



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

February 18, 2022

Hal Tolin
General III, LLC (d/b/a Southside Recycling)
11554 S. Avenue O
Chicago, IL 60617

Subject: **Recycling Facility Permit Application**
11600 S. Burley Avenue, Chicago, IL 60617

Dear Mr. Tolin,

The City of Chicago Department of Public Health (CDPH) has completed its review of Southside Recycling's (the Applicant's¹) permit application and supplementary information in support of the application for a Class IVB Recycling Facility Permit at 11600 S. Burley Avenue (the Facility).² CDPH has also completed its review of the Health Impact Assessment (HIA) findings with regard to the impacts of the proposed Facility on the existing community in Southeast Side Chicago.³ As a result of these reviews, CDPH hereby denies the permit.⁴

In support of the denial of the permit, CDPH has determined that there is an unacceptable risk that the proposed facility would produce an increase in particulate matter, noise, and diesel emissions, the negative effects of which are magnified in a population with the health vulnerabilities identified and documented in the HIA. The interaction between potential adverse changes in air quality and quality of life caused by operations, and health vulnerabilities in the

¹ The application at issue was submitted on behalf of "General III, LLC (d/b/a Southside Recycling)." The site of the proposed facility is located on a property owned by South Chicago Property Management, Ltd ("SCPM"), which is a corporate affiliate of two holding companies, RMG Investment Group, LLC, and RMG Investment Group II, LLC. These entities do business as Reserve Management Group ("RMG"). Further, General III, LLC, is an affiliate of RMG, which, in the fall of 2019, purchased the metal recycling operations and assets of General Iron Industries. The site of the proposed facility is also the location of four existing permitted recycling facilities: Reserve FTL LLC, dba Reserve Marine Terminals (RMT, aka "Reserve FTL"), Napuck Salvage of Waupaca (Napuck), South Shore Recycling, and RSR Partners (Regency Technologies), entities which are all owned by RMG or the owners of RMG as indicated in the permit applications (see Attachment "D").

² A copy of the application and additional information are posted on the City's website at <https://www.chicago.gov/city/en/sites/rmg-expansion/home/permitting.html>.

³ A copy of the HIA report is posted on the City's website at <https://www.chicago.gov/city/en/sites/rmg-expansion/home/health-impact-assessment.html> and is also attached as Attachment "A."

⁴ The findings and decision regarding this permit application are specific and limited to Southside Recycling's permit application.

surrounding communities described in the HIA—together with the Applicant’s track record in operating similar facilities within this campus—presents an unacceptable risk.

As detailed in the HIA report, certain census block groups in the Southeast Side community rank among the highest in Chicago for vulnerability to air pollution, based on underlying health and social conditions. Further, the Southeast Side population has higher rates of chronic conditions such as coronary heart disease and COPD in adults than Chicago overall. The HIA also found that community conditions on the Southeast Side have been affected by the presence of past and current industry and that the proposed Facility would contribute additional negative impacts to the environment, health, and quality of life for Southeast Side residents.

I. Regulatory Framework

The Municipal Code of Chicago (MCC or Code) grants the Commissioner of CDPH the sole power “[t]o issue all permits, certificates, notices or other documents required under the provisions of Chapter 11-4.” MCC § 2-112-110(b)(9). Chapter 11-4 of the Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6), and specifically to promulgate rules regarding recycling facilities, MCC § 11-4-2660. Lastly, the Commissioner is empowered to “advise, consult and cooperate with other agencies of the state and federal governments, and other governmental agencies to advance environmental protection in furtherance of the purposes of [the Chicago Environmental Protection and Control Ordinance],” and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(13), (c).

The requirement for recycling facilities to obtain a permit is established at MCC Chapter 11-4, Article XX, §§ 11-4-2510 through 11-4-2680, titled “Recycling Facility and Urban Farm Accessory Composting Permits.” The Code requires any permit application to contain certain listed information, but also allows a request for “[a]ny other information requested by the commissioner.” MCC § 11-4-2530. Specific standards and requirements for permit issuance are set forth in Article XX as well as the rules promulgated thereunder; i.e., the March 2014 Rules and Regulations for Recycling Facilities (the “2014 Rules”) and the June 2020 Rules for Large Recycling Facilities (the “LRF Rules.”) (Both sets of rules are available at www.cityofchicago.org/rules.)

In particular, Rule 3.0 in the 2014 Rules provides, in pertinent part, that:

The Commissioner shall not grant a new permit or renew an existing permit for any recycling facility in the City of Chicago unless the application for such permit meets each of the following conditions:

* * *

(6) The application passes the compliance history evaluation describe[d] in Section 4.0 of these regulations; and

(7) The application meets all other applicable requirements of the Code.

Rule 4.0 is set forth in full as follows:

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.

The LRF Rules require applicants to demonstrate that proposed facilities will be designed and operated in a manner that prevents public nuisance and protects the public health, safety, and the environment. Additionally, with respect to the proposed Facility, two federal agencies have expressed concerns about locating the proposed operation within an environmental justice

community area. The U.S. Department of Housing and Urban Development has a current open complaint investigation, and the U.S. Environmental Protection Agency (USEPA) External Civil Rights Compliance Office has indicated it is considering whether to open a complaint investigation. As further described below, the relative vulnerability of the host community is a factor in the decision-making process.

II. Procedural Background

On November 11, 2020, CDPH received a Large Recycling Facility permit application for a Class IV(B) scrap metal recycling facility submitted on behalf of General III, LLC (d/b/a Southside Recycling). The site of the proposed facility, at 11600 S. Burley Avenue⁵, is a property owned by South Chicago Property Management, Ltd (SCPM), which is a corporate affiliate of two holding companies, RMG Investment Group, LLC, and RMG Investment Group II, LLC. These entities do business as Reserve Management Group (RMG). Further, General III, LLC, is an affiliate of RMG, which, in the fall of 2019, purchased the metal recycling operations and assets of General Iron Industries. Accordingly, the permit application at issue has commonly been referred to as “the RMG Application.”

Upon review of the initial application, CDPH issued a deficiency letter and request for additional information on December 23, 2020. The Applicant resubmitted the application on January 13, 2021. Thereafter, CDPH requested additional information on March 15 and March 17, 2021, and the Applicant provided additional information on March 17, 2021.

Following receipt of the initial application, CDPH received a high level of public interest with regard to the proposed facility. Accordingly, on November 30, 2020, CDPH created a guidance document entitled Guidelines Regarding the Permitting Process for Consequential Large Recycling Facilities, in order to provide a process for public participation. CDPH posted the application on the City’s website and opened a 30-day public comment period, later extended to 45 days, and held a virtual community meeting on December 10, 2020. Following receipt of the applicant’s amended application package in response to CDPH’s deficiency letter, CDPH again extended the written public comment period by an additional fifteen (15) days.

During CDPH’s review of the written comments and review of the amended application, on May 7, 2021, Mayor Lori Lightfoot received a letter from U.S. Environmental Protection Agency (USEPA) Administrator Michael Regan regarding the application. The USEPA recommended that the City complete an environmental justice analysis, such as a health impact assessment (HIA), prior to reaching a decision on the Application. As a result, Mayor Lightfoot directed CDPH to delay a final decision on the application and initiate the environmental study recommended by the USEPA. With USEPA’s assistance, CDPH conducted a formal HIA to assess current conditions in the community and inform the permitting decision. The HIA process concluded on February 15, 2022. A copy of the final HIA report is attached as Attachment “A”

⁵ According to Chicago Department of Transportation (CDOT) records, the correct legal address for the site is 11554 S. Avenue O. The address “11600 S. Burley” used in the application, in the IEPA permit, in CDPH records, and in other documents, is an unofficial address.

and may also be viewed here: <https://www.chicago.gov/city/en/sites/rmg-expansion/home/health-impact-assessment.html>.

III. Current Facilities on RMG Property

The site of the proposed facility is also the location of four existing permitted recycling facilities: Reserve FTL LLC, dba Reserve Marine Terminals (RMT, aka “Reserve FTL”), Napuck Salvage of Waupaca (Napuck), South Shore Recycling, and RSR Partners (Regency Technologies). As stated by the Applicant in both the initial and resubmitted permit applications, the existing businesses conduct the following operations:

- *Reserve Marine Terminals operates an indoor foundry sand/scrap recovery process and also conducts outdoor scrap processing activities that include sorting, shearing, breakage and torch cutting.*
- *Napuck Salvage of Waupaca operates an indoor aluminum and cast iron recycling process that includes crushing, shredding, screening, and washing.*
- *South Shore Recycling operates a small indoor/outdoor ferrous/non-ferrous scrap recycling center and also processes scrap metal through sorting, shearing, torch cutting and baling.*
- *RSR Partners (Regency Technologies) operates an indoor electronics recycling process that consists of manual breakdown of electronic materials with some limited baling.*

(See page 2 of the November 2020 application and January 2021 resubmittal.)

For reference, attached is a Facility Plot Map provided by the Applicant in its March 17, 2021 additional information submittal (Attachment “B.”) This map purports to show the approximate boundaries of the existing operations. As shown on the map, Reserve FTL currently occupies the greatest portion of the property, operating in at least six separate locations throughout the site, (although not all of these areas are covered by RMT’s recycling facility permit). Another map provided by the Applicant on February 12, 2020 shows that the proposed facility, with a new metal shredder, would be situated on the northern end of the property, encompassing parts of property currently occupied by Southshore Recycling and Reserve FTL (See Attachment “C.”)

Throughout the permit review process, CDPH has sought to understand the interconnections among the proposed facility and the existing facilities. While they each operate under different business models and under separate permits, and each has its own manager and staff, there is some sharing of resources (including, but not limited to, the truck scale, fuel tank, and water trucks, as well as some administrative functions, such as accounting), as described in the Applicant’s March 17, 2021 submittal. In addition, as noted in footnote 1, all of the businesses are all owned by entities which are, in turn, owned by RMG or the individuals who own RMG. (The most recent permit applications for the facilities are attached as Attachment “D.”) Therefore, in conducting the compliance history review, CDPH has taken a close look at all of RMG’s activities over the past three years.

IV. Findings of the HIA

Over the past nine months, CDPH, with the assistance of the USEPA, conducted a Health Impact Assessment in this matter. The purpose of the HIA was to inform the permitting decision, taking into account environmental justice and equity concerns, and CDPH incorporated the results of the final HIA report in making its decision. The final HIA report (Attachment “A”) provides an assessment of current conditions, potential impacts of the proposed facility, and potential burdens and benefits, and makes recommendations in order to minimize burdens and maximize benefits. Materials supporting the HIA are available on the City’s website:

<https://www.chicago.gov/city/en/sites/rmg-expansion/home/health-impact-assessment.html>.

As stated in the report, the HIA process led to the following summary conclusions:

- Large metal recycling processes such as those proposed at Southside Recycling pose certain unique risks to the environment, health, and quality of life;
- The Southeast side includes certain areas that are more vulnerable to pollution than Chicago overall;
- These risks can only be adequately mitigated by operating in accordance with strict permit conditions, including but not limited to throughput caps, proper material storage practices, site access for inspections, and timely reporting and management of unsafe conditions;
- The history of the operation of the site, which has been problematic, does not provide CDPH with confidence that the company will run the site in strict compliance with permit conditions, which CDPH considers essential for avoiding negative impacts on the environment, health, and quality of life for residents of the Southeast side; and
- Therefore, issuance of the RMG/Southside Recycling permit would exacerbate health inequity.

V. Past and Present Environmental Compliance Issues

As stated above, the majority of the site is currently occupied by Reserve Marine Terminal, with smaller operations conducted by three other recycling businesses. (A copy of RMT’s current permit is attached as Attachment “E.”)⁶ During the RMG permit application review process, including the HIA process and compliance history review, CDPH identified the following concerns related to RMT’s operations:

1. Apparent exceedance of permitted capacity. Special Condition #6 in RMT’s permit states that:

The Facility may receive and process no more than 750 tons per day of recyclable materials as specified in Special Condition No. 2. If the Permittee desires additional capacity, the Permittee must submit a revised application to the CDPH for approval.

⁶ Although RMT’s permit has an expiration date of May 15, 2019, the renewal application was submitted prior to expiration. Accordingly, the permit remains in effect until CDPH acts on the pending permit application.

A revised application must demonstrate that the Facility is adequately handling the currently permitted volumes and is sufficiently sized and staffed to accept, store, and process the desired quantity of material.

Pursuant to Special Condition #1, the Permittee may operate from 7:00 a.m. to 9:00 p.m. Monday through Saturday. Thus, depending on the month, this means there are twenty-five to twenty-seven days per month in which the permittee may accept recyclable material, up to 750 tons per day.

In its March 17, 2021 submittal (beginning on page 812), RMG reported the total tonnage of materials accepted by each facility per month in the years 2018, 2019, and 2020. A review of these monthly figures revealed that RMT exceeded its permit limit at least once during each of the following months:

April 2018 (25 operating days): Limit = 18,750 tons / Actual tonnage = 20,545.61
August 2018 (27 operating days): Limit = 20,250 tons / Actual tonnage = 22,731.98
October 2018 (27 operating days): Limit = 20,250 tons / Actual tonnage = 21,898.82
November 2018 (25 operating days): Limit = 18,750 tons / Actual tonnage = 20,130.79
December 2018 (26 operating days): Limit = 19,500 tons / Actual tonnage = 21,296.25
January 2020 (27 operating days): Limit = 20,250 tons / Actual tonnage = 25,664.41

Therefore, based on the information provided by the Applicant in response to CDPH's request for information about the volume of material accepted at RMT, these exceedances indicate multiple apparent violations of Special Condition #6.

2. Failure to obtain appropriate permits for foundry sand operation. As mentioned above, the Applicant stated in both its initial and resubmitted application that "Reserve Marine Terminals operates an indoor foundry sand/scrap recovery process." In fact, on December 16, 2019, RMT applied for an Air Pollution Control (APC) permit for certain equipment related to the "processing of foundry sands." CDPH responded by sending the applicant a deficiency letter in January 2020. As RMT operates a recycling facility permit on the property, CDPH requested additional information to ensure that the proposed operation was allowed under the facility's recycling facility permit. In response, RMT provided a letter to CDPH on February 27, 2020, describing the operation, which, according to RMT, was already underway. RMT stated that:

Reserve Marine Terminals recently added a screening operation to its recycling capabilities at the South Burley campus. This operation consists of a small crusher unit, screeners, conveyors, dust collector, and magnetic separation equipment in an indoor setting. [See Attachment "F."]

Section 11-4-620(a)(1) of the Chicago Municipal Code provides as follows:

Except as otherwise provided in this article or in rules or regulations promulgated thereunder, no person shall install or operate in any way any regulated equipment or area without a valid air pollution control permit issued by the commissioner

Pursuant to 11-4-610, *Regulated equipment or area* means “any combustion equipment, pollution control device, process equipment, or process area.”

Process area means “any location within a facility where chemical, industrial, commercial, or manufacturing operations are conducted, and which emits or has the potential to emit air contaminants. Activities conducted in a process area include, but are not limited to, motor vehicle repairs, grinding, sawing, sanding, cutting, buffing, packaging, assembling, machining, blending, coating, plating, or mixing.” Id.

Process equipment means “any equipment or device used in any industrial, commercial, or manufacturing operations for the mechanical, thermal, or chemical treatment or processing of a raw material, product, or byproduct, and which emits or has the potential to emit air contaminants. Process equipment includes, but is not limited to, tanks, kettles, converters, CNC machines, kilns, ovens, non-residential food preparation units vented to the outdoor atmosphere via a hood, crucibles, stills, dryers, roasters, crushers, grinders, blenders, mixers, reactors, regenerators, separators, filters, spray booths, columns, classifiers, screeners, quenchers, cookers, washers, scrubbers, mills, condensers, absorbers, balers, compactors, unfired pressure vessels, indirect fired vessels, unit heaters, infra red heaters, makeup air units with heating elements, agitators, and sedimentation and classification devices. Process equipment also includes, but is not limited to, equipment or devices required for water conditioning, treatment of industrial and municipal wastes, metallurgical processing, pulp and paper production, food processing, dry cleaning, petrochemical production and other similar operations.” Id.

On September 1st and September 10th, 2021, CDPH inspected the site and observed the foundry sand operation described above, as well as the use of the above-mentioned process equipment, including a crusher unit, screeners, conveyors, dust collector, and magnetic separation equipment. (See inspection report attached hereto as Attachment “G.”)

Furthermore, a review of Google satellite imagery shows that RMT had already been handling foundry sand outdoors at least as early as October 2019. This imagery, attached to the above-referenced inspection report, shows there were multiple material stockpiles on areas totaling approximately six acres on the southwest and south areas of the property. This handling of materials outdoors required additional air permits from CDPH. As mentioned above, the application submitted did not include outdoor areas, and, in any event, no permit has been issued for these foundry sand activities.

Thus, at least two major concerns have been identified regarding the foundry sand operation: 1) RMT installed and began operating regulated equipment and areas *before* applying for or receiving any air pollution control permits; and 2) Contrary to RMT and its parent, RMG’s, repeated statements about this operation being indoors, part of the operation, including storage of

foundry sand and at least one piece of equipment was clearly outdoors. Accordingly, RMT is in violation of 11-4-620(a)(1) of the Code for installing and operating process equipment without an APC permit. Further, RMT and RMG's statements with regard to the indoor nature of the operation at the very least raises questions regarding the company's transparency.

3. Failure to Notify CDPH of IEPA Notices of Violation. Standard Condition #8 in all four existing permits at the site states as follows:

The Permittee shall notify the CDPH of any notices of violations or administrative, civil or criminal citations received by the Facility or any of its operators relating to any alleged violation of any federal, state, or local laws, regulations, standards, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site. Such notifications shall be provided by email to EnvWastePermits@cityofchicago.org.

On December 20, 2019, the Illinois Environmental Protection Agency (IEPA), Bureau of Air, issued South Chicago Property Management, Ltd a Notice of Violation (NOV) for several violations. (See Attachment "H.") These included failing to apply for required air construction permits, failing to pay fees, and submitting requisite annual emissions reports to IEPA. RMG did not notify CDPH about these violations.

4. Failure to control dust. On June 27, 2019, a CDPH inspector issued a notice of violation to RMT for failure to control dust during barge loading and unloading activities at the site, in violation of Special Condition #32 in RMT's permit. RMT pled liable to the permit violation at Administrative Hearings on September 5, 2019. (See Attachment "I.") Pursuant to Rule 4.0 in the 2014 Rules, CDPH's compliance review includes a review of "the applicant, or any owner or officer of the applicant, or any person having control of applicant or any of its operations." Thus, RMT's compliance history is relevant to Southside Recycling's application.

VI. Additional Site Concerns and Lack of Transparency/Responsiveness

1. Soil sampling results show high levels of lead on site.

On December 21, 2021, CDPH, its environmental consultant, and a representative of the USEPA visited the RMG facilities to undertake site sampling. As explained in advance by CDPH to RMG, the sampling consisted of the collection of surface soil samples for laboratory analysis. As also explained, the data was needed to inform the pending HIA, as well as two pending permit applications from RMG, for the Reserve Marine Terminal and Napuck operations, respectively.

Laboratory analysis found that seven of the samples contained excessive levels of lead.⁷ Specifically, lab data showed that these seven samples well-exceeded 800 mg/kg, which is both

⁷ The validated data reports are posted on the City's website at <https://www.chicago.gov/city/en/sites/rmg-expansion/home/health-impact-assessment.html>. In particular, see samples numbered SSR-SS-A01-211221, SSR-ST-

the USEPA industrial soil Regional Screening Level (RSL) and the USEPA Removal Management Level (RML) for lead. The levels in these samples ranged from 1,000 mg/kg to 58,000 mg/kg.

These high levels of lead contamination are of significant concern for a number of reasons. Lead-contaminated soil presents a risk to workers at the site, who are most likely to breathe in contaminated dust particles. Lead-contaminated soil can also leave the site through track out from trucks and fugitive dust emissions.

Notably, throughout the day of sampling activities, RMG personnel disrupted CDPH and its consultant as they performed their duties with frequent verbal interruptions. Sampling was significantly slowed down by RMG's obstruction and argumentative behavior. By the end of the day, RMG's conduct had escalated to verbal harassment directed at the leader and members of CDPH's sampling team, creating a threatening environment which resulted in CDPH terminating its sampling activities early and departing the site.

2. Recycling activity on unpermitted area.

In addition to the foundry sand operation mentioned above, CDPH observed other unpermitted activities on the southern part of the property during the December 21, 2021 sampling event. In particular, CDPH observed recyclable materials consisting of small iron fragments and fines (called "shrinkage" by RMG personnel). RMG admitted that this material was generated from the breaking and screening of large pieces of scrap metal (iron) at the RMT operation on the northern part of the site and then trucked to the southern part of the property for further processing. However, this activity was not included in any of RMG or RMT's permit materials.

3. Building collapse.

On or about July 26, 2021, CDPH was informed by the Department of Buildings (DOB) that a building collapsed on the RMG property. RMG never reported this building collapse to CDPH. As CDPH later learned, the building was a large warehouse located in the southwestern portion of the property. According to RMG's Facility Plot Map (Attachment "B"), the warehouse was in an area on the border between the areas delineated as occupied by RMT and Napuck.

As stated in an Administrative Order issued by DOB on September 7, 2021 (attached hereto as Attachment "J"):

"...on or about July 23rd, 2021 the Department of Buildings inspected the above reference property in response to an immediate response call for a building collapse. The building failure resulted [sic] constituted an actual and imminent danger to the public [therefore,] a[n] Emergency Permit must be applied within 72 hours."

DOB identified violations for properties needing partial or full demolition. A DOB demolition permit was obtained and the violations were addressed. On August 2, 2021, two CDPH inspectors conducted an inspection of the site and were told that the warehouse “sustained damage during a partial collapse in or about April 2021.” (See the August 2, 2021 Inspection Report, attached hereto as Exhibit “K.”) The inspectors took samples of suspected asbestos-containing material (ACM). After lab results confirmed the presence of ACM, CDPH issued a ticket based on the owner’s violation of 11-4-2180(a), for failing to properly maintain ACM in a Facility. The ticket is currently pending at the Department of Administrative Hearings. In addition, the Applicant’s failure to report the collapse raises concerns about RMG’s transparency.

4. Concerns regarding responsiveness.

In addition to the above-described violations, CDPH has concerns regarding the Applicant’s lack of responsiveness throughout the permit review process.

For example, upon review of RMG’s initial permit application, CDPH identified many significant omissions and inconsistencies, some of which were only remedied after repeated requests from CDPH. In particular, CDPH noted the following significant deficiencies:

- The proposed facility boundaries provided by the Applicant inexplicably omitted the 100’ wide section of the Property the Applicant intends to use for the barge-loading of recyclables.
- The Applicant failed to provide a copy of the April 22, 2019 Findings of the Zoning Board of Appeals, CAL 178-19-S & 179-19-Z (hearing held March 15, 2019), and any plans and drawings referenced there, as required under section 3.8 of the Rules for Large Recycling Facilities (“the Large Recycling Rules”).
- The Applicant failed to provide process flow diagrams and other information required under 3.9.21.1 of the Large Recycling Rules. Although this information was provided to the IEPA, the Applicant refused to give this information to CDPH, citing business confidentiality.
- The Applicant misrepresented drainage and federal Clean Water Act status by not disclosing that portion of the facility and the surrounding Property area are covered under a National Pollutant Discharge Elimination System (NPDES) permit and not providing a Storm Water Pollution Prevention Plan.
- The Applicant requested CDPH to authorize operating hours that conflicted with the hours authorized under IEPA’s air construction permit, No. 031600SFX.

As a result, on December 23, 2020, CDPH issued a Deficiency Letter and Request for Additional Information that contained over thirty-four items needed in addressing the Application’s shortcomings. After RMG responded to this request, CDPH still had difficulty obtaining a copy of requested emissions calculations from RMG’s air consultant. This information was needed to verify the calculations fed into the air model. The consultant initially refused CDPH’s request and only provided the information after repeated requests. However, RMG continued to refuse to provide the process flow diagrams requested by CDPH, instead stating that CDPH would need to come to RMG’s office in order to review the information.

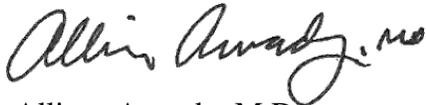
Thus, the Applicant's track record in operating similar facilities within the RMG campus gives CDPH reason to weigh the unpredictable risks and hazards associated with large metal recycling more heavily in assessing the likelihood of adverse outcomes for an already-burdened community.

Conclusion

Therefore, for all the reasons explained above, CDPH finds that the facility proposes to undertake an inherently dangerous activity in a vulnerable community area, and the Applicant failed to provide sufficient evidence that the Facility can comply and stay in compliance with the terms and conditions of a Permit, the Code, or the Rules as necessary to fully protect the residents of the Southeast Side. Accordingly, the permit application is denied.

Pursuant to section 11-4-040(b) of the Municipal Code, the Applicant may request a hearing on this denial by submitting the attached form within 15 days of the service date of this letter.

Sincerely,



Allison Arwady, M.D.
Commissioner

Enclosures

Hearing Request Form

- Attachment A – Health Impact Assessment Report
- Attachment B – Facility Plot Map, March 17, 2021
- Attachment C – Revised Facility Map, Ambient Air Boundaries, February 12, 2020
- Attachment D – Most recent permit applications for four existing facilities
- Attachment E – Current Permits for four existing facilities
- Attachment F – RMT letter regarding foundry sand operation, February 27, 2020
- Attachment G – CDPH Inspection report regarding foundry sand operation, September 2021
- Attachment H – IEPA Violation Notice, December 19, 2020
- Attachment I – RMT dust violation, Administrative Order, September 5, 2019
- Attachment J – DOB Administrative Order re. building collapse, Emergency, September 7, 2021
- Attachment K – CDPH Inspection Report, August 2, 2021

**HEARING REQUEST FORM
PERMIT DENIAL
UNDER SECTION 11-4-040 OF THE MUNICIPAL CODE OF
CHICAGO**



*Note: This form must be received by the Department of Public Health, Environmental Permitting and Inspections Unit, at 333 S. State St., Room 200, Chicago, IL, 60604, within **15 calendar days from the service date** of the Permit Denial Letter. Failure to submit this completed form within the specified time frame shall constitute a waiver of the opportunity for a hearing.*

Name: _____

Address: _____

Telephone: _____

I received a permit denial letter from the Department of Public Health on _____, pertaining to the property or facility located at _____.

I hereby demand a hearing in accordance with the provisions of Sections 11-4-040 and 11-4-025(c) of the Municipal Code of Chicago, which require the Commissioner of the Department of Public Health to initiate a hearing with the Department of Administrative Hearings within 30 calendar days of receiving this demand.

I understand that the permit denial will be stayed pending the hearing and final determination.

Signature

Date

For office use only: Date received: _____ Time _____ Received by: _____

HEALTH IMPACT ASSESSMENT

RMG/SOUTHSIDE RECYCLING
PERMIT APPLICATION

**Summary
Report**

February 2022

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INTRODUCTION

On November 11, 2020, Reserve Management Group (RMG), doing business as Southside Recycling, applied to the Chicago Department of Public Health (CDPH) for a [permit to operate a large metal recycling facility](#) on the Southeast side of Chicago. During CDPH’s review of this application, the U.S. Environmental Protection Agency (U.S. EPA) recommended that CDPH complete a health impact assessment (HIA) to ensure a thorough consideration of health and environmental justice concerns. In response, CDPH immediately paused its permitting process and began work on the HIA in May 2021.

This report summarizes our findings from the HIA, which was conducted in close coordination with and reliance on both the U.S. EPA and our environmental consultant, and with input from community members, environmental justice advocates, and public health stakeholders.

BACKGROUND ON THE RMG/SOUTHSIDE RECYCLING FACILITY PROPOSAL

RMG is an Ohio-based metal recycling company. The company has operated recycling facilities on a 175-acre property on the Southeast side of Chicago – the location of a former steel mill – for more than 30 years. Today, there are four businesses on the campus: Napuck Salvage of Waupaca, South Shore Recycling, Reserve Marine Terminals and RSR Partners (Regency Technologies).

In 2019, RMG purchased General Iron, which was at that time operating a large metal recycling facility on Chicago’s North side, and prepared to relocate certain recycling assets to RMG’s existing campus on the Southeast side. RMG is currently seeking a permit to operate Southside Recycling – a new facility that would accept a large volume of scrap metal, including end-of-life vehicles, for processing and recycling – at 11600 S. Burley Ave.



The Illinois EPA issued RMG a state construction permit for Southside Recycling in June 2020.

Following standard procedure, RMG also received the necessary special use zoning approval from the City of Chicago in 2019. In March 2021, with support from CDPH, Chicago’s City Council approved the [Air Quality Zoning ordinance](#), which now requires certain industrial zoning applicants to submit an air quality impact study and get a written recommendation from CDPH at the time of initial zoning decisions. RMG received its zoning approval prior to passage of this ordinance, and CDPH did not play a role in earlier siting decisions for the proposed Southside Recycling operation.

The Air Quality Ordinance, approved by City Council in March 2021, regulates the construction and expansion of certain facilities that create air pollution. The ordinance requires site plan review and approval by the Department of Planning and Development (DPD), the Chicago Department of Public Health (CDPH), and the Chicago Department of Transportation (CDOT).

RMG requires a CDPH air pollution control permit and a recycling facility permit for Southside Recycling. Permits are issued only if applicants meet zoning and environmental requirements. The Commissioner of CDPH can require special permit conditions based on past violations or other concerns. Consistent with the permit previously issued by the Illinois EPA, CDPH issued an air pollution control permit to RMG in September 2020 for the installation, but not the operation, of pollution control equipment. The facility cannot start operations without first being issued a recycling facility permit.

Throughout the Illinois EPA and CDPH permitting processes, community members and environmental justice advocates have protested the location of Southside Recycling. These protests have centered on concerns about environmental and community impacts, as well as the equity implications of policy decisions that may support de-industrialization of more affluent neighborhoods, while industry continues to be concentrated in areas like Chicago's Southeast side.



LARGE RECYCLING FACILITIES

Large recycling facilities with shredders collect and process automobiles, appliances, and other large items containing recyclable material. Recovered metals are sold to other end users – for instance, manufacturers and foundries. As such, recycling facilities play an important role in keeping metal materials out of the waste stream and landfills by preparing them for reuse. Using recycled metal in manufacturing processes reduces the need for environmentally harmful mining activities.

Large metal recyclers are fundamentally different from most other heavy industry in that they are dependent on suppliers to sort and process the materials they bring in for recycling. This includes “de-polluting” end-of-life vehicles by draining combustible fluids and removing batteries and other components. Similarly, suppliers (who often are individuals with pickup trucks full of miscellaneous scrap) are relied on to sort materials and exclude or separate out certain problematic items. The quality control issues inherent in this business model are different in kind from those of, say, large manufacturers with standardized parts, assembly processes, and final product testing and distribution.

Consequently, a facility like the one proposed for the Southeast side presents unique risks and uncertainties. As noted in a recent [U.S. EPA Enforcement Alert](#):

Significant amounts of non-metal materials are contained in the shredded materials, which can vaporize and become organic air emissions. These materials include plastics, paints, caulks, sealants, rubber, switches, fluids, and fluid residues. The process of grinding and shredding scrap metal generates heat, resulting in residual fluids and fuels becoming gases. The violent nature of the process creates the potential for particulate matter emissions of various sizes. Thus, the process generates emissions of VOCs, particulate matter, and hazardous air pollutants including lead, zinc, cadmium, mercury, and organic pollutants.

Beyond the risk of emissions, if fluids and certain materials are not properly removed and disposed of prior to shredding, there is a risk of fire and explosion – as occurred at General Iron on May 18, 2020. Industry experts have estimated that there are [hundreds of fires at metal recycling facilities each year](#). Recycling facilities also contribute to issues such as noise and traffic that impact the quality of life for nearby communities.

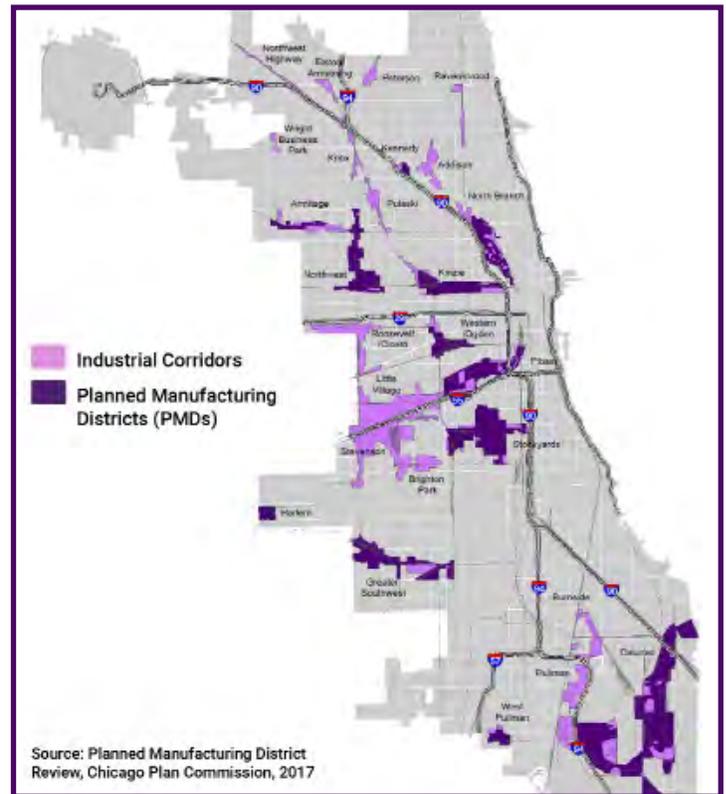
INDUSTRIAL CORRIDORS & PLANNED MANUFACTURING DISTRICTS

The city of Chicago is a center for industrial development with a rich industrial history, including strong freight and manufacturing clusters.

Chicago’s industrial corridors and planned manufacturing districts (PMDs) are designated areas with special land use provisions that support manufacturing, transportation, warehousing, and other industrial uses as part of a diversified economy. According to the [Department of Planning & Development](#), “each corridor has unique assets and characteristics that collectively function on behalf of the entire city, in which companies expand, relocate, and depend upon each other as their needs evolve within a changing economic landscape.” These industrial corridors and PMDs are located across the city of Chicago.

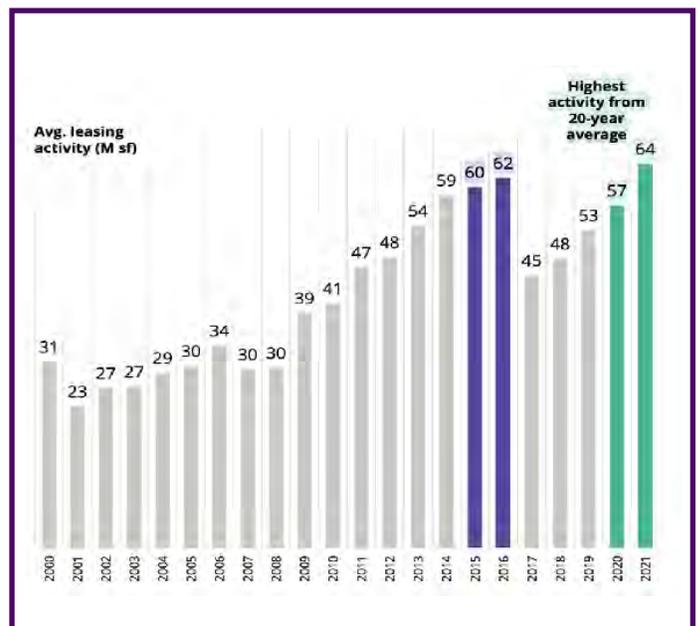
Today, the City’s 26 formal industrial corridors range in size from 70 to 3,500 acres, and contain about 12 percent of all city land.

Post COVID, Chicago’s industrial market has grown at a record rate, with industrial leasing activity up 48.3% from 2020-2021 versus the prior 20-year annual average leasing activity. (Chicago Industrial Market Report, Avison Young)



“Developed and emerging economies around the world have been transformed in recent years by new technologies, advances in freight and logistics, and evolving consumer demand. These trends and climate change will increasingly shape global commerce. Metropolitan Chicago is well-positioned not just to withstand these complex factors but to seize new opportunities due to our strengths among a range of industries and our diverse and skilled population. The region is also endowed with the preeminent North American freight hub, active and engaged civic leadership, and world-class institutions of education and research.”

Chicago Metropolitan Agency for Planning, On to 2050



PROMOTING HEALTH & RACIAL EQUITY

CDPH is committed to promoting health and racial equity. Even before the COVID-19 pandemic, Black Chicagoans lived an average 71.4 years while life expectancy for white Chicagoans was 80.2 years. Chronic disease is the leading driver of this nearly 9-year life expectancy gap, as well as decreasing life expectancy in Chicago’s Latinx population. Pollution exposure can both increase the risk of chronic illnesses like heart and lung diseases and contribute to worse outcomes for people living with certain health conditions.

In [Healthy Chicago 2025](#), our citywide plan to close this life expectancy gap, we lay out strategies to address the root causes of health – including by identifying and redressing policies and systems that create inequities in community conditions. The plan identifies improving the



environment as a priority, so that all Chicagoans – and particularly people who live in communities disproportionately burdened by pollution – can “breathe clean air free of harmful pollutants.”

CDPH recognizes that low-income communities and communities of color are disproportionately impacted by pollution. In 2020, CDPH published the [Air Quality and Health Report](#) outlining community-level data on air quality, health, and social factors to identify, for the first time, which neighborhoods should be prioritized for efforts to mitigate and reduce air pollution. We have already seen other City departments use this report to, for example, prioritize the electrification of bus routes and plan for tree planting initiatives.

**HEALTHY CHICAGO
2025 VISION**

A city where all people and all communities have power, are free from oppression and are strengthened by equitable access to resources, environments and opportunities that promote optimal health and well-being.

STRENGTHENING ENVIRONMENTAL PROTECTIONS

The CDPH Environmental Permitting and Inspection Program is responsible for permitting, inspections and enforcement of environmental regulations in Chicago. CDPH conducts thorough reviews of permit applications to ensure that they meet all applicable requirements.

CDPH and the City of Chicago have adopted recent policy changes to strengthen environmental enforcement and reduce environmental impacts, particularly in vulnerable communities. In June 2020, given new findings about the impacts of facilities such as General Iron, CDPH released the [Rules for Large Recycling Facilities](#). Created with input from local environmental justice groups and industry representatives, these standards are the first ever

Everybody doesn't breathe the same air. Air quality is worse in low-income neighborhoods located near industrial areas and major roadways.

CDPH Air Quality and Health Report

put in place in Chicago that specifically address the impacts of larger scale recycling facilities. The rules impose extensive requirements, including: air impact study and continuous air monitoring, real-time notification to CDPH of air monitor exceedances, noise impact assessment and monitoring, and more stringent record-keeping requirements. The rules also prohibit dust from leaving the site and include many requirements to minimize and control dust and pollution, such as submission of a fugitive dust plan, requirements to pave surfaces, regular street sweeping, visible dust opacity monitoring, height limits on stockpiles, thermal camera hotspot monitoring of stockpiles, development of a stormwater pollution prevention plan for facilities that discharge to storm sewers or that are near the river, and full enclosure of shredding equipment and waste. Most of these rules apply to all recyclers going forward, including those with existing permits when they apply for permit renewals.

In recent years, CDPH and the City have additionally:

- ▶ Issued **Rules for Control of Emissions from Handling and Storing Bulk Materials** that require continuous particulate matter and meteorological monitoring at facilities that process, handle, transfer, load, unload, stockpile, or store bulk solid materials. Any manganese-bearing bulk material facilities that do not enclose material must install and operate a filter-based sampler that measures ambient metals.
- ▶ Increased **environmental fines** to address more serious issues related to violations of air pollution, fugitive dust and demolition ordinances.
- ▶ Drafted **rock crusher rules** to require enhanced environmental controls. We expect to promulgate the rules later this year.
- ▶ As above, passed the **Air Quality and Zoning ordinance**, which requires industrial zoning applicants to submit an air quality impact study and get a written recommendation from CDPH and the Chicago Department of Transportation (CDOT) as a condition for site plan approval.

HEALTH IMPACT ASSESSMENT PROCESS SUMMARY

A health impact assessment (HIA) is a practice that aims to increase considerations of health and equity in decision making. HIAs use a range of data sources, methods, and stakeholder input to increase understanding of how a proposed policy, plan, or project will impact the health of a population. Once the potential health impacts are assessed, an HIA makes recommendations to maximize health benefits and mitigate health threats.¹

Considerable diversity exists in the practice and products of HIA. While an HIA must meet certain minimum elements described in the [Minimum Elements and Practice Standards for Health Impact Assessment](#), the specific application varies based on the timeline, decision context, available resources, and expertise.² This summary of the RMG/Southside Recycling HIA follows the standard six-step process of health impact assessment methodology. Steps include (1) screening, (2) scoping, (3) assessment, (4) recommendations, (5) reporting and (6) monitoring.

- ▶ For a description of how our HIA meets the [Minimum Elements and Practice Standards for Health Impact](#), see our HIA Process Evaluation (Appendix A)



step 1 SCREENING: Determine the need and value of an HIA for the decision-making process.

The U.S. EPA recommended an HIA as a process to inform CDPH's decision on the Large Recycling Facility permit application. After considering key screening questions, CDPH determined that an HIA would provide necessary additional insight into the health equity impacts of the RMG/Southside Recycling proposal.

step 2 SCOPING: Determine which health impacts to evaluate, methods for analysis, and priority populations.

CDPH solicited broad input on the RMG/Southside Recycling permit. Through public town halls, an extended public comment period, and daily media monitoring, we received insight from thousands of community members, local organizations, environmental advocacy groups, public health professionals, and other stakeholders to help us understand the impacts – both positive and negative – of greatest interest. CDPH used this feedback to establish the HIA scope, which we validated through additional engagement meetings during the HIA process. The U.S. EPA provided guidance on methods for analysis.

step 3 ASSESSMENT: Gather existing conditions data and evaluate potential health impacts.

CDPH conducted a mixed-methods assessment to understand existing conditions and potential environmental, health, and social/quality of life impacts on the Southeast side. We reviewed literature to help us analyze the environmental, health, and quality of life impacts of industrial facilities. We received input directly from community residents through small-group feedback sessions and a survey conducted as part of the HIA process. The U.S. EPA, Agency for Toxic Substances and Disease Registry (ATSDR), and CDPH's environmental consultant provided new analysis, sampling, and modeling to help us quantify current exposures and associated health risks, as well as the potential impacts of the proposed Southside Recycling operations.

step 4 RECOMMENDATIONS: Make recommendations to mitigate negative impacts and maximize positive impacts.

CDPH reviewed best and promising practices from around the country and also sought input from stakeholders on policy or process reforms that would advance racial and health equity and environmental justice. Community members offered their recommendations through small-group feedback sessions and a survey.

step 5 REPORTING: Develop a summary report to communicate findings and recommendations.

