

Kalina Malyszko

From: Alison Bruegger [REDACTED]
Sent: Thursday, January 14, 2021 5:23 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

Environmental justice is SO IMPORTANT.

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,
Alison

Sincerely,
Alison Bruegger

[REDACTED]
Chicago, IL 60657

From: Brandon Marks [REDACTED] >
Sent: Thursday, January 14, 2021 5:23 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Brandon Marks

[REDACTED]
Chicago, IL 60647

From: Patrick Herrera [REDACTED]
Sent: Thursday, January 14, 2021 5:30 PM
To: envcomments
Cc: info@fotp.org
Subject: RE: "NO" to RMG and General Iron's operations on the Southeast Side

[Warning: External email]

My name is Patrick Herrera, lifelong Southeast Side resident, Chicago Public School paraprofessional, and concerned citizen. I share this in the spirit of civic engagement, personal commitment and as a friend to the Friends of the Parks organization. Thank you.

January 14, 2020

Dr. Allison Arwardy
Commissioner of the Chicago Department of Public Health

Dear Dr. Arwardy,

Friends of the Parks (FOTP) is an Illinois not-for-profit organization founded in 1975 and dedicated to promoting healthy parks in the City of Chicago. Our goals include ensuring park lands are equitably distributed and managed across the city in a way that supports healthy communities and a healthy environment.

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The Southeast Side historically has battled petcoke and manganese, to name a few. Just recently, arsenic and lead were found in children's baseball fields in the area. Meanwhile, the Confined Disposal Facility at the confluence of the Calumet River and the lakefront is leaking PCBs, mercury, arsenic, and lead back into our water supply, an issue which the Army Corps of Engineers tried to keep from public view.

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We see this as a great opportunity for the City of Chicago to go back to the drawing board and create environmentally just policies that uplift our overburdened communities. Again, we respectfully request that CDPH deny the permit to operate a large recycling facility in the 10th Ward.

Sincerely,

Juanita Irizarry
Executive Director

The Southeast Side is not a dumping ground. The City of Chicago should not allow this hazardous company to move to an Environmental Justice community that has been overburdened with toxic pollution for generations.

We thank you for your support in helping us on behalf of Healthy Parks for a Healthy Chicago.

In unity,

Abigail Johnston
Policy and Communications Associate



From: Bridget Walsh [REDACTED]
Sent: Thursday, January 14, 2021 5:31 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Bridget Walsh

[REDACTED]
Chicago, IL 60622

From: Elise Mattenson [REDACTED]
Sent: Thursday, January 14, 2021 5:32 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Elise Mattenson

[REDACTED]
Chicago, IL 60618

From: Dianna Uchida [REDACTED]
Sent: Thursday, January 14, 2021 5:32 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Dianna Uchida

[REDACTED]
Chicago, IL 60615

From: Nelly mares [REDACTED]
Sent: Thursday, January 14, 2021 5:33 PM
To: envcomments
Subject: NO TO RMG/ GENERAL IRON

[Warning: External email]

To whom it may concern,

I am a resident in 10th ward, my home is within a couple of miles of the concerning location and I am a parent of a students at George Washington High School.

I am writing to you to demand that the permit is denied to the serial polluters General Iron/ RMG . Our community is already heavy polluted please do not add more pollutants to our environment. Our air is smelly and heavy our community should not have to carry the burden of being city's dump ground.

Thank you,

Nelly Martinez

--

null

From: Catherine Freund [REDACTED]
Sent: Thursday, January 14, 2021 5:35 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

To Whom it May Concern:

I'm a resident in Chicago's Logan Square neighborhood, a paralegal, a community member, and a lover of our city spaces. Like any resident of any city, I value clean air, quiet streets, and a healthy environment for myself and my neighbors. Which is why when I heard of General Iron's permit request to place a metal shredder in a neighborhood with a school, I was appalled.

I am therefore writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response and that RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side, and to all residents of the city. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,
Catherine Freund

Sincerely,
Catherine Freund

[REDACTED]
Chicago, IL 60647

From: Erin Barlow [REDACTED]
Sent: Thursday, January 14, 2021 5:36 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,
Erin Barlow

Sincerely,
Erin Barlow

[REDACTED]
Chicago, IL 60625

From: Jennifer Futterman [REDACTED]
Sent: Thursday, January 14, 2021 5:37 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,
Jennifer Futterman

Sincerely,
Jennifer Futterman
[REDACTED]
Highland Park, IL 60035

From: Laura Haule [REDACTED]
Sent: Thursday, January 14, 2021 5:38 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side. Why is it fair to remove a dirty polluter from the north side and relocate it to a poor neighborhood on the other side of town? Air quality, noise, odors, nuisances like this are nuisances wherever they are located and whomever has to have them in their neighborhood. Don't allow it!

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Laura Haule
[REDACTED]
Warrenville, IL 60555

From: Carole Smith [REDACTED]
Sent: Thursday, January 14, 2021 5:40 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Carole Smith

[REDACTED]
Winnetka, IL 60093

From: Patricia Morse [REDACTED]
Sent: Thursday, January 14, 2021 5:44 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Patricia Morse
[REDACTED]
Chicago, IL 60615

From: Xochitl Lopez [REDACTED]
Sent: Thursday, January 14, 2021 5:45 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Xochitl Lopez

[REDACTED]
Matteson, IL 60443

From: Jennifer Rodríguez [REDACTED]
Sent: Thursday, January 14, 2021 5:46 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

If it is not safe and acceptable for Lincoln Park, it is not safe and acceptable for the Southeast side. Environmental racism, like all racism, must be eradicated. It must stop NOW.

Thank you for your consideration,

Sincerely,
Jennifer Rodríguez
[REDACTED]
Chicago, IL 60623

From: Kristin Pink [REDACTED] >
Sent: Thursday, January 14, 2021 5:48 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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Thank you for your consideration,

Sincerely,
Kristin Pink

[REDACTED]
Orland Park, IL 60467

From: Patrick Herrera [REDACTED]
Sent: Thursday, January 14, 2021 5:48 PM
To: envcomments
Cc: info@fotp.org
Subject: "NO" - to RMG and General Iron operations on Southeast Side

[Warning: External email]

My name is Patrick Herrera, lifelong Southeast Side resident, Chicago Public School paraprofessional, and concerned citizen. I share this in the spirit of civic engagement, personal concern, and the hope that our home on the Southeast Side will no longer be used as a dumping ground for disengaged and harmful industries. Thank you.

General Iron's parent company, RMG, needs the final stamp of approval from the Chicago Department of Public Health before moving their scrap metal shredder from Lincoln Park to the 10th Ward, just down the street from Rowan Park. We say no!

General Iron is a bad actor with a history of pollution violations, explosions, and fires. This isn't a company that belongs on the Southeast Side, or anywhere near neighborhood parks and schools.

Please keep General Iron "OUT" of my neighborhood and away from schools, parks, green spaces, and working class families.

Sincerely,
Patrick J. Herrera

From: Barbara Hill [REDACTED]
Sent: Thursday, January 14, 2021 5:49 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Barbara Hill

[REDACTED]
Palatine, IL 60074

From: Katie Fleming [REDACTED] >
Sent: Thursday, January 14, 2021 5:51 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Katie Fleming
[REDACTED]
Chicago, IL 60613

From: Courtney Moran [REDACTED]
Sent: Thursday, January 14, 2021 5:53 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Courtney Moran
[REDACTED]
Chicago, IL 60608

From: Julissa Leon [REDACTED]
Sent: Thursday, January 14, 2021 5:55 PM
To: envcomments
Subject: Public Comment 1/14/2021

[Warning: External email]

"Hello,

My name is **Julissa Leon** and I am a **community member**, (parent, student, community member, resident, etc). I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

-
- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
-
-
- A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health.
-
-
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.
-

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,

Julissa Leon

From: Carlos Torres [REDACTED] >
Sent: Thursday, January 14, 2021 5:57 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Carlos Torres
[REDACTED]
Chicago, IL 60623

From: Declan Ryan [REDACTED]
Sent: Thursday, January 14, 2021 5:58 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I am asking that the City of Chicago not grant the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at 11600 S Burley Avenue.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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Thank you for your consideration,

Declan Ryan
[REDACTED]

Chicago, IL 60657

Sincerely,
Declan Ryan
[REDACTED]

Chicago, IL 60657

From: Rolando Perez [REDACTED]
Sent: Thursday, January 14, 2021 5:58 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side. Not good on so many levels!!!

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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Thank you for your consideration,

Sincerely,
Rolando Perez

[REDACTED]
Chicago, IL 60632

From: Susan Zimny [REDACTED]
Sent: Thursday, January 14, 2021 6:00 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Susan Zimny

[REDACTED]
Chicago, IL 60641

From: Yesenia Chavez [REDACTED] >
Sent: Thursday, January 14, 2021 6:00 PM
To: envcomments
Subject: Deny the permit - Public comment for General Iron - Yesenia

[Warning: External email]

To whom it may concern,

My name is Yesenia Chavez and I am a student, community organizer, and resident of the 10th ward. I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
- A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard to fill your pocket with profit.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,
Yesenia

From: Anna DiStefano <[REDACTED]>
Sent: Thursday, January 14, 2021 6:03 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Anna DiStefano

[REDACTED]
Chicago, IL 60608

From: mary mccloskey [REDACTED] >
Sent: Thursday, January 14, 2021 6:05 PM
To: envcomments
Subject: Deny General Iron's Permit

[Warning: External email]

Dear Mayor Lightfoot and Chicago Dept. of Public Health:

I live in Southeast Chicago, where we already have our fair share of dangerous pollution. Now that could be made worse if General Iron is allowed to move to our largely black and brown neighborhood from white Lincoln Park.

That's why I'm calling on the city of Chicago and the Department of Public Health to DENY the final permit that General Iron needs to move here. Issuing this permit would be an act of environmental racism.

Please do the right thing.

Sincerely,
Registered Chicago Voter

mary mccloskey
[REDACTED]

60302

From: Pete Leki [REDACTED]
Sent: Thursday, January 14, 2021 6:13 PM
To: envcomments
Cc: info@fotp.org
Subject: Testimony on Permit for iron smelter
Attachments: DOE letter on smelter.odt

[Warning: External email]

January 14, 2021

Dear Doctor Arwady,

I write to object to the placement of General Iron's relocation to a Southside neighborhood. I am the Director of Ecology Programs at Waters Elementary School in the NorthCenter Neighborhood. We have a long history of advocacy for the environment and for environmental justice. One cannot imagine what the response would be if such a facility was located near our beautiful neighborhood. This proposal seems blind to the health and social effects of this facility. Our city is sadly full of spoiled and vacant land that could host such a facility, tightly regulated.

