

June 4, 2019

Department of Public Health
City of Chicago
333 South State Street, Room 200
Chicago, IL 60604

Re: Proposed Rules for Large Recycling Facilities

Inland Rivers, Ports and Terminals, Inc. (IRPT) strongly opposes limiting the volume of aggregates transported in and out of and/or to and from river terminals in Illinois as proposed in the May 6th “Rules for Large Recycling Facilities”. Whereas we do applaud the City of Chicago for its efforts to reduce the carbon footprint of recycling facilities, we are pleased to inform you that recycling facilities located on navigable rivers in the United States already reduce the carbon footprint, provide safer surface transportation and reduce congestion and transit times for the general public.

- **Barges have the smallest carbon footprint** among other transportation modes. To move an identical amount of cargo by rail generates 30% more carbon dioxide than by barge, and 10 times more emissions by trucks than by barge.
- **Inland waterways transport has a low injury record** compared to rail or truck. For each *injury* involving barge transportation, there are 80.44 injuries related to rail and 824 truck-related injuries. **The inland waterways eases rail and highway congestion.** A loaded tank barge carries 27,500 barrels of gasoline, enough to keep about 2,500 automobiles running for an entire year.
- Stated very simply, the advantage of inland waterways transport is the modal comparison: a common 15-barge tow of dry cargo has the equivalent capacity of 216 rail cars and six locomotives, or 1,050 tractor-trailers.
- Even more clear, is that if volume is limited at river terminals in Illinois, the City of Chicago would experience **MORE CONGESTION** on roads, **MORE AIR POLLUTION** and unfortunately, **MORE ACCIDENTS AND FATALITIES.**

Facilities on navigable waterways adhere to regulations set forth by the State and Federal Agencies within the jurisdiction of activities, such as U.S. Army Corps of Engineers, U.S. Coast Guard, U.S. Environmental Public Agency, U.S. Department of Agriculture, U.S. Department of Natural Resources.

IRPT is a resource for growth, operations, development, and education for port and terminal professionals. We do this by keeping or members informed on federal legislation and security issues affecting our river system, promoting and marketing our inland waterway system, and working with port leaders to unify the inland ports, terminals, and river systems.

IRPT commends you on your focused attention to freight transportation and its impact on the general public. Your strong leadership and support on freight transportation in the State of Illinois has a national impact. Please do not hesitate to contact me if you have any questions.

Sincerely,

Aimee Andres

Aimee Andres
Executive Director