CDPH has made our materials associated with the HIA process – including the permit application, public comments, HIA meeting documentation, and underlying data – publicly available on our [website](#). With this report, CDPH is sharing our analysis, interpretation, and recommendations.

step 6 MONITORING: Evaluate the effects of the HIA on the decision, implementation of the project, as well as community health effects.

CDPH is committed to applying the findings of the HIA to the ultimate RMG/Southside Recycling permit decision, as well as tracking the effects of this decision on the community. Our HIA includes a monitoring plan.

SCREENING & SCOPING

SCREENING

Screening was conducted by CDPH and U.S. EPA and was informed by discussions and input from environmental organizations, community groups and residents through town hall meetings held in July and December 2020 and written comments as part of the permitting process. The following factors supported the use of HIA for this decision-making process:

- The potential to explicitly consider environmental justice and health equity in the review of this permitting decision;
- The opportunity to comprehensively review pertinent data not limited to just environmental impacts of the permitted facility, but existing and potential environmental, social and health impacts;
- The support of U.S. EPA;
- CDPH authority to review applications to determine whether or not to grant permits, request additional information, and recommend special conditions or mitigation strategies in the event a permit is granted; and
- The opportunity to highlight recommendations for broader policy and process change and to discuss these potential strategies with community partners.

SCOPING

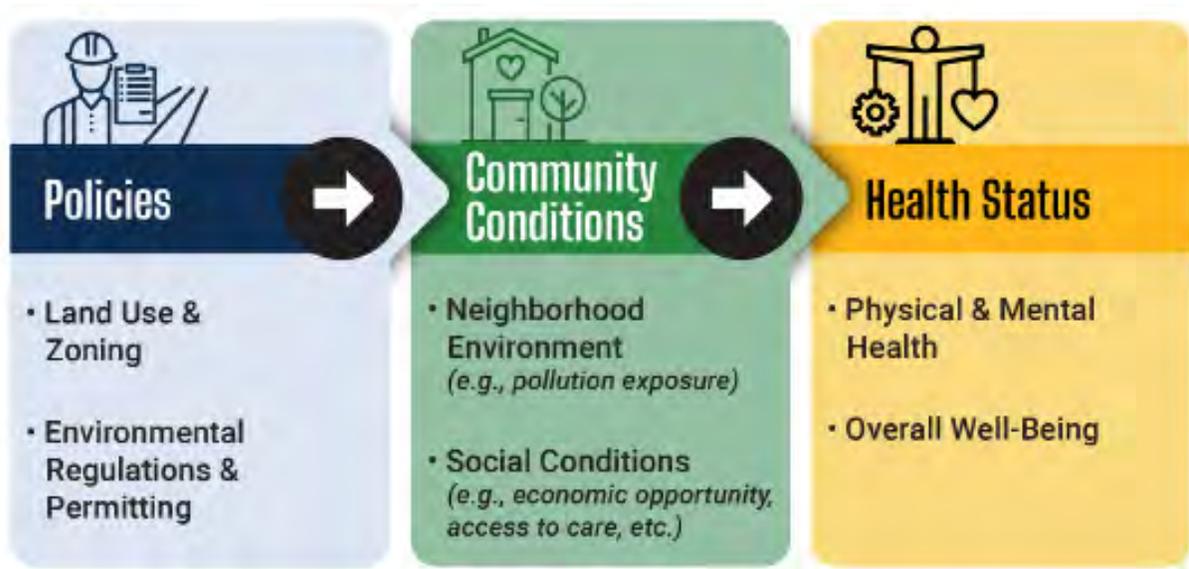
Scoping was conducted by CDPH and informed by guidance from the U.S. EPA, literature review, as well as discussions and input from environmental organizations, community groups and residents through community town hall meetings, review of written comments submitted as part of the permitting process, and public engagement sessions as part of the HIA process.

CONCEPTUAL FRAMEWORK, RESEARCH QUESTIONS, AND PATHWAY DIAGRAM

Assessing health impacts through a racial and health equity and environmental justice perspective requires moving beyond traditional risk assessment models that focus primarily on exposure to chemicals and their associated health effects. We must expand to consider how structural and social determinants of health – the conditions in which people are born, grow, live, work, and age – together with environmental pollution contribute to inequities in health and well-being. Indeed, the U.S. EPA has established that research is required to understand the extent to which these factors contribute to disproportionate risk and health inequities in overburdened communities, noting that this understanding of cumulative exposures must ultimately guide informed and effective regulatory and community-based decisions and interventions.³



In the absence of existing practice standards for applying cumulative impact assessment, CDPH was compelled to use the best available evidence, supplementing it with theory and promising practices. For the purposes of this HIA, we developed a conceptual framework for examining how industrial development affects conditions on the Southeast side, which in turn contribute to residents' health status.



Ecosocial Theory and the concept of embodiment helps us connect environmental exposures and outcomes. Because people incorporate biologically the conditions in which they live - history and context matter. We know that systemic racism permeates the systems and policies that shape community conditions, driving inequities and producing the lived realities of embodied (in)justice.^{4,5} Similarly, the concept of weathering helps us understand the cumulative biological impact being chronically exposed to, and having to cope with, socially structured stressors.⁶

Because racial inequities can be perpetuated through policies like zoning and permitting, CDPH incorporated theory and elements from race equity impact assessment within this HIA. This approach is intended to broaden understanding of how structural and social determinants contribute to disproportionate risk and must be considered within an assessment of cumulative impacts of this permitting decision on already overburdened communities.

Tools such as race equity impact assessments (REIA), can help us unpack these connections between systemic racism, social determinants, and health inequities, and integrate explicit consideration of racial equity into decision-making.⁷ One of the defining elements of REIA practice is asking who benefits and who is burdened, along with identifying strategies to mitigate unintended consequences and advance racial equity.

“ Approving Gill’s permit will place another source of environmental pollutants in a mostly Latinx and Black community already burdened by serious health threats...It continues an unjust pattern of environmental racism and undermines our future aspirations for economically and environmentally sound planning across Chicago. ”

Metropolitan Planning Council

Therefore, in scoping our HIA, we developed research questions that blend traditional environmental and health risk assessment with emerging cumulative impact analysis and best and promising practices in racial equity impact assessment. This approach allowed us to take a holistic view of potential impacts and to identify how the permit decision would either reduce, maintain, or increase racial equity. Our research questions were:

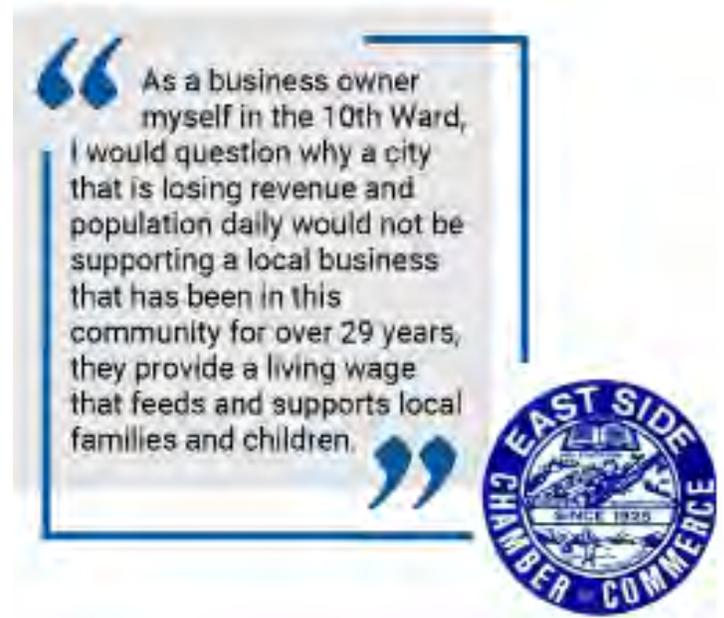
1. *What are the current community conditions on the Southeast side?*
2. *What are the potential impacts (both positive and negative) of the proposed Southside Recycling operations for Southeast side residents?*
3. *Who would benefit and who would be burdened by a decision to grant the permit?*
4. *How could we minimize burdens and maximize benefits?*
5. *What did we learn through this process about ways to improve City and other policies and practices to promote health and racial equity?*



For more information about the resources we reviewed to develop our conceptual framework, see our Literature Review (Appendix B).

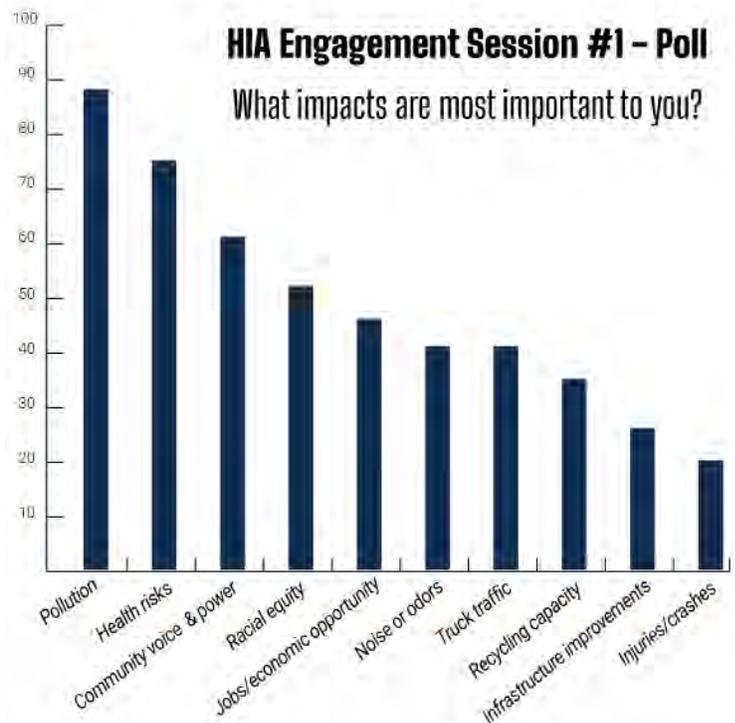
POTENTIAL IMPACTS

Within this framework, we examined issues and indicators that were of greatest interest to the community, as identified from public comments and direct input during the HIA process. Community town hall meetings were held in July and December 2020 and HIA engagement sessions were held in November and December 2021. There were also open public comment opportunities on both the Rules for Large Recycling Facilities and the RMG/Southside Recycling permit application. CDPH received over 4,000 written comments on the permit application. Some of these engagement opportunities preceded the start of the HIA process, but nonetheless yielded invaluable input on community concerns.



CDPH reviewed the extensive comments on the permit application submitted in writing and through town hall meetings. The themes of potential benefits and burdens that were raised by stakeholders during the permitting process were:

- racial equity (focusing on the relocation from a predominantly white, high-income community to a predominantly Latinx, lower income community)
- safety
- air and water pollution – and mitigation of environmental impacts
- infrastructure changes
- truck traffic
- quality of life (e.g., noise, odors)
- job creation
- recycling capacity



CDPH used these inputs to draft an initial pathway diagram, which we presented during the first HIA public engagement session held on November 4, 2021. At that time, CDPH polled participants about the impacts they were most concerned about. The choices were drawn from the benefits and burdens already identified through comments. Participants could select all that applied. By far the most selected responses were air pollution and health impacts with 75% and 65% of respondents selecting those options, respectively. The other top responses were racial equity (53%), community voice and power (45%) and jobs and economic opportunity (40%).

HIA Engagement Session #2 - Small Group Discussion Notes

Benefits?

- “Recycling keeps containers’ scrap out of the landfill, supports other companies and vendors.”
- “Employed hundreds of people over the years. Around 80% minority. Operation has been compliant. Good paying jobs with benefits.”
- “Potential benefit by not having abandoned property, which attracts fly dumpers.”

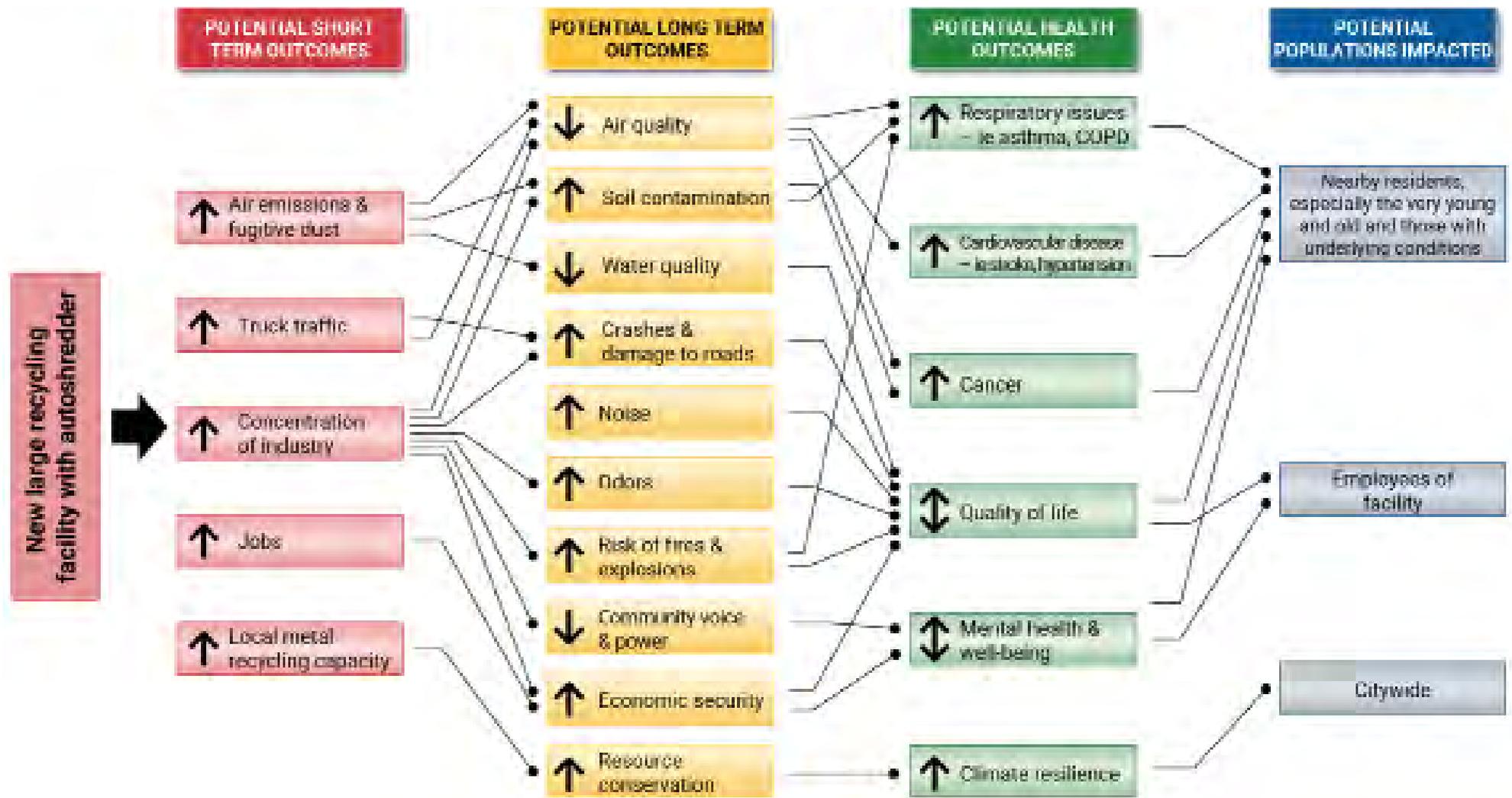
Burdens?

- “The facility is one mile from high school and elementary school, exposing students and teachers, who deserve to breathe clean air and not fumes.”
- “Having the facility here takes away the opportunity to use this land for natural space.”
- “We do not want to experience the clouds of metal dust.”
- “Cumulative impact of all industries should be considered. On top of fumes from vehicles and other industry, City should look at cumulative impact on air.”

Lived Experience?

- “This is a community that has suffered too much from burdens of pollution, lack of investment, lack of representation. This is going to further harm people.”
- “We need to move in a new direction. The SE side does not have to continue to be home to dirty industry.”
- “RMG purchased the old Republic Steel property 20+ years ago and employed over 200 people. Everything is starting to get developed and we are poised for a great comeback.”

Following the meeting, CDPH finalized the Pathway Diagram, as shown below.



CDPH then used the Pathway Diagram to consider which communities would be most affected by the impacts to be assessed with this HIA. CDPH considered three factors to define a geographic scope.

Geographic Scope Factors



Ultimately, we determined to focus our HIA on the community areas of **East Side**, **Hegewisch**, and **South Deering**, which are geographically proximate to the Southside Recycling location. Within that area, we were attentive to populations that are most vulnerable to pollution exposure, including the young and old as well as people with underlying health conditions like heart and lung disease.

! For a full discussion of how CDPH used community input to inform the HIA scope, see our Community Input Summary (Appendix C).

The work of Healthy Chicago 2025 requires a new approach, both to the process for how we make change and the values that guide our actions. This is how we'll ensure across all our priority areas that Chicagoans – especially Black and Latinx – have voice and choice in decisions that affect them and that disinvested communities receive equitable funding and support.

ASSESSMENT

METHODOLOGY

Based on this framework, CDPH applied a mixed-methods assessment approach to evaluate the current conditions and potential impacts – both positive and negative – of the proposed RMG/Southside Recycling facility. Data sources for this Assessment included the following:

● Permit Application

The [Southside Recycling permit application](#) (as resubmitted to CDPH on January 13, 2021, following CDPH's deficiency letter) and information provided to CDPH in response to our subsequent [information request](#). This includes modeling, mitigation plans, a traffic study, and the original zoning application, among other materials.

● Community Input Summary

CDPH analyzed community input provided through two town halls, [4,000+ public comments](#), daily mainstream and social media monitoring, and facilitated small group discussions and surveys conducted during HIA public engagement sessions. See Appendix C. This input was used for both Scoping (as described above) and in the Assessment.

● Existing Conditions Summary

To characterize current conditions on the Southeast side, CDPH analyzed quantitative data from various public health data sources, including but not limited to the American Community Survey (US Census Bureau); EJSCREEN (US EPA); PLACES (CDC); Illinois State Cancer Registry, Hospital Discharge Data, Birth Certificate Data, Death Certificate Data (IDPH); Healthy Chicago Survey (CDPH); and Land Use Inventory (CMAP). These data are presented in Appendix D. CDPH also referenced data provided in the U.S. EPA's [Southeast Chicago Ambient Air Quality Analysis](#), the [Air Quality and Health Report](#), and [ATSDR Health Consultation](#) to characterize current conditions on the Southeast side.

● Environmental and Health Risk Assessment

CDPH and its environmental consultant, with direction from EPA, prepared a comprehensive inventory of emission sources, calculated potential emissions, modeled air dispersion and deposition of contaminants, and conducted on-site soil sampling, then used this information as inputs for a risk model. These data allowed us to characterize existing site conditions and predict how the proposed Southside Recycling operations – together with current RMG business operations on the property – would affect community health risks. See Appendix E.

● Literature Review

CDPH reviewed relevant literature to help us analyze the environmental, health, and quality of life impacts of industrial facilities. A bibliography of our sources is included as Appendix B.

! All supporting documents for our assessments are included in the appendices. These documents provide detail about each assessment's methods, indicators, data sources, and limitations.

FINDINGS

Key findings from our assessment are summarized here by HIA research question.

1

What are the current community and health conditions on the Southeast Side?

For much of the 19th and 20th centuries, the Southeast side of Chicago was an industrial and economic hub for the city of Chicago – driven in part by the steel industry boom during and after World War II. When demand for steel declined and international competition increased in the 1970s and 1980s, steel mills closed and layoffs left the neighborhood more economically depressed. Today, residents of Southeast Chicago remain proud of the community’s industrial and working-class heritage; however, they continue to grapple with a legacy of pollution and social issues that affect neighborhood conditions and resident health.

! For the Existing Conditions Summary, CDPH characterized community conditions on the Southeast side as compared to other areas in the city. We summarize our key findings here, and the full assessment is included as Appendix D.

“ The Calumet Industrial Corridor includes at least 80 heavy manufacturing sites – chemical factories, plastics manufacturers, paint companies, landfills, recycling and waste management plants, railways. **”**
Washington Post, Oct. 22, 2021.

Community Demographics

According to the 2019 5-year American Community Survey estimates, Southeast side residents are predominantly people of color: South Deering – 96%, East Side – 86%, and Hegewisch – 65%. Between 5 and 15 percent of households (South Deering – 10.7%, East Side - 15.2%, Hegewisch – 5.0%) are linguistically isolated, meaning no household members 14 years and older speak English “very well,” compared to the city overall at 8.4%. All three community areas rank as having moderate (Hegewisch – 62%) to high (South Deering – 94%; East Side – 85%) economic hardship, which takes into account factors such as unemployment, age dependency, education, per capita income, crowded housing, and poverty.

Within ½-mile from RMG:

- 1,799 people live in residential areas located downwind
- Population is 71% Hispanic or Latino
- Up to 37% of people speak primarily Spanish
- Sensitive populations include:
 - ▶ Students at Washington High School and Washington Elementary.
 - ▶ Daycare and Head Start Program that cares for infants as young as 6 weeks

(ATSDR, Health Consultation)

Children and older adults are at increased risk of pollution-related health effects. Twenty-seven percent (13,179) of the total population in these community areas is less than 18 years old, while 14% (6,763) are 65 years and older. For comparison, Chicago’s population is 21% under 18 years old and 12% 65 years and older. Southeast side community areas have lost 4% (1,721) of their total population since 2010, according to the 2020 US Census; Chicago had a two percent increase in population during this same time period.

Environmental Conditions

Community conditions on the Southeast side are affected by past and current presence of industry. In 2020, one-third of all air toxic releases in the city of Chicago, more than 300,000 pounds, were released from eight facilities located on the Southeast side, as reported to the US EPA Toxic Release Inventory Program. As of 2015, industrial land use on the Southeast side is 40 to 66% higher than in Chicago overall (CMAP Land Use Inventory). South Deering, East Side and Hegewisch are the top three community areas in 2020 most proximate to Superfund (toxic waste) sites among all Chicago community areas (US EPA EJSCREEN). Median home values on the Southeast side are at least one hundred thousand dollars less than the median home value in Chicago overall (2019 5-year American Community Survey).

'The city of Chicago has long used the Southeast Side and other lower-income communities of color ... as dumping grounds for heavy and dirty industries,' said Nancy Loeb, director of Northwestern University's Environmental Advocacy Center.

Washington Post, Oct. 22, 2021.

The U.S. EPA provided an analysis of ambient air quality for Southeast Chicago. Their study found that, with the exception of ozone, the entire Chicago area is in attainment with the National Ambient Air Quality Standards (NAAQS). Over the past 10 years, concentrations of all pollutants measured at the Washington High School site on the Southeast side have either decreased or remained flat; however, concentrations of coarse particulate matter (PM10) have increased over the past three years. Annual averages of all metals measured at the Washington High School site have also been below relevant standards for the past 10 years. When compared to similar data collected across the Chicago area, Southeast Chicago:

- ranks 6 of 12 for an annual PM2.5 design value;
- is tied for the highest daily PM2.5 design value;
- ranks 2 of 3 for the highest annual average PM10;
- ranks 4 of 10 for annual ozone design value; and
- has a lead design value equivalent to the only other lead site in the Chicago area.

These data generally show that policies and enforcement efforts are improving air quality for the Southeast side, although more work is needed to address pollution – especially particulate matter.

Importantly, the report notes that the EPA recently announced that it is considering whether to strengthen the PM NAAQS.

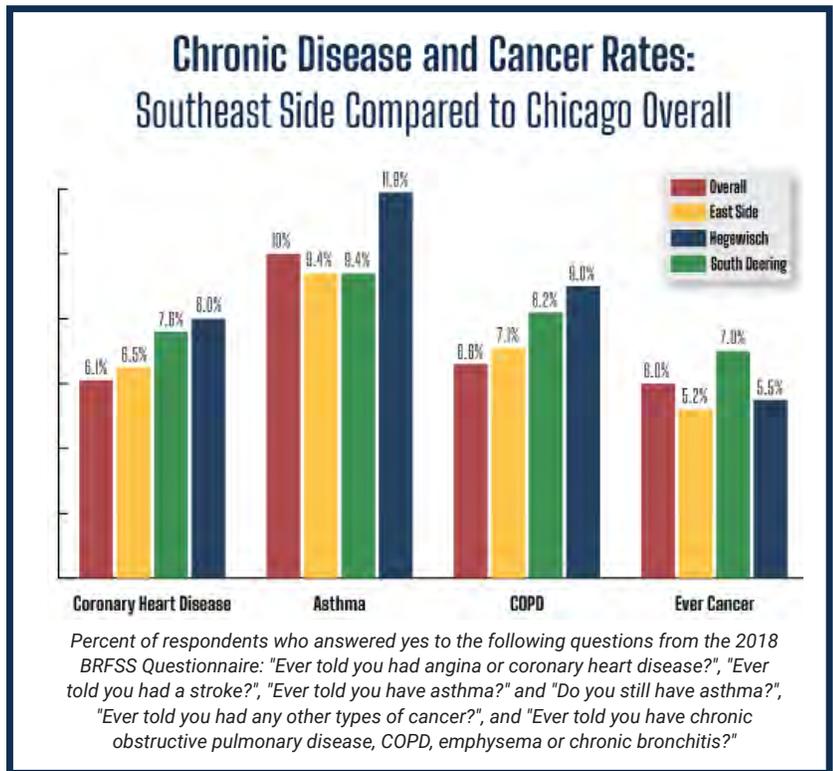
“...[A]vailable scientific evidence and technical information indicate that the current standards may not be adequate to protect public health and welfare. The strong body of scientific evidence shows that long- and short-term exposures to PM2.5 can harm people’s health, leading to heart attacks, asthma attacks, and premature death. Large segments of the U.S. population, including children, people with heart or lung conditions, and people of color, are at risk of health effects from PM2.5.”

Health Conditions & Access to Care

Air pollution contributes to increased risk of chronic disease, which is the leading driver of Chicago’s nine-year life expectancy gap between Black and White residents and decreases in life expectancy in the Latinx population. In 2019, life expectancy for the Southeast side neighborhoods is 74.0 years in South Deering, 77.2 years in Hegewisch and 78.3 years in East Side. Chicago’s overall life expectancy is 77.3 (IDPH Death Certificate Data). All three Southeast side community areas rank in the bottom half of all Chicago’s community areas for life expectancy.

As of 2018, the population on the Southeast side had higher rates of chronic conditions such as coronary heart disease (CHD) and chronic obstructive pulmonary disorder (COPD) in adults than the Chicago average. The Southeast side neighborhoods have higher rates of asthma, COPD and CHD than more than half of all Chicago community areas (CDC PLACES). These findings may underrepresent actual disease prevalence on the Southeast side, as these conditions are self-reported and people may be less commonly diagnosed due to a comparative lack of access to care.

An important measure of quality of life is how people feel about their own physical and mental health. The percentage of adults with poor self-reported physical health in 2018 was 17.8% in South Deering, 14.6% in East Side, and 14.2% in Hegewisch. Furthermore, the percentage of adults with poor self-reported mental health in 2018 was 16.4% in South Deering, 14.3% in East Side, and 13.1% in Hegewisch (CDC PLACES). For both poor physical and mental health, the three Southeast side community areas are above the citywide average.

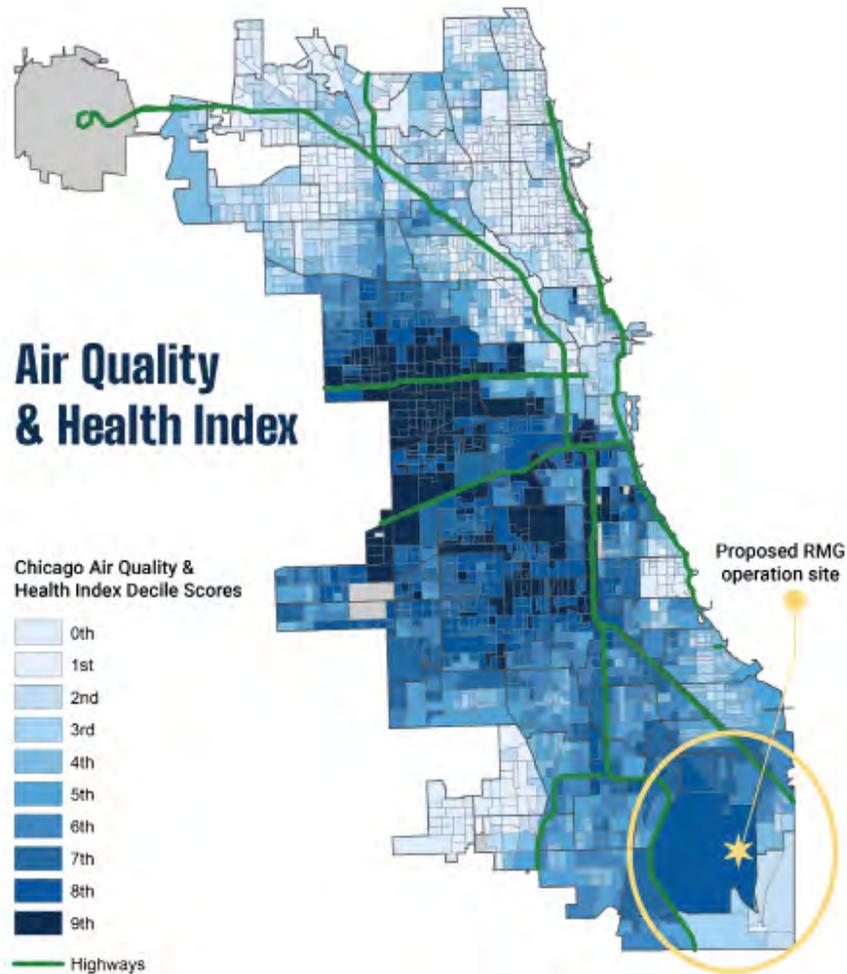


Socioeconomic inequities and insurance status often determine how available health services are and how much they are utilized in a community. Uninsured rates range from 8.1% to 10.4% in neighborhoods on the Southeast side, compared to Chicago’s overall uninsured rate of 9.7%. South Deering, East Side and Hegewisch have higher uninsured rates than more than half of all Chicago community areas (2019 5-year American Community Survey). For 2016-2018, the percentage of Chicago adults who have a primary care provider in the Southeast side was 67.3% in East Side, 69.2% in South Deering, and 78.8% in Hegewisch. For comparison, Chicago overall is 80.5%. Correspondingly, the Southeast side is a designated Health Professional Shortage Area with only two community health centers (2022 US HRSA).

“Community members living with environmental contamination may experience chronic stress, which can be compounded by feeling dismissed, powerless, unheard, or unsupported. In a community like southeast Chicago, stress is a normal reaction to environmental contamination; however, chronic stress can pose physiological health risks on top of the health risks associated with exposure to contaminants.” (ATSDR, Health Consultation).

Overall Community Vulnerability

CDPH sought to understand, overall, how vulnerable Southeast side community members are to negative health effects from pollution exposure, particularly relative to other areas of Chicago, based on underlying health and social conditions. This is a critical part of an environmental justice and racial equity analysis. Based on the [Air Quality and Health Index](#), certain Census block groups in East Side and Hegewisch rank among the highest in Chicago for vulnerability to air pollution.

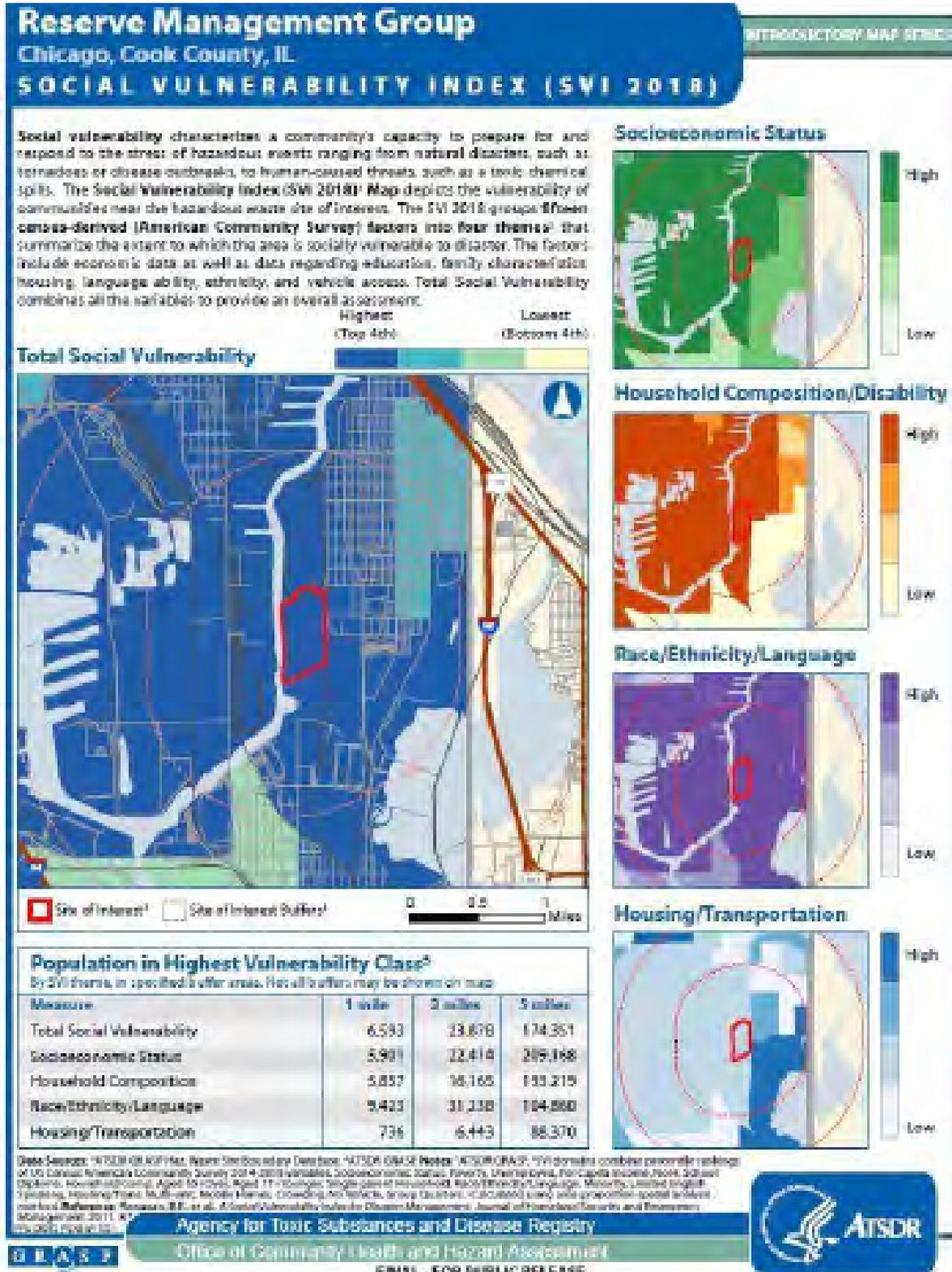


The U.S. EPA reached a similar conclusion about community vulnerability based on their EJSCREEN, a tool that provides a nationally consistent dataset and approach for combining environmental and demographic indicators.

The EJ Index for all eleven EJSCREEN indicators in the three-mile area around the proposed RMG site exceeds the 80th percentile in the State of Illinois, including indices for PM2.5, ozone, diesel PM, air toxics cancer risk, respiratory hazard, lead paint, and Superfund proximity. The population of the people who live in the area around the proposed RMG plant is disproportionately low income, people of color, and includes persons with limited English proficiency and less than high school education. The proposed RMG site is in an area that is already heavily populated by industrial facilities and is in close proximity to residential housing and community centers. (Southeast Chicago Ambient Air Quality Analysis)

Additionally, the Agency for Toxic Substances and Disease Registry (ATSDR), which is a federal public health agency overseen by the director of the U.S. Centers for Disease Control and Prevention (CDC), conducted a Health Consultation to analyze possible environmental exposures from past and current recycling activities at RMG and other industrial sources within one mile of the site.

ATSDR created social vulnerability index (SVI) maps to characterize the community. The SVI indicates that the community adjacent to RMG is in the top quartile for vulnerability.



Source: ATSDR, Health Consultation

ATSDR also reached the following conclusions about the health impacts of particulate matter and metals in the air on the Southeast side⁸:

Conclusion 1: Based on recent air monitoring data (2016-2020), *breathing PM10 and PM2.5 could be harmful for highly sensitive people*, especially if they live downwind from RMG and other industrial and commercial sites. Highly sensitive populations are people who have pre-existing heart and lung conditions like asthma, heart disease, or chronic obstructive pulmonary disease (COPD). Highly sensitive individuals exposed to PM over short periods of time (24-hours) and long periods of time (several months) are susceptible to respiratory symptoms and an exacerbation of lung and heart disease. ATSDR does not expect people without these pre-existing conditions living near RMG to develop health problems from breathing PM in the air.

Conclusion 2: Based on recent air monitoring (2015-2020) and historic data (1982-2015), people living downwind of RMG (now or in the past) *are not likely to develop health problems from breathing metals in the air*. The metals we looked at include arsenic, cadmium, chromium, lead, manganese, and nickel. It is not likely that people will experience an increased risk of cancer or other health problems from breathing the metals.

This report did not address any potential health effects of soil pollution outside of the RMG property, as sampling has not previously been conducted in the community.

2

What are the potential impacts of the proposed Southside Recycling operations for Southeast side residents?

To answer this question, CDPH focused on the impacts of greatest interest to community members. As described in the Scoping section, we identified themes through a qualitative analysis of public comments elicited during the permitting process as well as polling and small group discussion during the HIA engagement sessions, and ultimately developed a Pathway Diagram to represent the substantive issues that were most frequently mentioned. We then categorized impacts from the Pathway Diagram into three domains: Quality of Life, Environment, and Health.

For each potential impact, we reviewed existing data sources and determined whether additional information was needed to assess how the proposed operation of Southside Recycling would affect community members. We analyzed the magnitude of each impact and rated its direction, sorting these into categories: negative impact, potential negative impact, maintain status quo, potential positive impact, or positive impact. We then identified who would experience the impacts (i.e. who benefits or is burdened). **We note that, in an already overburdened community, even to maintain the status quo is to perpetuate existing health and racial inequities.**

“ I am a Social Science teacher at Washington H.S., which is located less than HALF a mile from the proposed facility. I worry about the detrimental effects on my students due to the increased level of particulate matter that would be released into the air, not to mention increased diesel truck traffic and noise. ”

- Donald Z. Davis

Our findings are summarized below, with additional detail provided in the relevant appendices.

Quality of Life Impacts

	Assessment Findings	Impact Rating	Who is Impacted	Data Sources
 Traffic & street conditions	<p>During weekday morning peak hours, there would be 70 new trips (personal vehicles and trucks); at weekday evening peak hours, there would be 30 new trips. The traffic study shows that this would maintain an adequate level of service at nearby intersections.</p>		Southeast side residents	<ul style="list-style-type: none"> Permit Application
 Economic development & job opportunity	<p>Southside Recycling would employ in excess of 100 people (35 jobs currently unfilled). The company will prioritize hiring from the community and continue to support small recyclers, many of which are led by people of color.</p>		Company & employees	<ul style="list-style-type: none"> Permit Application Company self-report
 Noise	<p>Modeling indicates that the operations will not cause noise above standards outside of the manufacturing district boundary but did not account for noise from any potential explosions.</p>		Southeast side residents	<ul style="list-style-type: none"> Permit Application
 Concentration of industry	<p>Southside Recycling would bring a new metal recycling facility to the area. This would continue a trend of industrial development rather than shift to a different type of land use as proposed by some community members.</p>		Southeast side residents	<ul style="list-style-type: none"> Community Input Summary (Appendix D)



Environmental Impacts

	Assessment Findings	Impact Rating	Who is Impacted	Data Sources
 <p>Recycling Capacity</p>	Under its current proposal, Southside Recycling has the capacity to process up to 500 tons per hour of obsolete metal products		Citywide	• Permit Application
 <p>Explosions/Fires</p>	Explosions/fires are an inherent risk for any metal shredding operation. The permit application includes a Feedstock Management Plan and the RTO system is equipped with controls to prevent explosions. But the risk cannot be reduced to zero.		• Southeast side residents	• Permit Application
 <p>Water Pollution</p>	Industrial facilities on the riverfront pose a risk for pollution. Application includes a Stormwater Pollution Prevention Plan to reduce potential stormwater contamination. Facility treats water before it drains to the City sewers.		• Southeast side residents	• Permit Application • Environmental & Health Risk Assessment (Appendix E)
 <p>Soil Pollution</p>	On-site soil sampling identified lead concentrations on the RMG property that exceed the industrial Removal Management Level. This presents a risk to workers as well as the potential for particles to be blown or tracked off the site.		• Southeast side residents	• Environmental & Health Risk Assessment (Appendix E)
 <p>Air Pollution</p>	Emission sources at the site include the stockpiling, loading, and unloading of materials; onsite operations such as the crushing, shredding, screening, cutting scrap metal; and mobile equipment and vehicles. Emissions consist primarily of particulates, volatile organic compounds (VOCs), and other gases such as nitrogen oxides (i.e., NOx). Emissions from the shredder will be treated using various pollution control devices, including an RTO, roll-media filter, and scrubber. Dust controls include watering materials and cleaning pavements with a street-sweeper, dust cannons to suppress airborne dust as well as covered conveyors and dust collection and treatment systems. Even with controls in place, emissions are not entirely prevented		• Southeast side residents	• Environmental & Health Risk Assessment (Appendix E)

 Positive impact
 Potential Positive Impact
 Neutral impact
 Potential negative impact
 Negative impact

Health Impacts

	Assessment Findings	Impact Rating	Who is Impacted	Data Sources
 Carcinogenic Risks (Cancer)	Human health risk assessment modeling does not indicate an increased risk of cancer due to Southside Recycling and other RMG businesses on the property. South Deering and Hegewisch are in the top half of all Chicago neighborhoods for cancer rates.		Southeast side residents	<ul style="list-style-type: none"> Environmental & Health Risk Assessment (Appendix E)
 Acute & Chronic Risks (Non-cancer)	Human health risk assessment modeling does not indicate an increased risk of adverse health effects (non-cancer acute and chronic risks) due to Southside Recycling and other RMG businesses on the property. The Southeast side community areas are in the top half of all Chicago neighborhoods for current rates of chronic disease (COPD, asthma, heart disease).		Southeast side residents	<ul style="list-style-type: none"> Environmental & Health Risk Assessment (Appendix E)
 Mental Health & Wellbeing	Living near industrial activity negatively impacts mental health. This impact is both direct and mediated by individuals' perceptions of neighborhood disorder and personal powerlessness, and the impact is greater for minorities and the poor than it is for whites and wealthier individuals.		Southeast side residents	<ul style="list-style-type: none"> Community Input Summary (Appendix C) Literature Review (Appendix B)



3

Who would benefit and who would be burdened by a decision to grant the permit?