We are in a new day. Each decision impacts the course our society takes on an increasingly dangerous journey into the future.

I urge you to deny permits and find a more suitable place for this facility.

Sincerely,

Pete Leki
[REDACTED]

Chicago, IL 60618



January 14, 2021

Dear Doctor Arwady,

I write to object to the placement of General Iron's relocation to a Southside neighborhood. I am the Director of Ecology Programs at Waters Elementary School in the NorthCenter Neighborhood. We have a long history of advocacy for the environment and for environmental justice. One cannot imagine what the response would be if such a facility was located near our beautiful neighborhood. This proposal seems blind to the health and social effects of this facility. Our city is sadly full of spoiled and vacant land that could host such a facility, tightly regulated.

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I urge you to deny permits and find a more suitable place for this facility.

Sincerely,

Pete Leki

[REDACTED]
Chicago, IL 60618

[REDACTED]

From: Colleen Walsh [REDACTED]
Sent: Thursday, January 14, 2021 6:20 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Colleen Walsh

[REDACTED]
Blue Island, IL 60406

From: Hilary Austin [REDACTED]
Sent: Thursday, January 14, 2021 6:24 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Hilary Austin

[REDACTED]
CHICAGO, IL 60626

From: Laura Piskor [REDACTED]
Sent: Thursday, January 14, 2021 6:25 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Laura Piskor

[REDACTED]
BLUE ISLAND, IL 60406

From: patrick laflamme <[REDACTED]>
Sent: Thursday, January 14, 2021 6:26 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
patrick laflamme
[REDACTED]
blue island, IL 60406

From: Elisa Meggs [REDACTED]
Sent: Thursday, January 14, 2021 6:28 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Elisa Meggs

[REDACTED]
Chicago, IL 60626

From: Evelin Rodriguez [REDACTED]
Sent: Thursday, January 14, 2021 6:28 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Evelin Rodriguez
[REDACTED]
Chicago, IL 60633

From: cati2011 <[REDACTED]>
Sent: Thursday, January 14, 2021 6:30 PM
To: envcomments
Subject: General Iron and 10 ward

[Warning: External email]

Hello,

My name is Catalina Pelaez and I am a resident of the 10 ward of Chicago. I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
- A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. Not to mention the fact that the 10 Ward's air quality already poor do to past pollution from US steel. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,
Catalina Pelaez

From: cherylkay king [REDACTED] >
Sent: Thursday, January 14, 2021 6:34 PM
To: envcomments

[Warning: External email]

Please do not allow general iron to build in the South East Side of Chicago we have Too Many Families that will be affected by this iron company moving to the South East Side of Chicago If they were kicked out of Lincoln Park Why are they allowing them to come to the South East Side . South East Side is not a Place For general iron To relocate We don't need any more pollution In our Community.

From: Tessa Murray [REDACTED] >
Sent: Thursday, January 14, 2021 6:39 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Tessa Murray

[REDACTED]
Chicago, IL 60610

From: Anthony Ramirez [REDACTED]
Sent: Thursday, January 14, 2021 6:43 PM
To: envcomments
Subject: Deny and say NO to General Iron on the Southeast Side of Chicago

[Warning: External email]

January 14, 2020

Dr. Allison Arwardy
Commissioner of the Chicago Department of Public Health

Dear Dr. Arwardy,

As a lifelong South Chicago resident, I've seen how the pollutants of the long gone steel mills have affected the community. With poisoned land and petcoke that lingers long in the air. Adding another metal scrapyards to the southeast side is just adding insult to injury. And proves in the eyes of elected and city officials that the south side is disposable, a dumping ground for the more affluent parts of the city, and that will not stand. Please vote against and deny General Iron from coming to, polluting, and destroying an already devastated and disinvested Southeast side.

Friends of the Parks (FOTP) is an Illinois not-for-profit organization founded in 1975 and dedicated to promoting healthy parks in the City of Chicago. Our goals include ensuring park lands are equitably distributed and managed across the city in a way that supports healthy communities and a healthy environment.

As such, we write to you regarding the pending air pollution control permit filed by Reserve Management Group (RMG) for the purpose of relocating General Iron's recycling operations to the Southeast Side at 11600 S. Burley Avenue. FOTP urges you to consider the following factors and deny this permit. The City of Chicago should not facilitate the relocation of dangerous operations that offer environmental threats to the 10th Ward, an already overburdened Environmental Justice community.

The proposed relocation site of General Iron by its parent company, RMG, to 11600 S. Burley Avenue, is within walking distance of Rowan Park. Rowan Park is adjacent to George Washington High School and serves as space for high school students to participate in recreational activities. Additionally, Rowan Park is a key gathering place for the 10th Ward community, where residents regularly visit for their physical and mental health--and especially now, amidst a pandemic in which more people than ever are turning to outdoor spaces to socially-distance.

This is not the first instance of the City of Chicago being complacent in allowing polluters to be sited near local parks. Finkl Steel moved its operations to Burnside within a couple of blocks of Burnside Park and Byrnes Park, and the MAT Asphalt plant continues to emit fumes on McKinley Park. Low-income communities and communities of color that we now find are experiencing particularly high rates of COVID-19 are bearing the brunt of these poor decisions, and their health and well-being continues to be threatened. The City of Chicago must not continue to turn a blind eye to the issue of environmental threats being located near parks, including this most timely issue on the Southeast Side.

The science behind the pollution putting the Southeast Side community at risk is simple:

Particulate matter (PM 10 & PM 2.5) will be released into the environment from RMG/General Iron and put resident's lung health and immune systems at risk and further compromise the health of the 10th Ward community amidst a pandemic that targets respiratory systems.

George Washington High School conducted a study that found winds from RMG's location to blow Southwest to

Northeast. With the wind pattern present, wind will carry pollutants directly to the learning environment of students and towards community members using Rowan Park.

According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased lifespan.

The Southeast Side historically has battled petcoke and manganese, to name a few. Just recently, arsenic and lead were found in children's baseball fields in the area. Meanwhile, the Confined Disposal Facility at the confluence of the Calumet River and the lakefront is leaking PCBs, mercury, arsenic, and lead back into our water supply, an issue which the Army Corps of Engineers tried to keep from public view.

As all of Chicago has seen, the operations at the General Iron site in Lincoln Park have led to an explosion in May 2020 and a fire in November 2020. Lincoln Park residents have long monitored bad smells, questionable dust, and other concerns associated with this operation and organized to get this threat to their health and safety out of their neighborhood. So we believe that Southeast Side residents have good reason to be concerned. We stand in solidarity with 10th Ward residents in saying that if it isn't good enough for Lincoln Park, it isn't good enough for the predominantly Latino and African-American 10th Ward.

We see this as a great opportunity for the City of Chicago to go back to the drawing board and create environmentally just policies that uplift our overburdened communities. Again, we respectfully request that CDPH deny the permit to operate a large recycling facility in the 10th Ward.

Sincerely,

Anthony Ramirez

[Redacted signature]



From: Brad Spilka [REDACTED] >
Sent: Thursday, January 14, 2021 6:46 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Brad Spilka

[REDACTED]
Chicago, IL 60614

From: Elinor Montgomery [REDACTED] >
Sent: Thursday, January 14, 2021 6:46 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Elinor Montgomery
[REDACTED]
Evanston, IL 60201

From: Sandra Herald [REDACTED] >
Sent: Thursday, January 14, 2021 6:47 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Sandra Herald
[REDACTED]
Jacksonville, IL 62650

From: Allison Preble [REDACTED] >
Sent: Thursday, January 14, 2021 6:48 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Allison Preble
[REDACTED]
Chicago, IL 60641

From: Maggie Murray [REDACTED]
Sent: Thursday, January 14, 2021 6:51 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Maggie Murray
[REDACTED]
Chicago, IL 60610

From: Mary Shesgreen <[REDACTED]>
Sent: Thursday, January 14, 2021 6:51 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

To move General Iron to the Southeast Side is a clear example of environmental racism. Stop it.

Thank you for your consideration,

Sincerely,
Mary Shesgreen
[REDACTED]
Elgin, IL 60123

From: Anders Gustafson [REDACTED] >
Sent: Thursday, January 14, 2021 6:52 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Anders Gustafson

[REDACTED]
Chicago, IL 60613

From: Corinne Dougherty [REDACTED]
Sent: Thursday, January 14, 2021 6:53 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Corinne Dougherty

[REDACTED]
Chicago, IL 60614

From: Alexis Pelaez [REDACTED]
Sent: Thursday, January 14, 2021 6:55 PM
To: envcomments
Subject: General Iron/RMG

[Warning: External email]

Hello,

My name is Alexis Pelaez and I have been born and raised in the 10 ward of Chicago. I am reaching out to you today in regards to General Iron/RMG.

As a resident of the 10th Ward I have lived my whole life in a part of Chicago that is often overlooked and forgotten. Like many other residents, I am angry and tired of having limited resources and being treated less than in comparison to residents of other neighborhoods. Is it not enough that we already have poor air quality due to past pollution from U.S Steel? Much of which still has not been addressed or removed.

I stand in solidarity with my fellow 10th ward South East Side residents against General Iron and I implore you to as well.

Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.

A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health. According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Best,
Alexis Pelaez

From: Alexis Phillips [REDACTED]
Sent: Thursday, January 14, 2021 6:55 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I am writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Alexis Phillips

[REDACTED]
Chicago, IL 60614

From: Sima Shah [REDACTED]
Sent: Thursday, January 14, 2021 6:56 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Sima Shah

[REDACTED]
Chicago, IL 60618

From: Olivia Gotsch [REDACTED] >
Sent: Thursday, January 14, 2021 6:57 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm a concerned constituent from Hyde Park writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I absolutely agree with this response, which considered RMG's permit application "substantially deficient", underscoring the safety concerns of the community and the City at the new facility planned by RMG at the 11600 S. Burley site. The CDPH must not grant a permit to RMG for General Iron's latest incarnation on the Southeast Side, an area of the city which has already suffered too much from environmental racism to a degree that would never be tolerated in the city of Chicago's whiter and more affluent sectors.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. Moving operations to a new neighborhood won't put an end to these harmful practices, but instead ensure that they burden the predominantly Latinx Southeast side instead of the up and coming Lincoln Park area, in a show of optics rather than concern for citizen safety.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground. Environmental injustice already impacts Black and Brown citizens of Chicago disproportionately in comparison to their white neighbors. The decision of RMG to relocate to the Southeast side is just one more iteration in a long string of these injustices.

The city must remain true to the promises of environmental justice made by our mayor. To approve this move would be directly contrary to these promises, an injustice to the communities living on the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the North Side.

