



VET ENVIRONMENTAL ENGINEERING, LLC

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June 20, 2019

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

To whom it may concern:

RE: City of Chicago Department of Public Health Proposed Rules for Large Recycling Facilities

VET Environmental Engineering, LLC (VET) provides environmental consulting services and certification for many automotive recycling facilities throughout Illinois and within the Chicago Metropolitan area. VET serves as the Environmental Manager for the Illinois Green Certified Automotive Recycling (IL Green CAR) Program on behalf of the Auto & Truck Recyclers of Illinois. The IL Green CAR program represents the highest achieving automotive recyclers in the State of Illinois. It seeks to unite member facilities committed to exceptional environmental and safety standards. This business collective assembles Illinois' most proactive automotive recyclers, that are leaders in environmental and safety compliance in both the State of Illinois and nationally.

Automotive recycling facilities are a vital part of the Illinois economy and have a major impact on resource conservation. By recycling automotive parts, we save the natural ores, oil, water, and energy needed to manufacture new parts. This reduces air pollution as well as our nation's dependence on foreign oil. Additionally, parts that cannot be reused provide the number one source of our national scrap metal supply. Tons of cast iron, steel, aluminum, platinum, copper, and lead are recovered annually by the automotive recycling industry.

The automotive recyclers we represent largely purchase late model, high end automobiles for dismantling and sale of used parts. These businesses responsibly handle automotive fluids and other harmful byproducts of automotive dismantling. In our professional opinion, based on experience with automotive recycling facilities and scrap metal processing facilities, we urge you to exclude automotive recyclers, specifically used auto parts sales facilities, from classification as Large Recycling Facilities. We believe these businesses would be unduly and unnecessarily burdened by being included as large recycling facilities in the proposed rules. This is a great opportunity to acknowledge and reward the proactiveness and hard work that these automotive recyclers have and continue to exhibit.

Very Respectfully,

Sara R. Hamidovic, MS, PE, CHMM
Illinois PE #062-066782