CDPH asked stakeholders to help answer this question in small group break-out sessions during the second HIA engagement session on December 9, 2021 (Community Input Summary, Appendix C).

When we analyze impact by who experiences benefits or burdens, we find that overwhelmingly, burdens would accrue to residents of the Southeast side community. As described in the existing conditions section, the Southeast side of Chicago is already an overburdened community ranking high for vulnerability to pollution, based on current health, environmental, quality of life and socioeconomic factors.

Conversely, the company and its employees would enjoy the benefits of the increased economic and job opportunity (with a potential for benefits to accrue to residents only if the company hires from within the Southeast side community), while the city overall would benefit from increased metal recycling capacity and reduced waste.

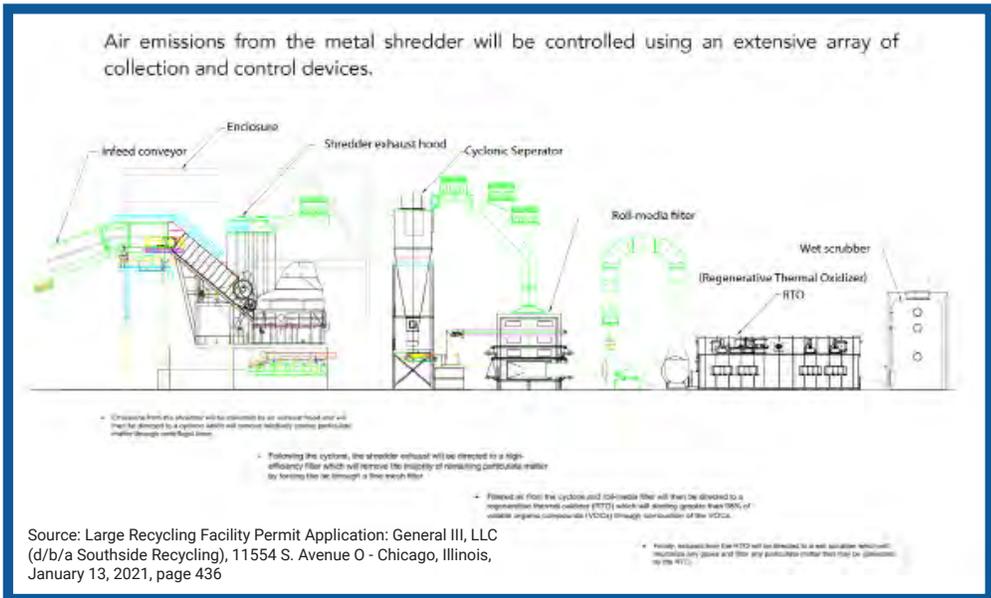
CDPH’s commitment to promoting health and racial equity means that CDPH must carefully consider this analysis of disproportionate burden being placed on an already overburdened community.

4

How could we minimize burdens and maximize benefits?

Southside Recycling’s permit application includes commitments to pollution control equipment and design features that are intended to prevent harmful emissions from the facility and to preserve quality of life for residents. The shredder is located approximately 2,500 feet from the nearest public right of way. The facility would operate with a regenerative thermal oxidizer (RTO), wet scrubber, roll-media filter, and other equipment that capture emissions and prevent combustion. The shredder is enclosed to contain noises and dust, and a wall of shipping containers and more than 200 newly planted trees provide additional buffers for the community.

RMG has paved large sections of its property to reduce dust from on-site vehicle travel and proposed a traffic management plan that will keep trucks from queuing on public roads.



In addition to the measures proposed by RMG, CDPH could impose new requirements in the form of permit conditions to address community burdens. Potential mitigations could include, for example:

			
Pollution	Traffic/Street Conditions	Noise	Explosion/Fires
Potential Mitigations / Permit Conditions			
<ul style="list-style-type: none"> • Conduct daily patrols for auto shredder residue and litter; clean in surrounding community areas • Prohibit torch cutting of metals and accepting any waste, including hazardous waste • Conduct continuous sampling for pollutants • Install, operate, and maintain weather station and particulate matter monitors; notify CDPH of any exceedances within 15 minutes • Treat all discharges to City's sewer system • Prohibit use of detention pond water for dust control 	<ul style="list-style-type: none"> • Improve and make public Burley Avenue between 106th street and 122nd Street to redirect truck traffic from residential and sensitive populations along Avenue Q. 	<ul style="list-style-type: none"> • Install, operate, and maintain a noise monitor • Notify CDPH of any and all shredder explosions, including raw sound pressure levels and minimum one-band octaves of the explosion 	<ul style="list-style-type: none"> • Require thermal cameras to monitor material stockpiles for hotspot • Conduct air monitoring and sampling for fires lasting more than one hour • Fire Department dispatch to flag RMG address and ensure prompt response by hazmat team with appropriate air monitoring equipment

These steps could help to offset the most significant environmental, health, and quality of life impacts. However, permit conditions are only effective to the extent that they are implemented as required by RMG – and mitigations would not address community concerns related to the continued concentration of industry in their neighborhoods.

5

What did we learn through this process about ways to improve City and other policies and practices to promote health and racial equity?

As part of the HIA public engagement process, CDPH heard from many stakeholders about the need to improve processes and policies to advance racial and health equity and environmental justice and to better include community voices. Our recommendations incorporate this feedback, and fall into three areas:

1. Increase monitoring, enforcement, and environmental protections for the Southeast side.
2. Embed cumulative impact principles in zoning, permitting, and enforcement and engage the community in decision-making.
3. Expand and enhance use of health and racial equity impact assessments to inform decision-making.

See **RECOMMENDATIONS FOR OTHER POLICY OR PROCESS CHANGE** for more information.

ADDITIONAL ASSESSMENT FINDINGS: COMPLIANCE ISSUES

During the course of this HIA, CDPH collected additional materials – including maps, reports of material receipts and shipments, and site samples – to help us better understand the proposed Southside Recycling facility as it relates to businesses currently operating on the campus. Our review brought to light compliance issues and apparent violations with the potential to adversely affect the environment, health, and quality of life on the Southeast side, including:

COMPLIANCE ISSUE	DESCRIPTION
<p>Exceedances of permitted capacity.</p>	<p>Based on information provided in response to CDPH’s request, it appears that Reserve Marine Terminal (RMT) received more recycling material than was allowed under its permit on multiple occasions between 2018 and 2020. CDPH places caps on material volume both to reduce potential emissions from the recycling process as well as truck traffic to and from the site on a daily basis – which is itself another source of pollution. By exceeding its permitted capacity, the company is effectively circumventing these controls.</p>
<p>Failure to obtain appropriate permits for foundry sand operation.</p>	<p>RMG installed and began operating regulated equipment and regulated areas before applying for or receiving any air pollution control permits for a foundry sand operation. The company also repeatedly represented to CDPH that the operation was conducted indoors; however, CDPH observed that storage of foundry sand and at least one piece of equipment is clearly outdoors. In subsequent investigation, CDPH and the U.S. EPA determined that these foundry sand piles are located in the same area where a recent increase in coarse particulate matter (PM10) has been observed on the Southeast side over the last three years. Beyond this direct impact on local environment, this finding indicates that RMG is not following the rules regarding proper materials storage, which will be an essential component of the Southside Recycling operation.</p>
<p>Failure to control dust.</p>	<p>On June 27, 2019, a CDPH inspector issued a notice of violation to RMT for failure to control dust during barge loading and unloading activities at the site. RMT pled liable to the permit violation at Administrative Hearings on September 5, 2019. Proper dust suppression - including watering, sheltering dust-emitting activities, and enclosing materials that are susceptible to becoming wind-borne - is an essential aspect of pollution control for the proposed Southside Recycling permit.</p>
<p>Failure to notify CDPH of IEPA Notices of Violation.</p>	<p>On December 20, 2019, the Illinois Environmental Protection Agency (IEPA), Bureau of Air, issued South Chicago Property Management, Ltd a Notice of Violation (NOV) for several violations, including RMG’s failure to apply for required permits, failure to pay fees, and failure to submit annual emissions reports to IEPA. RMG did not notify CDPH about these violations as required by its permits.</p>

COMPLIANCE ISSUE	DESCRIPTION
<p>Additional site concerns and lack of cooperation.</p>	<p>RMG has not taken necessary steps to immediately identify, report, and address unsafe site conditions that could affect the environment or health of its workers and the surrounding neighborhood. Further, CDPH has great concerns regarding the company’s behavior and lack of responsiveness throughout the permit review process.</p> <ul style="list-style-type: none"> <p>Soil sampling results. CDPH and its environmental consultant conducted soil sampling to inform the HIA, as well as two other pending permit applications from RMG. Company personnel disrupted the sampling team as they performed their duties with frequent verbal interruptions and harassment. Laboratory analysis of the sample subsequently revealed lead levels that exceeded the Removal Management Level (RML) for industrial soil. These high levels present a risk to workers at the site, as well as to the community due to track out from trucks or from particles that become wind-borne.</p> <p>Building collapse. A large warehouse collapsed on the RMG property in April 2021. RMG did not notify the City until July 2021, at which point CDPH conducted an inspection and confirmed the presence of asbestos-containing material (ACM). CDPH issued RMG a ticket (currently pending at the Department of Administrative Hearings) for failing to properly maintain ACM.</p> <p>Unpermitted recycling activities. In December 2021, CDPH observed recyclable materials consisting of small iron fragments and fines on an unpermitted area of the property. RMG admitted that this material was generated from the breaking and screening of large pieces of scrap metal (iron) at the RMT operation on the northern part of the site and then trucked to the southern part of the property for further processing. However, this activity was not included in any of RMG or RMT’s permit materials.</p> <p>Lack of responsiveness. Throughout the permitting process, RMG delayed or failed to provide requested information, such as emissions calculations and process flow diagrams.</p>

CDPH’s regulations require that we consider a company’s compliance history as part of our review of any recycling facility permit application. RMG’s track record in operating similar facilities within this campus gives CDPH reason to consider the unpredictable risks and hazards associated with large metal recycling more heavily in assessing the likelihood of adverse outcomes for this already overburdened community.

SUMMARY OF KEY FINDINGS

In this section, we provide a summary of overall findings. Our HIA findings indicate that:

- ▶ The Southeast side includes certain areas that are made more vulnerable to pollution than Chicago overall due to underlying health conditions and social factors, which often reflect structural racism and institutional inequities.
- ▶ Current pollution levels may be causing negative health effects for highly sensitive populations.
- ▶ Large metal recycling processes such as those proposed at Southside Recycling pose certain intrinsic uncertainties and unique risks to the environment, health, and quality of life.
- ▶ These risks can only be adequately mitigated by operating in accordance with strict permit conditions, including but not limited to thru-put caps, proper material storage practices, site access for inspections, and timely reporting and management of unsafe conditions.
- ▶ The history of RMG's operation of the site, which has been problematic, does not provide CDPH with confidence that the company will run the site in strict compliance with permit conditions, which CDPH considers essential for avoiding negative impacts on the environment, health, and quality of life for residents of the Southeast side.

Therefore, issuance of the RMG/Southside Recycling permit would exacerbate health inequity.

RECOMMENDATIONS

This HIA has two sets of recommendations; one related to the RMG/Southside Recycling permit decision (the focus of our HIA) and the other related to broader policy and process changes needed to advance health equity outcomes.

- ! The following recommendations are based on HIA findings, including the Community Input Summary (see Appendix C).

RECOMMENDATION FOR THE RMG/SOUTHSIDE RECYCLING PERMIT DECISION

CDPH reviewed the U.S. EPA's environmental justice practice standards, civil rights law, racial equity impact assessment models, and relevant City regulations to identify several factors to aid our recommendation on the RMG recycling permit decision:

Extent of current community burden and vulnerability

As compared to Chicago overall, many Southeast side residents are made more vulnerable to the health effects of pollution based on their health and social status. Recent research shows increased health risks from exposure to even low levels of particulate matter in the air. Prior to the proposed operation of Southside Recycling, ATSDR finds that highly sensitive groups may be harmed by the particulate matter pollution currently caused by RMG and other local industries. Even incremental additional emissions would exacerbate this harm.

Extent of potential benefits to people who live on the Southeast side

The assessment findings indicate that there are two primary benefits of Southside Recycling: the expansion of scrap metal recycling capacity in the city of Chicago as well as continued economic development on the Southeast side. The City of Chicago's [Waste Strategy](#) includes a commitment to reducing residential as well as industrial, commercial, and institutional waste. The presence of Southside Recycling as part of the city's recycling ecosystem would contribute to that goal, thereby benefiting all Chicagoans.

Continued economic development on the Southeast side would contribute to an expanded tax base, additional patronage for area businesses, and job opportunities for up to 35 new employees with the potential to earn head-of-household wages. These benefits accrue to Chicago overall, but also to certain Southeast side community members. RMG has further made or planned site improvements and community investments that benefit its neighbors including an on-site food pantry, trees, and street paving. While the Southside Recycling proposal has received support from certain individuals – including current RMG employees, as well as area businesses – based on the economic opportunity Southside Recycling could represent, other community members objected to a false choice between jobs, economic development, and a healthy neighborhood environment.

Extent of potential negative impacts on environment, health, and quality of life that cannot be adequately addressed through mitigations

Day-to-day environmental, health, and quality of life burdens would be felt most acutely by people of color and those with underlying conditions who live on the Southeast side. Community members would experience the direct impacts of increased pollution exposure, traffic, and associated health effects.

With strong permit conditions in place, our assessment indicates that the magnitude of Southside Recycling's impacts could be reduced in some cases. However, mitigations cannot eliminate certain

inherent risks of large metal recycling processes – for example, explosions due to undetected chemical compounds – that carry potentially severe consequences. They also do not ameliorate the negative effects on mental health and well-being reported by affected community members and borne out by research. Additionally, when the proposed Southside Recycling operation is considered as contributing to the cumulative burden experienced by the surrounding neighborhoods, it has the potential to exacerbate pre-existing environmental, health, and quality of life impacts associated with industrial development on the Southeast side. This is particularly true if RMG continues its pattern of failure to rigorously adhere to permit conditions. Many community members and their allies have protested the operation of Southside Recycling in their neighborhood on this basis.

Actions of the company, including compliance history

During the HIA process, CDPH directly observed or became aware of several instances of RMG’s failure to comply with City regulations and existing permit requirements to the detriment of the surrounding community. Given the additional environmental, health, and quality of life burdens that a large recycling facility could present for the Southeast side, CDPH should only grant a permit if it is confident that RMG would operate Southside Recycling in accordance with strict permit conditions that address these issues. The history of non-compliance exhibited here – even when the company was aware that it was under scrutiny for the HIA – indicates that the company is not currently acting in the best interest of the community and CDPH is not confident that it will do so with respect to Southside Recycling.

PERMIT RECOMMENDATION

As HIA findings indicate that the RMG/Southside Recycling permit would exacerbate health inequity, CDPH concludes that it ***should not grant*** the RMG/Southside Recycling permit.

RECOMMENDATIONS FOR OTHER POLICY OR PROCESS CHANGE

As part of the HIA, CDPH reviewed best and promising practices from around the country and also sought input from stakeholders on policy or process reforms that would advance racial and health equity and environmental justice.

! In our HIA engagement sessions, participants prioritized three areas for action to ensure progress beyond this immediate permitting decision (see Community Input Summary, Appendix C).

1 Increase monitoring, enforcement, and environmental protections for the Southeast side.

Increased monitoring

Community residents and environmental organizations called for improved access to reliable local air quality data. In response, CDPH has already allocated federal recovery funding to expand local air monitoring capabilities across the city - with an emphasis on overburdened communities - over the next two years. Once installed and baselined, data from the monitors will be made publicly available and incorporated into our public health and environmental surveillance and reporting.

Improved enforcement

Since 2014, the U.S. EPA – in cooperation with Illinois EPA and CDPH - has investigated over 75 companies to determine if they are in compliance with the Clean Air Act. Stringent regulation and targeted enforcement have already led several Southeast side facilities to make improvements or cease operations entirely; for instance, KCBX Terminals halted operations at its North Terminal, S.H. Bell implemented facility improvements, and Watco Terminal and Port Services no longer receive manganese in bulk handling operations (U.S. EPA Southeast side Ambient Air Quality Analysis). Our agencies will continue to collaborate on enforcement efforts at facilities on the Southeast side and throughout the city to ensure they are in compliance and to protect the community from adverse impacts.

CDPH has also already begun making internal process changes to focus more enforcement efforts on higher risk air pollution-related activities, with a goal of ensuring our own limited inspection and enforcement resources are focused where they are most needed. This work ranges from assessing the appropriate inspection frequency of permitted facilities to using community vulnerability data to prioritize inspection activities. We are working now, for example, on updating our inspector procedures and training to include additional guidance on prioritizing inspections, issuing warnings, recording complaint inspections and following up on violations.

Enhanced environmental protections.

CDPH intends to publish new, strong rules for facilities that process demolition and construction debris (known as “rock crushers”), air permit facilities, and general recycling facilities to ensure that facilities with the potential to impact surrounding communities are subject to monitoring, reporting and control requirements.

CDPH will continue to work with agencies such as IEPA, US EPA and ATSDR on strengthening environmental protections and ensuring that industries are held accountable, potentially including additional monitoring and sampling throughout the community.

2 Embed cumulative impact principles in zoning, permitting, and enforcement and engage the community in decision-making.

Zoning and land use policies, including recent reforms to update the Industrial Corridor system and trends in deindustrialization, play a role in the concentration of industry in parts of the city. The City's Air Quality Zoning ordinance takes a step in the right direction to ensure that public health is considered early in the zoning process. However, feedback from community engagement suggested that additional reforms to permitting and zoning processes are needed to explicitly include considerations of cumulative impact, improve transparency, and involve the community in decision-making.

Addressing cumulative impacts requires an understanding of the multiple sources of pollution in a community, their combined health risks, and the underlying health and social vulnerabilities of area residents. CDPH has dedicated federal recovery funding to conduct a foundational cumulative impact assessment and refine it with new data over the next two to three years. As CDPH and partners develop best practices around cumulative impact, these findings can be used to develop a policy, in collaboration with other City departments and community stakeholders, that formally incorporates consideration of cumulative impacts into decision-making and ensures community voice in the process. The Mayor has already directed the City's Chief Sustainability Officer and CDPH to propose a new cumulative impact ordinance for consideration by the City Council.

In this effort, CDPH will look to national examples of cumulative impact policies affecting land use and permitting. Newark, New Jersey, in particular, provides a template for consideration of cumulative impacts in the zoning process. Newark's Environmental Justice and Cumulative Impacts Ordinance, passed in 2016, requires applicants for zoning approval of commercial or industrial uses to complete an environmental checklist with details about potential impacts to air, water, truck traffic, nuisances and more. Applicants must also include information about existing environmental and social conditions where they propose to locate based on the Environmental Resources Inventory - a detailed, citywide baseline assessment developed by sustainability and planning staff. The information about current conditions and added burden is then provided to the Zoning or Planning Board for consideration in their final decision on land use approval.

Cumulative impact policies generally share features of robust community engagement through public notification, public meetings and extended public comment periods. Also, their development involves community voice from the outset. Based on feedback gleaned through this HIA, any proposed framework for considering cumulative impacts in the zoning process should be developed with stakeholders and incorporate similar engagement elements. We look forward to working with community and environmental groups and other City departments on our local approach, and with the Illinois and U.S. EPA as those agencies develop new policies.

Black, Latino and American Indian communities across the country continue to feel targeted and expected to carry a heavier burden no matter the consequences. In North Charleston, S.C., hundreds of people in a mostly Black community could lose their homes if a freeway interchange is expanded. In Dallas, a mountain of toxic waste rose illegally on the edge of a Black neighborhood and took extraordinary pressure to get removed.

Washington Post, Oct. 22, 2021.

3 Expand and enhance use of health and racial equity impact assessments to inform decision-making.

During public engagement sessions and in written comments, stakeholders provided valuable input on ways to conduct HIAs in alignment with Healthy Chicago 2025's guiding principles. In particular, we heard feedback about the need to co-develop the HIA scope, methods, and process in close collaboration with the people who are most affected by the decision under consideration.

- While the approach applied to this RMG/Southside recycling HIA met the minimum elements required for HIAs outlined in the [Minimum Elements and Practice Standards](#), we reflect on opportunities for improvement within our process evaluation to inform future efforts (see HIA Process Evaluation, Appendix A).

CDPH and the City of Chicago are committed to institutionalizing the use of assessment tools like health impact assessments and race equity impact assessments (REIA) as part of everyday practice. In 2016, Chicago, with CDPH support, adopted a Health in All Policies resolution that called upon all City departments and sister agencies to consider ways to improve health through their work – including by conducting health impact assessments. We have taken steps in that direction by incorporating health and race equity impact assessment (HREIA) approaches into the We Will Chicago citywide planning process, Equitable Transit-Oriented Development (ETOD) policy plan implementation, and racial equity assessment of the City's Qualified Allocation Plan. CDPH recently established a new Office of Health Equity in All Policies, which will provide tools and technical assistance to support CDPH and other City departments in leading HREIAs on high-impact policies and projects.

MONITORING

CDPH's intention is that this HIA will be used to guide action both on the RMG/Southside Recycling permit, as well as on broader policy and process change to promote health and racial equity. As such, we have developed a monitoring plan that includes indicators, actions, and responsible parties to implement the recommendations proposed in the HIA, as well as health effects and outcomes of these proposals (see HIA Monitoring Plan, Appendix F). CDPH also conducted a process evaluation (see HIA Process Evaluation, Appendix A) to inform future assessment efforts.

CONCLUSION

The findings from our HIA indicate that CDPH should deny the RMG/Southside Recycling permit application to operate a large recycling facility on Chicago's Southeast side. We reached this conclusion based on a combination of factors, including: concerns for health, environment, and quality of life in an already over-burdened community; the inherent risks of recycling operations; as well as concerns about the company's operating history, including apparent violations of existing permit requirements.

For many community members, environmental justice advocates, and public health practitioners, the issues raised by the RMG/Southside Recycling permitting process represented broader, more systemic concerns about how policies balance economic development interests with public health protections for vulnerable community areas. Recent steps such as the [Air Quality Zoning ordinance](#), which was passed after the RMG/Southside Recycling zoning approval, begin to address these issues for new developments.

This HIA is the most rigorous and comprehensive study of a proposed industrial facility in Chicago to date. However, more work is necessary to fully understand how the cumulative impacts of industrial development affect health, and how this should be considered in the context of zoning and permitting decisions. Through the HIA process, CDPH developed a conceptual framework as well as methods for characterizing existing community conditions and analyzing potential environmental, health, and quality of life impacts of industrial development. This represents a starting place to build from, together with community and industry stakeholders.

Certain aspects of this assessment and its resulting recommendations were specific to RMG/Southside Recycling, informed by the inherent risks of large recycling facilities and the company's compliance history. An HIA was necessary in this case because public health considerations raised during the permitting process were not fully addressed during zoning. Although a similar process would not be required for existing businesses, we will continue to strengthen regulations to protect the public from the adverse impacts of industrial operations.

Change must come not just from CDPH, but through a 'whole of government' approach that includes other environmental regulators and City departments tasked with making decisions that impact the environment and health of all Chicago communities.

Endnotes

- 1 Bhatia R, Farhang L, Heller J, Lee M, Orenstein M, Richardson M and Wernham A. *Minimum Elements and Practice Standards for Health Impact Assessment*, Version 3. September, 2014
- 2 Bhatia R, Farhang L, Heller J, Lee M, Orenstein M, Richardson M and Wernham A. *Minimum Elements and Practice Standards for Health Impact Assessment*, Version 3. September, 201
- 3 EPA. *Environmental Justice Research Roadmap*. December 2016. (EPA 601/R-16/006 | December 2016 | www.epa.gov/research)
- 4 Krieger N. (2005). Embodiment: a conceptual glossary for epidemiology. *Journal of epidemiology and community health*, 59(5), 350–355. <https://doi.org/10.1136/jech.2004.024562>
- 5 Krieger, N. (2021). *Ecosocial Theory, Embodied Truths, and The People's Health*. Oxford University Press
- 6 Geronimus, A. T., Pearson, J. A., Linnenbringer, E., Schulz, A. J., Reyes, A. G., Epel, E. S., Lin, J., & Blackburn, E. H. (2015). Race-Ethnicity, Poverty, Urban Stressors, and Telomere Length in a Detroit Community-based Sample. *Journal of Health and Social Behavior*, 56(2), 199–224. <https://doi.org/10.1177/0022146515582100>
- 7 "Governmental Use of Racial Equity Tools to Address Systemic Racism and the Social Determinants of Health," Institute for Healing Justice & Equity and the Center for Health Law Studies, November 2021.
- 8 U.S. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry, Office of Community Health Hazard Assessment. Health Consultation: Analysis of Outdoor Air Contaminants Reserve Management Group, Chicago, IL. February, 2022. <https://www.atsdr.cdc.gov/hac/pha/ReserveManagementGroup/RMG-Analysis-Outdoor-Air-HC-508.pdf>

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Appendix A

HIA Process Evaluation

CDPH utilized a process evaluation to determine whether our RMG/Southside Recycling Health Impact Assessment (HIA) included all of the minimum elements of HIA included in Version 3 of the Minimum Elements and Practice Standards for Health Impact Assessment.¹ The following table describes how our process met each of the minimum elements.

Minimum Elements of HIA	RMG/Southside Recycling HIA
<p>Was the HIA conducted to assess the potential health consequences of a proposed program, policy, project, or plan under consideration by decision-makers, and was it conducted in advance of the decision in question?</p>	<p>YES. The HIA was conducted to assess the potential health consequences of the RMG/Southside Recycling permit application to operate a large recycling facility on the Southeast side of Chicago. At the suggestion of the U.S. EPA, and with their guidance, CDPH conducted the HIA in advance of making a decision on whether to issue the permit. </p>
<p>Did the HIA involve and engage stakeholders affected by the proposal, particularly vulnerable populations?</p>	<p>YES. CDPH hosted three HIA public engagement sessions from November through February 2022. These sessions were open to the public, with a special focus on residents of the Southeast side. CDPH used input provided during the engagement sessions to establish the HIA scope and identify recommendations for policy and process changes to promote health and racial equity. This input built upon a public engagement process CDPH conducted prior to the HIA, which included two public town halls, an extended public comment period, and daily media monitoring. Overall, CDPH received insight from thousands of community members, local organizations, environmental advocacy groups, and public health professionals during this permitting process. </p> <p>Although the minimum element was satisfied here, CDPH acknowledges this as an area where we can and must do more to practice our Healthy Chicago 2025 value of ensuring that our processes are community-led. We take seriously the critique provided by Southeast side residents and public health colleagues that our HIA did not incorporate best practices in community engagement and promoting equity throughout the HIA process.</p> <p>Stakeholder participation in this HIA, as understood by the Ladders of Citizen participation, was limited to information and consultation. Stakeholder input shaped the HIA, but the process fell short of community ownership and delegated power as the highest practice standard for stakeholder participation in HIA.²</p>

¹ Bhatia R., Farhang L., Heller J., Lee M., Orenstein M., Richardson M., and Wernham A. Minimum Elements and Practice Standards for Health Impact Assessment, Version 3. September, 2014.

² Human Impact Partners. A Health Impact Assessment Toolkit: A Handbook to Conducting HIA, 3rd Edition. Oakland, CA: Human Impact Partners. February 2011.

Minimum Elements of HIA

Did the HIA systematically consider the full range of potential impacts of the proposal on health determinants, health status, and health equity?

RMG/Southside Recycling HIA

YES. During the scoping process, CDPH engaged stakeholders to identify the potential impacts of the proposed Southside Recycling facility on the surrounding neighborhoods. Based on this input, we identified potential impacts in three broad domains Environment (air pollution, water pollution, soil pollution, explosions/fire, recycling capacity), Health (acute and chronic risks, cancer risks, mental health and well-being), and Quality of Life (traffic and street conditions, economic development and job opportunity, noise, and concentration of industry). CDPH developed a pathway diagram to characterize the relationship among these impacts.



In the absence of existing practice standards for applying cumulative impact assessment, CDPH was compelled to use the best available evidence, supplementing it with theory and promising practices to consider a broader range of potential impacts on health determinants, health status, and health equity. The practice of assessing how the structural and social determinants of health contribute to disproportionate risk and health inequities in overburdened communities must continue to expand for cumulative impact assessment to drive informed and effective decision-making

Did the HIA provide a profile of existing conditions for the populations affected by the proposal, including their health outcomes, health determinants, and vulnerable sub-groups within the population, relevant to the health issues examined in the HIA?

YES. The HIA includes an extensive Existing Conditions Summary (Appendix D) that compares health outcomes, social factors that contribute to health, and environmental conditions in East Side, Hegewisch, and South Deering to Chicago overall. Our assessment gives special consideration to sub-groups such as people with underlying conditions who are made more vulnerable to negative health effects due to pollution exposure.



Did the HIA characterize the proposal's impacts on health, health determinants, and health equity, while documenting data sources and analytic methods, quality of evidence used, methodological assumptions, and limitations?

YES. For each of the impacts included in the HIA scope, CDPH identified and existing data source or conducted additional analysis to characterize potential effects on the environment, health, and quality of life for Southeast side residents. CDPH documented data sources, methods, quality of evidence, assumptions and limitations in the Existing Conditions Summary (Appendix D) and Environmental & Health Risk Assessment (Appendix E).



Real-world constraints result in diversity of HIA practice³ CDPH applied the analytical methods that were feasible with data sources available within the decision-making context and constraints. If additional assessment were feasible, particularly more robust qualitative input, it would only increase our understanding of the cumulative impacts of environmental injustice on health inequity.

3 Bhatia R., Farhang L., Heller J., Lee M., Orenstein M., Richardson M., and Wernham A. Minimum Elements and Practice Standards for Health Impact Assessment, Version 3. September, 2014.

Minimum Elements of HIA

Did the HIA provide recommendations, as needed, on feasible and effective actions to promote the positive health impacts and mitigate the negative health impacts of the decision, identifying, where appropriate, alternatives or modifications to the proposal?

Did the HIA produce a publicly accessible report that includes, at minimum, documentation of the HIA's purpose, findings, and recommendations, and either documentation of the processes and methods involved, or reference to an external source of documentation for these processes and methods? Was the report shared with decision-makers and other stakeholders?

Did the HIA propose indicators, actions, and responsible parties, where indicated, for a plan to monitor the implementation of recommendations, as well as health effects and outcomes of the proposal?

RMG/Southside Recycling HIA

YES. The HIA includes a discussion of environmental and quality of life mitigations proposed (or already put in place) by RMG, as well as additional mitigations that CDPH could impose as special conditions for a permit. These mitigations were developed with input from our environmental consultant, based on a review of industry standards and best practices. In addition to permit mitigations, the HIA includes recommendations on other policy and process changes that would promote health and racial equity for residents of the Southeast side. These recommendations were provided and prioritized by participants in the HIA public engagement sessions.

YES. CDPH produced a public document that includes the HIA's purpose, findings, recommendations, and methods for the process. The report will be shared with our commissioner, the mayor, relevant City departments, as well as the U.S. EPA. The report will also be disseminated to individuals who participated in public engagement sessions and made publicly available on our [website](#).

YES. CDPH developed an HIA Monitoring Plan (Appendix F) to track the implementation of recommendations. Monitoring the long-term health effects of our recommendations is beyond the scope of this HIA; however, CDPH does make a broad range of community health indicators publicly available on the [Chicago Health Atlas](#).



Appendix B

Literature Review

***TO BE INSERTED**

Appendix C

Community Input Summary

***TO BE INSERTED**

Appendix D

Existing Conditions Summary

***TO BE INSERTED**

Appendix E

Environmental & Health Risk Assessment

***TO BE INSERTED**

Appendix F

HIA Monitoring Plan

Proposed Indicators for Monitoring Adoption of HIA Recommendations

CDPH developed recommendations based on the HIA findings. This includes community input from the permit process and HIA public engagement sessions (see Community Input Summary, Appendix C) and a review of best and promising practices from around the country. CDPH is committed to being held accountable for and taking action on these recommendations. Detailed below are the actions proposed, the responsible agencies and an estimated time frame for when we expect to implement each of these actions.

Recommendation	Responsible Agency	Timing*
Make and announce permit decision in accordance with the recommendation of the summary report.	CDPH	Short term
Purchase and installation of federally equivalent air monitors to ensure increased air monitoring	CDPH	Medium term
Collaboration on improved enforcement of air facilities on the Southeast side and citywide	CDPH, IEPA, US EPA	Short term and ongoing
Updating procedures, protocols and training and implementing updates to ensure appropriate inspection frequency, using community vulnerability data to prioritize inspections, clear policies on issuing warnings, recording complaint inspections and following up on violations.	CDPH	Short term and ongoing
Promulgate new, strong rules for facilities that process demolition and construction debris to ensure businesses with potential to impact surrounding communities are subject to monitoring, reporting and control requirements.	CDPH, Law	Short term
Promulgate new, strong rules for air permit facilities to ensure businesses with potential to impact surrounding communities are subject to monitoring, reporting and control requirements.	CDPH, Law	Medium term
Promulgate new, strong rules for general recycling facilities to ensure businesses with potential to impact surrounding communities are subject to monitoring, reporting and control requirements.	CDPH, Law	Medium term
Conduct cumulative impact assessment to get baseline data on environmental, health and social conditions citywide.	CDPH	Medium term
Develop cumulative impact ordinance	CDPH, Mayor's Office, DPD, Law	Medium term
Institutionalize use of Health Impact Assessment (HIA) and Racial Equity Impact Assessment (REIA).	CDPH, other City departments as appropriate	Short term and ongoing

* **SHORT TERM** = Up to 1 year **MEDIUM TERM** = 1 to 2 years

The recommendations of this HIA will take several years to implement and certainly longer to realize results. Therefore, a detailed monitoring plan for all health effects and outcomes related to these recommendations is out of scope for this HIA. However, CDPH is committed to continuing to provide access to data on health, environment and quality of life indicators such as those presented in our Existing Conditions Summary (see Appendix D). This data is made available to the public through the Chicago Health Atlas and updated regularly. CDPH will also continue to update the [Air Quality and Health Index](#) as new data becomes available.

Facility Plot Map
South Chicago Property Management, Ltd.

KEY:
-Approximate Property Boundary:



Reserve FTL

Southshore Recycling

Regency Technologies

Napuck Salvage of Waupaca

Reserve FTL

Reserve FTL





<p>2S631 ROUTE 59 SUITE B WARRENVILLE, IL 60555 630-393-9000/630-393-9111</p>	COMMENTS: <p style="text-align: center;">Air Dispersion Modeling Report for the Assessment of Metal Emission Impacts</p>	<p>Revised Facility Map Ambient Air Boundaries General III, LLC 11600 South Burley, Chicago, IL</p>		FIGURE <p style="font-size: 2em;">1-2</p>
	DRAWN BY: 	APPROVED BY: <p style="text-align: center;">JGP</p>	PROJECT NUMBER: <p style="text-align: center;">R19439-7.10</p>	DATE DRAWN: <p style="text-align: center;">02-2020</p>



RECYCLING FACILITY APPLICATION



CITY OF CHICAGO DEPARTMENT OF PUBLIC HEALTH

AS REQUIRED UNDER THE PROVISIONS OF THE ENVIRONMENTAL PROTECTION AND CONTROL ORDINANCE (CHAPTER 11-4 OF THE MUNICIPAL CODE OF THE CITY OF CHICAGO): In order to receive a recycling facility permit from the Department of Public Health (CDPH), this application must be submitted and completed in its entirety. If further space is required, include additional sheets as attachments to this form as needed.

You must complete this form using Adobe Acrobat, version 8.0 or above. A free version of this software is available at <https://acrobat.adobe.com/us/en/acrobat/pdf-reader.html>. Failure to answer all questions will result in the rejection of this application.

Date of Application: May 15, 2019

Facility Address: 11600 S. Burley Avenue, Chicago, IL 60617

Type of Permit Requested: *(check one)*

- Permit for New Site
 Renewal for Existing Site
 Permit Modification

Facility Class for which you are applying: *(check one)*

- Class I Recycler
 Class II Recycler (click a rate below)
 Class III Recycler
 Class IVA Recycler
 Class V Recycler
- < 500 tons /daily
 Class IVB Recycler
- 500-1000 tons/daily
- >1000 tons/daily

Please supply the following contact information:

Contact	Full Name	Address	City, State	ZIP	Phone
1. Property Owner¹	South Chicago Property Management Ltd	11600 S. Burley Avenue	Chicago, IL	60617	+1 (773) 721-8740
2. Facility Owner²	Reserve FTL, LLC dba Reserve Marine Terminals	11600 S. Burley Avenue	Chicago, IL	60617	+1 (773) 382-0123
3. Site Manager	Hal Tolin	11600 S. Burley Avenue	Chicago, IL	60617	+1 (773) 382-0123

¹If Title of Property is held in trust, attach to this form the names and addresses of all beneficiaries and other persons authorized to deal with the property.

²If the facility owners are a partnership or corporation, include as an attachment to this form the names, addresses, phone numbers and social security numbers of all persons holding a share in the partnership or corporation.

Date Received by CDPH: For CDPH Use Only

Received By: For CDPH Use Only



<p>4. Zoning Information</p> <p>A. Please list the zoning district in which the facility is located. PMD 6</p> <p>B. Nature of proposed use (check one). <input type="radio"/> Permitted Use <input type="radio"/> Special Use </p> <p>C. ZBA Calendar Number - CAL No. (Attach copy of final resolution) </p>	<p style="text-align: center;">5. Zoning Review Stamp³ (for new permits only)</p> <p style="text-align: center; font-size: 1.2em;">Affix Zoning Review Stamp Here</p> <p>³ Print completed application and take to the Zoning Administrator for review.</p>
---	--

6. Applicant Information

A. List all owners of the facility. If the owners are themselves corporations or partnerships, list the natural persons who have an ownership interest:

Name	Address	Phone	Email
See Attached Schedule			
Add			
Remove			

B. If the applicant is a corporation or partnership, please list all owners/shareholders of the corporation and their shares of ownership. If owners are themselves corporation or partnerships, list the natural persons who have an ownership interest.

Name	Address	Phone	Percent Share
See Attached Schedule			
Add			
Remove			

C. Please attach an annual report.

Check here if no report is attached and explain why.

D. Who (natural persons) will be managing operations at the site? What hours will they be on-site?

Hal Tolin will be managing on site activities during normal business hours: 6:00 am to 4:00 pm daily: 6:00 am to 2:00 pm Saturdays



RECYCLING FACILITY APPLICATION



CITY OF CHICAGO DEPARTMENT OF PUBLIC HEALTH

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E. In the past three years, has the applicant, or any owner or officer of the applicant, or any person⁴ having control of applicant or any of its operations, including the person(s) listed in question D above, been cited for violations of any federal, state, or local laws, regulations, standards, 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?

⁴For purposes of this application, "person" means any natural person, corporation, general partnership, limited partnership, or any officer, partner, general partner, managing member or owner of 25% or more of any of such entity, including entities under common ownership with the applicant.

Yes

No

If yes and explain circumstances.

F. In the past 3 years, has the applicant, or any person in control of the applicant, had a recycling facility permit revoked? If yes, please explain the circumstances.

Yes

No

If yes and explain circumstances.

G. Has the applicant paid all fees required by the Municipal Code and any outstanding debts owed to the City? If not, please explain.

Yes

No

If yes and explain circumstances.



7. Site Plan: Drawings of the site must accompany the application form. All objects on the site plans must be named. The maximum site plan allowed is 11" x 17". Blueprints are not acceptable. For new permits only, the site plan must be drawn to scale. For all permits, the site plan must identify the following items: (Check off items and fill in all blanks.)

- A. Location of all buildings and structures
- B. Location of all surrounding fences and screens. Indicate approximate height:
- C. Location of all employee and customer parking areas. Clearly indicate the number of parking spaces.
- D. Location of all customer queuing areas
- E. Location where customers will unload their recyclable materials for purchase
- F. Location where facility vehicles will load recyclable materials for transport off site
- G. Location of parking area for facility vehicles used to transport materials from the facility
- H. Location of all scales
- J. Location of recyclable material storage areas
- K. Location where facility equipment will be staged and used
- I. Location of recyclable material processing areas
- L. Traffic flow for customer vehicles
- M. Traffic flow for walk-in customers
- N. Traffic flow for facility vehicles used to transport recyclable materials from the facility
- O. Location of any other facility operation not already identified in this question
- P. Location of water sources for fire protection and dust control
- Q. Location of all fire extinguishers. Indicate type, i.e. water, chemical, etc
- R. Location of covered material storage area
- S. Location of liquid waste storage area
- T. Location of surrounding streets and avenues
- U. Location of sewers
- V. Location of all paved surfaces and type of paving
- W. Location of required records
- X. Does the facility have a proper signage per ordinance and regulations? Show location of signage.
- Y. Location of recyclable material storage areas
- Z. Is the facility adequately lighted after dark? Show location of all exterior light fixtures.



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8. Accepted Materials: Check and/or list all the materials proposed to be accepted at the facility:

Type A Recyclables	Type A Recyclables (Continued)	Type B Recyclables
<input type="checkbox"/> Aluminum Cans	<input type="checkbox"/> Polyethylene Terephthalate (PET)	<input type="checkbox"/> Landscape Waste
<input type="checkbox"/> Bimetal or Tin Cans	<input type="checkbox"/> High Density Polyethylene (HDPE)	<input type="checkbox"/> Food Scraps (with meat, dairy, or cooked fruits/vegetables)
<input checked="" type="checkbox"/> Aluminum Scraps	<input type="checkbox"/> Low Density Polyethylene (LDPE)	<input type="checkbox"/> Food Scraps (without meat, dairy, or cooked fruits/vegetables)
<input checked="" type="checkbox"/> Ferrous Metal Scrap (non-vehicle Sources)	<input type="checkbox"/> Polystyrene	<input type="checkbox"/> Livestock Waste
<input checked="" type="checkbox"/> Non-Ferrous Metal Scrap (non-vehicle sources)	<input type="checkbox"/> Polypropylene	Type C Recyclables
<input type="checkbox"/> Other Metal Scrap (List all below*)	<input type="checkbox"/> Wheels	<input type="checkbox"/> Motor Vehicles
<input type="checkbox"/> Glass containers	<input type="checkbox"/> Batteries	<input type="checkbox"/> Vehicle Parts (other than batteries and wheels)
<input type="checkbox"/> Textiles	<input type="checkbox"/> Propane Tanks/Cylinder Tanks	Type D Recyclables
<input type="checkbox"/> Corrugated Cardboard	<input type="checkbox"/> Refrigerators and Air Conditioners	<input type="checkbox"/> Commingled Construction and Demolition Debris
<input type="checkbox"/> Newsprint	<input type="checkbox"/> Computers, Tablets, Mobile Phones	<input type="checkbox"/> Untreated Wood and Lumber
<input type="checkbox"/> Office Paper	<input type="checkbox"/> Other Electronics	<input type="checkbox"/> Stone, Brick, Asphalt, Concrete
<input type="checkbox"/> Other Paper		<input type="checkbox"/> Uncontaminated Dirt

Other Materials: (Please list all)

For Class IV applications, please describe how vehicles and vehicle parts will be handled, processes, and disposed:

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DEPARTMENT OF PUBLIC HEALTH**

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9. Operations: Please answer the following questions. An answer must be provided for each question or the application will be deemed incomplete. The phrase “not applicable” or “N/A” is not a complete answer.