Thank you for your consideration,

Sincerely,
Olivia Gotsch

[REDACTED]
Chicago, IL 60637

From: joe omeara [REDACTED]
Sent: Thursday, January 14, 2021 7:00 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
joe omeara

[REDACTED]
blue island, IL 60406

From: A. Anne Holcomb [REDACTED]
Sent: Thursday, January 14, 2021 7:05 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I live on the Southeast side of Chicago, which is already an "environmental justice" community due present and past industrial polluters. I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
A. Anne Holcomb

[REDACTED]
Chicago, IL 60649

From: Antonette Slater [REDACTED]
Sent: Thursday, January 14, 2021 7:06 PM
To: envcomments
Subject: RMG/General Iron's permit

[Warning: External email]

My name is Antonette Slater and I am a resident of the Hegewisch neighborhood. I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

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- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
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- A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health.
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- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.
-

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,

Antonette Slater

[Sent from Yahoo Mail on Android](#)

From: Eli Schuck [REDACTED] >
Sent: Thursday, January 14, 2021 7:08 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Eli Schuck

[REDACTED]
Des Plaines, IL 60016

From: Tiana Schlottman [REDACTED]
Sent: Thursday, January 14, 2021 7:08 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Tiana Schlottman

[REDACTED]
Chicago, IL 60614

From: Grace Pollard <[REDACTED]>
Sent: Thursday, January 14, 2021 7:10 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Grace Pollard

[REDACTED]
Chicago, IL 60616

From: Alexander Jones [REDACTED]
Sent: Thursday, January 14, 2021 7:13 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Alexander Jones
[REDACTED]
Oak Park, IL 60302

From: Zoe Kronenberg [REDACTED]
Sent: Thursday, January 14, 2021 7:19 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Zoe Kronenberg
[REDACTED]
Chicago, IL 60613

From: Anna McVey [REDACTED]
Sent: Thursday, January 14, 2021 7:19 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

This is ridiculous. Polluting the southside is not an option. The southside is not your dumping ground.

You need to stop the cycle of oppression and degradation and not allow this final permit!!!

Sincerely,
Anna McVey
[REDACTED]
Chicago, IL 60660

From: Nichola Folinazzo <[REDACTED]>
Sent: Thursday, January 14, 2021 7:23 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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Thank you for your consideration,

Sincerely,
Nichola Folinazzo

[REDACTED]
Grayslake, IL 60030

From: Avi Waldman [REDACTED]
Sent: Thursday, January 14, 2021 7:24 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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Thank you for your consideration,

Sincerely,
Avi Waldman

[REDACTED]
Chicago, IL 60615

From: Anne Holcomb <[REDACTED]>
Sent: Thursday, January 14, 2021 7:32 PM
To: envcomments
Cc: Amalia Nieto-Gomez (amalia@asechicago.org)
Subject: No permit for General Iron

[Warning: External email]

I live on the Southeast Side of Chicago which is already an "environmental justice" community. But where is this "justice"?

We've had petcoke and manganese in our air, lead and oil in our soil, lead is in our water too, and chromium has been in our Lake Michigan. For decades our community has been overburdened by toxic industrial polluters, both past and present. And now General Iron could be moving in. Where is there "justice" in this?

Why doesn't General Iron stay in Lincoln Park? This is a rhetorical question and everyone who cares to read the paper, watch the news, or look at social media knows the answer. Lincoln Park wants General Iron out of their community.

Well, the Southeast Side of Chicago doesn't want General Iron either. And we believe, in the name of justice and racial equity, that General Iron (and any other name it tries to reinvent itself with) shouldn't be allowed in our community either. The people who live here don't want it here.

Do the right thing. Don't give General Iron those permits.

A. Anne Holcomb

[REDACTED]
Chicago, IL 60649
[REDACTED]

Sent from my T-Mobile 5G Device
Get [Outlook for Android](#)

From: Jo ann Bonner [REDACTED]
Sent: Thursday, January 14, 2021 7:33 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Jo ann Bonner
[REDACTED]
Chicago, IL 60617

From: Chris Jeske [REDACTED] >
Sent: Thursday, January 14, 2021 7:34 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,
Chris Jeske

Sincerely,
Chris Jeske

[REDACTED]
Park Ridge, IL 60068

From: Pilar Gutierrez [REDACTED] >
Sent: Thursday, January 14, 2021 7:38 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Pilar Gutierrez

[REDACTED]
Chicago, IL 60613

From: John Dwyer [REDACTED]
Sent: Thursday, January 14, 2021 7:43 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
John Dwyer

[REDACTED]
Huntley, IL 60142

From: Jeffery Slater [REDACTED]
Sent: Thursday, January 14, 2021 7:46 PM
To: envcomments
Subject: RMG/General Iron Permiy

[Warning: External email]

January 14, 2021

"Hello,

My name is Jeffery Slater and I am a resident. I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
- A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,

Jeffery Slater

From: ROBERT VELOZ JR [REDACTED]
Sent: Thursday, January 14, 2021 7:46 PM
To: envcomments
Subject: Deny operating permit to General Iron on the South East Side

[Warning: External email]

Dear City of Chicago Leaders;

My name is Robert Veloz Jr. and I am a resident of the east side .I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

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A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, wind will carry pollutants directly to the learning environment of our students and negatively impact their health.

According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,

(Robert Veloz Jr..

[REDACTED]
Chicago,Il. 60617

From: Leah Ray [REDACTED] >
Sent: Thursday, January 14, 2021 7:49 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Leah Ray

[REDACTED]
Chicago, IL 60659

From: Melissa McMahon [REDACTED] >
Sent: Thursday, January 14, 2021 7:53 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Melissa McMahon

[REDACTED]
Chicago, IL 60615

From: Mike Nowak <[REDACTED]>
Sent: Thursday, January 14, 2021 7:54 PM
To: envcomments
Cc: info
Subject: Please DO NOT approve RMG Permit

[Warning: External email]

January 14, 2021

Dr. Allison Arwardy
Commissioner of the Chicago Department of Public Health

Dear Dr. Arwardy,

I am writing to urge you not to approve the pending air pollution control permit filed by Reserve Management Group (RMG) for the purpose of relocating General Iron's recycling operations to the Southeast Side at 11600 S. Burley Avenue.

That this decision is even being considered shows a disturbing tone-deafness to the concerns of the southeast side community that has, for far too long, borne the brunt of environmental negligence, if not outright antipathy. Whether it's petcoke, manganese, arsenic, lead, or the misguided proposal to "upgrade" the Confined Disposal Facility at the confluence of the Calumet River and the lakefront, Chicago's southeast side has had a toxic bullseye painted on it. I have talked to community and environmental leaders on my radio show about these issues, and they're appalled by the City of Chicago's indifference to their arguments for environmental justice. This is all the more astonishing given that the mayor herself belongs to two groups that have long suffered from discrimination--the black and the LGBTQ communities.

That RMG aka General Iron is a bad actor has been well documented in the Chicago media. The very renaming of the company seems like a "bait and switch" ploy to cover the City's tracks. Just last month, as reported by the Chicago Sun-Times (<https://chicago.suntimes.com/2020/12/23/22198176/general-iron-east-side-rmg-reserve-management-group-car-shredde>), the City called RMG's permit application "incomplete and substantially deficient." Friends of the Parks reports that "Particulate matter (PM 10 & PM 2.5) will be released into the environment from RMG/General Iron and put resident's lung health and immune systems at risk and further compromise the health of the 10thWard community amidst a pandemic that targets respiratory systems." On top of that, earlier in 2020, Block Club Chicago reported on an apparent lack of good faith from the Chicago Department of Public Health with regard to this issue (<https://blockclubchicago.org/2020/10/02/city-officials-quietly-approve-east-side-permit-for-general-iron-owner-breaking-promise-to-alert-public/>). All of that background information does not inspire confidence in the City's ability to make a determination rooted in social and environmental justice. And I haven't even mentioned George Washington High School, which would be just down the block from this facility!

I could go on but I know that you are already privy to these arguments against the relocation.

So I will conclude by saying that for almost 24 years, I have covered environmental issues on my radio program. In the year and a half during which Ms. Lightfoot has been mayor, she seems to have exhibited little interest in pursuing environmental matters with any degree of passion or commitment. Sadly, this appears to be one more example. That, coupled with its social justice implications, has me shaking my head.

Please do not approve the permit for RMG.

Thank you.

Sincerely,

Mike Nowak



Mike Nowak
773.960.1139
www.mikenowak.net



This email has been checked for viruses by Avast antivirus software.

www.avast.com

From: Diane Libman <[REDACTED]>
Sent: Thursday, January 14, 2021 7:55 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Diane Libman

[REDACTED]
Chicago, IL 60626

From: Rosa Pelaez [REDACTED] >
Sent: Thursday, January 14, 2021 7:56 PM
To: envcomments
Subject: General Iron and tenth ward

[Warning: External email]

Hello,

My name is Rosa Pelaez and I am a resident of the 10 ward of Chicago. I have live in the tenth ward for close to 30 years and raised my two daughters in the 10th ward. I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
- A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. Not to mention the fact that the 10 Ward's air quality already poor do to past pollution from US steel. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,
Rosa Pelaez

From: Emma Lockmiller [REDACTED]
Sent: Thursday, January 14, 2021 7:58 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Emma Lockmiller

[REDACTED]
Chicago, IL 60613

From: Sara Hoglund [REDACTED]
Sent: Thursday, January 14, 2021 7:58 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Sara Hoglund
[REDACTED]
Chicago, IL 60643

From: Bonnie Gahriss [REDACTED]
Sent: Thursday, January 14, 2021 8:05 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Bonnie Gahriss

[REDACTED]
Wheaton, IL 60187

From: Charlie Mueller [REDACTED] >
Sent: Thursday, January 14, 2021 8:08 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Charlie Mueller

[REDACTED]
Chicago, IL 60613

From: Lucia Whalen [REDACTED] >
Sent: Thursday, January 14, 2021 8:12 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,

Lucia Whalen

[REDACTED]
Forest Park, IL 60130

From: Mark Goldman [REDACTED] >
Sent: Thursday, January 14, 2021 8:14 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Mark Goldman
[REDACTED]
New Lenox, IL 60451

From: Nicole Sammartino [REDACTED]
Sent: Thursday, January 14, 2021 8:23 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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Thank you for your consideration,

Sincerely,
Nicole Sammartino
[REDACTED]
chicago, IL 60608

From: Elizabeth Lyon [REDACTED] >
Sent: Thursday, January 14, 2021 8:23 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

Good Evening,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

The people of the Southeast side deserve better than another polluter moving in the neighborhood.

Please do the right thing for our City and its residents by denying this permit.

