
From: Harley, Keith <kharley@kentlaw.iit.edu>
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.

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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

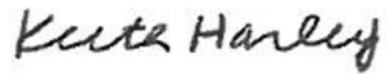
OBSERVED ESCAPING THE TOP AND THE SIDES OF THE SHREDDER. I ALSO OBSERVED SMOKE LEAVING THE SHREDDER AND TRAVELING THROUGH THE PROPERTY ACROSS FROM THE NORTH BRANCH CHICAGO RIVER. THE SHREDDER IS NOT AN ENCLOSED PIECE OF EQUIPMENT. IT DOES CONTAIN A HOOD TO CAPTURE THE EMISSIONS AND PROCESS THEM THROUGH 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
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