A. Days and Hours of Operation*: (**Normal facility hours are 7:00 a.m. until 9:00 p.m. Monday through Saturday or Sunday through Friday. If you plan to operate outside of these hours, you must submit a noise abatement plan along with your permit application.*)

Current Operations are from 7:00 am to 9:00 pm Monday through Saturday

B. Total material handling capacity (tons/day): 750

C. Number of full-time employee positions: 25

D. Number of part-time employee positions: 0

E. How will incoming materials be monitored?

All inbound material is passed through fixed radiation detection equipment prior to acceptance. Loads are visually inspected during unloading. No peddler business. All pre-established accounts.

F. From which sources will materials be accepted (*public, businesses, scavenged materials, alleyways, etc.*)?

Material is accepted from private industry/business - no peddler/public sources.

G. How will materials be separated and stored?

All material is separated by magnet crane and hand picking

H. How often will material be transported from the facility? (Indicate the average size of each out-going load, including weight and vehicle type.):

Daily - approximately 18 tons/load via truck and 80 tons/load via rail

I. Are any additional methods used to process the materials (*including heat processes, bailing, shredding, crushing, etc.*)?

Shearing, breaking, torching, size separation, magnetic separation.

J. List all other equipment and/or machinery that will be used:

14 cranes, 2 loaders, portable screening plant, in-yard truck.

K. How will odor, noise and dust emissions be handled?

Water truck will be used to control dust as needed - See Attachment 4 for Daily Water Truck Log



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L. Describe daily cleaning/housekeeping activities, including parking lots, staging areas and adjacent public ways:

Magnet used to keep materials in stockpiles and off roadways. Daily housekeeping of work areas. Regular inspection of incoming materials to ensure only approved items are received and to direct all materials for further processing/staging. Parking lots and entry way are swept on weekly basis. Periodic housekeeping along fence lines and adjacent public ways. Routine inspections of facility grounds

M. Where and how will incidental solid waste be handled (*unloaded, processed, loaded out*)?

All solid waste that is generated will be loaded into containers provided by a licensed waste hauler and shipped to approved landfills. Typical solid waste consists of wood, plastic, rubber, paper.

N. Please describe how you will screen for unauthorized materials including, but not limited to, municipal solid waste, hazardous materials and stolen goods. (*Include information pertaining to the schedule for removal of materials.*)

All incoming loads are subject to visual inspection during unloading process. Any unauthorized materials will be rejected and returned to the shipper. All materials are sourced from other established businesses. Sign is posted at entrance identifying unacceptable items.

O. Where and how will liquid waste be handled?

Any liquid waste generated will be collected and recycled through Excel Environmental, Inc. EPA# ILD094743507

10. Liquid Waste Handling Information: Please list the name of the company with whom you contract to remove/handle liquid waste. *Required for all facilities accepting motor vehicles and other materials likely to contain liquid waste.*

Company	Address	Phone
Excel Environmental, LLC	400 Ashland Avenue, PO Box 5010, River Forest, IL 60305	7083660440

11. Recordkeeping: Please describe the facility's system for maintaining required records, including records of regulated and prohibited materials and records of regular customer accounts.

The facility uses an integrated computer system that records each transaction, including supplier, material, date, and weight of load. Off-site backup system is also maintained.

12. Facility Description: Provide a detailed description of the operations that take place at the facility.

Raw materials are received via truck and/or railcar from other businesses. All material is weighed at receipt, inspected for product conformance, to ensure no radiation, forbidden items, or hazardous materials are being delivered. Material is directed to various locations in the facility for further processing including shearing, breaking, and torching. Finished product is loaded into trucks/rail and shipped customers as requested.



13. Certification

I certify that I have personally examined and am familiar with all the information submitted in response to the questions contained in this application and the attached document(s), and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that all information submitted is true, accurate and complete.

Name: Dennis Stropko	
Title: HSE Manager	
Company Name: Reserve FTL, LLC	
Mailing Address: 11600 S. Burley Avenue, Chicago, IL 60617	
Phone Number: 440-287-7216	Fax Number: 440-848-8633
Email: dennisstropko@reserve-group.com	
Signature: 	

Print and send the completed form to the address below.

Chicago Department of Public Health
333 S State Street
Room 200
Chicago, Illinois 60604
Attn: Recycling Permits

Attachment 1

Ownership of Reserve FTL, LLC

Reserve FTL, LLC
Attachment to the City of Chicago, DOE
Recycling Facility Permit Application

Ownership of the facility and applicant is as follows:

42.49% RMG Investment Group, LLC
1831 Highland Road
Twinsburg, OH 44087
FEIN: 45-2588798

57.51% RMG Investment Group II, LLC
1831 Highland Road
Twinsburg, OH 44087
FEIN: 45-3852632

Reserve FTL, LLC
Attachment to the City of Chicago, DOE
Recycling Facility Permit Application

Ownership of RMG Investment Group, LLC and RMG Investment GroupII, LLC as follows:

5.5000% Anthony Musara 1831 Highland Road Twinsburg, OH 44087 anthonymusarra@reserve-group.com 330-474-3513	20.5000% Hal Tolin 11600 S Burley Avenue Chicago, IL 60617 haltolin@reserve-group.com 773-382-0123
5.5000% James Levine 1831 Highland Road Twinsburg, OH 44087 jimlevine@reserve-group.com 440-287-7438	5.5000% Julius Hess 1831 Highland Road Twinsburg, OH 44087 julius Hess@reserve-group.com 440-287-7439
17.5000% Paul D Joseph Dynasty Trust 1/1/09 1831 Highland Road Twinsburg, OH 44087 pauljoseph@reserve-group.com 440-519-1768	17.5000% Scott Joseph 1831 Highland Road Twinsburg, OH 44087 scottjoseph@reserve-group.com 440-287-7210
10.5000% Saba Salloum 1831 Highland Road Twinsburg, OH 44087 sabasalloum@reserve-group.com 440-287-7220	17.5000% Steven Joseph 1831 Highland Road Twinsburg, OH 44087 stevejoseph@reserve-group.com 440-287-7222

Attachment 2

Reserve FTL, LLC – Annual Report

Form **LLC-50.1**

**Illinois
Limited Liability Company Act
Annual Report**

FILE # 03822028

Due prior to: 01/01/2019

Secretary of State
Department of Business Services
Limited Liability Division
501 S. Second St., Rm. 351
Springfield, IL 62756
217-524-8008
www.cyberdriveillinois.com

Filing Fee:	75.00
Series Fee, if required:	
Penalty:	0.00
Total:	75.00

Filed Electronically
November 27, 2018
Jesse White
Secretary of State

1. Limited Liability Company Name: RESERVE FTL, LLC

Registered Agent: HAL C TOLIN
11600 S BURLEY AVE
CHICAGO, IL 60617

2. State or Country of Organization: OH Date Organized in or Admitted to Illinois: 01/27/2012

3. Address of Principal Place of Business:
11600 S BURLEY AVE CHICAGO, IL 60617

4. Name and business address of all managers and any member having the authority of manager:
JOSEPH, STEVE C
1831 E HIGHLAND RD TWINSBURG, OH 44087

- 5. Entity managers affirm their current existence.
- 6. Changes to the registered agent and/or registered office must be submitted on Form LLC-1.36/1.37.
- 7. I affirm, under penalties of perjury, having authority to sign thereto, that this Annual Report is to the best of my knowledge and belief, true, correct and complete.

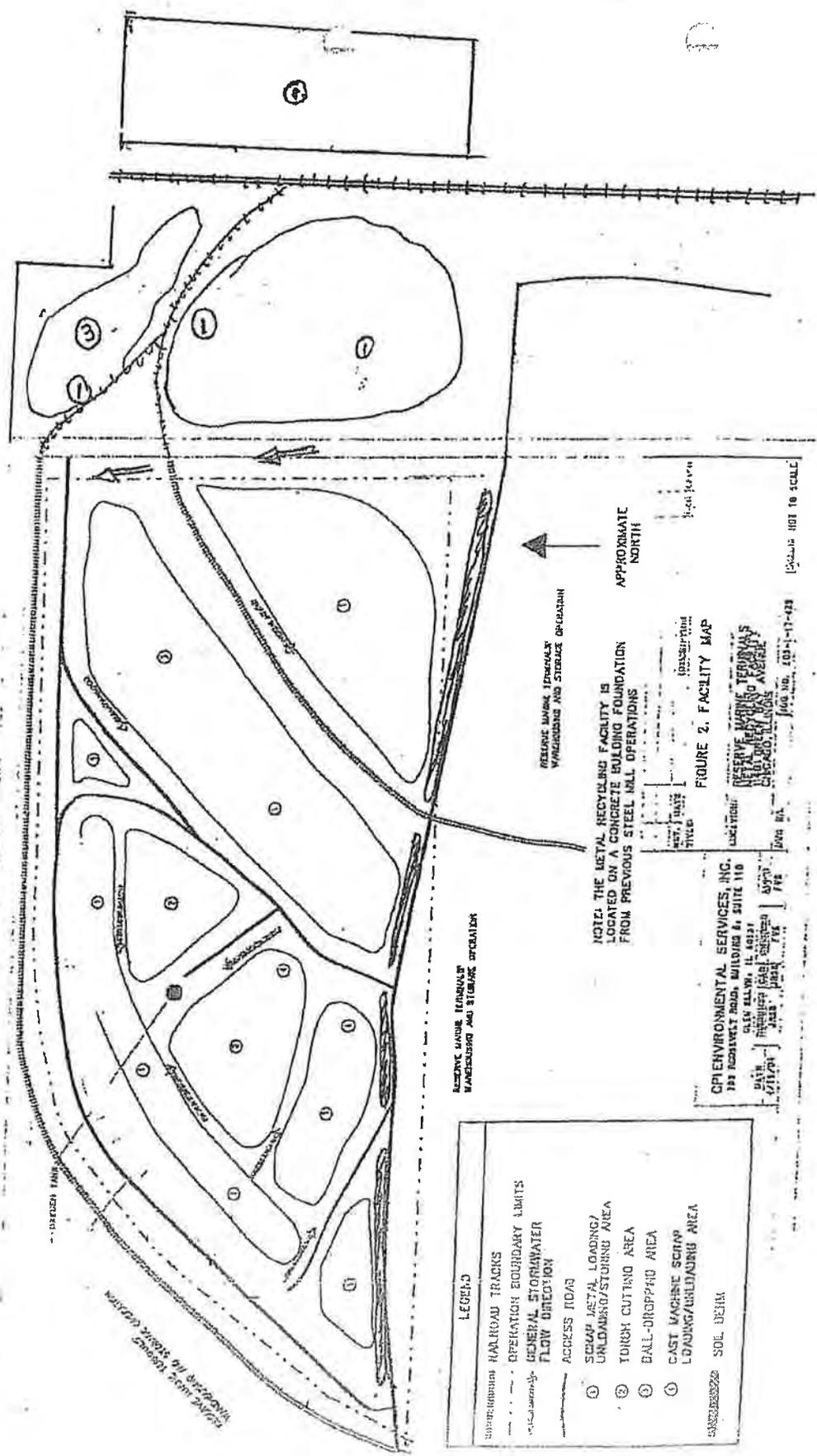
Dated: November 27, 2018
Month/Day Year

JOSEPH, STEVE C
Name
MANAGER
Title

If applicant is a company or other entity, state Name of Company

Attachment 3

Reserve FTL – Site Plan



LEGEND

- RAILROAD TRACKS
- OPERATION BOUNDARY LIMITS
- GENERAL STORMWATER FLOW DIRECTION
- ACCESS ROADS
- ① SCRAP METAL LOADING/ UNLOADING/STORAGE AREA
- ② TORCH CUTTING AREA
- ③ BALL-DROPPING AREA
- ④ CAST MACHINE SCRAP LOADING/UNLOADING AREA
- ⑤ SOIL DEHA

NOTE: THE METAL RECYCLING FACILITY IS LOCATED ON A CONCRETE BUILDING FOUNDATION FROM PREVIOUS STEEL MILL OPERATIONS

FIGURE 2. FACILITY MAP

ENVIRONMENTAL SERVICES, INC.
124 ROOSEVELT ROAD, BUILDING 6, SUITE 110
CLY BLDG., IL 60311

RESERVE MACHINE WAREHOUSE
METAL RECYCLING FACILITY
124 ROOSEVELT ROAD, SUITE 110
CLY BLDG., IL 60311

FIG. NO. 103-17-423

SCALE NOT TO SCALE

Fire Extinguisher Inspection Log

Reserve Marine Terminals

Page 1

LOCATION	EXTINGUISHER TYPE (Circle size)	CONDITION (Circle one)
Offices		
Front Hall	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Main Hall	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Supervisor Room	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Ray's Office	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Ray's Office	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Lunch Room	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Server Room	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Accounting	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Conference Room	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Back Offices	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Guard Shack	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Scale House	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Lunch Room 1	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Lunch Room 2	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Locker Room	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Burner's Bldg.	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Burner's Bldg.	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Plant Maintenance		
Diesel Tank	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Oil Storage	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Lunch Room	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Office	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit

Fire Extinguisher Inspection Log

Reserve Marine Terminals

Page 3

LOCATION	EXTINGUISHER TYPE (Circle size)	CONDITION (Circle one)
Mobile Equipment		
Dock 1	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Scrap Yard	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
Skyline Yard	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit
	ABC 2.5 / 5 / 10 / 20	OK / Service Unit

Emergency Exit Doors – Clear and Accessible? YES / NO
 Emergency Lighting – Functional? YES / NO

Additional Comments/Notes: _____

Inspectors Name: (Print) _____

(Signature) _____ DATE: _____

Attachment 4

**Dust Suppression
Water Truck Daily Log**

South Chicago Properties
Monthly Water Log – Road Dust Suppression Control Record

MONTH: _____

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<input type="checkbox"/> Gallons of water applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water applied: <input type="checkbox"/> Gallons of water Applied:
<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:
<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:	<input type="checkbox"/> Gallons of water Applied: <input type="checkbox"/> Gallons of water Applied:

NOTE: Enter total gallons of water used each day that water is applied to roadways for dust suppression purposes. Place a R in the box to represent Rain for that day.

5. Zoning Approval: For new permits only:

Please list the zoning district in which the facility is located: _____

Nature of the proposed use (check one): Permitted use Special use (Date of ZBA approval: _____)

6. Applicant Information: Please provide the following information, attach additional pages if necessary, and attach all specified documents.

A. List all owners of the facility. If the owners are themselves corporations or partnerships, list the natural persons who have an ownership interest: See Attachment A

B. If the applicant is a corporation or partnership, please list all owners/shareholders of the corporation and their shares of ownership. If owners are themselves corporation or partnerships, list the natural persons who have an ownership interest.

See Attachment A

C. Please attach an annual report. If no report is attached, please explain why. _____

See Attachment B

D. Who (natural persons) will be managing operations at the site? What hours will they be on-site? _____

Hal Tolin and Ron Trivisonno 7am - 5pm

E. In the past three years, has the applicant, or any owner or officer of the applicant, or any person* having control of applicant or any of its operations, including the person(s) listed in question D above, been cited for violations of any federal, state, or local laws, regulations, standards, 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? If yes, please explain. _____

No

* For purposes of this application, "person" means any natural person, corporation, general partnership, limited partnership, or any officer, partner, general partner, managing member or owner of 25% or more of any of such entity, including entities under common ownership with the applicant.

F. In the past 3 years, has the applicant, or any person in control of the applicant, had a recycling facility permit revoked?

If yes, please explain the circumstances. No

G. Has the applicant paid all fees required by the Municipal Code and any outstanding debts owed to the City? If not, please explain. Yes

7. Site Plan: Drawings of the site must accompany the application form. All objects on the site plans must be named. The maximum site plan allowed is 11" x 17". Blueprints are not acceptable. Electronic copies of the plans can also be submitted. For new permits only, the site plan must be drawn to scale. For all permits, the site plan must identify the following items: (Check off items and fill in all blanks.)

- A. Location of all buildings and structures ®
- B. Location of all surrounding fences and screens. Indicate approximate height: 6 Foot ®
- C. Location of all employee and customer parking areas. Approximate # of parking spaces: 40 ®1
- 1 D. Location of all customer queuing areas ®
- E. Location where customers will unload their recyclable materials for purchase ®
- F. Location where facility vehicles will load recyclable materials for transport off site ®
- G. Location of parking area for facility vehicles used to transport materials from the facility ®
- H. Location of all scales ®
- I. Location of recyclable material processing areas ®
- J. Location of recyclable material storage areas ®
- K. Location where facility equipment will be staged and used ®
- L. Traffic flow for customer vehicles ®
- M. Traffic flow for walk-in customers ® N/A
- N. Traffic flow for facility vehicles used to transport recyclable materials from the facility ® Same as L
- O. Location of any other facility operation not already identified in this question ®
- P. Location of water sources for fire protection and dust control ®
- Q. Location of all fire extinguishers. Indicate type, i.e. water, chemical, etc. ABC Type Fire Extinguishers ®
- R. Location of covered material storage area ®
- S. Location of liquid waste storage area ®
- T. Location of surrounding streets and avenues ®
- U. Location of sewers ®

V. Location of all paved surfaces and type of paving Asphalt ®

W. Location of required records ®1

X. Does the facility have a sign, clearly visible to the public, which states the name, address and telephone number of the facility, the type of recyclable materials accepted, and the hours during which the facility shall be open to the public? Yes

Y. Is the facility secured from unauthorized entry? Yes

Z. Is the facility adequately lighted after dark? Yes

8. Accepted Materials: Check and/or list all the materials proposed to be accepted at the facility:

- | | | |
|--|--|---|
| <input type="checkbox"/> Aluminum Cans | <input type="checkbox"/> Newsprint | <input type="checkbox"/> Polyethylene Terephthalate (PET) |
| <input checked="" type="checkbox"/> Aluminum Scrap | <input type="checkbox"/> Office Paper | <input type="checkbox"/> High Density Polyethylene (HDPE) |
| <input checked="" type="checkbox"/> Ferrous Metal Scrap | <input type="checkbox"/> Other Paper | <input type="checkbox"/> Low Density Polyethylene (LDPE) |
| <input checked="" type="checkbox"/> Non-Ferrous Metal Scrap | <input type="checkbox"/> Rubber | <input type="checkbox"/> Polystyrene |
| <input type="checkbox"/> Bi-metal or tin cans | <input type="checkbox"/> Textiles | <input type="checkbox"/> Polypropylene |
| <input type="checkbox"/> Glass containers | <input type="checkbox"/> Motor Vehicles** | <input type="checkbox"/> Batteries |
| <input type="checkbox"/> Corrugated Cardboard | <input type="checkbox"/> Vehicle Parts** | <input type="checkbox"/> Propane Tanks/Cylinder Tanks |
| <input type="checkbox"/> Other Metal Scrap: <i>(List all below*)</i> | <input type="checkbox"/> Construction & Demolition Debris <i>(List all below*)</i> | |

* Please itemize scrap metal and/or C&D debris, as applicable:

____ Other: *(please list all)*

** Please describe how vehicles and vehicle parts will be handled, processed, and disposed of: _____

N/A

9. Operations: Please answer the following questions. An answer must be provided for each question or the application will be deemed incomplete. The phrase “not applicable” or “N/A” is not a complete answer.

A. Days and Hours of Operation: *(Normal facility hours are 7:00 a.m. until 9:00 p.m. Monday through Saturday or Sunday through Friday. If you plan to operate outside of these hours, you must submit a noise abatement plan along with your permit application.)* 7am - 9pm Monday thru Saturday

B. Total material handling capacity (tons/day): Approx 400 tons per day

C. Number of full-time employee positions: Approx 40 per shift

D. Number of part-time employee positions: None

E. Describe how incoming materials be screened and monitored? All incoming materials will be subject to radiation detection and visual inspection during unloading.

F. From which sources will materials be accepted *(public, businesses, permitted scrappers, etc.)*? Materials will be sourced from other businesses

G. How will materials be separated (by hand, mechanical) and stored? All material is separated by magnetics and by tank. All materials is stored on concrete inside and outside.

H. How often will material be transported from the facility? (Indicate the average size of each out-going load, including weight and vehicle type.): Material will be transported by truck and railcar. Trucks will average 20 tons and railcars will average 80 tons

I. Are any additional methods used to process the materials *(including heat processes, bailing, shredding, crushing, etc.)*? Materials will be crushed, hand sorted, magnetically sorted and washed.

J. List all other equipment and/or machinery that will be used: _____

3- Crushers, 3- Magnetic Drums, 3- Eddy Current Separators, various vibratory conveyors, 4- front end loaders, 3- Liebherr Cranes,
4- Caterpillar Skidsteers, 2- Forklifts

K. Describe methods, processes, equipment, etc. that will be used to control odor, noise and dust emissions: _____

All processes will be contained inside a building located in an industrial facility. The zoning is M-3-3

L. Describe daily cleaning/housekeeping activities, including parking lots, staging areas and adjacent public ways: _____

Daily clean up will include sweeping floors and making sure all materials are stock piled in appropriate areas. Dust control will be implemented on dry days.

M. Where and how will incidental solid waste be handled (unloaded, processed, loaded out)?

All solid waste generated will be loaded into a container provided by a licensed waste hauler. The container will be disposed of at a landfill when necessary. Waste consists of rubber, wood and plastic.

N. Please describe how you will screen for unauthorized materials including, but not limited to, municipal solid waste, hazardous materials and stolen goods. (Include information pertaining to the schedule for removal of materials.)

Inbound material will be subject to radiation and visual inspection during unloading. Any unauthorized materials will be rejected back to the shipping facility. Inbound material is sourced from other established business and not from general public.

O. Where and how will liquid waste be handled? All liquid from the raw materials will be captured and recycled. The remaining water is reused in the wash process. Any liquid waste will be sent to an approved treatment facility.

10. Liquid Waste Handling Information: Please list the name of the company with whom you contract to remove/handle liquid waste. *Required for all facilities accepting motor vehicles and other materials likely to contain liquid waste.*

Safety Kleen Systems, Inc. Dan Patzschke

708-225-8500

Name of Company/Person

Phone Number

5400 Legacy Drive

Address

Plano

TX

75024

City

State

Zip Code

11. Recordkeeping: Please describe the facility's system for maintaining required records, including records of regulated and prohibited materials and records of regular customer accounts.

The facility has a computer system that every load is entered into. The computer system records the supplier, material, date and weight.

12. Facility Description: Provide a detailed description of the operations that take place at the facility. If further space is needed, include an attachment to this application.

Raw materials will be received via truck and railcar. Material will pass through radiation detectors and visual inspections. Raw materials will be moved from the stockpile to the processing equipment using a crane equipped with a magnet. The material is crushed, washed, and sorted using a system of conveyors. The water is then recirculated through the wash system. All liquid waste is sent to an approved treatment facility. All solid waste is loaded into a container provided by a licensed waste hauler and sent to the landfill. All finished product is collected and stockpiled inside the building on a concrete pad. The finished product is then loaded into trucks or railcars.

13. Certification

I certify that I have personally examined and am familiar with all the information submitted in response to the questions contained in this application and the attached document(s), and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that all information submitted is true, accurate and complete.

Name: Hal Tolin

Title: COO

Company Name: Napuck Salvage of Waupaca, LLC

Mailing Address: 11600 S Burley Ave, Chicago, IL 60617

Phone Number: 773-721-8740 Fax Number: 773-721-8798

E-mail address: haltolin@reserve-group.com

Signature: 

RECYCLING FACILITY SITE SKETCH

Name of Facility: Napuck Salvage of Waupaca, LLC

Address: 11600 S Burley Ave

City, State, Zip Code: Chicago IL 60617

Owner/Operator: Napuck Salvage of Waupaca

See Attachment C



Illinois
Limited Liability Company Act
Annual Report

FILE # 00640549

Due prior to: 12/01/2016

Secretary of State
Department of Business Services
Limited Liability Division
501 S. Second St., Rm. 351
Springfield, IL 62756
217-524-8008
www.cyberdriveillinois.com

Filing Fee: 250.00
Series Fee, if required:
Penalty: 0.00
Total: 250.00

Filed Electronically

October 31, 2016

Jesse White
Secretary of State

1. Limited Liability Company Name: NAPUCK SALVAGE OF WAUPACA, LLC

Registered Agent: ROBERT S EVENHOUSE

11401 S GREEN BAY AVENUE

CHICAGO, IL 60617

2. State or Country of Organization: WI Date Organized in or Admitted to Illinois: 12/18/2001

3. Address of Principal Place of Business:

11600 S. BURLEY AVENUE CHICAGO, IL 60617

4. Names and addresses of the members:

RMG INVESTMENT GROUP LLC
1831 E HIGHLAND ROAD TWINSBURG, OH 44087

RMG INVESTMENT GROUP II LLC
11600 S. BURLEY AVENUE CHICAGO, IL 60617

5. Entity members affirm their current existence.

6. Changes to the registered agent and/or registered office must be submitted on Form LLC-1.36/1.37.

7. I affirm, under penalties of perjury, having authority to sign thereto, that this Annual Report is to the best of my knowledge and belief, true, correct and complete.

Dated: October 31 2016
Month/Day Year

ROBERT EVENHOUSE

Signature

CFO

Name and Title (type or print)

RMG INVESTMENT GROUP LLC MEMBER

If applicant is a company or other entity, state Name of Company

Attachment to the City of Chicago DOE
Recycling Facility/Junkyard Permit Application Form
Attachment A

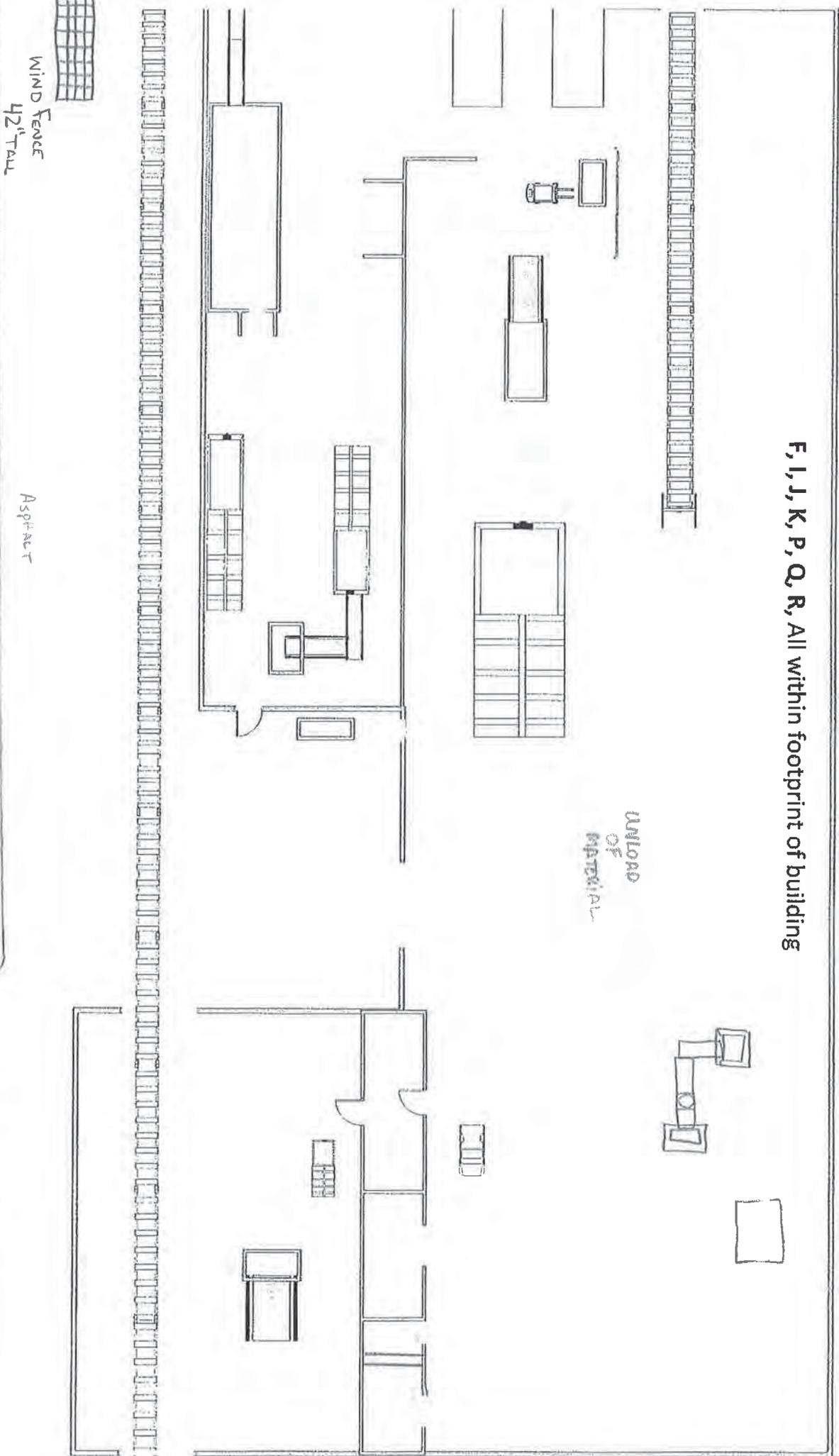
Ownership of Napuck Salvage of Waupaca, LLC as follows:

42.49% RMG Investment Group, LLC
1831 East Highland Road
Twinsburg, OH 44087
FEIN# 45-2588798

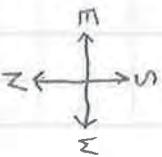
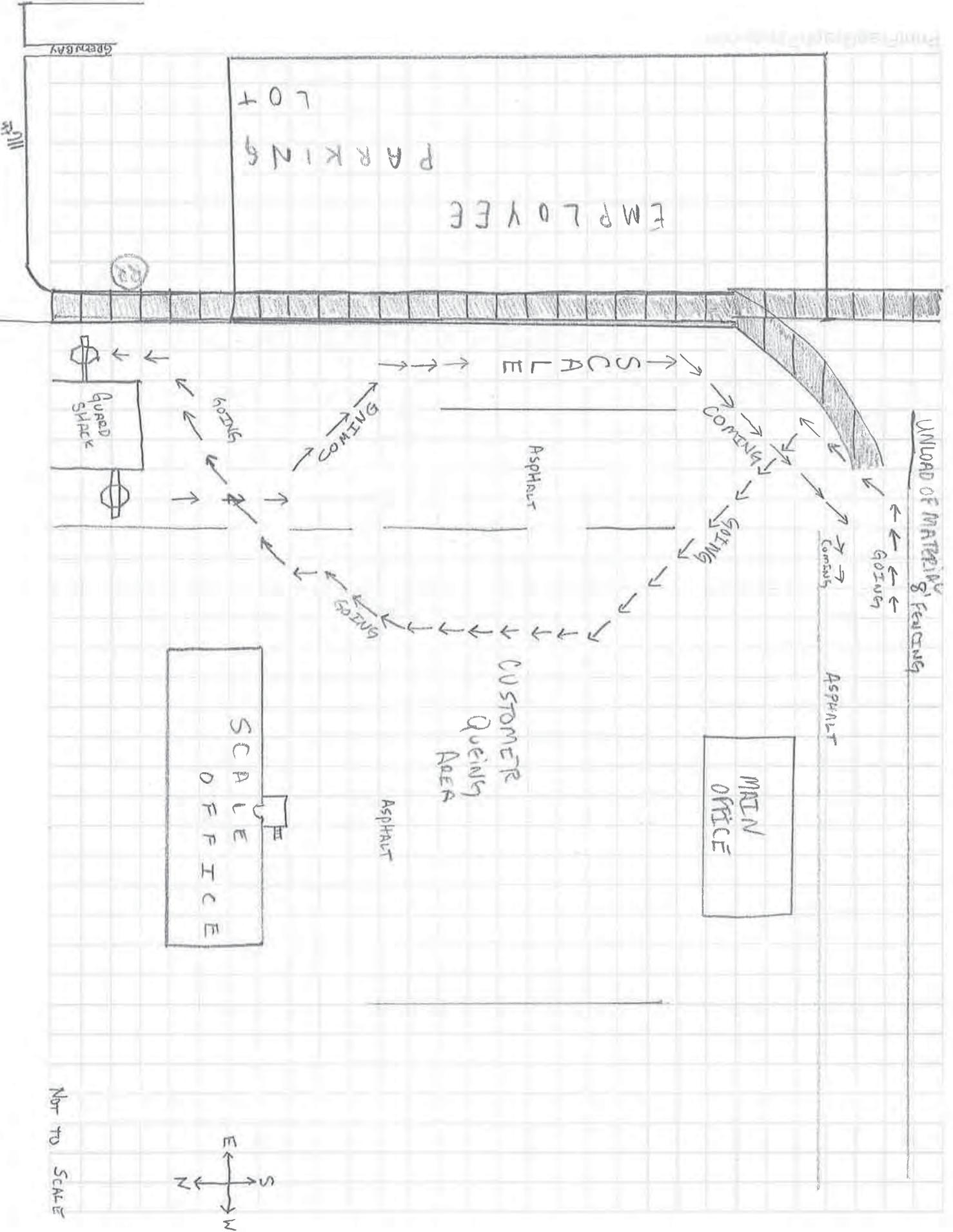
57.51% RMG Investment Group II, LLC
1831 East Highland Road
Twinsburg, OH 44087
FEIN# 45-3852632

Attachment C-3: Napuck Salvage of Waupaca, LLC

F, I, J, K, P, Q, R, All within footprint of building



ATTACHMENT C-2 Napueke Salvage of Napueke, LLC



NOT TO SCALE



RECYCLING FACILITY APPLICATION



CITY OF CHICAGO DEPARTMENT OF PUBLIC HEALTH

AS REQUIRED UNDER THE PROVISIONS OF THE ENVIRONMENTAL PROTECTION AND CONTROL ORDINANCE (CHAPTER 11-4 OF THE MUNICIPAL CODE OF THE CITY OF CHICAGO): In order to receive a recycling facility permit from the Department of Public Health (CDPH), this application must be submitted and completed in its entirety. If further space is required, include additional sheets as attachments to this form as needed.

You must complete this form using Adobe Acrobat, version 8.0 or above. A free version of this software is available at <https://acrobat.adobe.com/us/en/acrobat/pdf-reader.html>. Failure to answer all questions will result in the rejection of this application.

Date of Application: May 15, 2018

Facility Address: South Shore Recycling, LLC 11600 S Burley Avenue, Chicago, IL 60617

Type of Permit Requested: *(check one)*

- Permit for New Site
 Renewal for Existing Site
 Permit Modification

Facility Class for which you are applying: *(check one)*

- Class I Recycler
 Class II Recycler (click a rate below)
 Class III Recycler
 Class IVA Recycler
 Class V Recycler

 < 500 tons /daily
 Class IVB Recycler

 500-1000 tons/daily

 >1000 tons/daily

Please supply the following contact information:

Contact	Full Name	Address	City, State	ZIP	Phone
1. Property Owner ¹	South Chicago Property Management LTD	11600 S. Burley Avenue	Chicago, IL	60617	+1 (773) 721-8740
2. Facility Owner ²	South Shore Recycling, LLC	11600 S. Burley Avenue	Chicago, IL	60617	+1 (773) 374-0299
3. Site Manager	Jeff Handelman	11600 S. Burley Avenue	Chicago, IL	60617	+1 (773) 382-0110

¹If Title of Property is held in trust, attach to this form the names and addresses of all beneficiaries and other persons authorized to deal with the property.

²If the facility owners are a partnership or corporation, include as an attachment to this form the names, addresses, phone numbers and social security numbers of all persons holding a share in the partnership or corporation.

Date Received by CDPH:

Received By:



<p>4. Zoning Information</p> <p>A. Please list the zoning district in which the facility is located. PMD 6</p> <p>B. Nature of proposed use (check one). <input type="radio"/> Permitted Use <input checked="" type="radio"/> Special Use</p> <p>C. ZBA Calendar Number - CAL No. (Attach copy of final resolution) 83-12-5</p>	<p style="text-align: center;">5. Zoning Review Stamp³ (for new permits only)</p> <p style="text-align: center; font-size: 1.2em;">Affix Zoning Review Stamp Here</p> <p style="font-size: 0.8em;">³ Print completed application and take to the Zoning Administrator for review.</p>
--	--

6. Applicant Information

A. List all owners of the facility. If the owners are themselves corporations or partnerships, list the natural persons who have an ownership interest:

Name	Address	Phone	Email
See Attached			
Add			
Remove			

B. If the applicant is a corporation or partnership, please list all owners/shareholders of the corporation and their shares of ownership. If owners are themselves corporation or partnerships, list the natural persons who have an ownership interest.

Name	Address	Phone	Percent Share
See Attached			
Add			
Remove			

C. Please attach an annual report.

Check here if no report is attached and explain why.

D. Who (natural persons) will be managing operations at the site? What hours will they be on-site?

Jeff Handelman - 7:00 am to 5:00 pm Monday to Friday - 7:00 am to 12:00 pm Saturday



E. In the past three years, has the applicant, or any owner or officer of the applicant, or any person⁴ having control of applicant or any of its operations, including the person(s) listed in question D above, been cited for violations of any federal, state, or local laws, regulations, standards, 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?

⁴For purposes of this application, "person" means any natural person, corporation, general partnership, limited partnership, or any officer, partner, general partner, managing member or owner of 25% or more of any of such entity, including entities under common ownership with the applicant.

- Yes
- No

If yes and explain circumstances.

F. In the past 3 years, has the applicant, or any person in control of the applicant, had a recycling facility permit revoked? If yes, please explain the circumstances.

- Yes
- No

If yes and explain circumstances.

G. Has the applicant paid all fees required by the Municipal Code and any outstanding debts owed to the City? If not, please explain.

- Yes
- No

If yes and explain circumstances.



7. Site Plan: Drawings of the site must accompany the application form. All objects on the site plans must be named. The maximum site plan allowed is 11" x 17". Blueprints are not acceptable. For new permits only, the site plan must be drawn to scale. For all permits, the site plan must identify the following items: (Check off items and fill in all blanks.)

- A. Location of all buildings and structures
- B. Location of all surrounding fences and screens. Indicate approximate height:
- C. Location of all employee and customer parking areas. Clearly indicate the number of parking spaces.
- D. Location of all customer queuing areas
- E. Location where customers will unload their recyclable materials for purchase
- F. Location where facility vehicles will load recyclable materials for transport off site
- G. Location of parking area for facility vehicles used to transport materials from the facility
- H. Location of all scales
- J. Location of recyclable material storage areas
- K. Location where facility equipment will be staged and used
- I. Location of recyclable material processing areas
- L. Traffic flow for customer vehicles
- M. Traffic flow for walk-in customers
- N. Traffic flow for facility vehicles used to transport recyclable materials from the facility
- O. Location of any other facility operation not already identified in this question
- P. Location of water sources for fire protection and dust control
- Q. Location of all fire extinguishers. Indicate type, i.e. water, chemical, etc
- R. Location of covered material storage area
- S. Location of liquid waste storage area
- T. Location of surrounding streets and avenues
- U. Location of sewers
- V. Location of all paved surfaces and type of paving
- W. Location of required records
- X. Does the facility have a proper signage per ordinance and regulations? Show location of signage.
- Y. Location of recyclable material storage areas
- Z. Is the facility adequately lighted after dark? Show location of all exterior light fixtures.



8. Accepted Materials: Check and/or list all the materials proposed to be accepted at the facility:

Type A Recyclables	Type A Recyclables (Continued)	Type B Recyclables
<input checked="" type="checkbox"/> Aluminum Cans	<input type="checkbox"/> Polyethylene Terephthalate (PET)	<input type="checkbox"/> Landscape Waste
<input checked="" type="checkbox"/> Bimetal or Tin Cans	<input type="checkbox"/> High Density Polyethylene (HDPE)	<input type="checkbox"/> Food Scraps (<u>with</u> meat, dairy, or cooked fruits/vegetables)
<input checked="" type="checkbox"/> Aluminum Scraps	<input type="checkbox"/> Low Density Polyethylene (LDPE)	<input type="checkbox"/> Food Scraps (<u>without</u> meat, dairy, or cooked fruits/vegetables)
<input checked="" type="checkbox"/> Ferrous Metal Scrap (non-vehicle Sources)	<input type="checkbox"/> Polystyrene	<input type="checkbox"/> Livestock Waste
<input checked="" type="checkbox"/> Non-Ferrous Metal Scrap (non-vehicle sources)	<input type="checkbox"/> Polypropylene	Type C Recyclables
<input type="checkbox"/> Other Metal Scrap (List all below*)	<input checked="" type="checkbox"/> Wheels	<input checked="" type="checkbox"/> Motor Vehicles
<input type="checkbox"/> Glass containers	<input checked="" type="checkbox"/> Batteries	<input type="checkbox"/> Vehicle Parts (other than batteries and wheels)
<input type="checkbox"/> Textiles	<input type="checkbox"/> Propane Tanks/Cylinder Tanks	Type D Recyclables
<input type="checkbox"/> Corrugated Cardboard	<input checked="" type="checkbox"/> Refrigerators and Air Conditioners	<input type="checkbox"/> Commingled Construction and Demolition Debris
<input type="checkbox"/> Newsprint	<input type="checkbox"/> Computers, Tablets, Mobile Phones	<input type="checkbox"/> Untreated Wood and Lumber
<input type="checkbox"/> Office Paper	<input type="checkbox"/> Other Electronics	<input type="checkbox"/> Stone, Brick, Asphalt, Concrete
<input type="checkbox"/> Other Paper		<input type="checkbox"/> Uncontaminated Dirt
<input type="checkbox"/> Other Materials: (Please list all)		

For Class IV applications, please describe how vehicles and vehicle parts will be handled, processes, and disposed:

Purchased vehicles are staged on pad and sold as a whole units for downstream parts/shredding by third parties. Vehicle parts are not being purchased or sold at this time.



9. Operations: Please answer the following questions. An answer must be provided for each question or the application will be deemed incomplete. The phrase "not applicable" or "N/A" is not a complete answer.