Thank you for your consideration,

Elizabeth Lyon

Sincerely,
Elizabeth Lyon

[REDACTED]
Chicago, IL 60609

From: Michael Friend [REDACTED] >
Sent: Thursday, January 14, 2021 8:24 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

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Thank you for your consideration,

Sincerely,
Michael Friend
[REDACTED]
Evanston, IL 60201

From: [REDACTED] on behalf of Jo Jo Winkelmann
Sent: Thursday, January 14, 2021 8:32 PM
To: envcomments
Subject: Stop the General Iron Permit

[Warning: External email]

Dear City of Chicago Environmental Comments,

Dear Mayor Lightfoot and administration:

This city and its elected officials have a duty to protect all Chicagoans to the best of their extent. In the midst of a public health crisis and in light of the history of environmental racism on the Southeast Side of Chicago, this administration must not allow General Iron to move their operations to the 10th ward.

A repeated offender of state and federal environmental regulations, General Iron has proven itself to be a bad neighbor in Lincoln Park. They had an explosion at their Lincoln Park facility a few months ago, and residents of Lincoln Park have complained about fragments from the demolition entering their homes and worsening their public health.

A move to the southeast side will not change their behavior or fix this problem — that will only make it someone else's — a community that already struggles with the legacy of environmental and public health contamination. In fact, the proposed site will be 100 yards away from a school in the neighborhood, which is completely unacceptable.

The communities on the southeast side are already disproportionately burdened by air pollution and COVID-19. We cannot ask them to take on more risk to their lives and livelihood. General Iron should not be permitted to operate on the Southeast Side of Chicago, nor should it anywhere else within the borders of the city. We are not required to house industries that contaminate public health and worsen environmental pollution.

I urge you to deny the permits for General Iron to move to the southeast side of Chicago.

Sincerely,

Jo Jo Winkelmann

[REDACTED]
Chicago IL, 60657-1393

From: Mark Brooker [REDACTED]
Sent: Thursday, January 14, 2021 8:40 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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Thank you for your consideration,

Sincerely,
Mark Brooker

[REDACTED]
Chicago, IL 60637

From: Kiana Courtney [REDACTED] >
Sent: Thursday, January 14, 2021 8:44 PM
To: envcomments
Cc: Susan Mudd; Tiffany Werner
Subject: Large Facility Recycling Facility Application by General III
Attachments: 2021.01.14 ELPC General III Comments.pdf

[Warning: External email]

To whom it may concern,
Please find attached comments by the Environmental Law & Policy Center on the Large Recycling Facility Permit Application of General III, LLC d/b/a Southside Recycling.

Thank you,
Kiana Courtney

Kiana Courtney
She | Her
Staff Attorney
Environmental Law & Policy Center
35 E. Wacker Dr., Ste. 1600
Chicago, IL 60601
(312) 795-3712



ENVIRONMENTAL LAW & POLICY CENTER

Protecting the Midwest's Environment and Natural Heritage

January 14, 2021

Chicago Department of Public Health
Attn: Commissioner Allison Arwady, M.D.
333 S State St., #200
Chicago, IL 60604

Submitted electronically to envcomments@cityofchicago.org.

RE: Comments on the Proposed Issuance of Large Recycling Facility Permit to General III, LLC, d/b/a Southside Recycling

To Chicago Public Health Department:

The Environmental Law & Policy Center (“ELPC”), on behalf of itself and its members, submit these comments on the Large Recycling Facility Permit Application of General III, LLC d/b/a Southside Recycling (“Application”) for a permit to operate a large scrap metal recycling facility proposed to be located at 11600 South Burley Avenue in Chicago, IL. ELPC is the Midwest’s leading public interest environmental legal advocacy organization and works to protect the environment and public health.

The City of Chicago (the “City”) through the Chicago Department of Public Health (“CDPH”) should deny the application of General III, LLC, doing business as Southside Recycling, but also known as the RMG Expansion (hereinafter “General III” or the “Facility”) draft permit for a large recycling facility. There are several issues with the Application: (1) General III’s Application is incomplete; (2) the Application will place a cumulative burden on the surrounding community; and (3) the Application fails to demonstrate that it will be protective of air quality and public health. In consideration of the Application, the City has a duty to not only consider the cumulative burden General Iron will place on the community, but also the past history of General Iron. The City must also consider the need to incorporate the community’s voice throughout this permitting process. Given these considerations, the City should not find that this Application is worthy of a draft recycling facility permit.

35 East Wacker Drive, Suite 1600 • Chicago, Illinois 60601
(312) 673-6500 • www.ELPC.org

Harry Drucker, Chairperson • Howard A. Learner, Executive Director
Chicago, IL • Columbus, OH • Des Moines, IA • Grand Rapids, MI • Indianapolis, IN
Minneapolis, MN • Madison, WI • North Dakota • South Dakota • Washington, D.C.

ELPC also supports the comments of local groups directly affected by the burden posed by General III, including Southeast Environmental Task Force and Southeast Side Coalition to Ban Petcoke, as well as the comments of NRDC.

I. Authority of CDPH

The Rules for Large Recycling Facility (“Rules” or “Recycling Rules”)¹ were established to provide explanations, guidelines, and requirements regarding the operation, location, design, and permitting of a Large Recycling Facility in such so that the Commission is able to ensure that the facility does not create a public nuisance nor threaten the public health, safety, and the environment. The Rules found that such facilities should be located in areas where the surrounding uses are consistent with the industrial nature of Recycling Facilities and should be operated so that the environmental impacts can be minimized.² Furthermore, the Rules find that recycling facilities can be significant sources of dust, contaminated storm and process water discharges, metal-containing particulate or vapor, and possible radiation with the potential to harm human health and the environment, and cause a public nuisance or adversely impact the surrounding area or surrounding users. The Rules also note that recycling facilities can present a high risk of fire and explosion and significant source of noise. Accordingly, CDPH has a duty to protect communities from the nuisance, environmental, and public health harms that may arise from the placement and operation of a facility.

The requirements set in the Rules are merely minimum standards for a Permit Application.³ CDPH can request additional information due to the complexity of the facility in order to ensure that the facility will not create a public nuisance or to ensure that the public health, safety, and the environment are protected.⁴ The Rules include prohibitions on the emission of fugitive dust into the atmosphere,⁵ visible dust traveling outside the boundaries of a recycling facility,⁶ and the idling and back up of vehicles onto public roads or rights-of-way at any time. The Rules also set opacity limits on dust⁷ and require air quality monitoring,⁸ a contingency plan describing mitigative actions that will be taken when the monitors detect PM10 or other parameters that exceed the Recordable Action Level,⁹ a plan fire prevention,¹⁰ and contingency plan to prevent or minimize any dust emissions, and pavement maintenance and cleaning to ensure there is no auto shredder residue (“ASR”) within at least a quarter-mile from the facility.¹¹ When reviewing the requirements and the standards for a permit application, CPDH can notify an applicant of deficiencies. The Rules, however, do not indicate that once completed an applicant should be awarded a permit.

¹ Rules for Large Facility Recycling, City of Chicago (June 5, 2020).

² *Id.*

³ *Id.* § 1.

⁴ *Id.* § 4.7.7.12

⁵ *Id.* § 4.7.2.

⁶ *Id.* § 4.7.3.

⁷ *Id.* § 4.7.4.

⁸ *Id.* § 4.7.7.

⁹ *Id.* § 4.7.7.

¹⁰ *Id.* § 4.7.7 and 4.13.

¹¹ *Id.* § 4.14.

Furthermore, CDPH should not propose a draft permit when the application has unremedied deficiencies. In fact, the 2014 Recycling Rules¹² allow the denial of a permit application where the applicant has within the past has been found in violation of any federal, state, or local air quality law or regulation.¹³ In its determination of whether to accept General III's application and propose a draft permit, CDPH should, as directed by the Rules, consider the numerous and well documented past violations of General III and RMG at its recently closed northside location.

In addition to its authority under the Recycling Rules, the City also has home rule authority giving it the ability to deny applications that fail to meet the requirements of the Recycling Rules or violate other rules or provisions, such as nuisance law.¹⁴ As such, the City should not take a complete application to mean that the City must propose a draft permit. This authority also gives CDPH the ability to impose emissions standards that are greater than that of Illinois Environmental Protection Agency ("IEPA"). IEPA's standards would be the floor rather than the ceiling for the measures Chicago can take to protect public health. If CDPH chooses to propose a permit it is not bound to the limitations set by Illinois Environmental Protection Agency ("IEPA"). Through the Recycling Rules, CDPH can set more stringent limitations and require additional monitoring and recordkeeping under its authority to protect public health and the environment.

II. General Iron's History of Pollution

The Applicant's Facility is located at 11600 Burley Ave, in the East Side community. It however did not start at that location. General III's assets come from General Iron on the north side of the City.

General Iron (as GII, LLC, hereinafter "GII") did business on the north side of the City at 1909 N Clifton Avenue for decades. The area around GII is only 16% minority and 14% low income within a half-mile of the facility. This site is the locus of numerous neighborhood complaints, explosions on May 18, 2020, and September 18, 2020, a fire on November, 10, 2020, and a US EPA Administrative Consent Order, calling for pollution control equipment to reduce air emissions from the facility.¹⁵ RMG attained GII assets in 2019, which overlaps with several

¹² These rules supplement the requirements contained in the Recycling Facility Rules dated March 19, 2014, as amended.

¹³ 2014 rules, S 4 Note that the 2020 Rules include this in the definition of a consequential recycling facility: "a Large Recycling Facility that either: (1) is located within 660 feet of a sensitive area, (2) has been found in violation of any federal, state, or local air quality law or regulation in the past 3 years, (3) conducts the mechanical shredding of vehicles, operates a metal Shredder with a manufacturer-rated capacity of more than 25 tons per hour, or utilizes Mechanical Sorting Equipment in the Processing of ASRs; or (4) Is a Class V Facility."

¹⁴ Under the Illinois Constitution a home rule unit may "exercise any power and perform any function pertaining to its government and affairs including, but not limited to, the power to regulate for the protection of public health, safety, morals and welfare; to license; to tax; and to incur debt." Ill. Const. 1970, art. VII, § 6(a).

¹⁵ See e.g. Chicago Department of Public Health, Air Pollution, Odor or Dust Complaint for 1909 N Clifton Ave, 60614, Submitted on: November 21, 2019, Service Request Number SR19-02994914; Chicago Dept of Public Health, "Statement from CDPH on Citations to General Iron on Explosions at the Facility," Public Health (May 21, 2020), https://www.chicago.gov/city/en/depts/cdph/provdrs/healthy_communities/news/2020/may/statement-from-cdph-on-citations-to-general-iron-on-explosions-a.html; US Env't. Protection Agency, *Administrative Consent*

of these violations. North Branch residents continually and still see auto-fluff on their streets, in, on and around their property, despite the City settling with General Iron in November 2020 for its violations.¹⁶

In order to make way for the Lincoln Yards development in the North Branch, GII, through RMG, found a new place to dump its wares in the Receiving Zone on the southeast side of the City—ultimately forming General III, doing business as Southside Recycling. General Iron is therefore closing its doors in a developing well-off majority white neighborhood and moving its assets to the Southeast side. The Southeast side community is an environmental justice community by Illinois EPA standards¹⁷ and has been identified by CDPH as a community that “should be prioritized for efforts to mitigate and reduce air pollution to better protect public health.”¹⁸ The Southeast side community is in the 83rd percentile in the state of Illinois for its racially and ethnically marginalized populations, in the 83rd percentile in the state for linguistically isolated populations, and in the 85th percentile for low-income populations. Within a mile of General III are Washington High School and several parks. The community faces increased truck traffic and several other sources of air pollution including the existing RMG facilities and at least 10 other permitted facilities in the area that will continue to negatively impact the health of area residents and pollute the community.

There can be no doubt that permitting General III will increase the pollution burden the Southeast Side bears, running counter to the City’s initiative to mitigate and reduce air pollution to better protect public health. In addition to the depreciation of air quality from emissions, General III estimates it will generate 8,000 gallons of used oil per year, 300 gallons of parts washer solvent per year, 150,000 tons per year of “shredder fluff”, and 15 tons of PCB ballast and capacitors (a TSCA waste) per year.¹⁹

General III is expanding on a site where there are other RMG-controlled facilities: Reserve Marine Terminals, Napuck Salvage of Waupaca, South Shore Recycling, and RSR Partners.²⁰ Similar to General Iron at Clifton Ave, RMG’s existing facilities have also operated without adequate permits, and violated air requirements in 2019. Because this is an expansion,²¹ it begs the question of whether the facilities will be operating in conjunction with one another. The Application fails to note the environmental impact these facilities will have in conjunction with the General III facility. If they are sharing resources, then the combined pollution burden should be in each of the plans, studies, and reports required in the application.

Order EPA-5-19-113(a)-IL-08I (Aug 22, 2019), https://www.epa.gov/sites/production/files/2019-08/documents/general_iron_industries_inc_aco.pdf.

¹⁶ Michael Hawthorne, *General Iron scrap shredder pays \$18,000 fine for explosion, noxious air pollution on the North Side*, Chicago Tribune (Nov. 2, 2020).

¹⁷ A minority population greater than 74.8% and a low-income population greater than 64.8%. Illinois EPA EJ Start. <https://www.arcgis.com/apps/webappviewer/index.html?id=f154845da68a4a3f837cd3b880b0233c>

¹⁸ City of Chicago, Air Quality and Health Report (2020), https://www.chicago.gov/city/en/depts/cdph/provdrs/healthy_communities/svcs/air-quality-and-health.html.

¹⁹ Application § 2.19 at 5.

²⁰ Application at 1.

²¹ Application at C-9 and C-10.

Due to North Branch neighborhood concerns about GII and General III the emissions and residual waste (“shredder fluff”) drifting from the Clifton Ave site, ELPC worked with North Branch residents from October 2019 through June 2020 to monitor the surrounding neighborhood for particulate matter.²² ELPC’s air quality monitoring program partners with neighborhood residents, community organizations, and students to conduct air quality monitoring, collecting, and mapping small particulate levels, using AirBeam monitors. The AirBeam monitors have been tested against the Federal Reference Monitors and provide particulate matter (“PM”) measurements (PM 1, PM 2.5, and PM 10) in real time on a second by second basis. ELPC began this project in part due to the distance of the federal monitors from communities suffering from disproportionately worse air quality. Data showed concentrations of poor air quality close to the General Iron facility. ELPC also worked with neighbors to test the auto-fluff that drifted from the Clifton Ave site.²³ The samples were gathered in August 2020 by a resident from their deck and alleyway, rather than on the street to ensure that they were not contaminated by metals that would likely come from car brakes and tires. Results showed that there were concentrations of heavy metals, including arsenic, chromium, strontium, and zinc.

III. CDPH Must Deny General III’s Application

A. CDPH Should Deny General III’s Application Because It Is Deficiently Incomplete

An application for a permit to operate a Large Recycling Facility must provide sufficient information to demonstrate that the Facility will be designed and operated in a manner that prevents public nuisance and protects public health, safety, and the environment.²⁴ On December 23, 2020, CDPH sent a letter to General III noting that the application was incomplete with numerous substantial deficiencies. ELPC is appreciative of CDPH recognizing many deficiencies in the Application. However, the Application is not limited to those deficiencies.

1. Air Quality

The Deficiency Letter states that General III failed to include information about the “Air Study,” pursuant to paragraph 3.9.21.1 of the Rules. Under the Rules, a Design Report for a consequential facility should contain an Air Quality Impact Assessment that includes but is not necessarily limited to: an emissions and air dispersion modeling study of the Facility and its operations that evaluates PM10 emissions.²⁵ If the facility receives scrap metal, the modeling study should also include the following HAPs: antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, nickel, and selenium compounds.²⁶ General III is a consequential facility

²² See maps with monitoring data at airqualitychicago.org. The AirBeam monitors have been tested against the Federal Reference Monitors and provide particulate matter (“PM”) measurements (PM 1, PM 2.5, and PM 10) in real time on a second by second basis. ELPC began this project in part due to the distance of the federal monitors from communities that suffer from disproportionately worse air quality.

²³ Residents and ELPC were concerned about the composition of the fluff due to claims at a public meeting on the General Iron explosion that the fluff was not hazardous or toxic by the City.

²⁴ Recycling Rules § 1.

²⁵ Recycling Rules § 3.9.21.1.

²⁶ *Id.*

and would receive scrap metal.²⁷As noted above, ELPC has reason to believe that the shredder fluff contains at least arsenic and chromium. The Application should include modeling of HAPs. General III states in its Application that this information was provided to CDPH at a different time, but the public has not had the opportunity to review that portion of the application.

The Rules note that diesel emissions from on-road mobile sources are not required to be included in the modeling study. However, CDPH has the ability to ask for more information than provided for in the Rules. CDPH should require modeling of constituents that derive from the additional truck traffic from General III's operations. Truck traffic is a part of the raw material receiving and handling operations as noted in the Air Study. Although General III may have submitted to IEPA or to CDPH similar information on a different occasion as indicated in its application, materials about vehicle traffic were not available for public review in this Application.

Due to the presence of diesel emissions, General Iron should also have to model for PM2.5, NOx, VOCs, and other pollutants that derive from diesel pollution, as well as any other potential emissions at the site. For instance, as particulate matter exposure is linked to asthma, COPD, and other lung and heart diseases, it would serve the interests of public health and be aligned with CDPH initiatives to review the variety of pollutants that would impact the nearby community and school.

Modeling should not be limited to the sources listed in the Application. It should also include the impact from the shredder fluff or ASR left in open piles. It is unclear the impact that the piles have on emissions, and in the interest of protecting public health and the environment, CDPH should have the data to understand the ASR/shredder fluff's impact on air quality. Moreover, the study should not be limited to the area that is General III, but should also account for the emissions from other operations at RMG. As an extension of RMG, General III is contributing to the existing pollutants emitted from the various facilities. These emissions do not exist in silos and should not be modeled as such. Indeed, they are in close proximity, the emissions are additive and residents, students and others nearby will experience all of them, not just the latest pollution additions to the neighborhood.

General III failed to provide information for its operating plan. Under the consequential facility air quality monitoring requirements, General III fails to provide an adequate dust contingency plan that describes the mitigative actions that will be taken when the monitors detect PM10 or other parameters that exceed the RAL under these rules or in the permit.²⁸ General III should include information about how it will notify and engage with the surrounding community. The Application is also missing information about opacity of dust. Similarly, General III fails to include how it will ascertain whether the ASR and shredder fluff travels outside of the facility in accordance with maintaining and cleaning the pavement within a quarter-mile of the facility.

2. NPDES Permit and Water Usage

In the Deficiency Letter, CDPH stated that GIII failed to include the relevant NPDES permit. The Application mentions that water will be used for shredder processing, fire suppression,

²⁷ Application § 3.3 at 7.

²⁸ Recycling Rules § 4.7.7.12

dust control and employee facilities. General Iron intends to connect to the MWRD and therefore fails to provide information about potential discharges. Because the Calumet River is the western boarder of the General III area, the Application should include the potential constituents that could be discharged from its operations. General III should not simply assume that the City's infrastructure should bear its pollutant load. The Application should also account for how General III pollutants would combine with the existing burden from the existing facilities. This should be inclusive of its operations, which inherently includes pollutants that derive from vehicle traffic. The effects of truck parking and loading should also therefore be included an assessment of water contamination.

3. Traffic

The Design Report should demonstrate that the Facility is designed and located to minimize the impact on the existing traffic flow in the surrounding area.²⁹ The Deficiency Letter also takes issue with the traffic information provided. The Letter (1) asked the applicant to provide a traffic study in the actual application; (2) noted that the IEPA Air Permit limited facility vehicle traffic to 14 hours per day on weekdays and 12 hours per day on weekends, which conflicts with the 24/7 operation proposed in the Application; and (3) asked General III to provide a stacking plan of all trucks and vehicles during the Facility's peak AM and PM traffic hours. General III fails to include additional information about the vehicle traffic. The Application states that the vast majority of material received at the proposed facility will be delivered by semi-trailers and the remaining portion will enter the facility in pickup truck sized vehicles driven by peddlers.³⁰ Industrial sites attract additional vehicle usage, which contributes to increased black carbon, particulate matter, and nitrous oxide (NOx) pollution.³¹ To provide CDPH with an adequate picture of the impact to mobile emissions, General III should account for its anticipated truck traffic based on recent adequate data. This should include the class of vehicle, the anticipated volume, and its plans to minimize truck traffic to meet the requirements of the Rules. This accounting should reflect traffic at peak hours. It should also account for existing vehicles held at and traffic generated by the other RMG facilities at the site. Furthermore, it should include the truck traffic routes and plans for the vehicles that will carry out the ASR. General III cannot just simply promise "there will be minimal impact to existing traffic flows"³² and list its own vehicles to satisfy the Rules' requirements.

CDPH must therefore deny General III's Application because without the above information, General III's application incomplete and substantially deficient.

B. CDPH Must Protect Public Health and the Environment from General III

CDPH has a duty to protect the public. If CDPH chooses to propose a draft permit for the facility, it has the authority to incorporate requirements to protect public health and the environment. While these provisions provide accountability of General III, they would not prevent the public harm brought by allowing General III to operate in this community. General III should

²⁹ Recycling Rules § 3.9.13.