A. Days and Hours of Operation*: (**Normal facility hours are 7:00 a.m. until 9:00 p.m. Monday through Saturday or Sunday through Friday. If you plan to operate outside of these hours, you must submit a noise abatement plan along with your permit application*)

7:00 am to 9:00 pm Monday through Friday - 7:00 am to 12:00 pm Saturday

B. Total material handling capacity (tons/day): 500

C. Number of full-time employee positions: 10

D. Number of part-time employee positions: 0

E. How will incoming materials be monitored?

Loads are visually inspected as well as camera at the scale. System records all suppliers and keeps valid ID with vehicle identification to ensure accuracy.

F. From which sources will materials be accepted (*public, businesses, scavenged materials, alleyways, etc.*)?

Materials are accepted from the public and other businesses

G. How will materials be separated and stored?

Materials separated and stored by commodity type. Material can be sorted by hand, magnet, or other processes.

H. How often will material be transported from the facility? (Indicate the average size of each out-going load, including weight and vehicle type.):

Daily via truck (40 NT)

I. Are any additional methods used to process the materials (*including heat processes, bailing, shredding, crushing, etc.*)?

Baling, shearing, torch cutting, saw

J. List all other equipment and/or machinery that will be used:

Baler, Alligator shear, chop saws, plasma/oxygen/gas torching.

K. How will odor, noise and dust emissions be handled?

Negligible with some operations happening indoors.



L. Describe daily cleaning/housekeeping activities, including parking lots, staging areas and adjacent public ways:

End of shift cleanup and sweeping. No adjacent public ways. Periodic sweeps of parking lots and driveways.

M. Where and how will incidental solid waste be handled (unloaded, processed, loaded out)?

No solid waste received. All internally generated waste is placed in roll off boxes and shipped to landfills by a licensed waste hauler.

N. Please describe how you will screen for unauthorized materials including, but not limited to, municipal solid waste, hazardous materials and stolen goods. (Include information pertaining to the schedule for removal of materials.)

Each load is individually inspected during the unloading process by trained inspectors. Any unauthorized materials will be rejected and returned to the shipper. Sign is posted at entrance identifying unacceptable items. All payments to the public require government issued ID to be kept on file.

O. Where and how will liquid waste be handled?

Any liquid waste generated at the site will be collected and recycled through Excel Environmental, LLC EPA ID#D094743507

10. Liquid Waste Handling Information: Please list the name of the company with whom you contract to remove/handle liquid waste. Required for all facilities accepting motor vehicles and other materials likely to contain liquid waste.

Company	Address	Phone
Excel Environmental LLC	400 Ashland Avenue, PO Box 5010, River Forest, IL 60305	708-366-0440

11. Recordkeeping: Please describe the facility's system for maintaining required records, including records of regulated and prohibited materials and records of regular customer accounts.

The facility uses an integrated computer system that records each transaction, including supplier, material, date, and weight of load. Off-site backup system also maintained.

12. Facility Description: Provide a detailed description of the operations that take place at the facility.

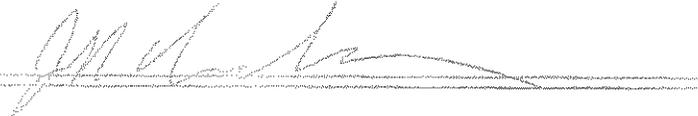
Raw materials are received from the general public or from other businesses. All material is weighed at receipt, inspected for product conformance, and screened for radiation. Any forbidden or hazardous materials are rejected and returned to the supplier. Material is directed to various locations in the facility for further processing including shearing, torching, or cutting. Finished product is loaded into trucks and shipped to customers as requested.



13. Certification

I certify that I have personally examined and am familiar with all the information submitted in response to the questions contained in this application and the attached document(s), and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that all information submitted is true, accurate and complete.

Name:	Jeff Handelman		
Title:	Facility Manager		
Company Name:	South Shore Recycling, LLC		
Mailing Address:	11600 S. Burley Avenue, Chicago, IL 60617		
Phone Number:	773-374-0299	Fax Number:	773-374-0269
Email:	jeffhandelman@reserve-group.com		

Signature: 

Print and send the completed form to the address below.

Chicago Department of Public Health
333 S State Street
Room 200
Chicago, Illinois 60604
Attn: Recycling Permits

ZONING BOARD OF APPEALS, CITY OF CHICAGO, CITY HALL, ROOM 905

APPLICANT: South Shore Recycling, LLC CAL NO.: 83-12-S
 APPEARANCE FOR: James Banks MINUTES OF MEETING:
 APPEARANCE AGAINST: None March 16, 2012
 PREMISES AFFECTED: 11600 S. Burley Avenue

NATURE OF REQUEST: Application for a special use under Chapter 17 of the Zoning Ordinance for the approval of the establishment of recycling Class IV B which engages in the shredding, crushing or other large-scale processing of vehicles.

ACTION OF BOARD-
 APPLICATION APPROVED

THE VOTE

OCT 05 2012
 CITY OF CHICAGO
 ZONING BOARD OF APPEALS

JONATHAN SWAIN
 GIGI McCABE-MIELE
 LYNETTE SANTIAGO
 LORI HEALEY
 SAM TOIA

ATTRIBUTIVE	NEGATIVE	ABSENT
X		
X		
X		
		X
X		

THE RESOLUTION:

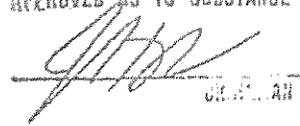
WHEREAS, a public hearing was held on this application by the Zoning Board of Appeals at its regular meeting held on March 16, 2012 after due notice thereof as provided under Section 17-13-0107B and by publication in the Chicago Sun-Times on March 1, 2012; and

WHEREAS, the Zoning Board of Appeals, having fully heard the testimony and arguments of the parties and being fully advised in the premises, hereby finds the following; the applicant shall be permitted to establish a Class IV B recycling facility; expert testimony was offered that the use would not have a negative impact on the surrounding community and is in character with the neighborhood; further expert testimony was offered that the use complies with all of the criteria as set forth by the code for the granting of a special use at the subject site; the Board finds the use complies with all applicable standards of this Zoning Ordinance; is in the interest of the public convenience and will not have a significant adverse impact on the general welfare of neighborhood or community; is compatible with the character of the surrounding area in terms of site planning and building scale and project design; is compatible with the character of the surrounding area in terms of operating characteristics, such as hours of operation, outdoor lighting, noise, and traffic generation; and is designed to promote pedestrian safety and comfort; it is therefore

RESOLVED, that the aforesaid special use request be and it hereby is approved and the Zoning Administrator is authorized to permit said special use subject to the following condition(s): The Department of Housing and Economic Development recommends approval of the proposed Class IV B recycling facility, provided the development is constructed consistent with the site plan and building elevations dated March 7, 2012 by Jonathan Splitt Architects, Ltd.

That all applicable ordinances of the City of Chicago shall be complied with before a permit is issued

APPROVED AS TO SUBSTANCE



JONATHAN SWAIN

Form **LLC-50.1**

Illinois
Limited Liability Company Act
Annual Report

FILE # 03740129

Due prior to: 12/01/2017

Secretary of State
Department of Business Services
Limited Liability Division
501 S. Second St., Rm. 351
Springfield, IL 62756
217-524-8009
www.cyberdriveillinois.com

Filing Fee: 250.00
Series Fee, if required:
Penalty: 0.00
Total: 250.00

Filed Electronically
November 18, 2017
Jesse White
Secretary of State

1. Limited Liability Company Name: SOUTH SHORE RECYCLING, LLC

Registered Agent: HAL C TOLIN

11600 S BURLEY AVE

CHICAGO, IL 60617

2. State or Country of Organization: OH Date Organized In or Admitted to Illinois: 12/09/2011

3. Address of Principal Place of Business:

11600 S BURLEY AVE CHICAGO, IL 60617

4. Name and business address of all managers and any member having the authority of manager:

JOSEPH, STEVEN
1831 EAST HIGHLAND RD TWINSBURG, OH 44087

5. Entity managers affirm their current existence.

6. Changes to the registered agent and/or registered office must be submitted on Form LLC-1.36/1.37.

7. I affirm, under penalties of perjury, having authority to sign thereto, that this Annual Report is to the best of my knowledge and belief, true, correct and complete.

Dated: November 18, 2017
Month/Day Year

JOSEPH, STEVEN

Name

MANAGER

Title

If applicant is a company or other entity, state Name of Company

South Shore Recycling, LLC
Attachment to the City of Chicago, DOE
Recycling Facility Permit Application

Ownership of the facility and applicant is as follows:

42.49% RMG Investment Group, LLC
1831 Highland Road
Twinsburg, OH 44087
FEIN: 45-2588798

57.51% RMG Investment Group II, LLC
1831 Highland Road
Twinsburg, OH 44087
FEIN: 45-3852632

South Shore Recycling, LLC
Attachment to the City of Chicago, DOE
Recycling Facility Permit Application

Ownership of RMG Investment Group, LLC and RMG Investment GroupII, LLC as follows:

5.5000% Anthony Musara
1831 Highland Road
Twinsburg, OH 44087
anthonymusarra@reserve-group.com
330-474-3513

20.5000% Hal Tolin
11600 S Burley Avenue
Chicago, IL 60617
haltolin@reserve-group.com
773-382-0123

5.5000% James Levine
1831 Highland Road
Twinsburg, OH 44087
jimlevine@reserve-group.com
440-287-7438

5.5000% Julius Hess
1831 Highland Road
Twinsburg, OH 44087
julius Hess@reserve-group.com
440-287-7439

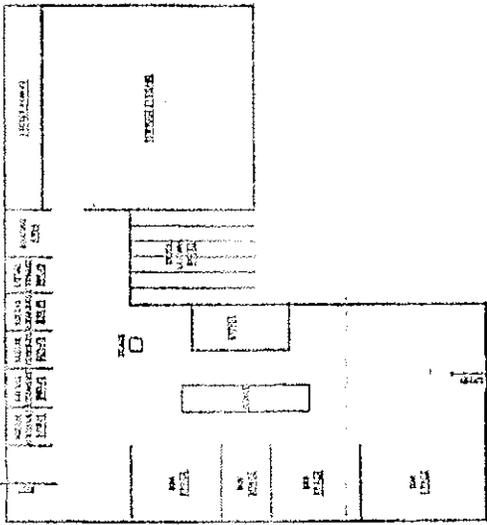
17.5000% Paul D Joseph Dynasty Trust 1/1/09
1831 Highland Road
Twinsburg, OH 44087
pauljoseph@reserve-group.com
440-519-1768

17.5000% Scott Joseph
1831 Highland Road
Twinsburg, OH 44087
scottjoseph@reserve-group.com
440-287-7210

10.5000% Saba Salloum
1831 Highland Road
Twinsburg, OH 44087
sabasalloum@reserve-group.com
440-287-7220

17.5000% Steven Joseph
1831 Highland Road
Twinsburg, OH 44087
stevejoseph@reserve-group.com
440-287-7222

- GENERAL NOTES:**
1. SEE THE CONTRACT DOCUMENTS FOR ALL APPLICABLE SPECIFICATIONS AND CONDITIONS OF CONTRACT.
 2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL, STATE AND FEDERAL AUTHORITIES.
 3. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL, STATE AND FEDERAL AUTHORITIES.
 4. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL, STATE AND FEDERAL AUTHORITIES.
 5. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL, STATE AND FEDERAL AUTHORITIES.
 6. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL, STATE AND FEDERAL AUTHORITIES.

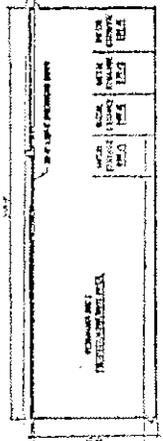


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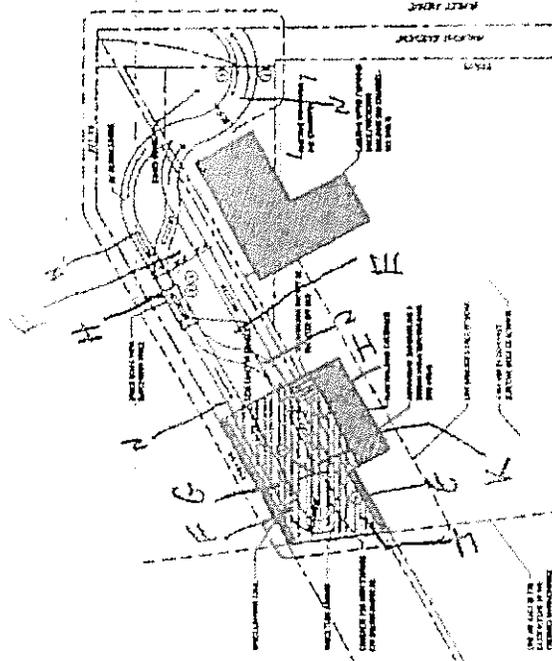
Not in Use



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RECYCLING FACILITY APPLICATION

CITY OF CHICAGO DEPARTMENT OF PUBLIC HEALTH

AS REQUIRED UNDER THE PROVISIONS OF THE ENVIRONMENTAL PROTECTION AND CONTROL ORDINANCE (CHAPTER 11-4 OF THE MUNICIPAL CODE OF THE CITY OF CHICAGO): In order to receive a recycling facility permit from the Department of Public Health, this application must be submitted and completed in its entirety. If further space is required, include additional sheets as attachments to this form as needed.

Please type or print neatly. Failure to answer all questions will result in the rejection of this application.

Date of Application: 8/28/18

Facility Name and Address: RSR Partners LLC, dba Regency Technologies

Type of Permit Requested: (check one)

New Permit Renewal Permit Permit Modification

Facility Class for which you are applying: (check one)

Recycler Class I Recycler Class II Recycler Class III Recycler Class IV A Recycler Class V
 XX < 500 tons/daily
 ___ 500 – 1000 tons/daily Recycler Class IV B
 ___ >1000 tons/daily

1. Property Owner¹:			2. Facility Owner²:		
<u>South Chicago Properties Mgt.,</u> <u>773-721-8140</u>			<u>RSR Partners, LLC dba Regency Technologies</u>		
Property Owner Name		Phone Number	Facility Owner Name		
<u>11600 S. Burley Ave.,</u>			<u>Dennis Stropko</u> <u>440-287-7216</u>		
Address			Contact Name		Phone Number
<u>Chicago</u>	<u>IL</u>	<u>60617</u>	<u>1831 E. Highland Rd., Twinsburg, OH 44087</u>		
City	State	Zip Code	Contact Address		

¹If Title of Property is held in trust, attach to this form the names and addresses of all beneficiaries and other persons authorized to deal with the property.

²If the facility owners are a partnership or corporation, include as an attachment to this form the names, addresses, phone numbers and social security numbers of all persons holding a share in the partnership or corporation.

3. Manager on site:		4. Employees on site:	
<u>Ray Sowa, III;</u> <u>773-382-0134</u>		<u>Jose Pardo:</u> <u>773-382-0135</u>	
Name	Phone Number	1) Name	Phone Number
<u>11600 S. Burley Ave., Chicago, IL 60617</u>		<u>11600 S. Burley Ave., Chicago, IL 60617</u>	
Address		Address	
<u>773-595-5532</u>		<u>Leonardo Delgadillo:</u> <u>773-382-8019</u>	
Emergency After-hours Phone Number		2) Name	Phone Number
		<u>11600 S. Burley Ave., Chicago, IL 60617</u>	
		Address	

Date Received by CDPH: _____

Received by: _____

5. Zoning Approval: For new permits only:

Please list the zoning district in which the facility is located: _____

Nature of the proposed use (*check one*): Permitted use Special use (Date of ZBA approval: _____)

6. Applicant Information: Please provide the following information, attach additional pages if necessary, and attach all specified documents.

A. List all owners of the facility. If the owners are themselves corporations or partnerships, list the natural persons who have an ownership interest: RSR Partners, LLC dba Regency Technologies

B. If the applicant is a corporation or partnership, please list all owners/shareholders of the corporation and their shares of ownership. If owners are themselves corporation or partnerships, list the natural persons who have an ownership interest. Steve Joseph, Scott Joseph, Saba Salloum, Hal Tolin, Jim Levine, Julius Hess, Anthony Mussara

C. Please attach an annual report. If no report is attached, please explain why. See Attachment

D. Who (natural persons) will be managing operations at the site? What hours will they be on-site? Ray Sowa, III - Facility Manager; typically on site from 6:30 am till 4:30 pm.

E. In the past three years, has the applicant, or any owner or officer of the applicant, or any person* having control of applicant or any of its operations, including the person(s) listed in question D above, been cited for violations of any federal, state, or local laws, regulations, standards, 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? If yes, please explain. NO

* For purposes of this application, "person" means any natural person, corporation, general partnership, limited partnership, or any officer, partner, general partner, managing member or owner of 25% or more of any of such entity, including entities under common ownership with the applicant.

F. In the past 3 years, has the applicant, or any person in control of the applicant, had a recycling facility permit revoked? If yes, please explain the circumstances. NO

G. Has the applicant paid all fees required by the Municipal Code and any outstanding debts owed to the City? If not, please explain. YES

7. Site Plan: Drawings of the site must accompany the application form. All objects on the site plans must be named. The maximum site plan allowed is 11" x 17". Blueprints are not acceptable. Electronic copies of the plans can also be submitted. For new permits only, the site plan must be drawn to scale. For all permits, the site plan must identify the following items: (Check off items and fill in all blanks.)

- A. Location of all buildings and structures ® See attached site map
- B. Location of all surrounding fences and screens. Indicate approximate height: 6' - 8' ®
- C. Location of all employee and customer parking areas. Approximate # of parking spaces: 85 ®1
- 1 D. Location of all customer queuing areas ® N/A
- E. Location where customers will unload their recyclable materials for purchase ® N/A
- F. Location where facility vehicles will load recyclable materials for transport off site ®
- G. Location of parking area for facility vehicles used to transport materials from the facility ®
- H. Location of all scales ®
- I. Location of recyclable material processing areas ®
- J. Location of recyclable material storage areas ®
- K. Location where facility equipment will be staged and used ®
- L. Traffic flow for customer vehicles ® N/A
- M. Traffic flow for walk-in customers ® N/A
- N. Traffic flow for facility vehicles used to transport recyclable materials from the facility ®
- O. Location of any other facility operation not already identified in this question ® N/A
- P. Location of water sources for fire protection and dust control ®
- Q. Location of all fire extinguishers. Indicate type, i.e. water, chemical, etc. See attached FE Inspection Form ®
- R. Location of covered material storage area ® N/A
- S. Location of liquid waste storage area ® N/A
- T. Location of surrounding streets and avenues ®
- U. Location of sewers ® N/A - indoor facility

- V. Location of all paved surfaces and type of paving roadways - concrete/slag/gravel base ®
- W. Location of required records ®1
- X. Does the facility have a sign, clearly visible to the public, which states the name, address and telephone number of the facility, the type of recyclable materials accepted, and the hours during which the facility shall be open to the public? N/A No public access/service
- Y. Is the facility secured from unauthorized entry? YES
- Z. Is the facility adequately lighted after dark? YES

8. Accepted Materials: Check and/or list all the materials proposed to be accepted at the facility:

- | | | |
|---|--|---|
| <input type="checkbox"/> Aluminum Cans | <input type="checkbox"/> Newsprint | <input type="checkbox"/> Polyethylene Terephthalate (PET) |
| <input type="checkbox"/> Aluminum Scrap | <input type="checkbox"/> Office Paper | <input type="checkbox"/> High Density Polyethylene (HDPE) |
| <input checked="" type="checkbox"/> Ferrous Metal Scrap | <input type="checkbox"/> Other Paper | <input type="checkbox"/> Low Density Polyethylene (LDPE) |
| <input checked="" type="checkbox"/> Non-Ferrous Metal Scrap | <input type="checkbox"/> Rubber | <input type="checkbox"/> Polystyrene |
| <input type="checkbox"/> Bi-metal or tin cans | <input type="checkbox"/> Textiles | <input type="checkbox"/> Polypropylene |
| <input type="checkbox"/> Glass containers | <input type="checkbox"/> Motor Vehicles** | <input checked="" type="checkbox"/> Batteries |
| <input type="checkbox"/> Corrugated Cardboard | <input type="checkbox"/> Vehicle Parts** | <input type="checkbox"/> Propane Tanks/Cylinder Tanks |
| <input checked="" type="checkbox"/> Other Metal Scrap: <i>(List all below*)</i> | <input type="checkbox"/> Construction & Demolition Debris <i>(List all below*)</i> | |

* Please itemize scrap metal and/or C&D debris, as applicable:

Mixed electronic scrap materials (E-Waste); televisions/CRTs/Monitors; Printers/Faxes; Phones;

Servers; Laptops/Desktops; etc; small appliances/plug in units; consumer electronic devices.

Other: *(please list all)*

** Please describe how vehicles and vehicle parts will be handled, processed, and disposed of: N/A No vehicles accepted.

9. Operations: Please answer the following questions. An answer must be provided for each question or the application will be deemed incomplete. The phrase “not applicable” or “N/A” is not a complete answer.

A. Days and Hours of Operation: *(Normal facility hours are 7:00 a.m. until 9:00 p.m. Monday through Saturday or Sunday through Friday. If you plan to operate outside of these hours, you must submit a noise abatement plan along with your permit application.)* Generally 6:00 am till 9:00 pm M-F; 7:00 am - 3:00 pm Sat; Indoor Operation

B. Total material handling capacity (tons/day): 450 Tons/Day Max

C. Number of full-time employee positions: Around 130 employees)

D. Number of part-time employee positions: No part-time employees

E. Describe how incoming materials be screened and monitored? All material is pre-approved from known customers/suppliers/sources. No over-the-scale, peddler, or public purchases/access is allowed. All items are verified against pre-established, approved commodity lists. Visual screening and radiation screening are conducted on every load.

F. From which sources will materials be accepted *(public, businesses, permitted scrappers, etc.)?*

Sources come from Industrial/commercial/Retailers, e-scrap recyclers, Government/medical/educational institutions: NO PEDDLER or public source materials accepted.

G. How will materials be separated (by hand, mechanical) and stored? All separation is performed by hand/manually. Most items are stored indoors in boxes, drums and/or bins. Some bulk metal scrap storage is in roll-offs and some plastics are in bins outdoors.

H. How often will material be transported from the facility? (Indicate the average size of each out-going load, including weight and vehicle type.): Average 7 daily outbound shipments; average load is around 20 tons and average truck is around 70,000 lbs loaded. LOads are shipped out via tractor/trailer, roll-off, and IM containers.

I. Are any additional methods used to process the materials *(including heat processes, bailing, shredding, crushing, etc.)?*

Separated plastics/cardboard are baled; CFCs are drained from appliances/3rd party recycled; No heat processes/no torching, no shredding, shearing or crushing at this operation.

J. List all other equipment and/or machinery that will be used: Fixed conveyors, horizontal baler, Forklifts, skid steers, roll-offs, CFC recovery unit, Air Compressor

K. Describe methods, processes, equipment, etc. that will be used to control odor, noise and dust emissions: N/A This is an indoor operation; there is no dust or odor generation associated with this operation, and noise levels are very low. Facility is located in heavy industrial complex, far from public roadways. Plant roadways are routinely swept and watered to control dust.

L. Describe daily cleaning/housekeeping activities, including parking lots, staging areas and adjacent public ways: Indoor Operation: Daily end-of-shift sweeping/housekeeping is conducted throughout facility including all production areas, restrooms and lunchroom. Daily patrolling of employee parking areas, dock, and staging areas; weekly housekeeping of these areas and as needed. No adjacent public ways to address.

M. Where and how will incidental solid waste be handled (*unloaded, processed, loaded out*)? Incidental solid waste is generated and placed in hoppers by hand at process areas, and then transferred to outdoor trash roll-offs via forklift. Roll-offs are picked up by 3rd party hauler when full.

N. Please describe how you will screen for unauthorized materials including, but not limited to, municipal solid waste, hazardous materials and stolen goods. (*Include information pertaining to the schedule for removal of materials.*) All loads are from pre-established known sources/customers. Only previously approved items are accepted for processing. Unauthorized items are rejected back to supplier/customer. All items/loads pass through radiation detector monitors and are visually screened/inspected during the unloading/sorting process. No materials are purchased over the scale; no public access/sales.

O. Where and how will liquid waste be handled? Oil drained from projection TV units is hand drained into totes until ready for pickup. Tote drainage station located at SE side of building. Mobile equipment serviced by 3rd party who removes oils/liquids as part of service.

10. Liquid Waste Handling Information: Please list the name of the company with whom you contract to remove/handle liquid waste. <i>Required for all facilities accepting motor vehicles and other materials likely to contain liquid waste.</i>		
<u>Excel Oil Co. / Ken Petruck</u>		<u>708-366-0440</u>
Name of Company/Person		Phone Number
<u>400 Ashland Ave.</u>		
Address		
<u>River Forest, IL 60305</u>		
City	State	Zip Code

11. Recordkeeping: Please describe the facility's system for maintaining required records, including records of regulated and prohibited materials and records of regular customer accounts.

Records are stored on-site at supervisor's office. All records are electronically backed up in real time and all electronic data is stored off site.

12. Facility Description: Provide a detailed description of the operations that take place at the facility. If further space is needed, include an attachment to this application.

Indoor facility that recycles a range of electronic scrap/E-waste. Items are delivered by tractor/trailer and container trucks to the facility for recycling from pre-established customers/suppliers. Items are typically packaged in container boxes and pallets. Material is hand sorted/separated and de-manufactured manually to required commodity specifications/size/type. Items are then packaged and delivered to 3rd party downstream consumers for use in their process or for additional processing

13. Certification

I certify that I have personally examined and am familiar with all the information submitted in response to the questions contained in this application and the attached document(s), and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that all information submitted is true, accurate and complete.

Name: Dennis Stropko

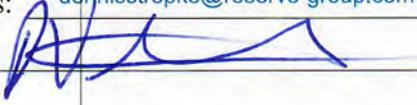
Title: HSE Manager

Company Name: RSR Partners, LLC dba Regency Technologies

Mailing Address: 1831 E. Highland Rd., Twinsburg, OH 44087

Phone Number: 440-287-7216 Fax Number: 440-848-8633

E-mail address: dennisstropko@reserve-group.com

Signature: 

RECYCLING FACILITY SITE SKETCH

Name of Facility: Regency Technologies - Chicago

Address: 11600 S. Burley Ave.,

City, State, Zip Code: Chicago, IL 60617

Owner/Operator: RSR Partners, LLC dba Regency Technologies

See attached maps for specific details/information:

Site Plan Index:

SP-1: Complex/Facility Map includes 7A, 7B, 7C, 7G, 7H, 7N, 7P, 7T, 7V

SP-2: Operations Map includes 7F, 7I, 7J, 7K, 7S, 7W

Fire Extinguisher Map: 7Q

Items not applicable: 7D, 7E, 7L, 7M, 7O, 7R, 7U



Attachment 1
Annual Report – RSR Partners

Attachment 2

SP-1 includes 7A, 7B, 7C, 7G, 7H, 7N, 7P, 7V

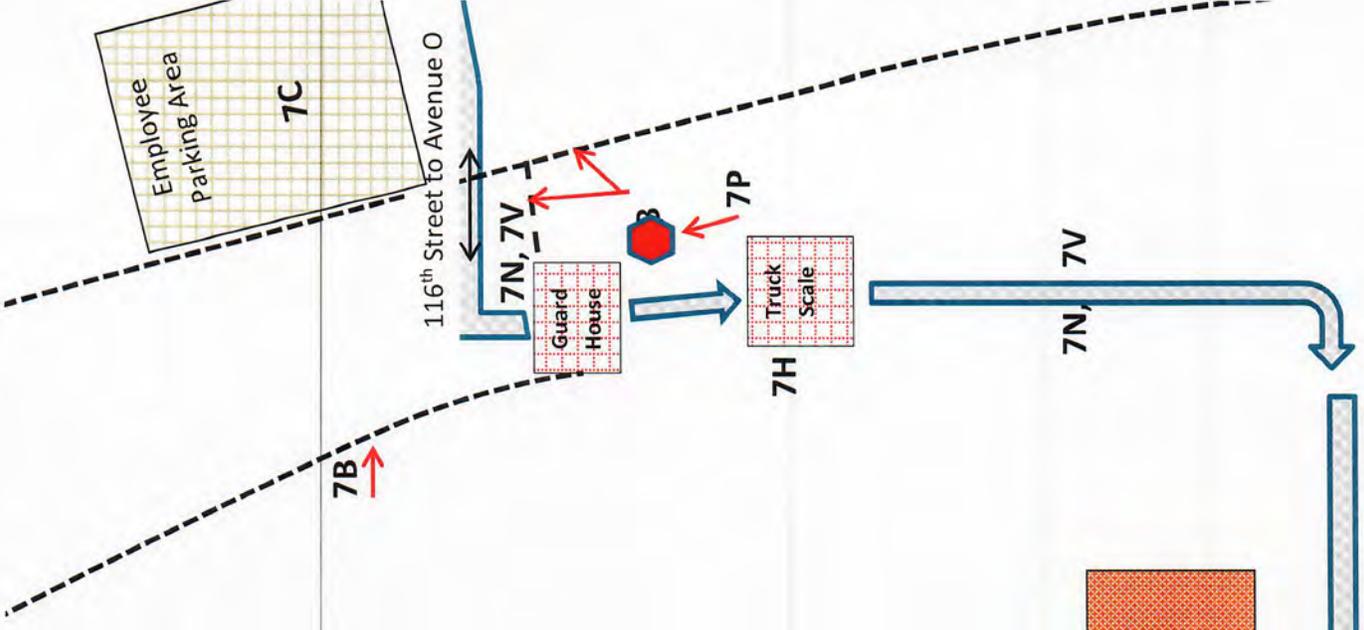
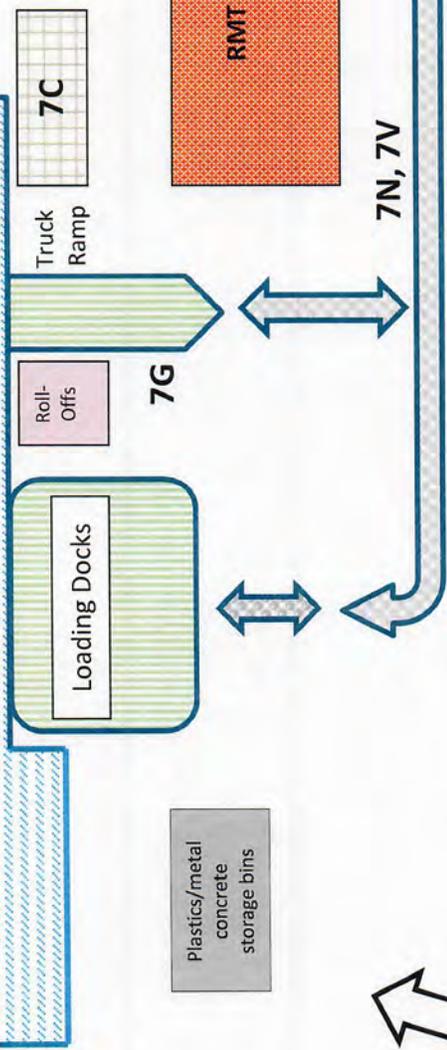
RSR Partners/Regency Technologies: Chicago Facility
11600 S. Burley Ave., Chicago, IL
SP-1 Complex/Facility Map

Site Plan Not To Scale

- 7A – Buildings/Structures; 7B – Fence Lines: 6'-8' fences;
- 7C – Employee Parking; 7G – Facility Equipment parking;
- 7H – Scale; 7N – Traffic Flow; 7P – Fire Hydrant; 7V – paved roads

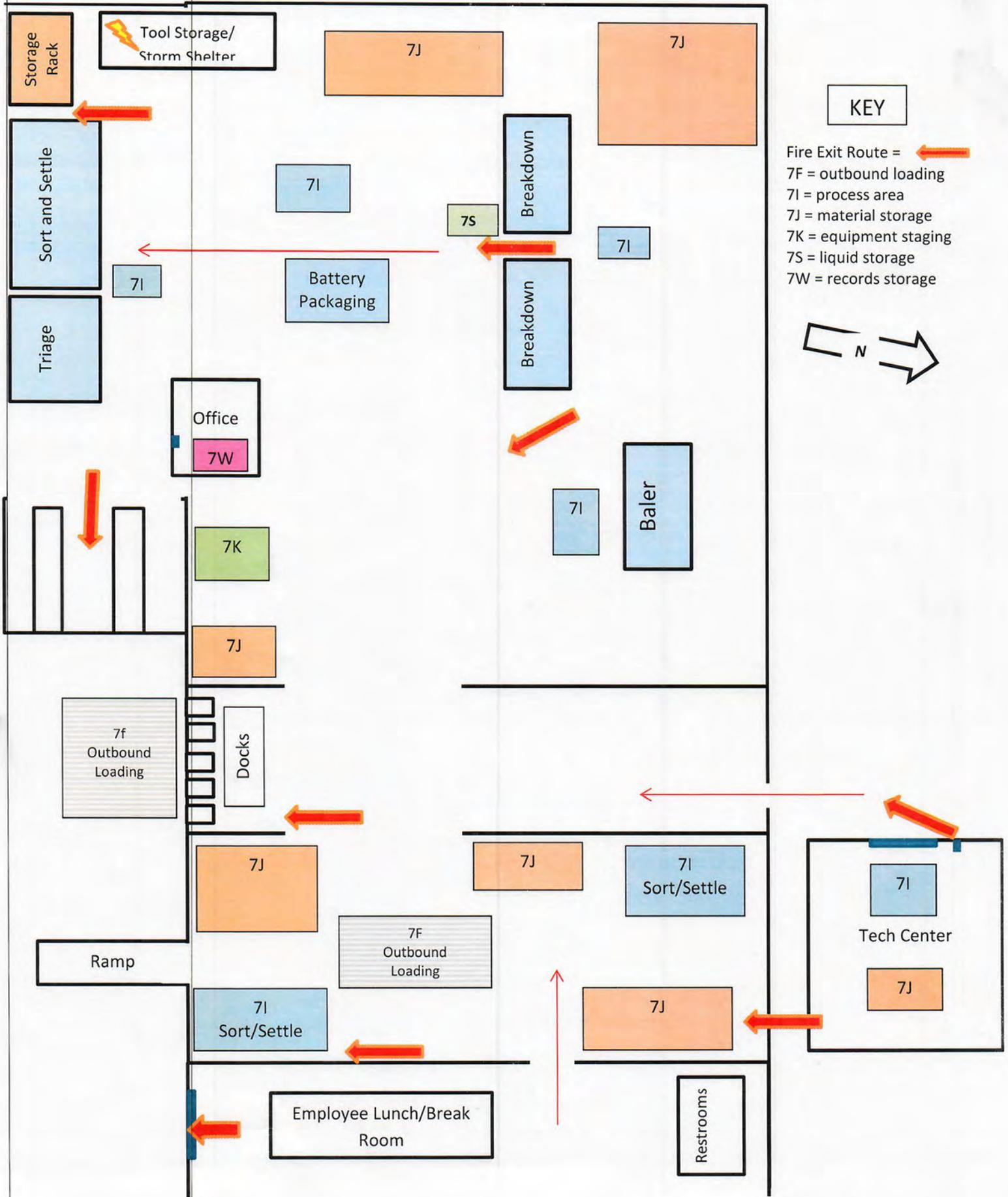
RSR Partners/Regency Technologies Facility – 7A

Indoor Operation
 All recycling activities conducted under roof.
 See SP-2 for additional site information.



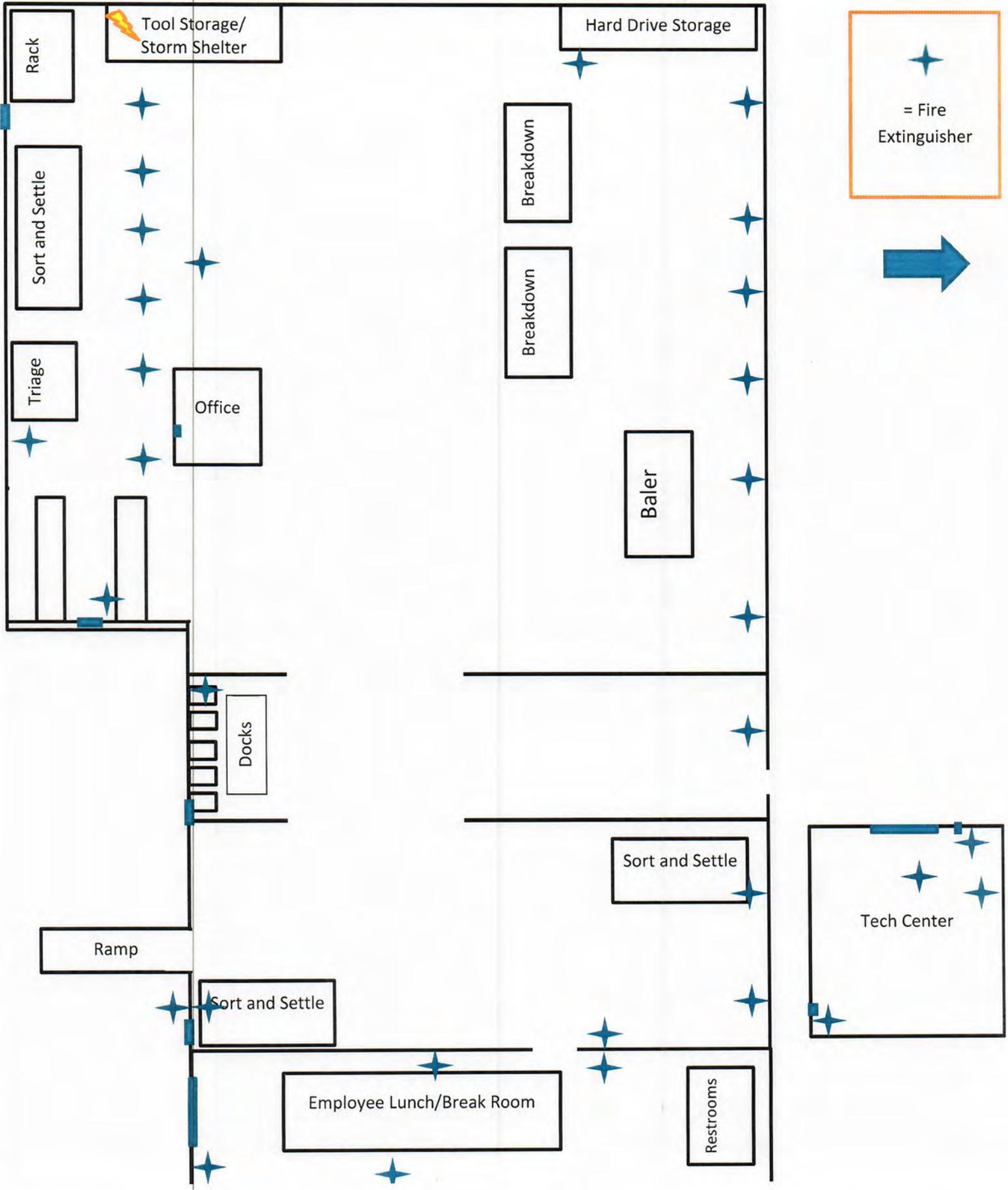
Attachment 3
SP-2 includes 7F, 7I, 7J, 7K, 7S, 7W

RSR Partners/Regency Technologies: Chicago Facility SP-2 Operations Map



Attachment 4
Fire Extinguisher Map/Checklist – 7Q

RSR Partners/Regency Technologies – Chicago
Fire Extinguisher Map



Fire Extinguisher & Emergency Resource Inspection Log

Facility Name: Chicago

LOCATION	EXTINGUISHER TYPE	CONDITION	
West Room:			
North Wall #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
North Wall #2	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
North Wall #3	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
North Wall #4	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
North West Trailer:			
Center Column #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Center Column #2	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Center Column #3	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Center Column #4	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Center Column #5	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Center Column #6	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
South Wall Scale #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
DOCK:			
Dock #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Dock #2	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
EAST ROOM:			
North Wall #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
South Wall #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
East Wall #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
LUNCH ROOM / RESTROOM:			
LR / RA #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
LR / RA #2	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
LR / RA #3	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
TECH CENTER:			
TC #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
TC #2	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
TC #3	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
TC #4	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
OUTSIDE:			
Propane Area #1	10# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced

BATTERY AREA:				
BA #1		30 # D	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
MOBILE EQUIPMENT:				
Cat Rotator A		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Cat Rotator B		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Cat C		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Cat D		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Cat E		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Clark A		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Clark B		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Clark C		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
232 Cat		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
252 B3 #61		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced
Toyota		2.5# ABC	<input type="checkbox"/> Unit is OK	<input type="checkbox"/> Unit Needs Serviced

Emergency Exit Doors – Clear and Accessible?

<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Yes	<input type="checkbox"/> No

Emergency Lighting – Functional?

Emergency Eye Wash Station – Clean and Usable?

Additional Comments/Notes:

Inspector's Name

Signature

Date: _____



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

June 7, 2016

Mr. Hal Tolin
Reserve FTL LLC
11600 S. Burley
Chicago, IL 60617

**Subject: City of Chicago Class II-B Recycling Facility Permit (ENVREC102879)
Reserve Marine Terminals – 11600 S Burley Ave
Effective date: May 16, 2016 to May 15, 2019**

Dear Mr. Tolin,

A permit is hereby granted by the City of Chicago Department of Public Health (“CDPH”) to Reserve FTL LLC dba Reserve Marine Terminal (“the Permittee”) to operate a Class II-B Recycling Facility located within the corporate limits of the City of Chicago at 11600 S Burley Ave (“the Facility”).

Please carefully review all conditions outlined in this permit. Incorporated into this permit by reference are the following: 1) the application dated May 13, 2016 (“[the Application](#)”); and 2) all other supplemental information submitted as part of this application including drawings, sheets, and specifications. In the event of a conflict with said references, the terms and conditions of this permit shall prevail.

The Permittee shall fully comply with Article XX, Chapter 11-4 of the Municipal Code of Chicago (“[the Ordinance](#)”) and the Recycling Facility Rules and Regulations (“[the Regulations](#)”). The Permittee shall also fully comply with the Standard Conditions outlined in Attachment A and the Special Conditions outlined in Attachment B of this permit.

This permit allows for the operation of the Facility from May 16, 2016 through May 15, 2019 upon which time the permit shall terminate by its own terms. On or before May 15, 2019, the Permittee may apply to the CDPH for a new operating permit for the following year. If a subsequent operating permit is applied for on or before May 15, 2019, this permit shall remain in effect until the CDPH acts on the pending permit application. If you have any questions concerning this permit, please contact me at (312) 745-3136.