³⁰ Application at V-11.

³¹ See Environmental Defense Fund, Houston Air Quality Mapping, *available at* <https://www.edf.org/airqualitymaps/houston/findings> (Air quality around metal facilities resembled air quality around highways due to increased diesel truck emissions and wheel dust).

³² Application § 2.18 at 5.

instead be sited elsewhere away from schools, parks, and residential areas. Nevertheless, if CDPH chooses to propose a permit it should include provisions that limit vehicular traffic, accordingly limiting diesel pollution, and provide information to the public.

1. Cumulative Impact on the Community

In its determination of whether to propose a permit to General III, CDPH should consider the cumulative burden that the surrounding community bears. The Southeast Side is currently a sacrifice zone—but it should not bear this burden. It now bears the disproportionate health and economic sacrifices that more privileged neighborhoods can avoid. It is zoned to be the receiving dump of the region’s unwanted facilities and trash.

While we understand that the City plans to address cumulative burdens on communities in the near future, it still already has an initiative to protect communities that are disproportionately impacted today.³³ The City has acknowledged that it is committed to systematic regulatory reform aimed at mitigating air pollution and protecting our communities. CDPH should not ignore the problem now, as this only compounds the harm it intends to later fix.

The City of Chicago, and thereby CDPH, has the authority to incorporate consideration of the cumulative burden on the community. The City should recognize that General III’s added operations to RMG and the other industries in the community will increase the pollution burden on the surrounding community. The community is already exposed to a litany of contaminants like petroleum coke, manganese,³⁴ the expansion of a contaminated disposal facility,³⁵ and the historical pollution from the Schroud Superfund and other sites. The additional diesel pollution and waste brought through General III should be viewed in conjunction with at least the other RMG facilities on site, if not with the other emitters in the community. CDPH should also consider that by adding to the burden of the Southeast Side, it is widening the disparity between this community and other neighborhoods like North Branch.

Thus, in preparing a draft permit CDPH should limit the pollution from the facility based on the cumulative burden that the Southeast community faces and will continue to face with the RMG expansion.

2. Traffic

CDPH has the authority to impose additional restrictions under the Rules to protect public health and prevent a nuisance. The additional vehicular traffic equates to a nuisance because it will exacerbate the truck traffic and increase the diesel pollution already burdening the community. CDPH must impose limitations on the amount of traffic that General III receives. This can be done by limiting the hours of delivery, for instance. The Applicant should be required keep a log of its vehicle activity which should be publicly available. The log should note incoming and outgoing

³³ City of Chicago, Air Quality and Health Report (2020).

³⁴ Michael Hawthorne, “Petcoke piles gone, but another dangerous pollutant discovered in the air,” Chicago Tribune, (Feb. 21, 2017) <https://www.chicagotribune.com/news/breaking/ct-manganese-pollution-chicago-met-20170218-story.html>.

³⁵ Annemarie Mannion, Community Groups Vow to Fight Plan for ‘Mountain of Dredge’ on Chicago’s Southeast Side, WTTW (Oct 27, 2020).

traffic and the class of vehicle. Maintenance of this log is important to reduce the pollution burden from diesel truck traffic. CDPH should also require General III to keep a log of its vehicular, and in particular diesel traffic activity, which should also be publicly available.

3. Air Quality Monitoring

The Rules primarily require monitoring of PM 10. PM 10, however, is likely not the only threat to the Southeast Side community from the General III and RMG operations. Monitoring should include other constituents, including but not limited to heavy metals, VOCs, NOx, and PM 2.5.

Under the Rules, the Design Report should also contain a monitoring plan that describes the placement and operation of PM10 monitors, a weather station and a schedule/plan for quarterly testing. Here, CDPH should not limit monitoring to PM10 because other constituents could potentially travel to the nearby public high school and parks. The Rules give CDPH the authority to require the installation of additional air monitors if existing air monitors in the facility cause a dust nuisance. CDPH could also require additional monitors if it determines that the current number or placement of air monitors at the facility is ineffective or inadequate. If the Commissioner cannot adequately assess the health impacts of a facility's emissions, CDPH can also require other methods when a facility's PM10 monitoring does not provide sufficient information about fugitive dust.³⁶ Given the history of General Iron and RMG and the presence of heavy metals in the shredder fluff outside the Clifton Ave. location, the City should not give General III the opportunity to again be a nuisance. CDPH should determine that the number of air monitors proposed is inadequate and require monitoring of other constituents.

The monitoring data should also be readily accessible to the public. The Design Plan must also include a Dust Monitoring Contingency Plan. This Plan should include immediate and adequate notice to the community when there is an event.

4. Shredder Fluff and Auto Shredder Residue

The Application notes that the shredder fluff or auto shredder residue ("ASR") will be stored in open piles, open storage bins, and would be loaded into trucks and sent to a landfill for use as alternate daily cover. Given the dismal history of handling shredder fluff at the Clifton Ave. location, General III's plan must raise flags for CDPH reviewers. Adequate controls to actually completely cover the shredder fluff and other ASR piles during storage and transport are needed. This community has already seen through petcoke pollution the damages from uncovered waste.³⁷ As noted above, the shredder fluff likely contains heavy metals. Due to the presence of the heavy metals in the auto-fluff at a nearby residence, ELPC urges CDPH to have a third-party lab take several additional samples of the autofluff to determine the constituents and concentrations of the pollutants in the auto-fluff. Any permit should also require ongoing monitoring and regular

³⁶ Recycling Rule § 4.7.7.2-3.

³⁷ See e.g. Nicole Greenfield, "A Dirty Battle in Chicago's Backyard," NRDC (Aug 13, 2015) <https://www.nrdc.org/stories/dirty-battle-chicagos-backyards>.

testing of the constituents of the ASR and shredder fluff. This information should also be readily available on a publicly accessible database.

The Application also notes the Calumet River is the western property boundary. The shredder is staged to be near the Calumet River. Given the history of the shredder fluff and ASR traveling off-property, and the open storage and transport of the shredder fluff and ASR, CDPH should consider whether the fluff has ability to land in the Calumet River.

5. *Publicly Available Data*

Online public reporting provides the public an effective tool to conduct their own monitoring and raise compliance issues when they arise. Online public reporting promotes accountability and transparency. There is precedent for online public reporting in the 2015 federal Coal Ash Rule³⁸ and in Illinois EPA's proposed set of coal ash rules,³⁹ which require regulated facilities to post all of their compliance reports on a website hosted by the regulated facility. Public reporting is also required in the Consent Decree covering the Chicago Police Department, which requires the Department to maintain a website and publicly post a variety of compliance reports.⁴⁰

The reporting required under the Rules should be in a place where the community has ready access to them, for instance on a publicly available website. The website should take into account the language diversity among the affected community residents. The data hosted on the site should include the data from the monthly and quarterly reports. The community should also have adequate access to existing monitoring data. Access to the fence-line monitoring data could help the community make decisions about their health, while also holding the Applicant accountable.

IV. CDPH Should Provide the Public an Opportunity to be Heard at a Hearing

Illinois law recognizes that hearings afford a community the opportunity to comment by facilitating the submission of views and comments that might not otherwise be submitted.⁴¹ Because the Rules found that a Large Recycling Facility can have significant environmental pollution, which ultimately affects the surrounding community, there are likely several individuals that will have input on the adequacy of a potential draft permit. Given the substantial deficiencies of the existing application, the public should have an opportunity to comment on a complete application. While the public does have the ability to comment in writing, written comments should not be the only voice given to the public on an issue of great import. Accordingly, if CDPH chooses to propose a draft permit for the facility, it should give the public an opportunity to comment at a hearing.

V. Conclusion

³⁸ *Disposal of Coal Combustion Residuals from Electric Utilities*, U.S. ENV'T. PROT. AGENCY ("Additionally, the rule sets out recordkeeping and reporting requirements as well as the requirement for each facility to establish and post specific information to a publicly-accessible website."), <https://www.epa.gov/coalash/coal-ash-rule#summary>, archived at <https://perma.cc/4JD9-UN8Q>.

³⁹ See Proposed 35 I.A.C. § 845

⁴⁰ See Consent Decree at ¶¶ 634, 664 (Jan. 31, 2019), *Illinois v. City of Chicago*, Case No. 17-6260 (N.D. Ill.).

⁴¹ See e.g. Illinois APA § 5-40(b)(5).

For these reasons CDPH should deny General III's Large Recycling Facility application. CDPH has the authority and a duty to deny General III's application permit. General III must cure all deficiencies before CDPH proposes a permit that is protective of public health and the environment.

Thank you for the opportunity to submit and your consideration of these comments.

/s Kiana Courtney
Kiana Courtney
kcourtney@elpc.org

/s Susan Mudd
Susan Mudd
smudd@elpc.org

/s Tiffany Werner
Tiffany Werner
tdavis@elpc.org
Environmental Law & Policy Center
35 E Wacker Drive, Ste 1600
Chicago, IL, 60657

From: Corinne Oak [REDACTED] >
Sent: Thursday, January 14, 2021 8:46 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Corinne Oak
[REDACTED]
Chicago, IL 60631

From: Nerissa Diaz [REDACTED]
Sent: Thursday, January 14, 2021 8:49 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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This area needs to have clean air and soil. All of the current and planned companies / factories / businesses need to leave. It's dangerous for everyone's health. It's unfair that we even have to fight against these hazards.

Please take people's health and lives seriously.

Thank you for your consideration,

Sincerely,
Nerissa Diaz

[REDACTED]
Naperville, IL 60564

From: Eric Sullivan [REDACTED]
Sent: Thursday, January 14, 2021 8:49 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Eric Sullivan
[REDACTED]
Chicago, IL 60605

From: Erin Doyle [REDACTED]
Sent: Thursday, January 14, 2021 8:50 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Erin Doyle

[REDACTED]
Chicago, IL 60622

From: Linnea Ogrentz [REDACTED] >
Sent: Thursday, January 14, 2021 8:50 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Linnea Ogrentz

[REDACTED]
Chicago, IL 60633

From: Jose Diaz [REDACTED] >
Sent: Thursday, January 14, 2021 8:55 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Jose Diaz

[REDACTED]
Chicago, IL 60617

From: Thomas Schmidt [REDACTED]
Sent: Thursday, January 14, 2021 9:07 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Thomas Schmidt
[REDACTED]
Urbana, IL 61801

From: envcomments
Sent: Thursday, January 14, 2021 9:07 PM
To: envcommentsDL
Subject: FW: Please deny General Iron's final permit request

From: Thomas Schmidt
Sent: Thursday, January 14, 2021 9:06:44 PM (UTC-06:00) Central Time (US & Canada)
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Thomas Schmidt
[REDACTED]
Urbana, IL 61801

This e-mail, and any attachments thereto, is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail (or the person responsible for delivering this document to the intended recipient), you are hereby notified that any dissemination, distribution, printing or copying of this e-mail, and any attachment thereto, is strictly prohibited. If you have received

this e-mail in error, please respond to the individual sending the message, and permanently delete the original and any copy of any e-mail and printout thereof.

From: Alice Brandon [REDACTED] >
Sent: Thursday, January 14, 2021 9:08 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Alice Brandon

[REDACTED]
Chicago, IL 60647

From: Iszy Licht [REDACTED]
Sent: Thursday, January 14, 2021 9:08 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Iszy Licht

[REDACTED]
Chicago, IL 60657

From: Kenyon Adamcik [REDACTED] >
Sent: Thursday, January 14, 2021 9:10 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Kenyon Adamcik
[REDACTED]
Chicago, IL 60625

From: Baird Bream [REDACTED] >
Sent: Thursday, January 14, 2021 9:10 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Baird Bream

[REDACTED]
Chicago, IL 60605

From: Caroline Rushmore <[REDACTED]>
Sent: Thursday, January 14, 2021 9:15 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Caroline Rushmore
[REDACTED]
Chicago, IL 60614

From: Sherry Liske [REDACTED] >
Sent: Thursday, January 14, 2021 9:22 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

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The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Sherry Liske

[REDACTED]
Elgin, IL 60120

From: Paul Dickerson [REDACTED] >
Sent: Thursday, January 14, 2021 9:22 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Paul Dickerson

[REDACTED]
Oak Park, IL 60301

From: Camryn Torres [REDACTED]
Sent: Thursday, January 14, 2021 9:27 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Camryn Torres
[REDACTED]
Chicago, IL 60656

From: Travis Solberg [REDACTED]
Sent: Thursday, January 14, 2021 9:28 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Travis Solberg

[REDACTED]
West Dundee, IL 60118

From: Alison Trojan [REDACTED]
Sent: Thursday, January 14, 2021 9:30 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Alison Trojan
[REDACTED]
Lemont, IL 60439

From: lisbethh [REDACTED]
Sent: Thursday, January 14, 2021 9:34 PM
To: envcomments

[Warning: External email]

“Hello,

My name is Lisbeth Nunez and I am a student. I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public’s health. Therefore, I demand that CDPH and Dr. Arwady protect the public’s health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

- Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.
- A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG’s location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health.
- According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility’s operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron’s permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,
Lisbeth Nunez

From: Pat Dywan [REDACTED]
Sent: Thursday, January 14, 2021 9:35 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Pat Dywan

[REDACTED]
Roselle, IL 60172

From: Krista Greenwald [REDACTED] >
Sent: Thursday, January 14, 2021 9:37 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Krista Greenwald

[REDACTED]
Chicago, IL 60647

From: John Love [REDACTED]
Sent: Thursday, January 14, 2021 9:37 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
John Love

[REDACTED]
Chicago, IL 60625

From: Sara Frabotta [REDACTED] >
Sent: Thursday, January 14, 2021 9:41 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Sara Frabotta

[REDACTED]
Chicago, IL 60618

From: Tamela Fralin [REDACTED]
Sent: Thursday, January 14, 2021 9:41 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Tamela Fralin

[REDACTED]
Chicago, IL 60615

From: Jaclyn Wegner [REDACTED] >
Sent: Thursday, January 14, 2021 9:44 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Jaclyn Wegner

[REDACTED]
Chicago, IL 60622

From: Elena Bruess [REDACTED] >
Sent: Thursday, January 14, 2021 9:47 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Elena Bruess

[REDACTED]
Chicago, IL 60613

From: ANNE ABRAMSON [REDACTED] >
Sent: Thursday, January 14, 2021 9:47 PM
To: envcomments
Subject: info@fotp.org

[Warning: External email]

January 14, 2020
Dr. Allison Arwady Commissioner of the Chicago Department of Public Health

Dear Dr. Arwady:

I am writing in support of my fellow Chicagoans in the 10th ward. For decades, my community in the 2nd and 43rd wards endured the presence of General Iron in close proximity to residences and schools. The constant emission of particulate into our air was a constant threat to our health.

Despite officials' statements assuring our safety, no one believed that breathing metal dust could possibly be healthy or safe. I held my breath or wore a scarf when passing by General Iron, well before the pandemic. I would not wish such a neighbor on any other community in this city, especially not near a school or park where our children learn and play.

Clean air should be a basic right of every Chicago resident no matter their address. The Southeast side is already burdened by high levels of contaminants as a result of several polluting industries. The city should not add to this burden. Please do not grant this permit.

Best regards,

Anne Abramson
2nd Ward

From: Jose Hernandez [REDACTED] >
Sent: Thursday, January 14, 2021 9:52 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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Thank you for your consideration,

Sincerely,
Jose Hernandez
[REDACTED]
Chicago, IL 60647

From: Antonio Flores [REDACTED] >
Sent: Thursday, January 14, 2021 9:55 PM
To: envcomments
Subject: Not another metal scrapper in the 10th Ward

[Warning: External email]

The owner of General Iron should not be permitted to operate anywhere if they cannot meet the low standards.

If you must grant permission for them to operate somewhere, place them where they will sicken people with high incomes and health care. If you are willing to kill people by exposing their daily lives to this metal scrapper, place the operation in a neighborhood of people that have not been killed by racist decisions in the past. If you are willing to kill people for this company, don't kill people of color. If you are going to condemn people to health issues, condemn people who can pay for those health issues.

The well known environmental justice community already pays too high a price and their burden is unjust. There is no confidence in the city to hold the metal scrapper accountable. The government does not have the credibility to make assurances of the operations' compliance.

What possible justification can be offered for allowing a known violator to set up operations in the southeast side of Chicago?

Who are you?

My name is Antonio Flores. I live at [REDACTED] in Chicago, IL. My zip code is 60609. My phone number is [REDACTED]

From: Christopher Byrne [REDACTED] >
Sent: Thursday, January 14, 2021 9:55 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Christopher Byrne
[REDACTED]
Lombard, IL 60148

From: Holly Gillis [REDACTED] >
Sent: Thursday, January 14, 2021 9:57 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

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I voted for Lori Lightfoot after I heard her specifically speak on environmental justice in 2019. During her campaign, she promised to reinstate the city's Dept of Environment. Now that there have been well covered (by press), recent examples of corporate polluters damaging the health and well being of predominantly Latinx and Black Chicago communities (with very little of the promised economic benefit), will this administration continue to look the other way? This city, and I as a Chicagoan, want accountability.

Thank you for your consideration,

Sincerely,
Holly Gillis
[REDACTED]
Chicago, IL 60647

From: Lora Galich [REDACTED]
Sent: Thursday, January 14, 2021 10:04 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Lora Galich

Sincerely,
Lora Galich

[REDACTED]
Chicago, IL 60630

From: Bobbie Gorski [REDACTED] >
Sent: Thursday, January 14, 2021 10:06 PM
To: envcomments
Subject: General Iron

[Warning: External email]

Hello,

My name is Bobbie and I am a parent. I stand in solidarity with 10th ward South East Side residents against General Iron. Firstly, the Chicago Department of Public Health (CDPH) and Public Health Commissioner Dr. Allison Arwady has a duty and the authority to protect the public's health. Therefore, I demand that CDPH and Dr. Arwady protect the public's health by exercising their duty, due diligence, and authority to deny General Iron the permit to operate a Large Recycling facility on the Southeast Side.

The science behind the pollution putting the SE side community at risk is simple:

Particulate matter (PM 10 & PM 2.5) will be released into our environment from RMG/General Iron and go into our lungs and further compromise the immune system of 10th Ward residents. Just because we cannot see it does not mean it is not there.

A study conducted by George Washington Highschool, the high school directly across the road from RMG/General Iron, found winds from RMG's location to blow Southwest to Northeast. With the wind pattern present, the wind will carry pollutants directly to the learning environment of our students and negatively impact their health.

According to the Environmental Protection Agency (EPA) and the World Health Organization (WHO), chronic exposure to particulate matter and air pollutants results in higher asthma rates amongst adolescents, higher lung cancer rates, depression, lower academic performance, and a decreased life span.

Moving an industrial facility's operations from a gentrified, mostly white neighborhood to a community with majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism. The City must deny the permit if it is to be in compliance with the US Fair Housing Act.

If you all do not deny this permit, you all are signing away valuable years of our lives at the expense of another scrap metal yard.

Deny RMG/General Iron's permit to operate a Large Recycling Facility. We deserve clean air.

Sincerely,
Bobbie Gorski

[Sent from Yahoo Mail for iPhone](#)

From: Sarah Faur [REDACTED]
Sent: Thursday, January 14, 2021 10:09 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

At the end of last year, the City responded to RMG's final permit application with a letter of deficiency. I wholly agree with this response. RMG's permit application is "substantially deficient." The deficiency letter underscores why the community and the City cannot trust that RMG will operate a new facility at the 11600 S. Burley site safely and that CDPH must not grant a permit to RMG for the new incarnation of General Iron on the Southeast Side.

During General Iron's tenure in Lincoln Park, they proved time and again that they are not a good neighbor with fires & explosions, City shut-downs, coating the neighborhood in toxic "fluff" and federal EPA citations. There is no reason to believe moving to a new neighborhood will put an end to these harmful practices.

The Southeast side is already environmentally overburdened, with manganese, petcoke and landfill pollution already impacting the health and safety of residents, and we must not continue to use the neighborhood as the City's dumping ground.

The Mayor promised environmental justice. To approve this move would be an injustice to the Southeast side. The City promised the Southeast side transparency, but passed one of two City permits without informing residents. It's time to follow through on these promises and protect all the Chicago communities, not just those on the Northside.

Thank you for your consideration,

Sincerely,
Sarah Faur

[REDACTED]
Chicago, IL 60647

From: Martha Vasquez-Weber [REDACTED]
Sent: Thursday, January 14, 2021 10:11 PM
To: envcomments
Subject: SUPPORT LETTER for RMG South Side Recycling
Attachments: ESCC Support Letter for RMG South Side Recycling .pdf

[Warning: External email]

On behalf of the East Side Chamber of Commerce, I am forwarding you a copy of our letter of support and continuance of RMG South Side Recycling in the East Side.

Please review and let me know if you have any questions or concerns!