Sincerely,

Renante Marante
Environmental Engineer III

ATTACHMENT A STANDARD CONDITONS

1. The Permittee shall comply with all applicable local, State, and Federal laws, regulations and standards regarding the construction, operation, maintenance, and closure of the subject Facility, including but not limited to those regulations and standards concerning noise, vibrations, and particulate emissions.
2. Construction, operation, maintenance, and closure of the Facility shall be in accordance with the plans, drawings, and specifications referenced by this permit and included in these Standard Conditions and the Special Conditions.
3. Any changes, modifications, and additions to the Facility's permit or the approved plans and documentation shall be submitted to the CDPH for review and approval. Such a request shall be made in writing to the CDPH.
4. Issuance of this permit shall not transfer, assign or otherwise affect any liability to the City of Chicago, the CDPH, their employees, or agents as a result of the construction, operation, maintenance, and closure of this Facility.
5. Issuance of this permit does not relieve the Permittee of any liability with regards to the subject Facility.
6. The CDPH or its authorized representatives may inspect the Facility and the Facility records at any reasonable time to ensure compliance with this permit and all applicable rules, regulations, and standards, as well as all conditions necessary to protect the public health and safety.
7. The CDPH may revoke this permit on the basis of any of the grounds set forth in the City of Chicago, CDPH, Article XX Recycling Facility Permits Rules and Regulations.
8. The Permittee shall notify the CDPH of any notices of violations or administrative, civil or criminal citations received by the Facility or any of its operators relating to any alleged violation of any federal, state, or local laws, regulations, standards, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site. Such notifications shall be provided by email to EnvWastePermits@cityofchicago.org.
9. The Permittee shall provide the CDPH, if so requested, with copies of all correspondence to or from the IEPA and USEPA pertaining to the Facility, including, but not limited to notices of violation, letters, permit applications, reports, groundwater monitoring reports, and annual reports.
10. The Permittee shall comply with all requirements and conditions set forth in this permit. Should any portion of this permit be declared illegal or non-binding, the conditions of the remainder of the permit shall remain in effect.

ATTACHMENT B SPECIAL CONDITIONS

The following Special Conditions are attached to the operating permit for the Reserve FTL LLC dba Reserve Marine Terminal Class II-B Recycling Facility located at 11600 S Burley Ave:

OPERATING HOURS

1. The Permittee may operate 7:00 a.m to 9:00 p.m. Monday through Saturday. CDPH reserves the right to amend the Permittee's operating hours and days of operation if the facility operation causes a nuisance to neighborhood uses.

MATERIAL HANDLING

2. The Facility is permitted to accept and handle Type A recyclable materials consisting of aluminum scraps; ferrous metal scrap; and non-ferrous metal scrap. The Permittee may also receive packaging materials (e.g. cardboard, wood, plastic, etc.) that are shipped with the above-authorized recyclables.

The Facility is not allowed to receive other recyclable materials not explicitly listed above. The Facility shall not accept hazardous special waste, reactive metals, sealed containers, municipal solid waste, or stolen goods. The Permittee shall not accept charred wire unless it is accompanied by proper documentation stating that the material was obtained from a properly licensed company that uses adequate emission control devices for removing the wire coating.

The Permittee shall inspect all loads entering the Facility for unauthorized wastes. Loads containing waste other than recyclable materials as authorized above shall not be accepted at this Facility.

3. The Permittee shall handle all unauthorized wastes inadvertently admitted into the Facility as follows:
 - a. The Permittee shall separately containerize special waste, including hazardous waste, non-hazardous special waste, and PCB waste, and arrange for the immediate removal of such waste by a waste hauler authorized to accept such wastes for transport to a disposal facility that has obtained all necessary Federal, State, and local authorization.
 - b. The Permittee shall isolate reactive metals upon discovery and place such material in a sealed, waterproof container. The Permittee shall arrange for proper disposal of the reactive metals and shall immediately notify the CDPH.
 - c. The Permittee shall isolate all municipal solid waste and properly store such waste in an enclosed waste receptacle for disposal at a properly permitted facility.
 - d. The Permittee shall isolate all suspected stolen property upon discovery and immediately notify the City of Chicago Police Department ("CPD").
 - e. After unauthorized waste has been removed from the Facility, the Permittee shall thoroughly clean the affected area in a manner consistent with the type of unauthorized waste managed.

ATTACHMENT B SPECIAL CONDITIONS

4. The Permittee shall not accept, receive, purchase or acquire any material that is delivered to the Facility in any city- owned or government-owned garbage container or cart; or city-owned or government-owned recycling container or cart; or retail store shopping cart of the type commonly provided by big-box stores and supermarkets for use by customers to transport merchandise to the checkout counter during shopping.
5. The Permittee may accept regulated or prohibited recyclable materials as defined in [the Ordinance and the Regulations](#) under the following conditions:
 - a. The regulated or prohibited material is consistent with the types of recyclable materials authorized under Special Condition No. 2;
 - b. The Facility is in compliance with all surveillance requirements specified in 11-4-2640(g) of [the Ordinance](#); and
 - c. The Permittee complies with the documentation requirements set forth in Section 9 of [the Regulations](#).
6. The Facility may receive and process no more than 750 tons per day of recyclable materials as specified in Special Condition No. 2. If the Permittee desires additional capacity, the Permittee must submit a revised application to the CDPH for approval. A revised application must demonstrate that the Facility is adequately handling the currently permitted volumes and is sufficiently sized and staffed to accept, store, and process the desired quantity of material.
7. When transporting material to and from the site, the material shall fit entirely within the truck or trailer. Additionally, the truck or trailer shall have its tailgates in place, and the load covered with a tarp as necessary to control dust or loss of material.
8. When transporting material to and from the site, the Permittee shall prevent any fluids or material from spilling into the streets.
9. Material handling at the Facility shall be limited to breaking; cutting with torches and cutters; shearing; sorting, and screening using a McCloskey or similar screener. The Permittee is authorized to move materials at the Facility with the aid of vehicles; front-end loaders; fork lifts; cranes; and magnets.
10. The Permittee shall operate the McCloskey screener or similar screener, with attached generator and associated conveyors, in accordance with Mr. Dennis V. Stropko's letter dated June 21, 2013 and subject to the following requirements:
 - a. The Permittee shall secure and maintain all necessary air permits and approvals from the Illinois Environmental Protection;
 - b. The Permittee shall suppress dust and other air-borne materials generated by screening activities. At a minimum, the screener and related equipment (i.e. hoppers, conveyors, etc.) shall be outfitted with a spray/watering system to suppress dust;
 - c. The Permittee shall ensure that sufficient water is available for dust suppression pursuant to Special Condition No. 31;
 - d. The screener and associated equipment may be moved around the Facility to support various processing operations so long as a minimum setback of 20 feet from the river is maintained.; and

ATTACHMENT B SPECIAL CONDITIONS

- e. The Permittee shall ensure that no process or storm water from the screening operation drains into the river or storm-only sewer system.

REFRIGERANTS

11. If the Facility accepts any small appliance, room air conditioning appliance, motor vehicle air conditioner (MVAC), or MVAC-like appliance, as those terms are defined in [40 CFR Part 82 Subpart F](#), where applicable, the Permittee shall comply with all requirements of [40 CFR Section 82.156\(f\)](#) in connection with any such appliance or item. Specifically, the Permittee shall either:

- a. Verify that the refrigerant was evacuated from the appliance or item in accordance with [40 CFR Section 82.156\(f\)](#) by:
 - i. Obtaining a written and signed statement from each customer stating that all refrigerant was removed in accordance with EPA standards. This statement must include the name and address of the person who removed the refrigerant and the date the refrigerant was removed; or
 - ii. Maintaining a contract between the Permittee and the customer that specifies that refrigerant will be properly removed before delivery.

Or

- b. Recover any remaining refrigerant from the appliance in accordance with [40 CFR Section 82.156\(f\)](#) using EPA-certified refrigerant recovery equipment;

12. The Permittee shall not accept any appliance or item that has been previously vented of CFCs without the proper documentation in Special Condition 11(a) above.

MATERIAL STORAGE

13. The Permittee shall store all materials within the permitted property at all times. At no time shall material be stored on neighboring properties or the public way.

14. The Permittee shall maintain a minimum aisle width of 36 inches, or wider to accommodate workers, equipment, cleaning, and emergency response.

15. The Permittee shall handle and store all recyclable materials that may leak fluids or leave an oily residue on a dedicated, impervious concrete pad. The concrete pad shall be sloped, bermed, or otherwise constructed to minimize storm water run-on and run-off, and facilitate the capture and collection of fluids. The Permittee must properly dispose of all liquid waste collected at the Facility.

16. The Permittee shall segregate and store recyclable materials in durable receptacles or enclosures such as drums, boxes, bins, or storage bunkers. The Permittee may store recyclables in cardboard boxes provided they are placed indoors, on pallets or otherwise kept off the ground.

ATTACHMENT B SPECIAL CONDITIONS

17. The Permittee may store recyclable materials on sturdy racks or shelving provided the stored materials are kept at least 18 inches off the ground and are not leaking.
18. The Permittee shall store newsprint, paper, corrugated paper and cardboard in closed containers.
19. The Permittee shall clearly mark all storage receptacles with the type of recyclable material stored. Letters shall not be less than three inches high, outward facing and not hidden. The Permittee shall not deposit other materials than that specified on the receptacle.
20. The Permittee shall maintain the area surrounding all storage containers in a clean and neat manner. No recyclable materials or waste materials of any kind shall be allowed to accumulate around any receptacle or to overflow from any receptacle.
21. The Permittee may stockpile bulk recyclable materials that require large machinery (such as a backhoe, front-end loader, crane, or grapple) to move or process. The Permittee shall maintain such inventories no taller than 30 feet in height as shown by a pile height marker. Further, such stockpiles shall be set back at least 8 feet away from the public way, as measured from the edge of the stockpile closest to the public way.
22. The Permittee shall maintain a twenty (20) foot setback between any waterway and any stockpile, as measured from the edge of the stockpile closest to the waterway and the top bank of the waterway.
23. The Permittee shall not allow the discharge of storm water or waste water into the waterway without a valid National Pollutant Discharge and Elimination System (NPDES) permit issued by IEPA.
24. The Permittee may not store recyclable materials at the Facility for a period longer than 90 days except materials ready for shipment offsite as finished product or raw material in the manufacturing of new, reused or reconstituted products.
25. The Permittee shall store all waste materials in such a way as to ensure adequate site safety. Flammable materials shall be stored away from sources of heat, sparks and open flames, and in accordance with applicable fire codes. Incompatible materials shall be segregated or stored away from each other.
26. The Permittee shall ensure that all tanks, drums or other vessels containing liquid materials such as, but not limited to, solvents and petroleum products, are:
 - a. Kept in good condition. The Permittee shall immediately replace, repair, or overpack damaged containers;
 - b. Compatible with their contents to avoid reactions or impairment of the container's integrity;
 - c. Kept closed at all times except when adding or removing materials;
 - d. Appropriately labeled in accordance with all local, state, and federal requirements; and
 - e. Are provided with secondary containment complying with all local, state, and federal requirements.

ATTACHMENT B SPECIAL CONDITIONS

SITE REQUIREMENTS

27. The Facility shall be entirely surrounded by a solid fence eight feet in height that obscure all material stored or kept outdoors at the Facility. Such fencing must be located at least eight feet from all public ways surrounding the property
28. The Permittee shall adequately pave and maintain all material handling areas, driveways, and access/haul roads to prevent migration of contaminants off-site. The acceptable paving material shall include, but not be limited to, asphalt, concrete or gravel. The CDPH reserves the right to require any additional or alternate paving as deemed necessary by CDPH.
29. The 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, the types of materials prohibited, and the Facility's operating hours.

HOUSEKEEPING, DUST CONTROL, AND MAINTENANCE

30. The Permittee shall sweep Facility pavements and affected adjacent streets each working day, and on an as-needed basis. Such sweeping shall be performed using a mechanical street sweeper equipped with a water spray and vacuum system to effectively remove dust and litter.
31. The Permittee shall make a water source available at all times for purposes of Facility cleaning, and dust control. If the water source is a public waterbody or a City of Chicago fire hydrant, the Permittee shall secure all necessary permits and approvals prior to drawing water from such sources.
32. The Permittee 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. This control and suppression may include, but are not limited to:
 - a. Employing watering methods as often as necessary;
 - b. Adequately sheltering dust-emitting activities from the wind or temporarily suspending such activities during high wind conditions; and
 - c. Enclosing and containerizing materials that are susceptible to becoming wind-borne.
33. The Permittee shall promptly repair damaged or broken pavements to sustain their integrity, prevent standing water, and minimize the generation of dust and mud. The Permittee shall promptly backfill all potholes and depressions at the Facility with aggregate or suitable fill material. In addition, The Permittee shall resurface worn gravel pavements with fresh aggregate as needed.
34. The Permittee shall place garbage inside a covered container. The Permittee shall not allow such containers to overflow and shall immediately empty, or remove and replace them when full.
35. The Permittee shall install and maintain filter inserts in all Facility catch basins and storm water inlets to keep sediments, oily liquids, and floatables from discharging into the City of Chicago sewer system.

ATTACHMENT B SPECIAL CONDITIONS

36. The Permittee shall promptly contain, and clean-up spilled or leaked fluids. The Permittee shall provide spill response kits in all areas of the Facility where chemical, oil, and fuel spills or leaks of one gallon or more may occur. Such kits shall be fully stocked with appropriate materials such as socks, brooms, adsorbent material, and proper personal protective equipment.
37. The Permittee shall routinely remove oil and grease stains off of site pavements, walls, and equipment by steam cleaning, pressure washing, or scrubbing these surfaces clean. Such cleaning shall be conducted at least bi-weekly and as needed.
38. The Permittee shall inspect the Facility for vectors twice per month or retain the services of a vector control specialist to conduct said inspections. The Permittee shall employ vector control measures that may include, but are not limited to, bait stations and traps, as often as necessary.
39. The Facility shall have personnel for patrolling adjacent properties for litter. The Permittee shall promptly remove and dispose of any litter that is observed at any affected off-site areas.
40. The Permittee shall maintain the streets, sidewalks and sewers adjacent to the Facility, free and clear at all times of all material and debris transported to or from, handled or stockpiled at the Facility.
41. The Permittee shall follow applicable requirements in [Part 722](#) of the Illinois Administrative Code, Title 35 in the management and disposal of potentially hazardous waste such as, but not limited to, spilled battery acids, mercury-containing waste, and spent oils or chemicals.

RECORD KEEPING

42. All logs, receipts, and other documentation required under this permit shall be kept at the Facility a minimum of three years and shall be made available to the CDPH and the CPD upon request.
43. The Permittee shall maintain a written record of all vector inspections and vector control installations including date, time and a detailed description of each inspection and any installations or applications to control vectors.
44. The Permittee shall keep a log of liquid waste pickups that documents the dates and the volumes of liquid waste removed and disposed of offsite. Further, the Permittee shall keep all disposal receipts as proof of proper waste disposal.
45. The Permittee shall maintain a log of all vehicles entering and leaving the Facility. This log shall indicate the date, vehicle type, hauling company name if any, and the material type and quantity being transported. The Permittee shall maintain copies of all load ticket receipts.
46. The Permittee shall maintain a written log documenting all cleaning and maintenance activities performed at the Facility under the Housekeeping, Dust Control, and Maintenance section of this permit. Such log shall include a description of the cleaning operation or maintenance activity performed, the signature of the employee that performed it, and the date and time the employee started and completed the task.
47. The Permittee shall maintain a written record of all emergencies occurring at the Facility,

ATTACHMENT B SPECIAL CONDITIONS

including the date and time of each incident, along with a detailed description of the emergency. The Permittee shall notify the CDPH each day that the Facility is affected by the emergency. Such notification shall be sent by email to EnvWastePermits@cityofchicago.org.

48. The Permittee shall timely comply with the requirements contained in [Chapter 11-5](#), Reduction and Recycling Program of the Chicago Municipal Code. The Permittee shall submit semi-annual reports to the Department of Streets and Sanitation (“DSS”) Recycling Coordinator, on forms provided by the DSS.

SITE SAFETY

49. The Permittee shall undertake all necessary steps to ensure that the Facility is secure from unauthorized entry, is sufficiently screened from the surrounding area and is adequately lighted after dark.
50. The Permittee shall provide training to all Facility employees on fire prevention, emergency procedures and hazardous material identification and handling procedures.
51. The Permittee shall install and maintain fire suppressant equipment in accordance with the Municipal Code of the City of Chicago.
52. The Permittee shall correct any and all violations identified by the City of Chicago Fire Department inspections. Failure to comply with these actions may result in revocation of this permit.
53. The Permittee shall conduct all torch cutting activities in a designated area located away from flammable material storage areas. Gas cylinders used for cutting or welding purposes shall be stored in an upright position and properly secured to avoid accidental jarring or impact.

PERMITS

54. The Permittee shall maintain an active Certificate of Operation from the CDPH, pursuant to Section [11-4-660](#) of the Code, for all existing regulated equipment or areas requiring an Air Pollution Control (APC) permit. The Permittee shall obtain an [APC Permit](#) from CDPH, pursuant to Section [11-4-620](#) of the Code, for any new regulated equipment or area installed at the Facility.
55. The Permittee shall acquire all necessary permits and approvals for the Facility including but not limited to those required by the CDPH, Department of Business Affairs and Consumer Protection, Zoning Board of Appeals, Metropolitan Water Reclamation District of Greater Chicago and the IEPA. The Permittee shall provide copies of all such permits and approvals to the CDPH upon request.
56. The Permittee shall maintain copies of all Facility permits on site at all times and shall make these available for inspection upon request by the CDPH.

CLOSURE

57. If the Permittee permanently closes or ceases operations at the site (“closure”), the Permittee must submit a written closure notification to the CDPH within 30 days of closure.

ATTACHMENT B SPECIAL CONDITIONS

If the permit is not renewed for any reason, or the Permittee ceases operations at the site, the Permittee must clean up, remove and properly dispose of or recycle all material and waste on the site within 30 days of permit expiration or closure. The Permittee must submit disposal and recycling receipts as proof of proper disposal.

VEHICLES

58. Every vehicle used by the Facility for the collection, transportation or disposal of any recyclable material shall display on each side of the vehicle in letters not less than two inches in height, in contrasting color, the name, address, telephone number and permit number of the recycling facility.

MISCELLANEOUS

59. Within 45 days from the date of this permit, the Permittee shall submit a plan and timeline to effectively reduce dust generation and track-out from vehicles. Such plan may include the following:

- a. A thorough cleaning of underlying concrete pavement to remove dust buildup;
- b. Application of a gravel layer over worn surfaces in accordance with Section Three of the [Federal Highway Administration's Gravel Roads Maintenance and Design Manual](#) (available at the Illinois Department of Transportation's website at <http://1.usa.gov/1Woytmg>), and/or as directed by a qualified pavement engineer or professional;
- c. Posting and enforcement of speed limits at the Facility to 15 miles per hour or less;
- d. Daily sweeping of concrete pavements with a street sweeper to pick up dust accumulation;
- e. Use of alternate environmentally-responsible dust suppressant to reduce water usage and prevention of mud;
- f. Construction of a stabilized surface at Facility ingress and egress points to remove dirt and mud from vehicles before entering the public way; and
- g. Incorporation of temperature, humidity, and roadway condition information to the *Facility's Monthly Water Log - Road Dust Suppression Control Record* form, and consideration of these factors to prevent the excessive application of water that contributes to mud generation.

VARIANCES

60. The Permittee is authorized to stockpile recyclables materials outdoors, with or without markings or labels as required in Special Condition No. 19.



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

May 24, 2017

Mr. Hal Tolin
Napuck Salvage of Waupaca, LLC
11600 S Burley Avenue
Chicago, Illinois 60617

**Subject: City of Chicago Class II Recycling Facility Permit (ENVREC102882)
Napuck Salvage of Waupaca, LLC – 11610 S Avenue O
Effective date: February 16, 2017 to February 15, 2020**

Dear Mr. Tolin,

A permit is hereby granted by the City of Chicago Department of Public Health (“CDPH”) to Napuck Salvage of Waupaca, LLC (“the Permittee”) to operate a Class II Recycling Facility located within the corporate limits of the City of Chicago at 11610 S Avenue O (“the Facility”).

Please carefully review all conditions outlined in this permit. Incorporated into this permit by reference are the following: 1) the application dated January 20, 2017 (“the Application”); and 2) all other supplemental information submitted as part of this application including drawings, sheets, and specifications. In the event of a conflict with said references, the terms and conditions of this permit shall prevail.

The Permittee shall fully comply with Article XX, Chapter 11-4 of the Municipal Code of Chicago (“[the Ordinance](#)”) and the Recycling Facility Rules and Regulations (“[the Regulations](#)”). The Permittee shall also fully comply with the Standard Conditions outlined in Attachment A and the Special Conditions outlined in Attachment B of this permit.

This permit allows for the operation of the Facility from February 16, 2017 through February 15, 2020 upon which time the permit shall terminate by its own terms. On or before February 15, 2020, the Permittee may apply to the CDPH for a new operating permit for the following year. If a subsequent operating permit is applied for on or before February 15, 2020, this permit shall remain in effect until the CDPH acts on the pending permit application. If you have any questions concerning this permit, please contact me at (312) 745-3136.

Sincerely,

Renante Marante
Environmental Engineer III

ATTACHMENT A STANDARD CONDITIONS

1. The Permittee shall comply with all applicable local, State, and Federal laws, regulations and standards regarding the construction, operation, maintenance, and closure of the subject Facility, including but not limited to those regulations and standards concerning noise, vibrations, and particulate emissions.
2. Construction, operation, maintenance, and closure of the Facility shall be in accordance with the plans, drawings, and specifications referenced by this permit and included in these Standard Conditions and the Special Conditions.
3. Any changes, modifications, and additions to the Facility's permit or the approved plans and documentation shall be submitted to the CDPH for review and approval. Such a request shall be made in writing to the CDPH.
4. Issuance of this permit shall not transfer, assign or otherwise affect any liability to the City of Chicago, the CDPH, their employees, or agents as a result of the construction, operation, maintenance, and closure of this Facility.
5. Issuance of this permit does not relieve the Permittee of any liability with regards to the subject Facility.
6. The CDPH or its authorized representatives may inspect the Facility and the Facility records at any reasonable time to ensure compliance with this permit and all applicable rules, regulations, and standards, as well as all conditions necessary to protect the public health and safety.
7. The CDPH may revoke this permit on the basis of any of the grounds set forth in the City of Chicago, CDPH, Article XX Recycling Facility Permits Rules and Regulations.
8. The Permittee shall notify the CDPH of any notices of violations or administrative, civil or criminal citations received by the Facility or any of its operators relating to any alleged violation of any federal, state, or local laws, regulations, standards, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site. Such notifications shall be provided by email to EnvWastePermits@cityofchicago.org.
9. The Permittee shall provide the CDPH, if so requested, with copies of all correspondence to or from the IEPA and USEPA pertaining to the Facility, including, but not limited to notices of violation, letters, permit applications, reports, groundwater monitoring reports, and annual reports.
10. The Permittee shall comply with all requirements and conditions set forth in this permit. Should any portion of this permit be declared illegal or non-binding, the conditions of the remainder of the permit shall remain in effect.

ATTACHMENT B SPECIAL CONDITIONS

The following Special Conditions are attached to the operating permit for the Napuck Salvage of Waupaca, LLC Class II-A Recycling Facility located at 11610 S Avenue O:

OPERATING HOURS

1. The Permittee may operate 7:00 a.m. to 9:00 p.m. Monday through Saturday. CDPH reserves the right to amend the Permittee's operating hours and days of operation if the facility operation causes a nuisance to neighborhood uses.

MATERIAL HANDLING

2. The Facility is permitted to accept and handle Type A recyclable materials consisting of aluminum scraps; ferrous metal scrap; and non-ferrous metal scrap. The Permittee may also receive packaging materials (e.g. cardboard, wood, plastic, etc.) that are shipped with the above-authorized recyclables.

The Facility is not allowed to receive other recyclable materials not explicitly authorized above. The Facility shall not accept hazardous special waste, reactive metals, sealed containers, municipal solid waste, or stolen goods. The Permittee shall not accept charred wire unless it is accompanied by proper documentation stating that the material was obtained from a properly licensed company that uses adequate emission control devices for removing the wire coating.

The Permittee shall inspect all loads entering the Facility for unauthorized wastes. Loads containing waste other than recyclable materials as authorized above shall not be accepted at this Facility.

3. The Permittee shall handle all unauthorized wastes inadvertently admitted into the Facility as follows:
 - a. The Permittee shall separately containerize special waste, including hazardous waste, non-hazardous special waste, and PCB waste, and arrange for the immediate removal of such waste by a waste hauler authorized to accept such wastes for transport to a disposal facility that has obtained all necessary Federal, State, and local authorization.
 - b. The Permittee shall isolate reactive metals upon discovery and place such material in a sealed, waterproof container. The Permittee shall arrange for proper disposal of the reactive metals and shall immediately notify the CDPH.
 - c. The Permittee shall isolate all municipal solid waste and properly store such waste in an enclosed waste receptacle for disposal at a properly permitted facility.
 - d. The Permittee shall isolate all suspected stolen property upon discovery and immediately notify the City of Chicago Police Department ("CPD").
 - e. After unauthorized waste has been removed from the Facility, the Permittee shall thoroughly clean the affected area in a manner consistent with the type of unauthorized waste managed.

ATTACHMENT B SPECIAL CONDITIONS

4. The Permittee shall not accept, receive, purchase or acquire any material that is delivered to the Facility in any city-owned or government-owned garbage container or cart; or city-owned or government-owned recycling container or cart; or retail store shopping cart of the type commonly provided by big-box stores and supermarkets for use by customers to transport merchandise to the checkout counter during shopping.
5. The Permittee may accept regulated or prohibited recyclable materials as defined in [the Ordinance and the Regulations](#) under the following conditions:
 - a. The regulated or prohibited material is consistent with the types of recyclable materials authorized under Special Condition No. 2;
 - b. The Facility is in compliance with all surveillance requirements specified in 11-4-2640(g) of [the Ordinance](#); and
 - c. The Permittee complies with the documentation requirements set forth in Section 9 of [the Regulations](#).
6. The Facility may receive and process no more than 400 tons per day of recyclable materials as authorized in Special Condition No. 2. If the Permittee desires additional capacity, the Permittee must submit a revised application to the CDPH for approval. A revised application must demonstrate that the Facility is adequately handling the currently permitted volumes and is sufficiently sized and staffed to accept, store, and process the desired quantity of material.
7. When transporting material to and from the site, the material shall fit entirely within the truck or trailer. Additionally, the truck or trailer shall have its tailgates in place, and the load covered with a tarp as necessary to control dust or loss of material.
8. When transporting material to and from the site, the Permittee shall prevent any fluids or material from spilling into the streets.
9. Processing at the Facility shall be limited to crushing with metal crushers; washing; manual sorting; and mechanical sorting with magnetic drums and eddy current separators. The Permittee is authorized to move materials at the Facility with the aid of front-end loaders; skid-steers; fork lifts; cranes; and conveyors.

REFRIGERANTS

10. If the Facility accepts any small appliance, room air conditioning appliance, motor vehicle air conditioner (MVAC), or MVAC-like appliance, as those terms are defined in [40 CFR Part 82 Subpart F](#), where applicable, the Permittee shall comply with all requirements of [40 CFR Section 82.156\(f\)](#) in connection with any such appliance or item. Specifically, the Permittee shall either:
 - a. Verify that the refrigerant was evacuated from the appliance or item in accordance with [40 CFR Section 82.156\(f\)](#) by:
 - i. Obtaining a written and signed statement from each customer stating that all refrigerant was removed in accordance with EPA standards. This statement must include the name and address of the person who removed the refrigerant and the date the refrigerant was removed; or
 - ii. Maintaining a contract between the Permittee and the customer that

ATTACHMENT B SPECIAL CONDITIONS

specifies that refrigerant will be properly removed before delivery.

or

- b. Recover any remaining refrigerant from the appliance in accordance with [40 CFR Section 82.156\(f\)](#) using EPA-certified refrigerant recovery equipment;

11. The Permittee shall not accept any appliance or item that has been previously vented of CFCs without the proper documentation in Special Condition 10(a) above.

MATERIAL STORAGE

12. The Permittee shall store all materials within the permitted property at all times. At no time, shall material be stored on neighboring properties or the public way.

13. The Permittee shall maintain a minimum aisle width of 36 inches, or wider to accommodate workers, equipment, cleaning, and emergency response.

14. The Permittee shall handle and store all recyclable materials that may leak fluids or leave an oily residue on a dedicated, impervious concrete pad. The concrete pad shall be sloped, bermed, or otherwise constructed to minimize storm water run-on and run-off, and facilitate the capture and collection of fluids. The Permittee must properly dispose of all liquid waste collected at the Facility.

15. The Permittee shall segregate and store recyclable materials in durable receptacles or enclosures such as drums, boxes, bins, or storage bunkers. The Permittee may store recyclables in cardboard boxes provided they are placed indoors, on pallets or otherwise kept off the ground.

16. The Permittee may store recyclable materials on sturdy racks or shelving provided the stored materials are kept at least 18 inches off the ground and are not leaking.

17. The Permittee shall store newspaper, paper, corrugated paper and cardboard in closed containers.

18. The Permittee shall clearly mark all storage receptacles with the type of recyclable material stored. Letters shall not be less than three inches high, outward facing and not hidden. The Permittee shall not deposit other materials than that specified on the receptacle.

19. The Permittee shall maintain the area surrounding all storage containers in a clean and neat manner. No recyclable materials or waste materials of any kind shall be allowed to accumulate around any receptacle or to overflow from any receptacle.

20. The Permittee may stockpile bulk recyclable materials that require large machinery (such as a backhoe, front-end loader, crane, or grapple) to move or process. The height of such stockpiles shall not exceed 20 feet.

21. The Permittee may not store recyclable materials at the Facility for a period longer than 90 days except materials ready for shipment offsite as finished product or raw material in the manufacturing of new, reused or reconstituted products.

22. The Permittee shall store all waste materials in such a way as to ensure adequate site safety.

ATTACHMENT B SPECIAL CONDITIONS

Flammable materials shall be stored away from sources of heat, sparks and open flames, and in accordance with applicable fire codes. Incompatible materials shall be segregated or stored away from each other.

23. The Permittee shall ensure that all tanks, drums or other vessels containing liquid materials such as, but not limited to, solvents and petroleum products, are:
- a. Kept in good condition. The Permittee shall immediately replace, repair, or overpack damaged containers;
 - b. Compatible with their contents to avoid reactions or impairment of the container's integrity;
 - c. Kept closed at all times except when adding or removing materials;
 - d. Appropriately labeled in accordance with all local, state, and federal requirements; and
 - e. Are provided with secondary containment complying with all local, state, and federal requirements.

SITE REQUIREMENTS

24. The Permittee shall adequately pave and maintain all material handling areas, driveways, and access/haul roads to prevent migration of contaminants off-site. The acceptable paving material shall include, but not be limited to, asphalt, concrete or gravel. The CDPH reserves the right to require any additional or alternate paving as deemed necessary by CDPH.
25. The 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, the types of materials prohibited, and the Facility's operating hours.

HOUSEKEEPING, DUST CONTROL, AND MAINTENANCE

26. The Permittee shall sweep Facility pavements and affected adjacent streets each working day, and on an as-needed basis. Such sweeping shall be performed using a mechanical street sweeper to effectively remove dust and litter.
27. The Permittee shall make a water source available at all times for purposes of Facility cleaning, dust control, and fire safety.
28. The Permittee 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. This control and suppression may include, but are not limited to:
- a. Employing watering methods as often as necessary;
 - b. Adequately sheltering dust-emitting activities from the wind or suspending such activities during high wind conditions; and
 - c. Enclosing and containerizing materials that are susceptible to becoming wind-borne.
29. The Permittee shall promptly repair damaged or broken pavements to sustain their integrity, prevent standing water, and minimize the generation of dust and mud. The Permittee shall

ATTACHMENT B SPECIAL CONDITIONS

promptly backfill all potholes and depressions at the Facility with aggregate or suitable fill material. In addition, The Permittee shall resurface worn gravel pavements with fresh aggregate as needed.

30. The Permittee shall place garbage inside a covered container. The Permittee shall not allow such containers to overflow and shall immediately empty, or remove and replace them when full.
31. The Permittee shall install and maintain filter inserts in all Facility catch basins and storm water inlets to keep sediments, oily liquids, and floatables from discharging into the City of Chicago sewer system.
32. The Permittee shall promptly contain, and clean-up spilled or leaked fluids. The Permittee shall provide spill response kits in all areas of the Facility where chemical, oil, and fuel spills or leaks of one gallon or more may occur. Such kits shall be fully stocked with appropriate materials such as socks, brooms, adsorbent material, and proper personal protective equipment.
33. The Permittee shall routinely remove oil and grease stains from site pavements, walls, and equipment by steam cleaning, pressure washing, or scrubbing these surfaces clean. Such cleaning shall be conducted at least bi-weekly and as needed.
34. The Permittee shall inspect the Facility for vectors twice per month or retain the services of a vector control specialist to conduct said inspections. The Permittee shall employ vector control measures that may include, but are not limited to, bait stations and traps, as often as necessary.
35. The Permittee shall follow applicable requirements in [Part 722](#) of the Illinois Administrative Code, Title 35 in the management and disposal of potentially hazardous waste such as, but not limited to, spilled battery acids, mercury-containing waste, and spent oils or chemicals.

RECORD KEEPING

36. All logs, receipts, and other documentation required under this permit shall be kept at the Facility a minimum of three years and shall be made available to the CDPH and the CPD upon request.
37. The Permittee shall maintain a written record of all vector inspections and vector control installations including date, time and a detailed description of each inspection and any installations or applications to control vectors.
38. The Permittee shall keep a log of liquid waste pickups that documents the dates and the volumes of liquid waste removed and disposed of offsite. Further, the Permittee shall keep all disposal receipts as proof of proper waste disposal.
39. The Permittee shall maintain a log of all vehicles entering and leaving the Facility. This log shall indicate the date, vehicle type, hauling company name if any, and the material type and quantity being transported. The Permittee shall maintain copies of all load ticket receipts.
40. The Permittee shall maintain a written log documenting all cleaning and maintenance activities performed at the Facility under the Housekeeping, Dust Control, and Maintenance section of this permit. Such log shall include a description of the cleaning operation or maintenance activity performed, the signature of the employee that performed it, and the date and time the

ATTACHMENT B SPECIAL CONDITIONS

employee started and completed the task.

41. The Permittee shall maintain a written record of all emergencies occurring at the Facility, including the date and time of each incident, along with a detailed description of the emergency. The Permittee shall notify the CDPH each day that the Facility is affected by the emergency. Such notification shall be sent by email to EnvWastePermits@cityofchicago.org.
42. The Permittee shall timely comply with the requirements contained in [Chapter 11-5](#), Reduction and Recycling Program of the Chicago Municipal Code. The Permittee shall submit semi-annual reports to the Department of Streets and Sanitation (“DSS”) Recycling Coordinator, on forms provided by the DSS.

SITE SAFETY

43. The Permittee shall undertake all necessary steps to ensure that the Facility is secure from unauthorized entry, is sufficiently screened from the surrounding area and is adequately lighted after dark.
44. The Permittee shall provide training to all Facility employees on fire prevention, emergency procedures and hazardous material identification and handling procedures.
45. The Permittee shall install and maintain fire suppressant equipment in accordance with the Municipal Code of the City of Chicago.
46. The Permittee shall correct any and all violations identified by the City of Chicago Fire Department inspections. Failure to comply with these actions may result in revocation of this permit.

PERMITS

47. The Permittee shall maintain an active Certificate of Operation from the CDPH, pursuant to Section [11-4-660](#) of the Code, for all existing regulated equipment or areas requiring an Air Pollution Control (APC) permit. The Permittee shall obtain an [APC Permit](#) from CDPH, pursuant to Section [11-4-620](#) of the Code, for any new regulated equipment or area installed at the Facility.
48. The Permittee shall acquire all necessary permits and approvals for the Facility including but not limited to those required by the CDPH, Department of Business Affairs and Consumer Protection, Zoning Board of Appeals, Metropolitan Water Reclamation District of Greater Chicago and the IEPA. The Permittee shall provide copies of all such permits and approvals to the CDPH upon request.
49. The Permittee shall maintain copies of all Facility permits on site at all times and shall make these available for inspection upon request by the CDPH.

CLOSURE

50. If the Permittee permanently closes or ceases operations at the site (“closure”), the Permittee must submit a written closure notification to the CDPH within 30 days of closure. If the permit is not renewed for any reason, or the Permittee ceases operations at the site, the Permittee must clean up, remove and properly dispose of or recycle all material and waste on the site

ATTACHMENT B SPECIAL CONDITIONS

within 30 days of permit expiration or closure. The Permittee must submit disposal and recycling receipts as proof of proper disposal.

VEHICLES

51. Every vehicle used by the Facility for the collection, transportation or disposal of any recyclable material shall display on each side of the vehicle in letters not less than two inches in height, in contrasting color, the name, address, telephone number and permit number of the recycling facility.



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

July 17, 2019

Jeff Handelman
South Chicago Recycling
11600 S Burley Avenue
Chicago, Illinois 60617

**Subject: City of Chicago Class IVB Recycling Facility Permit (ENVREC102877)
South Shore Recycling, Inc. – 11600 S Burley Ave
Effective date: May 16, 2018 to May 15, 2021**

Dear Mr. Handelman,

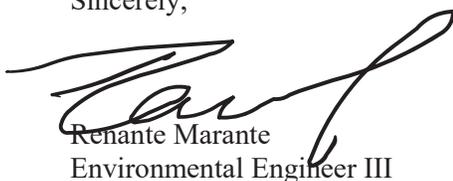
A permit is hereby granted by the City of Chicago Department of Public Health (“CDPH”) to South Chicago Recycling (“the Permittee”) to operate a Class IVB Recycling Facility located within the corporate limits of the City of Chicago at 11600 S Burley Ave (“the Facility”).

Please carefully review all conditions set forth in this permit. Incorporated into this permit by reference are the following: 1) the application dated May 15, 2018 (“the Application”); and 2) all other supplemental information submitted as part of this application including drawings, sheets, and specifications. In the event of a conflict with said references, the terms and conditions of this permit shall prevail.

The Permittee shall fully comply with Article XX, Chapter 11-4 of the Municipal Code of Chicago (“[the Ordinance](#)”) and the Recycling Facility Rules and Regulations (“[the Regulations](#)”). The Permittee shall also fully comply with the Standard Conditions set forth in Attachment A and the Special Conditions set forth in Attachment B of this permit.

This permit allows for the operation of the Facility from May 16, 2018 through May 15, 2021 upon which time the permit shall terminate by its own terms. On or before May 15, 2021, the Permittee may apply to the CDPH for a new operating permit for the following year. If a subsequent operating permit is applied for on or before May 15, 2021, this permit shall remain in effect until the CDPH acts on the pending permit application. If you have any questions concerning this permit, please contact me at (312) 745-3136.

Sincerely,



Renante Marante
Environmental Engineer III

ATTACHMENT A STANDARD CONDITONS

1. The Permittee shall comply with all applicable local, State, and Federal regulations and standards regarding the construction, operation, maintenance, and closure of the subject Facility, including but not limited to those regulations and standards concerning noise, vibrations and particulate emissions.
2. Construction, operation, maintenance, and closure of the Facility shall be in accordance with the plans, drawings, and specifications referenced by this permit and included in these Standard Conditions and the Special Conditions.
3. Any changes, modifications, and additions to the Facility's permit or the approved plans and documentation shall be submitted to the CDPH for review and approval. Such a request shall be made in writing to the CDPH.
4. Issuance of this permit shall not transfer, assign or otherwise affect any liability to the City of Chicago, the CDPH, their employees, or agents as a result of the construction, operation, maintenance, and closure of this Facility.
5. Issuance of this permit does not relieve the Permittee of any liability with regards to the subject Facility.
6. The CDPH or its authorized representatives may inspect the Facility and the Facility records at any reasonable time to ensure compliance with this permit and all applicable rules, regulations, and standards, as well as all conditions necessary to protect the public health and safety.
7. The CDPH may revoke this permit on the basis of any of the grounds set forth in the City of Chicago, CDPH, Article XX Recycling Facility Permits Rules and Regulations.
8. The Permittee shall notify the CDPH of any notices of violations or administrative, civil or criminal citations received by the facility or any of its operators relating to any alleged violation of any federal, state, or local laws, regulations, standards, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site. Such notifications shall be provided by email to EnvWastePermits@cityofchicago.org.
9. The Permittee shall provide the CDPH, if so requested, with copies of all correspondence to or from the IEPA and USEPA pertaining to the Facility, including, but not limited to: notices of violation, letters, permit applications, reports, groundwater monitoring reports, and annual reports.
10. The Permittee shall comply with all requirements and conditions set forth in this permit. Should any portion of this permit be declared illegal or non-binding, the conditions of the remainder of the permit shall remain in effect.

ATTACHMENT B SPECIAL CONDITIONS

The following Special Conditions are attached to the operating permit for the South Chicago Recycling Class IVB Recycling Facility located at 11600 S Burley Ave:

OPERATING HOURS

1. The Permittee may operate 7:00 a.m. to 5:00 p.m. Monday through Friday and between 7 a.m. and 12:00 p.m. on Saturday. CDPH reserves the right to amend the Permittee's operating hours and days of operation if the facility operation causes a nuisance to neighborhood uses.

MATERIAL HANDLING

2. The Facility is permitted to accept and handle Type A and Type C recyclable materials consisting of: aluminum cans and scrap; ferrous metal scrap; non-ferrous material; batteries; end of life vehicles (ELV's); and vehicle parts.

The Facility is not authorized to accept other recyclable materials not explicitly listed above. The Facility shall not accept hazardous special waste, reactive metals, sealed drums, municipal solid waste, and stolen goods.

The Permittee shall inspect all loads entering the Facility for unauthorized wastes. Loads containing waste other than recyclable materials as authorized above shall not be accepted at this Facility.