Thank you,

Martha Vasquez-Weber
Executive Director
East Side Chamber of Commerce
3501 E. 106th Street
Chicago, IL 60617
Email: eastsidechamber@sbcglobal.net
Tel. (773) 470-8304

EAST SIDE CHAMBER OF COMMERCE

3501 EAST 106TH STREET • CHICAGO, ILLINOIS 60617
VOICE: (773) 721-7948 • FAX: (773) 721-7446
EMAIL: EASTSIDECHAMBER@SBCGLOBAL.NET



January 14, 2021

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Tony Ziak

To Whom It May Concern:

My name is Jared Kott, I am an Eastside resident and a Board Member of the East Side Chamber of Commerce. This letter is in support of RMG South Side Recycling.

I and the Chamber members have met the leadership of RMG South Side Recycling. We have spent countless hours together learning about the establishment, people, location, safety measures, overall plans, and opportunity this business continues to bring to the 10th ward.

This establishment is top notch and has no reported issues within the community. The 10th ward needs solid paying jobs, RMG South Side Recycling is providing great paying wages and is hiring locally, we want jobs and we support RMG South Side Recycling.

As a business owner myself in the 10th Ward, I would question why a city that is losing revenue and population daily would not be supporting a local business that has been in this community for over 29 years, they provide a living wage that feeds and supports local families and children.

The solution here is to fully support RMG South Side Recycling so that they can continue to be a great community partner as well as the employer for so many in our 10th Ward.

Sincerely,


Jared Kott
Chairman
Business Development Committee
East Side Chamber of Commerce
3501 E. 106th Street
Chicago, IL 60617
eastsidechamber@sbcglobal.net
O: 773.721.7948



From: Samantha Schneider [REDACTED]
Sent: Thursday, January 14, 2021 10:12 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Samantha Schneider

[REDACTED]
Chicago, IL 60614

From: Tamara Witzl [REDACTED] >
Sent: Thursday, January 14, 2021 10:24 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Tamara Witzl

[REDACTED]
Oak Park, IL 60304

From: Meggie Gates [REDACTED]
Sent: Thursday, January 14, 2021 10:27 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Meggie Gates

[REDACTED]
Chicago, IL 60614

From: Lauren Sivak [REDACTED]
Sent: Thursday, January 14, 2021 10:27 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Lauren Sivak

[REDACTED]
Chicago, IL 60625

From: Lois Lauer [REDACTED]
Sent: Thursday, January 14, 2021 11:04 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Lois Lauer

[REDACTED]
Palos Heights, IL 60463

From: Mary Barbezat [REDACTED] >
Sent: Thursday, January 14, 2021 11:09 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Mary Barbezat

[REDACTED]
Elgin, IL 60124

From: Kyle Schlie [REDACTED]
Sent: Thursday, January 14, 2021 11:09 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

The city's unwanted allowance of RMG's move to the Southeast Side is to further add to the exploitation of people and places that are already unfairly overburdened.

Please act justly and with compassion for my community and deny the Recycling Facility Application permit for RMG.

Thank you,

Sincerely,
Kyle Schlie

[REDACTED]
Chicago, IL 60617

From: Aoife Burke [REDACTED]
Sent: Thursday, January 14, 2021 11:12 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Aoife Burke

[REDACTED]
Tinley park, IL 60477

From: Alex Rossi [REDACTED]
Sent: Thursday, January 14, 2021 11:17 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Alex Rossi

[REDACTED]
Chicago, IL 60605

From: [REDACTED] on behalf of Kristen Ahern
Sent: Thursday, January 14, 2021 11:25 PM
To: envcomments
Subject: Stop the General Iron Permit

[Warning: External email]

Dear City of Chicago Environmental Comments,

Dear Mayor Lightfoot and administration:

This city and its elected officials have a duty to protect all Chicagoans to the best of their extent. In the midst of a public health crisis and in light of the history of environmental racism on the Southeast Side of Chicago, this administration must not allow General Iron to move their operations to the 10th ward.

A repeated offender of state and federal environmental regulations, General Iron has proven itself to be a bad neighbor in Lincoln Park. They had an explosion at their Lincoln Park facility a few months ago, and residents of Lincoln Park have complained about fragments from the demolition entering their homes and worsening their public health.

A move to the southeast side will not change their behavior or fix this problem — that will only make it someone else's — a community that already struggles with the legacy of environmental and public health contamination. In fact, the proposed site will be 100 yards away from a school in the neighborhood, which is completely unacceptable.

The communities on the southeast side are already disproportionately burdened by air pollution and COVID-19. We cannot ask them to take on more risk to their lives and livelihood. General Iron should not be permitted to operate on the Southeast Side of Chicago, nor should it anywhere else within the borders of the city. We are not required to house industries that contaminate public health and worsen environmental pollution.

I urge you to deny the permits for General Iron to move to the southeast side of Chicago.

Sincerely,

Kristen Ahern

[REDACTED]
Chicago IL, 60630-4935

From: Claudia Herrera [REDACTED] >
Sent: Thursday, January 14, 2021 11:26 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Claudia Herrera

[REDACTED]
Chicago, IL 60608

From: Caitlin McKay [REDACTED] >
Sent: Thursday, January 14, 2021 11:27 PM
To: envcomments
Subject: RMG EXPANSION - stop

[Warning: External email]

Hello I am a registered voter 60612 last name McKay first name Caitlin and I oppose the General IronRMG EXPANSION. It is near natural areas of our city that are already stressed by industry.

Industries have demonstrated time and time again that they do not have the interest of the natural world and our city residents in mind. Air pollution is already contributing to to disease and low quality of life for many communities on the south side. I lived near an industrial area 60647 and the pollution was always pervasive and ominous. We need to focus on helping our communities rather than granting permits to iron companies that will pollute the air.

Please deny the permits for their expansion.
Thank you,
Caitlin McKay

From: Paige Dwyer [REDACTED]
Sent: Thursday, January 14, 2021 11:31 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

I'm writing to demand that the City of Chicago deny the remaining Class IVB Large Recycling Facility Application permit needed for RMG to operate their scrap metal recycler, formerly known as General Iron, at their new location 11600 S Burley Avenue in the Southeast Side.

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Thank you for your consideration,

Sincerely,
Paige Dwyer

[REDACTED]
Chicago, IL 60613

From: Dana Westley [REDACTED] >
Sent: Thursday, January 14, 2021 11:42 PM
To: envcomments
Subject: Reject General Irons Permit!

[Warning: External email]

We cannot expand the already disproportionate environmental burden communities of color bear in Chicago. We should as a city be focused on eliminating food deserts, restoring natural landscapes and green spaces, and reducing waste in the air, water, and land for those most impacted. Approving this permit would do the opposite. Reject it!

Dana Westley

From: Lucia Herrera [REDACTED] >
Sent: Thursday, January 14, 2021 11:50 PM
To: envcomments
Subject: Please deny General Iron's final permit request

[Warning: External email]

Dear Environmental Permitting and Inspections,

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Thank you for your consideration,

Sincerely,
Lucia Herrera
[REDACTED]
Chicago, IL 60652

From: Kate McCarter [REDACTED]
Sent: Thursday, January 14, 2021 11:57 PM
To: envcomments; Allison Arwady
Subject: RMG/ General Iron application - public comment

[Warning: External email]

Dear Dr. Allison Arwady,

I commend you for the proactive measures you've taken in Chicago's fight of COVID-19. As you have sought to protect respiratory and overall health for Chicagoans, I write to urge denial of Reserve Management Group's (RMG) application for an air pollution control permit.

I live over ½ mile from General Iron's recycling site – far enough away that, were the business run responsibly, no detrimental impacts would be experienced. But particulate and noxious odors blow far from the site. Beyond the daily exposure, multiple fires have broken out among their refuse, piled stories upon stories high – unprotected neither from sparks or passersby, one of whom was fatally crushed in October 2018.

In October of 2020, an RMG executive wrote an op-ed to distance himself from General Iron's operations. But even under his leadership, in November of 2020, before the ink on his op-ed was dry, yet another fire broke out. Rebranding a company with a new name does not erase years of willful neglect – nor can it erase the ongoing health impacts so many have experienced.

The fire of perhaps most deleterious consequence was Sunday, December 6, 2015 – a Hazmat Level 1 extra-alarm fire. Residents remember this date for its acute and ongoing repercussions: chronic coughing, atelectasis, pneumonia, pulmonary granulomas, asthma. Residents remember this date for their medicine cabinets of lung prescriptions; for their reduced abilities and qualities of life.

And these reports are not only anecdotal. As you know, General Iron has been repeatedly cited by both the EPA and OSHA.

For decades, General Iron has had a PR strategy that's enabled them to continue operations deleterious to communities' health. But it doesn't matter if an alderman has "broken bread" with company owners. Nor does it matter what a company claims if they continue to show blatant disregard to workers, neighbors, and the environment.

This is an opportunity to show the community that the City of Chicago is serious about the health of ALL Chicagoans. While I am relieved that this irresponsible business will no longer be located less than a mile from my home, I cannot abet the exporting of this business to another Chicago community, particularly one that has borne the brunt of systemic environmental racism. Adding another harm to this community is of multiplicative effect. It threatens George Washington High School. It threatens Rowan Park. It threatens the very workers that the company purports to benefit.

As a neighbor who has witnessed the profound negative impact of RMG/General Iron's operations, I urge you to reject the permit sought by them or any subsidiaries.

Thank you for your attention to this matter.

Sincerely,
Kate McCarter

West DePaul Neighborhood

--

Kate McCarter



From: David Lottich [REDACTED]
Sent: Thursday, January 14, 2021 11:48 PM
To: envcomments
Subject: We support General Iron - letter to Dr. Arwardy attached
Attachments: We support General Iron.docx

[Warning: External email]

January 14, 2021

Dr. Allison Arwardy
Commissioner of the Chicago Department of Public Health
envcomments@cityofchicago.org

Dear Dr. Arwardy,

The General Iron project will profoundly enhance the health of the Southeast Side community.

An essential part of human health is the inner certainty that one's life adds value to the world. The fruitful, productive (well-paid) people that General Iron will employ will know their lives are vital to the truly essential, mighty work of recycling. Such people develop lifestyles for themselves and their families that optimize their chances of good physical health.

The 10th Ward and the 7th Ward are full of the low-paid grass cutters and the cheap nannies that work for the Lincoln Park folks that oppose General Iron. These workers are paid so low that they need Illinois Link cards just to eat. Their children frequently aspire to a life of petty crime as a strategy to individuate away from the parents they do not respect. Early death by murder is common, and drug use is rampant. These lifestyles define poor public health, and good jobs are an obvious antidote.

The Not-In-My-Back-Yard complaints against General Iron on the North Side are being re-packaged as "environmental racism" on the Southeast Side. The term has a certain cachet, but I fail to believe that modern Environmental Engineers can't keep a car shredder from poisoning the Earth.

Thank you for the work you do.

David K. Lottich
7th Ward
Chicago, IL 60617