3. The Permittee shall handle all unauthorized wastes inadvertently accepted into the Facility as follows:
 - a. The Permittee shall separately containerize special waste, including hazardous waste, non-hazardous special waste and PCB waste, and arrange for the immediate removal of such waste by a waste hauler authorized to accept such wastes for transport to a disposal facility which has obtained all necessary Federal, State and local authorization.
 - b. The Permittee shall isolate reactive metals upon discovery and place such material in a sealed, waterproof container. The Permittee shall arrange for proper disposal of the reactive metals and shall immediately notify the CDPH.
 - c. The Permittee shall isolate all municipal solid waste and properly store such waste in an enclosed waste receptacle for disposal at a properly permitted facility.
 - d. The Permittee shall isolate all stolen property upon discovery and immediately notify the City of Chicago Police Department ("CPD").
 - e. After unauthorized waste has been removed from the Facility, the Permittee shall thoroughly clean the affected area in a manner consistent with the type of unauthorized waste managed.
4. The Permittee may accept regulated or prohibited recyclable materials as defined in [the Regulations](#) under the following conditions:
 - f. The regulated or prohibited material is consistent with the types of

ATTACHMENT B SPECIAL CONDITIONS

recyclable materials authorized in Special Condition No. 2;

- g. The Facility is in compliance with all surveillance requirements specified in 11-4-2640(g) of [the Ordinance](#); and
 - h. The Permittee complies with the documentation requirements in Section 9 of [the Regulations](#).
5. The Facility may receive and process no more than 500 tons per day of recyclable materials as specified in Special Condition No. 2. If additional permitted capacity is desired, the Permittee must submit a revised application to the CDPH for approval. A revised application must demonstrate that the Facility is adequately handling the currently permitted volumes and is sufficiently sized and staffed to process the desired quantity of material.
 6. When transporting material to and from the site in semi-truck trailers, the material shall fit entirely within the semi-truck trailer. Additionally, the truck trailers shall have the tail gates in place and tarped as necessary to control dust or loss of material.
 7. When transporting material to and from the site, the Permittee shall prevent any fluids or material from spilling into the streets.
 8. Material processing at the Facility shall be limited to baling; cutting with acetylene torches, shears, and saws; cleaning; dismantling of vehicles manually and with handheld tools; sorting; and flattening of vehicles. The Permittee is authorized to move materials at the Facility with the aid of the following equipment: front-end loaders; skid-steers; and fork lifts.

END OF LIFE VEHICLES (ELV'S)

9. The Permittee shall completely drain and separately collect all fluids from incoming end-of-life vehicles ("ELV's") as soon as possible, including fluids from the engine, fuel tank, transmission, radiator, differential, window washing fluid tank, heater core, and all lines and hoses. The Permittee shall use a fluid drainage system that includes the use of funnels or pumps when transferring or disposing liquids. Fluids must be stored, labeled and managed according to Federal, State and Local Codes.

TIRES

10. The Permittee shall comply with the Illinois Environmental Protection Act, [415 ILCS 5/55](#) for purposes of storing used tires. The Permittee shall not allow used tires to accumulate for more than 90 days. If the Facility has 100 or more tires on site at any one time, the facility shall obtain a Tire Facility license from the Department of Business Affairs and Consumer Protection pursuant to [Chapter 4-228-010](#) of the Code.

REFRIGERANTS

11. If accepting any small appliance, room air conditioning appliance, motor vehicle air conditioner (MVAC), or MVAC-like appliance, as those terms are defined in [40 CFR Part 82 Subpart F](#), where applicable, the Permittee shall comply with all requirements of [40 CFR Section 82.156\(f\)](#) in connection with any such appliance or item. Specifically, the Permittee shall either:
 - a. Verify that the refrigerant has been evacuated from the appliance or item

ATTACHMENT B SPECIAL CONDITIONS

in accordance with [40 CFR Section 82.156\(f\)](#) by:

- i. Obtaining a written and signed statement from each customer stating that all refrigerant has been removed in accordance with EPA standards. This statement must include the name and address of the person who removed the refrigerant and the specific date the refrigerant was removed; or
 - ii. Maintaining a contract between the Permittee and the customer that specifies that refrigerant will be properly removed prior to delivery.
 - b. Recover any remaining refrigerant from the appliance in accordance with [40 CFR Section 82.156\(f\)](#) using EPA-certified refrigerant recovery equipment;
12. The Permittee shall not accept any appliance or item that has been previously vented of CFCs without the proper documentation in Special Condition 11(a) above.

BATTERIES

13. The Permittee shall ensure that all batteries are removed from the Facility within one calendar year of their acceptance at the Facility.
14. Batteries shall be stored inside the building, away from sources of heat, spark, and open flame, and isolated from incompatible materials.
15. The permittee shall store batteries inside a non-conducting, leak proof, and acid resistant container with no evidence of leakage, spillage, or damage. The Permittee shall take all appropriate measures to prevent the batteries from short circuiting. Such measures shall include but not be limited to the covering of terminals or individually wrapping each battery in a plastic bag.
16. The Permittee shall label each battery or battery container with any one of the following phrases: i) Universal Waste Batteries; or ii) Waste Batteries; or iii) Used Batteries.
17. The Permittee shall store car batteries as follows:
- a. Place car batteries on acid resistant pallets. Only pallets with no broken or missing boards and free of protruding nails shall be used.

Working car batteries intended for resale at the Facility may be stored on racks in accordance with Special Condition No. 28;
 - b. Batteries shall be stacked no more than 3 layers high. Layers of cardboard, waffleboard, or similar materials shall be placed between all battery layers, underneath the bottom layer and over the top layer to prevent puncturing and short circuiting.
18. The Permittee shall handle damaged batteries and conduct the clean-up of released electrolytes as follows:
- a. Damaged or leaking batteries shall be placed inside a container that is structurally sound, acid-resistant, and leak-proof. Such containers shall be kept closed at all times when not placing or removing materials.

ATTACHMENT B SPECIAL CONDITIONS

- b. Any release of electrolyte shall be immediately contained. Released electrolyte shall be neutralized with a baking soda solution or equivalent base solution and the spill area rinsed with clean water.
- c. The Permittee shall follow applicable requirements in [Part 722](#) of the Illinois Administrative Code, Title 35 in the management of spilled battery fluids and all other waste generated by the clean-up.

MERCURY SWITCHES AND SENSORS

- 19. The Permittee shall remove mercury-containing light switches and anti-lock braking system sensors from vehicles manufactured prior to 2004 using procedures prescribed in IEPA's Recycling Mercury Vehicle Switches in Illinois ("IEPA mercury manual") guidance manual, the End of Life Vehicle Solutions (ELVS) website, or pertinent auto manuals.
- 20. The Permittee shall store removed switches in a durable screw top plastic bucket that is structurally sound with no evidence of leakage, spillage, or damage. The Permittee shall affix a "Universal Waste" sticker on the outside of the bucket and mark the month, day, and year of the first switch placed inside it.
- 21. The Permittee shall send the mercury switch bucket, whether full or not, to a properly permitted recycler offsite within one year from when the first switch was placed inside the bucket. Upon shipping of the mercury switch bucket offsite, the Permittee shall complete and sign the IEPA's mercury switch log form and maintain a copy of said log at the Facility.
- 22. The Permittee shall maintain adequate mercury spill kits at areas of the Facility where mercury leaks and spills can occur.
- 23. The Permittee shall follow applicable requirements in Part 722 of the Illinois Administrative Code, Title 35 in the management of all mercury-containing waste generated from the clean-up of mercury releases at the Facility.

MATERIAL STORAGE

- 24. The Permittee shall ensure that all materials are stored within the permitted property at all times. At no time shall material be stored on neighboring properties or the public way.
- 25. The Permittee shall maintain a minimum aisle width of 36 inches, or wider to accommodate workers, equipment, cleaning, and emergency response.
- 26. Recyclable materials that may leak fluids or leave oily residue shall be delivered and stored indoors whenever possible, or on a dedicated, impermeable concrete pad. The impermeable concrete pad shall be sloped, bermed, or otherwise constructed to minimize storm water run-on and run-off, and facilitate the capture and collection of fluids. The Permittee must properly dispose of all liquid waste collected at the Facility.
- 27. Recyclable materials shall be segregated and stored in durable receptacles or enclosures such as drums, boxes, bins, or storage bunkers. The Permittee may store recyclables in cardboard boxes provided such containers are placed indoors, on pallets or otherwise kept off the ground.

ATTACHMENT B SPECIAL CONDITIONS

28. Recyclable materials may be stored on sturdy racks or shelving provided the stored materials are kept at least 18 inches off the ground and are not leaking.
29. Newsprint, paper, corrugated paper and cardboard must be stored in closed containers.
30. Material storage receptacles shall be clearly marked with the type of recyclable material to be stored. Letters shall not be less than three inches high, outward facing and not hidden. No material other than that specified on a receptacle shall be deposited therein.
31. The area surrounding storage receptacles shall at all times be maintained in a clean and neat manner. No recyclable materials or waste materials of any kind shall be allowed to accumulate around any receptacle or to overflow from any receptacle.
32. Bulk recyclable materials that require large machinery (such as a backhoe, front-end loader, crane, or grapple) to move or process, may be stockpiled at the Facility. Material stockpiles shall not exceed 20 feet in height as shown by a pile height marker.
33. The Permittee shall provide a twenty (20) foot setback between the river and any stockpiles.
34. The Permittee shall not allow any discharge of storm water or process water into the river without a proper National Pollutant Discharge and Elimination System (NPDES) permit issued by IEPA.
35. The Permittee may not store recyclable materials at the Facility for a period longer than 90 days except for finished processed materials ready for shipment offsite as finished product or raw material in the manufacturing process of new, reused or reconstituted products.
36. The Permittee shall store all waste materials in such a way as to ensure adequate site safety. Flammable materials should be stored away from sources of heat, sparks and open flames, and in accordance with applicable fire codes. Incompatible materials shall be segregated or stored away from each other.
37. The Permittee shall ensure that all tanks, drums or other vessels kept at the Facility containing liquid materials such as, but not limited to, solvents and petroleum products, are:
 - a. Kept in good condition; damaged containers must be replaced, repaired, or overpacked;
 - b. Compatible with their contents to avoid reactions or impairment of the container's integrity;
 - c. Kept closed at all times except when adding or removing materials;
 - d. Properly labeled in accordance with all local, state, and federal requirements; and
 - e. Provided with secondary containment complying with all local, state, and federal requirements.

SITE REQUIREMENTS

38. The Facility shall be entirely surrounded by a solid fence eight feet in height which is so constructed as to obscure all material stored or kept within the boundaries thereof, unless said facility operations occur within the confines of an enclosed building. Such fence shall be located at least eight feet from all public ways surrounding the property and none of said

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materials shall be piled higher than said fence. Where such an existing fence is erected nearer than eight feet to the public way, such fence may be permitted to remain but none of said material shall be piled nearer than eight feet to such public way.

39. The Permittee shall adequately pave all material handling areas, driveways and access/haul roads to prevent migration of contaminants off-site. Acceptable paving material shall include, but not be limited to, asphalt, concrete or, with prior written approval from CDPH, gravel. The CDPH reserves the right to require any additional or alternate paving as deemed necessary by CDPH.
40. The 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, the types of materials prohibited, and the Facility's operating hours.

HOUSEKEEPING, DUST CONTROL, AND MAINTENANCE

41. The Permittee shall make a water source available at all times for purposes of Facility cleaning, dust control and fire safety.
42. The Permittee shall control and/or suppress dust and other air-borne materials created by Facility activities so that the off-site migration of these materials does not occur. This control and/or suppression shall include, but not be limited to:
 - a. Employing watering methods as often as necessary;
 - b. Adequately sheltering dust-emitting activities from the wind or temporarily suspending such activities during high wind conditions; and
 - c. Enclosing and containerizing materials susceptible to becoming wind-borne.
43. The Permittee shall routinely sweep and properly maintain site pavements in order to minimize dust and mud debris occurring both on and off-site. The Permittee shall sweep and maintain these areas as often as necessary to sustain their integrity, prevent standing water, and minimize the generation of dust and mud.
44. The Permittee shall place garbage inside a covered container. The Permittee shall not allow such containers to overflow and shall immediately empty, or remove and replace them when full.
45. The Permittee shall install and maintain filter inserts in all Facility catch basins and storm water inlets to keep sediments, oily liquids, and floatables from discharging into the City of Chicago sewer system.
46. The Permittee shall promptly contain and clean-up spilled or leaked fluids. The Permittee shall provide spill response kits in all areas of the Facility where chemical, oil, and fuel spills or leaks of one gallon or more may occur. Such kits shall be fully stocked with appropriate materials such as socks, brooms, adsorbent material, and proper personal protective equipment.
47. The Permittee shall routinely remove oil and grease stains off of site pavements, walls, and equipment by steam cleaning, pressure washing, or scrubbing these surfaces clean. Such cleaning shall be conducted at least bi-weekly and as needed.

ATTACHMENT B SPECIAL CONDITIONS

48. The Permittee shall inspect the Facility for vectors twice per month or retain the services of a vector control specialist to conduct said inspections. The Permittee shall employ vector control measures which include, but are not limited to, bait stations and traps, as often as necessary.

RECORD KEEPING

49. The Permittee shall maintain a written record of all vector inspections and installations including date, time and a detailed description of each inspection and any installations or applications to control vectors.

50. The Permittee shall keep a log of liquid waste pickups that documents the dates and the volumes of liquid waste removed and disposed offsite. Further, the Permittee shall keep all disposal receipts as proof of proper waste disposal.

51. The Permittee shall maintain a log of all vehicles entering and leaving the Facility. This log shall indicate the date, vehicle type, hauling company name, and the material type and quantity being transported. The Permittee shall maintain copies of all load ticket receipts.

52. The Permittee shall maintain a written log documenting all cleaning and maintenance activities performed at the Facility pursuant to the Housekeeping, Dust Control, and Maintenance section of this permit. Such log shall include a description of the cleaning activity or maintenance activity performed, the signature of the employee that performed the activity, and the date and time the employee started and completed the activity.

53. The Permittee shall maintain a written record of all emergencies occurring at the Facility, including the date and time of each incident, along with a detailed description of the emergency. The Permittee shall notify the CDPH each day that the Facility is affected by the emergency. Such notification shall be sent by email to EnvWastePermits@cityofchicago.org.

54. All logs, receipts, and other documentation required pursuant to this permit shall be kept at the Facility a minimum of three years and shall be made available to the CDPH and the CPD upon request.

55. The Permittee shall timely comply with the requirements contained in [Chapter 11-5](#), Reduction and Recycling Program of the Chicago Municipal Code. The Permittee shall submit semi-annual reports to the Department of Streets and Sanitation Recycling Coordinator. The semi-annual reports shall be prepared on forms provided by the Department of Streets and Sanitation.

SITE SAFETY

56. The Permittee shall undertake all necessary steps to ensure that the Facility is secure from unauthorized entry, is sufficiently screened from the surrounding area and is adequately lighted after dark.

57. The Permittee shall provide training to all Facility employees on fire prevention, emergency procedures and hazardous material identification and handling procedures.

58. The Permittee shall install and maintain fire suppressant equipment in accordance with the Municipal Code of the City of Chicago.

ATTACHMENT B SPECIAL CONDITIONS

59. The Permittee shall correct any and all violations identified by the City of Chicago Fire Department inspections. Failure to comply with these actions may result in revocation of this permit.
60. The Permittee shall conduct all torch cutting activities in a designated area located away from flammable material storage areas. Gas cylinders used for cutting or welding purposes shall be stored in an upright position and properly secured to avoid accidental jarring or impact.

PERMITS

61. The Permittee shall maintain an active Certificate of Operation from the CDPH for all existing processing equipment used at the Facility. The Permittee shall obtain an [Air Pollution Control Permit](#) for each new process equipment installed at the Facility.
62. The Permittee shall acquire all necessary permits and approvals for the Facility including but not limited to those required from the CDPH, Department of Revenue, Zoning Board of Appeals, Metropolitan Water Reclamation District of Greater Chicago and the IEPA. The Permittee shall provide copies of all such permits and approvals to the CDPH upon request.
63. The Permittee shall maintain copies of all Facility permits on site at all times and shall make these available for inspection upon request by the CDPH.

CLOSURE

64. If the Permittee permanently closes and/or ceases operations at the site (“closure”), the Permittee must submit a written closure notification to the CDPH within 30 days of closure. If the permit is not renewed for any reason, or the Permittee ceases operations at the site, the Permittee must clean up, remove and properly dispose of or recycle all material and waste on the site within 30 days of permit expiration or closure. The Permittee must submit disposal and recycling receipts as proof of proper disposal.

VEHICLES

65. Every vehicle used by the Facility for the collection, transportation or disposal of any recyclable material shall display on each side of the vehicle in letters not less than two inches in height, in contrasting color, the name, address, telephone number and permit number of the recycling facility.

MISCELLANEOUS

66. The Permittee shall discharge the effluent from the oil/water separator (“OWS”) in conformance with all IEPA requirements. The Permittee shall operate and maintain the unit in accordance with its user manual, and shall keep a detailed record of all maintenance performed on the unit as required under Special Condition No. 52 of the Permit.

VARIANCES

67. In lieu of the concrete or asphalt paving required in Special Condition No. 39, the Permittee

ATTACHMENT B SPECIAL CONDITIONS

may utilize existing slag/asphalt-grinding paving provided, in areas subjected to heavy equipment and truck traffic, these surfaces are supplemented with a top layer of gravel applied and maintained in accordance with: 1) Section Three of the [Federal Highway Administration's Gravel Roads Maintenance and Design Manual](#), available at the Illinois Department of Transportation's website at <http://1.usa.gov/1Woytmg>; or 2) plans and specifications prepared by a qualified pavement engineer.



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

October 9, 2018

Mr. Dennis Stropko
Regency Technologies
1831 E. Highland Road
Twinsburg, Ohio 44087

**Subject: City of Chicago Class II-A Recycling Facility Permit (ENVREC122597)
Regency Technologies – 11600 S Burley Ave
Effective date: August 29, 2018 to August 28, 2021**

Dear Mr. Stropko,

A permit is hereby granted by the City of Chicago Department of Public Health (“CDPH”) to Regency Technologies (“the Permittee”) to operate a Class II-A Recycling Facility located within the corporate limits of the City of Chicago at 11600 S Burley Ave (“the Facility”).

Please carefully review all conditions outlined in this permit. Incorporated into this permit by reference are the following: 1) the application dated August 28, 2018 (“the Application”); and 2) all other supplemental information submitted as part of this application including drawings, sheets, and specifications. In the event of a conflict with said references, the terms and conditions of this permit shall prevail.

The Permittee shall fully comply with Article XX, Chapter 11-4 of the Municipal Code of Chicago (“[the Ordinance](#)”) and the Recycling Facility Rules and Regulations (“[the Regulations](#)”). The Permittee shall also fully comply with the Standard Conditions outlined in Attachment A and the Special Conditions outlined in Attachment B of this permit.

This permit allows for the operation of the Facility from August 29, 2018 through August 28, 2021 upon which time the permit shall terminate by its own terms. On or before August 28, 2021, the Permittee may apply to the CDPH for a new operating permit for the following year. If a subsequent operating permit is applied for on or before August 28, 2021, this permit shall remain in effect until the CDPH acts on the pending permit application. If you have any questions concerning this permit, please contact me at (312) 745-3136.

Sincerely,

Renante Marante
Environmental Engineer III

ATTACHMENT A STANDARD CONDITIONS

1. The Permittee shall comply with all applicable local, State, and Federal laws, regulations and standards regarding the construction, operation, maintenance, and closure of the subject Facility, including but not limited to those regulations and standards concerning noise, vibrations, and particulate emissions.
2. Construction, operation, maintenance, and closure of the Facility shall be in accordance with the plans, drawings, and specifications referenced by this permit and included in these Standard Conditions and the Special Conditions.
3. Any changes, modifications, and additions to the Facility's permit or the approved plans and documentation shall be submitted to the CDPH for review and approval. Such a request shall be made in writing to the CDPH.
4. Issuance of this permit shall not transfer, assign or otherwise affect any liability to the City of Chicago, the CDPH, their employees, or agents as a result of the construction, operation, maintenance, and closure of this Facility.
5. Issuance of this permit does not relieve the Permittee of any liability with regards to the subject Facility.
6. The CDPH or its authorized representatives may inspect the Facility and the Facility records at any reasonable time to ensure compliance with this permit and all applicable rules, regulations, and standards, as well as all conditions necessary to protect the public health and safety.
7. The CDPH may revoke this permit on the basis of any of the grounds set forth in the City of Chicago, CDPH, Article XX Recycling Facility Permits Rules and Regulations.
8. The Permittee shall notify the CDPH of any notices of violations or administrative, civil or criminal citations received by the Facility or any of its operators relating to any alleged violation of any federal, state, or local laws, regulations, standards, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site. Such notifications shall be provided by email to EnvWastePermits@cityofchicago.org.
9. The Permittee shall provide the CDPH, if so requested, with copies of all correspondence to or from the IEPA and USEPA pertaining to the Facility, including, but not limited to notices of violation, letters, permit applications, reports, groundwater monitoring reports, and annual reports.
10. The Permittee shall comply with all requirements and conditions set forth in this permit. Should any portion of this permit be declared illegal or non-binding, the conditions of the remainder of the permit shall remain in effect.

ATTACHMENT B SPECIAL CONDITIONS

The following Special Conditions are attached to the operating permit for the Regency Technologies Class II-A Recycling Facility located at 11600 S Burley Ave:

OPERATING HOURS

1. The Permittee may operate 7:00 a.m. to 9:00 p.m. Monday through Friday, and between 7:00 a.m. and 3:00 p.m. on Saturday. Operations prior to 7:00 a.m. and after 9:00 p.m. require a written waiver pursuant to Section 8.0 of the Regulations. Such waiver may be applied for by submitting a noise abatement plan demonstrating that operations outside the authorized hours will not cause a nuisance to nearby residences. CDPH reserves the right to amend the Permittee's operating hours and days of operation if the facility operation causes a nuisance to neighborhood uses.

MATERIAL HANDLING

2. The Facility is permitted to accept and handle Type A recyclable materials consisting of ferrous metal scrap; non-ferrous material; other metal scrap consisting of e-wastes such as televisions/CRTs/monitors, printers/faxes, computers, small appliances/plug-in units, and other consumer electronic devices; and batteries. The Permittee may also receive packaging materials (e.g. cardboard, wood, plastic, etc.) that are shipped with the above-authorized recyclables.

The Facility is not allowed to receive other recyclable materials not explicitly authorized above. The Facility shall not accept hazardous special waste, reactive metals, sealed containers, municipal solid waste, or stolen goods. The Permittee shall not accept charred wire unless it is accompanied by proper documentation stating that the material was obtained from a properly licensed company that uses adequate emission control devices for removing the wire coating.

The Permittee shall inspect all loads entering the Facility for unauthorized wastes. Loads containing waste other than recyclable materials as authorized above shall not be accepted at this Facility.

3. The Permittee shall handle all unauthorized wastes inadvertently admitted into the Facility as follows:
 - a. The Permittee shall separately containerize special waste, including hazardous waste, non-hazardous special waste, and PCB waste, and arrange for the immediate removal of such waste by a waste hauler authorized to accept such wastes for transport to a disposal facility that has obtained all necessary Federal, State, and local authorization.
 - b. The Permittee shall isolate reactive metals upon discovery and place such material in a sealed, waterproof container. The Permittee shall arrange for proper disposal of the reactive metals and shall immediately notify the CDPH.
 - c. The Permittee shall isolate all municipal solid waste and properly store such waste in an enclosed waste receptacle for disposal at a properly permitted facility.

ATTACHMENT B SPECIAL CONDITIONS

- d. The Permittee shall isolate all suspected stolen property upon discovery and immediately notify the City of Chicago Police Department (“CPD”).
 - e. After unauthorized waste has been removed from the Facility, the Permittee shall thoroughly clean the affected area in a manner consistent with the type of unauthorized waste managed.
4. The Permittee shall not accept, receive, purchase or acquire any material that is delivered to the Facility in any city- owned or government-owned garbage container or cart; or city-owned or government-owned recycling container or cart; or retail store shopping cart of the type commonly provided by big-box stores and supermarkets for use by customers to transport merchandise to the checkout counter during shopping.
5. The Permittee may accept regulated or prohibited recyclable materials as defined in [the Ordinance and the Regulations](#) under the following conditions:
 - a. The regulated or prohibited material is consistent with the types of recyclable materials authorized under Special Condition No. 2;
 - b. The Facility follows all surveillance requirements specified in 11-4-2640(g) of [the Ordinance](#); and
 - c. The Permittee complies with the documentation requirements set forth in Section 9 of [the Regulations](#).
6. The Facility may receive and process no more than 450 tons per day of recyclable materials as authorized in Special Condition No. 2. If the Permittee desires additional capacity, the Permittee must submit a revised application to the CDPH for approval. A revised application must demonstrate that the Facility is adequately handling the currently permitted volumes and is sufficiently sized and staffed to accept, store, and process the desired quantity of material.
7. The Permittee shall not unload, load, store, process, or otherwise handle recyclable materials outdoors at the Facility. Such operations shall be conducted wholly inside the Facility building.
8. When transporting material to and from the site, the material shall fit entirely within the truck or trailer. Additionally, the truck or trailer shall have its tailgates in place, and the load covered with a tarp as necessary to control dust or loss of material.
9. When transporting material to and from the site, the Permittee shall prevent any fluids or material from spilling into the streets.
10. Material handling at the Facility shall be limited to baling with a horizontal baler; disassembling of E-Waste; and sorting. The Permittee is authorized to move materials at the Facility with the aid of skid-steers; fork lifts; and conveyors.

REFRIGERANTS

11. If the Facility accepts any small appliance, room air conditioning appliance, motor vehicle air conditioner (MVAC), or MVAC-like appliance, as those terms are defined in [40 CFR Part 82 Subpart F](#), where applicable, the Permittee shall comply with all requirements of [40 CFR Section 82.156](#)(f) in connection with any such appliance or item. Specifically, the Permittee shall either:
 - a. Verify that the refrigerant was evacuated from the appliance or item in

ATTACHMENT B SPECIAL CONDITIONS

accordance with [40 CFR Section 82.156\(f\)](#) by:

- i. Obtaining a written and signed statement from each customer stating that all refrigerant was removed in accordance with EPA standards. This statement must include the name and address of the person who removed the refrigerant and the date the refrigerant was removed; or
- ii. Maintaining a contract between the Permittee and the customer that specifies that refrigerant will be properly removed before delivery.

or

- b. Recover any remaining refrigerant from the appliance in accordance with [40 CFR Section 82.156\(f\)](#) using EPA-certified refrigerant recovery equipment;

12. The Permittee shall not accept any appliance or item that has been previously vented of CFCs without the proper documentation in Special Condition 11(a) above.

BATTERIES

13. The Permittee shall properly dispose of or recycle all batteries offsite within one calendar year of their receipt at the Facility.

14. Batteries shall be stored inside the building, away from sources of heat, spark, and open flame, and isolated from incompatible materials.

15. The Permittee shall store batteries, other than lead-acid batteries, inside a non-conducting, leak proof, and acid-resistant container with no evidence of leakage, spillage, or damage. The Permittee shall take all appropriate measures to prevent the batteries from short circuiting. Such measures shall include, but not be limited to, the covering of terminals or individually wrapping each battery in a plastic bag.

16. The Permittee shall label each battery or battery container with any one of the following phrases: i) Universal Waste Batteries; or ii) Waste Batteries; or iii) Used Batteries.

17. The Permittee shall store lead-acid batteries as follows:

- a. Place lead-acid batteries on acid resistant pallets. The Permittee shall only use pallets with no broken or missing boards and free of protruding nails.

Working lead-acid batteries intended for resale at the Facility may be stored on racks in accordance with Special Condition No. 23;

- b. Lead-acid batteries shall be stacked no more than three layers high. Layers of cardboard, waffle board, or similar materials shall be placed between all battery layers, underneath the bottom layer and over the top layer to prevent puncturing and short circuiting.

18. The Permittee shall handle damaged batteries and conduct the clean-up of released acids as follows:

- a. Damaged or leaking batteries shall be placed in a structurally sound, acid-resistant, and leak-proof container. Such containers shall be kept closed at

ATTACHMENT B SPECIAL CONDITIONS

all times when not placing or removing batteries.

- b. Spilled acids shall be neutralized with an appropriate base solution, and disposed of properly.

MATERIAL STORAGE

19. The Permittee shall always store materials within the permitted property. At no time shall material be stored on neighboring properties or the public way.
20. The Permittee shall maintain a minimum aisle width of 36 inches, or wider to accommodate workers, equipment, cleaning, and emergency response.
21. The Permittee shall handle and store all recyclable materials that may leak fluids or leave an oily residue on a dedicated, impervious concrete pad. The concrete pad shall be sloped, bermed, or otherwise constructed to minimize storm water run-on and run-off and facilitate the capture and collection of fluids. The Permittee must properly dispose of all liquid waste collected at the Facility.
22. The Permittee shall segregate and store recyclable materials in durable receptacles or enclosures such as drums, boxes, bins, or storage bunkers. The Permittee may store recyclables in cardboard boxes provided they are placed indoors, on pallets or otherwise kept off the ground.
23. The Permittee may store recyclable materials on sturdy racks or shelving provided the stored materials are kept at least 18 inches off the ground and are not leaking.
24. The Permittee shall store newsprint, paper, corrugated paper and cardboard in closed containers.
25. The Permittee shall clearly mark all storage receptacles with the type of recyclable material stored. Letters shall not be less than three inches high, outward facing and not hidden. The Permittee shall not deposit other materials than that specified on the receptacle.
26. The Permittee shall maintain the area surrounding all storage containers in a clean and neat manner. No recyclable materials or waste materials of any kind shall be allowed to accumulate around any receptacle or to overflow from any receptacle.
27. The Permittee may not store recyclable materials at the Facility for a period longer than 90 days except materials ready for shipment offsite as finished product or raw material in the manufacturing of new, reused or reconstituted products.
28. The Permittee shall store all waste materials in such a way as to ensure adequate site safety. Flammable materials shall be stored away from sources of heat, sparks and open flames, and in accordance with applicable fire codes. Incompatible materials shall be segregated or stored away from each other.
29. The Permittee shall ensure that all tanks, drums or other vessels containing liquid materials such as, but not limited to, solvents and petroleum products, are:
 - a. Kept in good condition. The Permittee shall immediately replace, repair, or overpack damaged containers;

ATTACHMENT B SPECIAL CONDITIONS

- b. Compatible with their contents to avoid reactions or impairment of the container's integrity;
- c. Always be closed except when adding or removing materials;
- d. Appropriately labeled in accordance with all local, state, and federal requirements; and
- e. Are provided with secondary containment complying with all local, state, and federal requirements.

SITE REQUIREMENTS

- 30. The Permittee shall pave and maintain all material handling areas, driveways, and access/haul roads to prevent migration of contaminants off-site. The acceptable paving material shall include, but not be limited to, asphalt, concrete or gravel. The CDPH reserves the right to require any additional or alternate paving as deemed necessary by CDPH.
- 31. The 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, the types of materials prohibited, and the Facility's operating hours.

HOUSEKEEPING, DUST CONTROL, AND MAINTENANCE

- 32. The Permittee shall sweep Facility pavements and affected adjacent streets each working day, and on an as-needed basis. Such sweeping shall be performed using a mechanical street sweeper to effectively remove dust and litter.
- 33. The Permittee shall make a water source available at all times for purposes of Facility cleaning, dust control, and fire safety.
- 34. The Permittee 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. This control and suppression may include, but are not limited to:
 - a. Employing watering methods as often as necessary;
 - b. Sheltering dust-emitting activities from the wind or suspending such activities during high wind conditions; and
 - c. Enclosing and containerizing materials that are susceptible to becoming wind-borne.
- 35. The Permittee shall promptly repair damaged or broken pavements to sustain their integrity, prevent standing water, and minimize the generation of dust and mud. The Permittee shall promptly backfill all potholes and depressions at the Facility with aggregate or suitable fill material. In addition, The Permittee shall resurface worn gravel pavements with fresh aggregate as needed.
- 36. The Permittee shall place garbage inside a covered container. The Permittee shall not allow such containers to overflow and shall immediately empty or remove and replace them when full.
- 37. The Permittee shall install and maintain filter inserts in all Facility catch basins and storm water

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inlets to keep sediments, oily liquids, and floatables from discharging into the City of Chicago sewer system.

38. The Permittee shall promptly contain, and clean-up spilled or leaked fluids. The Permittee shall provide spill response kits in all areas of the Facility where chemical, oil, and fuel spills or leaks of one gallon or more may occur. Such kits shall be fully stocked with appropriate materials such as socks, brooms, adsorbent material, and proper personal protective equipment.
39. The Permittee shall routinely remove oil and grease stains from site pavements, walls, and equipment by steam cleaning, pressure washing, or scrubbing these surfaces clean. Such cleaning shall be conducted at least bi-weekly and as needed.
40. The Permittee shall inspect the Facility for vectors twice per month or retain the services of a vector control specialist to conduct said inspections. The Permittee shall employ vector control measures that may include, but are not limited to, bait stations and traps, as often as necessary.
41. The Facility shall have personnel for patrolling adjacent properties for litter. The Permittee shall promptly remove and dispose of any litter that is observed at any affected off-site areas.
42. The Permittee shall always maintain the streets, sidewalks and sewers adjacent to the Facility, free and clear of all material and debris transported to or from, handled or stockpiled at the Facility.
43. The Permittee shall follow applicable requirements in [Part 722](#) of the Illinois Administrative Code, Title 35 in the management and disposal of potentially hazardous waste such as, but not limited to, spilled battery acids, mercury-containing waste, and spent oils or chemicals.

RECORD KEEPING

44. All logs, receipts, and other documentation required under this permit shall be kept at the Facility a minimum of three years and shall be made available to the CDPH and the CPD upon request.
45. The Permittee shall maintain a written record of all vector inspections and vector control installations including date, time and a detailed description of each inspection and any installations or applications to control vectors.
46. The Permittee shall keep a log of liquid waste pickups that documents the dates and the volumes of liquid waste removed and disposed of offsite. Further, the Permittee shall keep all disposal receipts as proof of proper waste disposal.
47. The Permittee shall maintain a log of all vehicles entering and leaving the Facility. This log shall indicate the date, vehicle type, hauling company name if any, and the material type and quantity being transported. The Permittee shall maintain copies of all load ticket receipts.
48. The Permittee shall maintain a written log documenting all cleaning and maintenance activities performed at the Facility under the Housekeeping, Dust Control, and Maintenance section of this permit. Such log shall include a description of the cleaning operation or maintenance activity performed, the signature of the employee that performed it, and the date and time the employee started and completed the task.

ATTACHMENT B SPECIAL CONDITIONS

49. The Permittee shall maintain a written record of all emergencies occurring at the Facility, including the date and time of each incident, along with a detailed description of the emergency. The Permittee shall notify the CDPH each day that the Facility is affected by the emergency. Such notification shall be sent by email to EnvWastePermits@cityofchicago.org.
50. The Permittee shall timely comply with the requirements contained in [Chapter 11-5](#), Reduction and Recycling Program of the Chicago Municipal Code. The Permittee shall submit annual reports to the Department of Streets and Sanitation (“DSS”) Recycling Coordinator, on forms provided by the DSS.

SITE SAFETY

51. The Permittee shall undertake all necessary steps to ensure that the Facility is secure from unauthorized entry, is sufficiently screened from the surrounding area and is adequately lighted after dark.
52. The Permittee shall provide training to all Facility employees on fire prevention, emergency procedures and hazardous material identification and handling procedures.
53. The Permittee shall install and maintain fire suppressant equipment in accordance with the Municipal Code of the City of Chicago.
54. The Permittee shall correct all violations identified by the City of Chicago Fire Department inspections. Failure to comply with these actions may result in revocation of this permit.

PERMITS

55. The Permittee shall maintain an active Certificate of Operation from the CDPH, pursuant to Section [11-4-660](#) of the Code, for all existing regulated equipment or areas requiring an Air Pollution Control (APC) permit. The Permittee shall obtain an [APC Permit](#) from CDPH, pursuant to Section [11-4-620](#) of the Code, for any new regulated equipment or area installed at the Facility.
56. The Permittee shall acquire all necessary permits and approvals for the Facility including but not limited to those required by the CDPH, Department of Business Affairs and Consumer Protection, Zoning Board of Appeals, Metropolitan Water Reclamation District of Greater Chicago and the IEPA. The Permittee shall provide copies of all such permits and approvals to the CDPH upon request.
57. The Permittee shall always maintain copies of all Facility permits on site and shall make these available for inspection upon request by the CDPH.

CLOSURE

58. If the Permittee permanently closes or ceases operations at the site (“closure”), the Permittee must submit a written closure notification to the CDPH within 30 days of closure. If the permit is not renewed for any reason, or the Permittee ceases operations at the site, the Permittee must clean up, remove and properly dispose of or recycle all material and waste on the site within 30 days of permit expiration or closure. The Permittee must submit disposal and recycling receipts as proof of proper disposal.

ATTACHMENT B SPECIAL CONDITIONS

VEHICLES

59. Every vehicle used by the Facility for the collection, transportation or disposal of any recyclable material shall display on each side of the vehicle in letters not less than two inches in height, in contrasting color, the name, address, telephone number and permit number of the recycling facility.

VARIANCES

60. The Permittee may stockpile metal and plastic recyclables outdoors in concrete bunkers. Such recyclables shall be completely drained of all fluids prior to their placement in a bunker. Outdoor stockpiles may not exceed the height of its containing bunker or be taller than 20', whichever height is shorter.

Reserve, FTL, LLC dba Reserve Marine Terminals
11600 S. Burley Ave., Chicago, IL 60617
T: 773-721-8740; F: 773-721-8798

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

February 27, 2020

RE: Supplemental information Reserve FTL Recycling Facility permit renewal – ENVREC102879

Dear Mr. Marante,

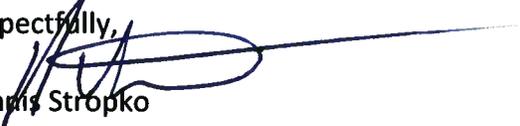
This letter is being submitted to provide supplemental information for the Reserve FTL, LLC dba Reserve Marine Terminals, Recycling Facility Permit renewal application submitted in May, 2019. This additional information is in response to a telephone conversation we had in January, 2020 regarding clarification of an indoor sand screening process now operating at the facility.

Overview: Reserve Marine Terminals recently added a screening operation to its recycling capabilities at the South Burley campus. This operation consists of a small crusher unit, screeners, conveyors, dust collector, and magnetic separation equipment in an indoor setting. The operation receives around 60 tons/day and the plant throughput averages 7.5 tons/hour or around 60 tons/day. We have attached a Process Flow diagram for your information. Final products include an iron/metal component that is shipped to consumers, and a sand/non-magnetic component that is suitable for use as trench fill, road base and other beneficial reuse applications. Prior to this process, this material was all going to a landfill for disposal. A City Air permit and related fees have been submitted for this equipment/process.

1. Total capacity: with the addition of this process, the RMT operation has capacity to receive/process an average of 750 Tons/Day, as reflected in the application. We remain within the Daily Tonnage Rate Of 500 - 1,000 tons/daily. We do wish to increase the average number of employees to 50 – this was an oversight in the last submittal.
2. Documentation of approved beneficial use of sand commodity. See attached excerpt from State Lab report regarding analysis and approved use of this material.

Should you have additional questions, please call or email me at 440-287-7216 or dennisstropko@reserve-group.com, respectively.

Respectfully,


Dennis Stropko

Attachments

**RMT Screening Operation
Process Flow**





PDC Technical Services, Inc.

4349 Southport Road, P.O. Box 9071
Peoria, Illinois 61615
309.676.4893
www.pdcarea.com

March 1, 2019

Mr. Eric Mundy
Reserve Marine Terminals
11600 South Burley Ave.
Chicago, IL 60617

**Re: Beneficial Use of Spent Foundry Sand
Summary Report**

Dear Mr. Mundy:

INTRODUCTION

This letter summarizes the services that PDC Technical Services, Inc. (PDC Tech) has performed to identify the environmental regulatory requirements related to Reserve Marine Terminals' potential beneficial use of spent ferrous metal foundry sand in Illinois. PDC Tech's services were performed in accordance with our proposal dated June 12, 2018, as authorized by Mr. Eric Mundy of Reserve Marine Terminals (RMT) on February 13, 2019.

The scope of our work included the following:

- Provide RMT personnel with detailed instructions, sample containers and chain-of-custody forms for RMT's use in collecting spent foundry sand samples in conformance with ASTM D2234.
- Extract leachate from two samples of spent foundry sand provided by RMT, using method ASTM D3987,
- Analyze the leachate extracts for the constituents listed at 35 Illinois Administrative Code (IAC) 817.106(a),
- Classify the spent foundry sand samples in accordance with 35 IAC 817.105,
- Investigate the regulatory requirements for beneficially using spent ferrous metal foundry sands in Illinois, and
- Prepare this report.

WASTE CLASSIFICATION

The McHenry, Illinois laboratory of PDC Laboratories, Inc. (PDC Labs) received two samples of spent foundry sand from RMT under chain-of-custody protocol on January 11, 2019. One sample was labeled “RMR Sand”, the other “AMR Sand”.

PDC Labs first extracted leachate from each sample in accordance with ASTM D3987, then analyzed the extracts for the constituents listed in 35 IAC 817.106(a) using appropriate U.S. EPA test methods. The analytical report and chain-of-custody documentation are provided as Attachment 1 to this report.

Following receipt of the analytical report, PDC Tech compared the analytical results to the waste classification criteria provided at 35 IAC 817.106(a). A table showing the comparisons is provided as Attachment 2 to this report.

The analytical results for both the RMR and AMR Sands meet the 35 IAC 817.106(a) criteria for “Beneficially Usable Wastes”. We note that cadmium in the RMR Sand sample was detected at the Maximum Allowable Leaching Concentration (MALC) for Beneficially Usable Wastes, whereas lead in both samples were just below the MALC for Beneficially Usable Wastes.

REGULATORY REQUIREMENTS

PDC Tech investigated the regulatory requirements that are applicable for beneficially using spent ferrous metal foundry sands that meet the Beneficially Usable Waste criteria at 35 IAC 817.106(a). Our analysis is based on a review of 35 IAC Part 817, a teleconference with senior Illinois Environmental Protection Agency (IEPA) Bureau of Land personnel, and our extensive experience with waste management and permitting requirements in Illinois. A copy of 35 IAC 817 Subparts A and B (i.e. those subparts applicable to Beneficially Usable Wastes) is provided as Attachment 3 to this report.

Pertinent regulatory requirements are summarized below:

- The requirements listed herein only apply to spent ferrous metal foundry sands which are produced by steel and foundry processes covered by SIC Codes 331 and 332 (with the exception of SIC Code 3312), and foundry processes at business operations whose primary SIC Code is not included within SIC Code 332.
- Pursuant to 35 IAC 817.101(f), spent ferrous metal foundry sand may be used as an ingredient in an industrial process to make a product without additional testing or notification.
- Pursuant to 35 IAC 817.101(d), spent ferrous metal foundry sand meeting the Beneficially Usable Waste criteria may be used for road base, construction fill used to raise or level grades for general construction projects, utility trench backfill, and other similar uses provided:

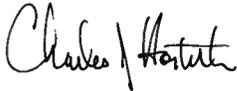
- Although specific approval for these uses is not required, the generator must notify the IEPA of its intent to use the spent foundry sand for an approved beneficial use. A notification must be provided for “each new recipient” of the waste, and for “each new use location” (interpreted to mean each property owner and each property on which the material will be beneficially used). Information that is to be included in each notification is listed at 35 IAC 817.203(b). This includes a nominal amount of additional physical and analytical testing.
- The generator must certify that the spent foundry sand meets the Beneficially Usable Waste criteria, is produced at facilities with the above-listed SIC Codes, and testing is conducted (as described in the next bullet point) to demonstrate that the spent foundry sand meets the Beneficially Usable Wastes criteria. A copy of the certification must be attached to the Bill of Lading for each shipment of spent foundry sand from the generator to the location at which it will be beneficially used.
- The spent foundry sand must be tested at least once annually to confirm that the material meets the Beneficially Usable Wastes criteria. Additional (i.e. more frequent) testing is required if:
 - There is a change in the raw materials which could result in a change in the wastes’ classification,
 - There is a modification to the process which generates the waste that could result in a change in the waste’s leaching characteristics, or
 - There is an addition of a new process which may generate a new waste material.
- The spent foundry sand is shipped directly from the generator to the property at which the sand will be used, without stockpiling or transfer at an intermediary location (see discussion, below).
- Spent foundry sand stockpiles must be properly managed to ensure that the stockpiles do not result in a dust or runoff nuisance or violations of the Illinois Environmental Protection Act (or Illinois environmental regulations).
- Access to spent foundry sand stockpiles and placement areas shall be restricted to authorized personnel only.
- Stockpiles which have neither received additional spent foundry sand, or from which spent foundry sand has not been removed within the preceding year must be closed as a landfill pursuant to 35 IAC 817 Subpart C (an up to six-month extension may be requested of the IEPA under certain conditions).
- Spent foundry sand must be transported directly from the waste generator to the point of use without being transferred to other vessels, trucks, containers, railcars, etc., except at a permitted waste transfer station. Legal interpretations of what constitutes waste transfer

is broad, but some narrow exceptions may exist. We note that new waste transfer stations must undergo local siting approval pursuant to the Illinois Environmental Protection Act prior to applying for a permit from the IEPA.

- Significantly more regulatory requirements apply to spent foundry sand that is used for land reclamation. According to the IEPA, there is no applicable regulatory definition of “land reclamation”, but filling a quarry would be considered to be land reclamation.

We trust that this letter and attachments provide the information required at this time to allow Reserve Marine Terminals to determine the feasibility of beneficially using spent foundry sand in Illinois. Please contact either of the undersigned if you have any questions or comments.

Sincerely,
PDC Technical Services, Inc.



Charles J. Hostetler, Ph.D.
Director – Environmental Sciences
(309) 495-1568
chostetler@pdcarearea.com



George L. Armstrong, P.E.
Vice President
(309) 495-1566
garmstrong@pdcarearea.com

- Attachments: 1 - Analytical Report and Chain-of-Custody
2 - Comparison of Analytical Results to Maximum Allowable Leaching Concentration for Beneficially Usable Wastes
3 – 35 Illinois Administrative Code 817 Subparts A and B

s:\19-0902 reserve group bud\documents\foundry sand beneficial use requirements.docx



**CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
PERMITTING AND ENFORCEMENT**

NARRATIVE EVALUATION

INSPECTION DATE: 09/01/2021
 SITE NAME: 11600 S Burley Ave
 SITE ADDRESS: 11600 S BURLEY AVE, CHICAGO, IL 60617
 SITE CODE: 11600 S Burley Ave
 PERMIT #: ENVGEN1414542

TIME: 6:30 pm
 EMPLOYEE:STEPHANIE SAMPRA
 COUNTY:COOK / CHICAGO
 INSPECTION #: 1703843

SUMMARY

On September 1, 2021, an inspection in regards to operations was conducted at 11600 S Burley Ave. This inspection is part of the Health Impact Assessment (HIA) associated with a proposed large recycling facility on the property, as well as two pending permit applications from Reserve Management Group (RMG). A separate inspection (Inspection# 1725974) was conducted regarding demolition surveillance (roof collapse of an idle building) on September 10, 2021.

Onsite was CDPH (Renante Marante, Dave Graham, Eamon Reilly, and Stephanie Sampra), RMG (Hal Tolin, Adam Labkon, Jim Kallas, and the RMG safety manager, and USEPA (David Ogulei). Photos were taken by Eamon Reilly.

During the inspection we observed Reserve Marine Terminal (RMT), Napuck Salvage of Waupaca, Regency Technologies, and Southshore Recycling. This report focuses on the area of the property being used for the 'Foundry Sand' operations. We were informed of another operation, a part of RMT that is taking place on the southwest side of the 11600 S Burley Ave, called 'Foundry Sand'. RMG explained that RMT receives foundry ferrous slag to generate an iron product (two sizes) and a sand product. An iron material pile was observed directly outside of the building. The building did have an open doorway to enter the facility but spray misters were utilized to control the dust leaving the open doorway. Inside of the facility, we walked through inches of fine material accumulated on the floor, causing airborne particulate, and when viewing the ceiling and walls, a lot of openings were observed. We observed the machinery to crush and separate the magnet material, ferrous, from the slag. A screener, 2x crushers, 3x magnets, and a dust collector is utilized. Piles of fine materials were seen under the equipment. The process is not enclosed and a dust collector is only attached to one of the crushers.

On September 10, 2021 (inspection# 1725974), outside, on the most southern portion of property, a screener with multiple material piles from screening was observed. A ferrous slag pile with other debris, an iron pile, and sand berms was observed.

After the inspection, the external operations on the southern portion of the property was observed on Google Earth. Prior to 2019 (Google Earth Photo 10/15/2018), the southernmost property was unused as foliage was observed. In 2019 (as seen on the Google Earth Photo 10/8/2019), the southernmost property began operations, with a screener and storing material piles, as the foliage was seen removed.

REPORT COMPLETED? YES NO NOV ISSUED? YES NO
 INVESTIGATION COMPLETED? YES NO ATTACHMENTS? YES NO

I, STEPHANIE SAMPRA, an employee of the City of Chicago, Department of Public Health, declare that I have conducted an inspection of the above mentioned property on the date indicated. I further declare that the observations set forth on the report are true and accurate.

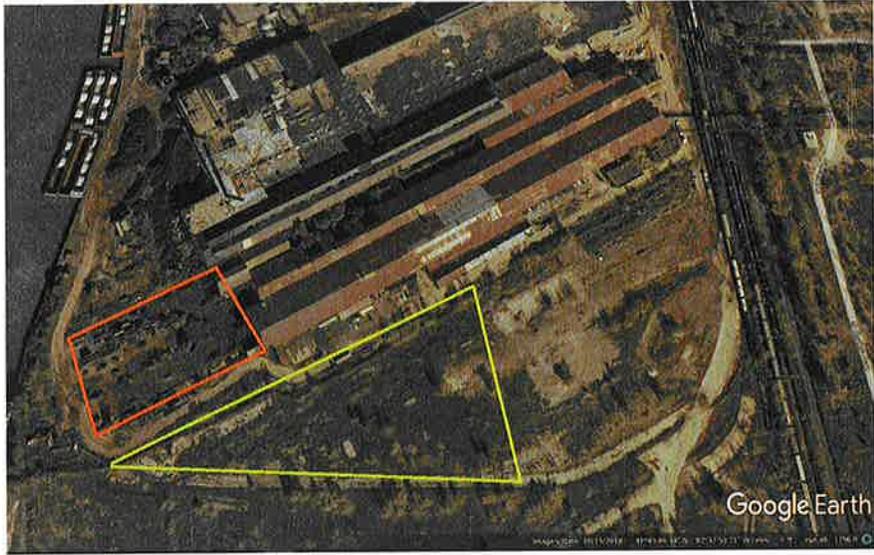
147

STAR #

 SIGNATURE

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: Google Earth image 10/15/2018 - future site of Foundry Sand operations with annotations.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: Google Earth image 10/15/2018 - future site of Foundry Sand operations.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
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PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: Google Earth image 10/27/2020 - Foundry Sand operations with annotations.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: Google Earth image 10/27/2020 - Foundry Sand operations.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
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COMMENTS: Google Earth image 10/8/2019 - Foundry Sand operations with annotations.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: Google Earth image 10/8/2019 - Foundry Sand operations.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
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PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: Google Earth image 5/21/2021 - Foundry Sand operations with annotations.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: Google Earth image 5/21/2021 - Foundry Sand operations.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



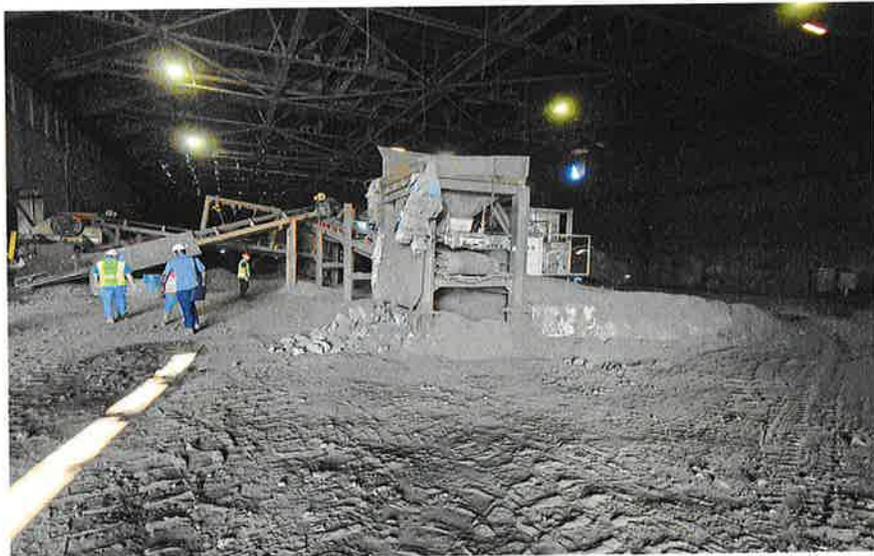
COMMENTS: September 1, 2021 - Foundry Sand operations. Accumulation of fine materials on floor and holes in the ceiling/roof.



COMMENTS: September 1, 2021 - Foundry Sand operations. Accumulation of fine materials on floor and holes in the ceiling/roof.



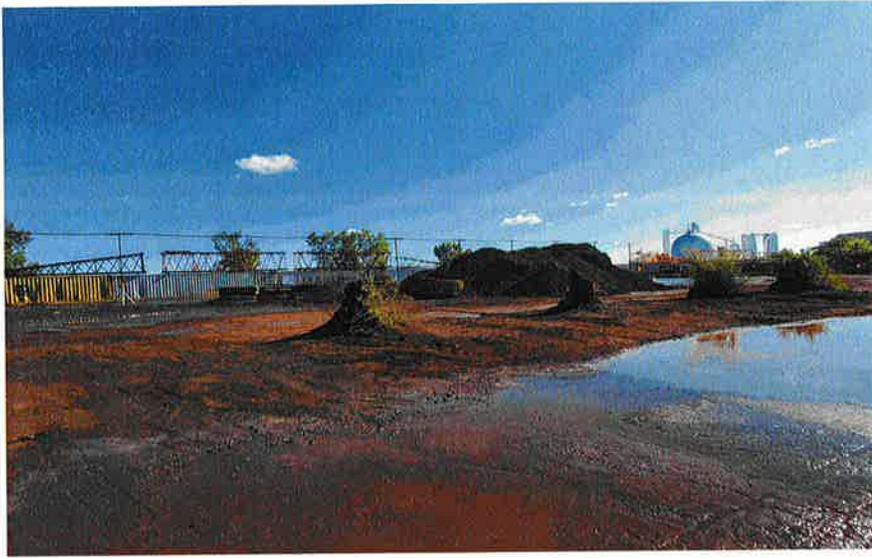
COMMENTS: September 1, 2021 - Foundry Sand operations. Accumulation of fine materials on floor and holes in the ceiling/roof.



COMMENTS: September 1, 2021 - Foundry Sand operations. Accumulation of fine materials on floor and holes in the ceiling/roof.

DATE: 09/01/2021
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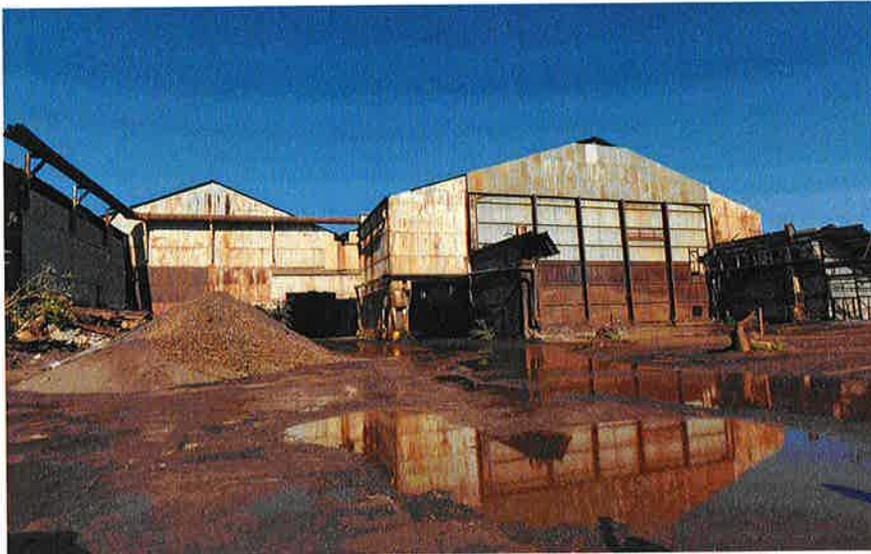
TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMBRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: September 1, 2021 - Looking southwest directly outside of the most southern building. Material piles observed.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

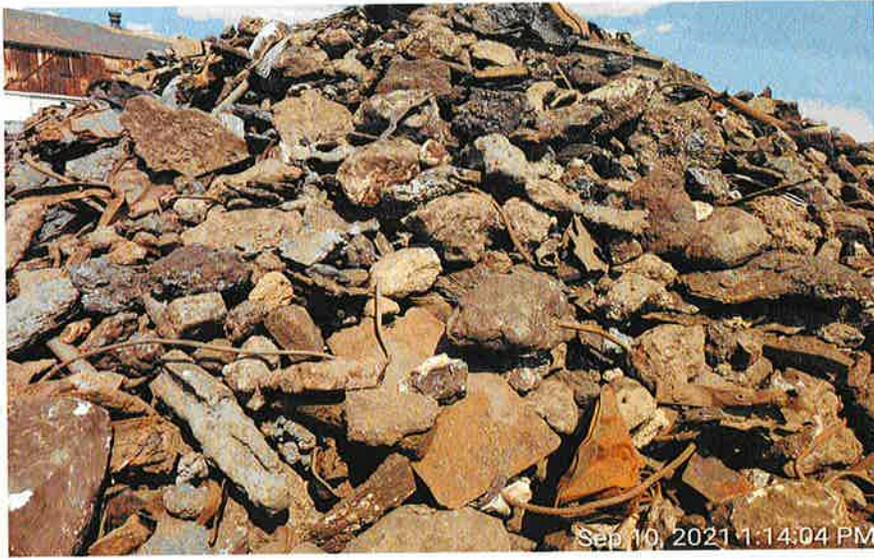
TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: September 1, 2021 - Outside of the most southern building, Foundry Sand operations occur. Spray mister seen at open doorway and a material pile observed.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

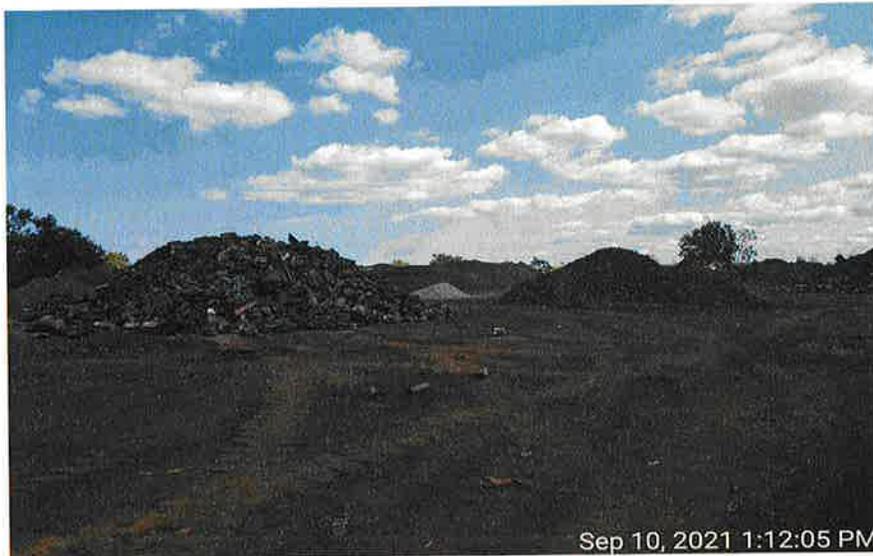
TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: September 10, 2021 - Foundry Sand operations on most southern portion of property. Mixed material pile of foundry ferrous slag and C&D debris.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



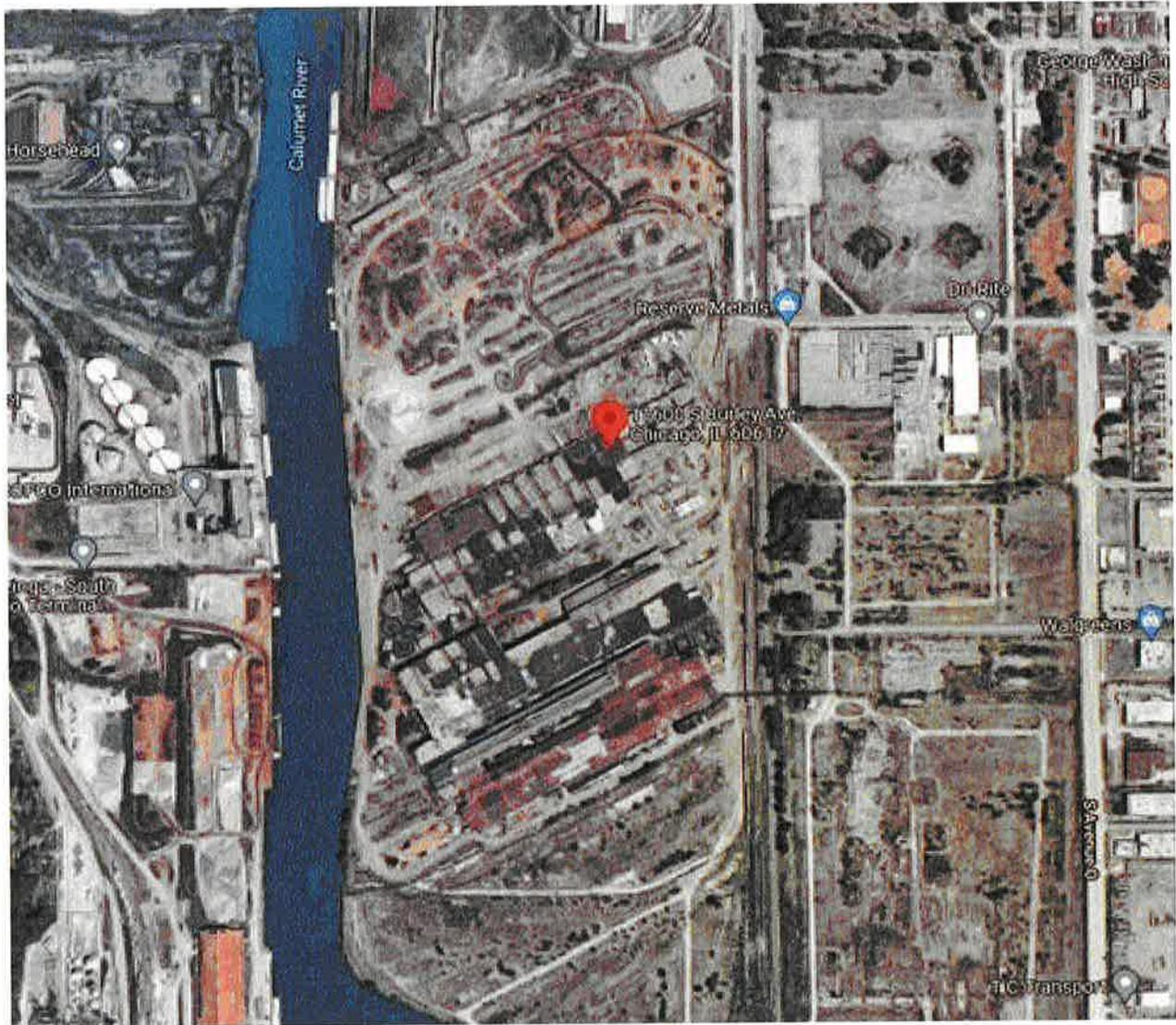
COMMENTS: September 10, 2021 - Foundry Sand operations on the most southern portion of the property. Material piles and sand berm observed.

DATE: 09/01/2021
SITE: 11600 S BURLEY AVE
SITE CODE: 11600 S Burley Ave
PERMIT #: ENVGEN1414542

TIME: 9/1/2021 6:30:00PM
INSPECTOR: STEPHANIE SAMPRA
COUNTY: COOK / CHICAGO
INSPECTION #: 1703843



COMMENTS: September 10, 2021 - Foundry Sand operations on the most southern portion of the property. Screener with piles observed.



*** Not drawn to scale.



SITE SKETCH

CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
PERMITTING AND INSPECTIONS

DATE:	September 1, 2021
TIME:	08:00 – 18:30
SITE ADDRESS:	11600 N Burley Ave
SITE CODE:	
INVESTIGATOR:	S. Sampra
COUNTY:	COOK COUNTY/CHICAGO



CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL PERMITTING AND INSPECTIONS

CITY OF CHICAGO

OTHER CDPH PERMITS

Permit Number	Permit Type	Expiration Date
ENVAIR181098	ENV_AIR	
ENVAIR181111	ENV_AIR	
ENVAIR181128	ENV_AIR	
ENVAIR181144	ENV_AIR	
ENVAIR997329	ENV_AIR	
ENVAIR997335	ENV_AIR	
ASTINS1302431	ENV_ASTINS	12/31/2020
ENVREC102877	ENV_RCYCLE	05/15/2021
ENVREC102879	ENV_RCYCLE	05/15/2022
ENVREC122597	ENV_RCYCLE	08/28/2021



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

866/273-5488 TTY

December 20, 2019

Hal Tolin
South Chicago Property Management, Ltd.
11600 S Burley Ave
Chicago, Illinois 60617

Certified Mail
Return Receipt Requested
7015 0640 0005 6905 8866
7015 0640 0005 6905 8873
Steven Joseph
Reserve Management Group
1831 E Highland Rd
Twinsburg, Ohio 44087

RE: Violation Notice A-2019-00200
I.D. 031600GYI
Site: 11600 S. Burley Ave, Chicago

IEPA - DIVISION OF RECORDS MANAGEMENT
RELEASE

NOV 25 2020

RECEIVED: JMR

Dear Mr. Tolin:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this letter. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the source wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the source wishes to enter into a CCA, the written response must also include proposed terms for the CCA that contains dates for achieving each commitment and may also include a statement that compliance has been achieved for some or all of the alleged violations. In order to increase the likelihood of the Illinois EPA accepting such terms, the written response should specifically propose them in a manner that can be formalized into an enforceable agreement between the Illinois EPA and the source. As such, proposed conditions should be as detailed as possible, including steps to be taken to achieve compliance, the manner of compliance, interim and completion dates, etc.

Page 2

Violation Notice A-2019-00200

South Chicago Property Management, Ltd.; I.D. 031600GYI

The Illinois EPA will review the proposed terms for a CCA provided by the source and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the source must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the source rejects the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to the prosecutorial authority.

Written communications should be directed to Yasmine Keppner-Bauman Illinois EPA, Bureau of Air, Compliance Unit, P.O. Box 19276, Springfield, Illinois 62794-9276. All communications must include reference to the Violation Notice number in this matter.

Questions regarding this matter should be directed to Yasmine Keppner-Bauman at 217/524-0908.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent E. Mohr Jr.", with a long horizontal flourish extending to the right.

Kent E. Mohr Jr., Manager
Compliance Section
Bureau of Air

KM:YKB

ATTACHMENT A

Based on observations by Daniel Delgado on October 31, 2019, and other available information:

VIOLATIONS:

1. Section 9(b) of the Act and 35 Ill. Adm. Code 201.142: South Chicago Property Management, Ltd., failed to apply for and obtain construction permits prior to the construction of various emission units located at its source at 11600 South Burley Avenue, Chicago, Cook County.
2. Section 9.12 of the Act: South Chicago Property Management, Ltd., failed to pay the appropriate construction permit fees for the construction of various emission units at its source located at 11600 South Burley Avenue, Chicago, Cook County.
3. Section 9(b) of the Act and 35 Ill. Adm. Code 201.143: South Chicago Property Management, Ltd., failed to apply for and obtain an operating permit prior to the operation of emission units at its source located at 11600 South Burley Avenue, Chicago, Cook County.
4. Section 9(a) of the Act and 35 Ill. Adm. Code 254.132(a) and 201.302: South Chicago Management, Ltd., failed to submit the requisite Annual Emissions Report ("AER") to the Illinois EPA for each calendar year for which it was required for its source located at 11600 South Burley Avenue, Chicago, Cook County.

RECOMMENDATIONS:

The Illinois EPA suggests that South Chicago Property Management, Ltd. take the following actions to address the violations stated above:

1. Within 45 days of receipt of this Violation Notice, submit to the Illinois EPA, Bureau of Air, Compliance Section, a clear and thorough presentation, including detailed calculations, of actual and potential emissions for all air pollutants, and a complete listing of all emission units and air pollution control equipment with initial dates of construction and operation, and any dates of subsequent modification for all its companies and their operations at its source located at 11600 South Burley Avenue, Chicago, Cook County.
2. Within 45 days of receipt of this Violation Notice, verify that the Lifetime Operating Permit application submitted to the Illinois EPA, Bureau of Air, Permit Section, in December 2019, for the source located at 11600 South Burley Ave, Chicago, Cook County is complete, true, and accurate.
3. Within 45 days of receipt of the Violation Notice, submit to the Illinois EPA, Bureau of Air, Compliance Section, all avoided construction permit fees for the emission units located at 11600 South Burley Ave, Chicago, Cook County.

ATTACHMENT A (continued)

RECOMMENDATIONS (continued):

4. Within 45 days of receipt of this Violation Notice, submit to the Illinois EPA, Bureau of Air, Compliance Section, all avoided operating permit fees for its source located at 11600 South Burley Ave, Chicago, Cook County.
5. Within 45 days of receipt of this Violation Notice, submit to the Illinois EPA, Bureau of Air, Compliance Section, complete, true, and accurate AERs for all years they are required for its source located at 11600 South Burley Ave, Chicago, Cook County.
6. Within 45 days of receipt of this Violation Notice submit to the Illinois EPA, Bureau of Air, Compliance Section, a Fugitive Particulate Operating Program which includes all South Chicago Property Management, Ltd. Companies and their operations located at its source at 11600 South Burley Avenue, Chicago, Cook County.



**IN THE CITY OF CHICAGO, ILLINOIS
DEPARTMENT OF ADMINISTRATIVE HEARINGS**

CITY OF CHICAGO , a Municipal Corporation, Petitioner,)	Address of Violation:
v.)	11600 S Burley
Reserve Flt Llc)	
11600 S BURLEY AVE)	Docket #: 19DE000186
CHICAGO, IL 60617)	Issuing City
Respondent.)	Department: Environment

FINDINGS, DECISIONS & ORDER

This matter coming for Hearing, notice given and the Administrative Body advised in the premises, having considered the motions, evidence and arguments presented, IT IS ORDERED: As to the count(s), this tribunal finds by a preponderance of the evidence and rules as follows:

<u>Finding</u>	<u>NOV#</u>	<u>Count(s)</u>	<u>Municipal Code Violated</u>	<u>Penalties</u>
City non-suit	E000035474	1	11-4-760(a) Failed to take reasonable precautions to minimize air pollution while handling a substance or material that may become airborne or be scattered by the wind.	\$0.00
Liabe - By plea	E000035474	2	11-4-2520 Permit--Required.	\$1,000.00

Sanction(s):

Admin Costs: \$40.00

JUDGMENT TOTAL: \$1,040.00

Balance Due: \$1,040.00

Respondent is ordered to come into immediate compliance with any/all outstanding Code violations.

ENTERED: Margaret G. Plesh 35 Sep 5, 2019
 Administrative Law Judge ALO# Date

This Order may be appealed to the Circuit Court of Cook Co. (Daley Center 6th Fl.) within 35 days by filing a civil law suit and by paying the appropriate State mandated filing fees.

Pursuant to Municipal Code Chapter 1-19, the city's collection costs and attorney's fees shall be added to the balance due if the debt is not paid prior to being referred for collection.



ADMINISTRATIVE NOTICE OF ORDINANCE VIOLATION
 In the City of Chicago Department of Administrative Hearings
 City of Chicago, a Municipal Corporation, Petitioner, vs.

Respondent if Chicago Business, use name on license Last Name, First Name MI
RESERVE FTL LLC

Resp. Address No. Dir. Street Name ST Suffix Apt./Ste.
11600 S BURLEY AVE

City State ZIP
CHICAGO IL 60617

Person Served if other than the respondent Last Name, First Name MI
TOLIN HAL

Phone Acct. No. or DREV No. on business license
773 721 8740

Identification DLN/ID DLN State D.O.B. (M/D/Y)
 DLN/ID IL Other: / /

Height Weight Sex Race Eyes Hair Service Request Number
 /

Officer, Investigator, Inspector, and/or Complainant on oath states that the Respondent did then and there violate the following section(s) of the Municipal Code of Chicago:

ca 300-1000

cll 1,000-3,000

COUNT	OTHER: TITLE CHA. SEC.	RULE
DUMPING ON REAL ESTATE WITHOUT A PERMIT 7-28-440	211-4-2520	
OPERATING A FACILITY WITHOUT A PERMIT (11-4-030	Offense (if other):	PERMIT VIOLATION
HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE 11-4-760		OF SPECIAL CONDITION #32
TREATMENT AND DISPOSAL OF SOLID OR LIQUID WASTE 11-4-1500	COUNT OTHER: TITLE CHA. SEC.	RULE
SANDBLASTING, GRINDING, CHEMICAL WASHING VIOLATION (11-4-2190	Offense (if other):	
RECYCLING FACILITY PERMIT 11-4-2520		
CONSTRUCTION SITE CLEANLINESS (13-32-125(2)		

E000035474 16

You Must Describe Actions for Each Count below:

Count 1 In That: RESPONDENT FAILED TO TAKE REASONABLE PRECAUTIONS TO MINIMIZE WINDBORNE PARTICULATE MATTER.

Count 2 In That: RESPONDENT FAILED TO CONTROL DUST FROM MIGRATING OFF-SITE FROM BARGE LOADING/UNLOADING OPERATIONS.

Violation Location Nos. Dir. Street Name in the City of Chicago, County of Cook ST Suffix
11600 S BURLEY

Viol. Date: Mo/Day Year Time of Violation AM PM Notice Date: Mo/Day Year of Notice
06 27 20 19 2:00 PM 07 03 20 19

Complainant's Name if not issuing officer, investigator, or inspector Public Health (Environment) Version 10-24-15

Unit Star / Badge Signature of issuing officer, investigator, or inspector
P&I 82 X [Signature]

Administrative Hearing Appearance

IMPORTANT: You must appear for a mandatory hearing on:

Date: Mo/Day Year Time AM PM at: 400 W. Superior Room No.
09 05 20 19 1:00 PM 112

FAILURE TO APPEAR may result in the imposition of a fine not to exceed the maximum penalties for each violation as specified in the Municipal Code of Chicago plus costs, restitution, and fees. Failure to comply with the administrative law judge's order may result in the issuance of additional sanctions.

I acknowledge receipt of this notice. Signature of Respondent or Person Served: **X [Signature]** **E**

Comments
11-4-760(a)



CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
PERMITTING AND ENFORCEMENT

NARRATIVE EVALUATION

INSPECTION DATE: 06/27/2019
SITE NAME: Reserve Marine Terminals
SITE ADDRESS: 11600 S BURLEY AVE, CHICAGO, IL 60617
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 2:45 pm
EMPLOYEE: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670

SUMMARY

While I was carrying out a follow up inspection of American Zinc Recycling (AZR); with Michael Enos (CDPH environmental engineer); we observed plume of windborne particulate matter from barge loading, across the Calumet River. After completing the inspection of AZR, we proceeded to the location of the windborne particulate matter plume for inspection. Today was partly cloudy, temperature: high 88 degree F, low 67 degree F, wind: South at 16 mph; gust 0 mph, according to Weather Underground. Upon arrival we met Messrs. Hal Tolin (The Facility Co-Chief Operating Officer); and Ron Trivisonno (The Facility Plant Manager); for Reserve Marine Terminal, a permitted class II-B Recycling Facility. The two men took us around the facility for today's inspection, after a brief meeting. Summary of the facility PROCESS DESCRIPTION, according to Hal Tolin: The facility receives from customers, metal/iron from junk vehicles, demolition materials etc. which could be processed through screening, manual sorting, touch cutting, shear and bale/compacting. The facility has capacity for rail, barge and truck loading/unloading of metal/iron scrap.

Today's inspection revealed the following:

- 1) 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 (Please see photo #s 1, 2, 3, 4, 5, 6, 7, 8, 9, & 10);
2) I observed the plume of windborne particulate matter from the barge loading operations of metal scrap migrating off-site (Please see photo #s 1, 6 & 10),
3) I observed plume of windborne particulate matter from pile of metal scrap processing (see photo #s 11 & 12).

Reserve Marine Terminals was served with notice of violation # E000035474 for the municipal codes violations 11-4-760 (a) (Handling of material susceptible to becoming windborne), 11-4-2520 (Permit violation of special condition #32). Hearing date pending for 9/5/2019. Follow up inspection the week of July 01, 2019. See the attachments

REPORT COMPLETED? [X] YES [] NO NOV ISSUED? [X] YES [] NO
INVESTIGATION COMPLETED? [X] YES [] NO ATTACHMENTS? [X] YES [] NO

I, EMMANUEL ADESANYA, an employee of the City of Chicago, Department of Public Health, declare that I have conducted an inspection of the above mentioned property on the date indicated. I further declare that the observations set forth on the report are true and accurate.

82

STAR #

Handwritten signature of Emmanuel Adesanya

SIGNATURE

DATE: 06/27/2019

SITE: 11600 S BURLEY AVE

SITE CODE: Reserve Marine Terminals

PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM

INSPECTOR: EMMANUEL ADESANYA

COUNTY: COOK / CHICAGO

INSPECTION #: 678670



COMMENTS:

DATE: 06/27/2019

SITE: 11600 S BURLEY AVE

SITE CODE: Reserve Marine Terminals

PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM

INSPECTOR: EMMANUEL ADESANYA

COUNTY: COOK / CHICAGO

INSPECTION #: 678670



COMMENTS: Photo # 09 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019

SITE: 11600 S BURLEY AVE

SITE CODE: Reserve Marine Terminals

PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM

INSPECTOR: EMMANUEL ADESANYA

COUNTY: COOK / CHICAGO

INSPECTION #: 678670



COMMENTS: Photo # 1 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019

SITE: 11600 S BURLEY AVE

SITE CODE: Reserve Marine Terminals

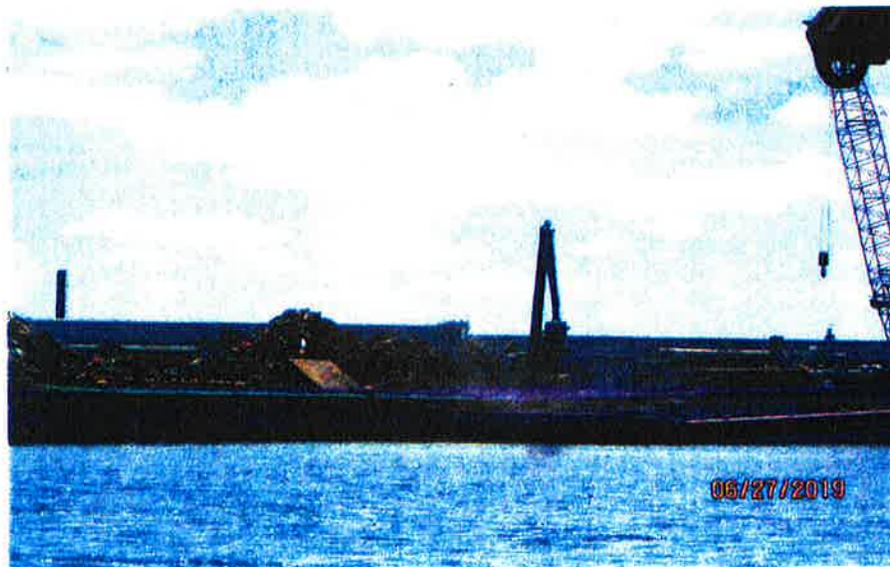
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM

INSPECTOR: EMMANUEL ADESANYA

COUNTY: COOK / CHICAGO

INSPECTION #: 678670



COMMENTS: Photo # 10 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 11 Direction: NE Comments: Plume of Windborne Particulate Matter from scrap metal pile and processing operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 12 Direction: NE Comments: Plume of Windborne Particulate Matter from scrap metal pile and processing operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 2 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 3 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 4 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 5 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 6 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

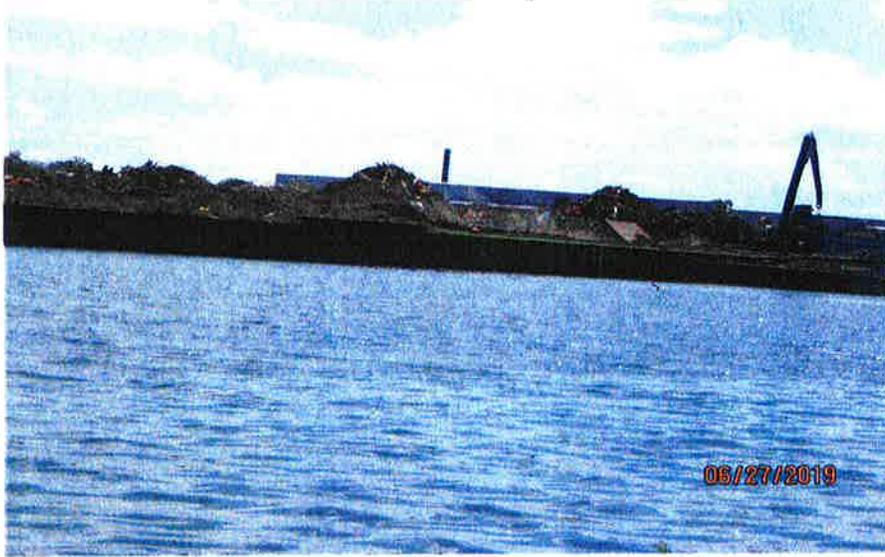
TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 7 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.

DATE: 06/27/2019
SITE: 11600 S BURLEY AVE
SITE CODE: Reserve Marine Terminals
PERMIT #: ENVAIR181098

TIME: 6/27/2019 2:45:00PM
INSPECTOR: EMMANUEL ADESANYA
COUNTY: COOK / CHICAGO
INSPECTION #: 678670



COMMENTS: Photo # 8 Direction: SE Comments: Plume of Windborne Particulate Matter from barge loading operations.



CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL PERMITTING AND INSPECTIONS

CITY OF CHICAGO

OTHER CDPH PERMITS

Permit Number	Permit Type	Expiration Date
ENVAIR181111	ENV_AIR	
ENVAIR181128	ENV_AIR	
ENVAIR181144	ENV_AIR	
ENVAIR997329	ENV_AIR	
ENVAIR997335	ENV_AIR	
ENVREC102877	ENV_RCYCLE	05/15/2021
ENVREC102879	ENV_RCYCLE	05/15/2022
ENVREC122597	ENV_RCYCLE	08/28/2021



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

June 7, 2016

Mr. Hal Tolin
Reserve FTL LLC
11600 S. Burley
Chicago, IL 60617

**Subject: City of Chicago Class II-B Recycling Facility Permit (ENVREC102879)
Reserve Marine Terminals – 11600 S Burley Ave
Effective date: May 16, 2016 to May 15, 2019**

Dear Mr. Tolin,

A permit is hereby granted by the City of Chicago Department of Public Health (“CDPH”) to Reserve FTL LLC dba Reserve Marine Terminal (“the Permittee”) to operate a Class II-B Recycling Facility located within the corporate limits of the City of Chicago at 11600 S Burley Ave (“the Facility”).

Please carefully review all conditions outlined in this permit. Incorporated into this permit by reference are the following: 1) the application dated May 13, 2016 (“[the Application](#)”); and 2) all other supplemental information submitted as part of this application including drawings, sheets, and specifications. In the event of a conflict with said references, the terms and conditions of this permit shall prevail.

The Permittee shall fully comply with Article XX, Chapter 11-4 of the Municipal Code of Chicago (“[the Ordinance](#)”) and the Recycling Facility Rules and Regulations (“[the Regulations](#)”). The Permittee shall also fully comply with the Standard Conditions outlined in Attachment A and the Special Conditions outlined in Attachment B of this permit.

This permit allows for the operation of the Facility from May 16, 2016 through May 15, 2019 upon which time the permit shall terminate by its own terms. On or before May 15, 2019, the Permittee may apply to the CDPH for a new operating permit for the following year. If a subsequent operating permit is applied for on or before May 15, 2019, this permit shall remain in effect until the CDPH acts on the pending permit application. If you have any questions concerning this permit, please contact me at (312) 745-3136.

Sincerely,

Renante Marante
Environmental Engineer III

ATTACHMENT A STANDARD CONDITONS

1. The Permittee shall comply with all applicable local, State, and Federal laws, regulations and standards regarding the construction, operation, maintenance, and closure of the subject Facility, including but not limited to those regulations and standards concerning noise, vibrations, and particulate emissions.
2. Construction, operation, maintenance, and closure of the Facility shall be in accordance with the plans, drawings, and specifications referenced by this permit and included in these Standard Conditions and the Special Conditions.
3. Any changes, modifications, and additions to the Facility's permit or the approved plans and documentation shall be submitted to the CDPH for review and approval. Such a request shall be made in writing to the CDPH.
4. Issuance of this permit shall not transfer, assign or otherwise affect any liability to the City of Chicago, the CDPH, their employees, or agents as a result of the construction, operation, maintenance, and closure of this Facility.
5. Issuance of this permit does not relieve the Permittee of any liability with regards to the subject Facility.
6. The CDPH or its authorized representatives may inspect the Facility and the Facility records at any reasonable time to ensure compliance with this permit and all applicable rules, regulations, and standards, as well as all conditions necessary to protect the public health and safety.
7. The CDPH may revoke this permit on the basis of any of the grounds set forth in the City of Chicago, CDPH, Article XX Recycling Facility Permits Rules and Regulations.
8. The Permittee shall notify the CDPH of any notices of violations or administrative, civil or criminal citations received by the Facility or any of its operators relating to any alleged violation of any federal, state, or local laws, regulations, standards, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site. Such notifications shall be provided by email to EnvWastePermits@cityofchicago.org.
9. The Permittee shall provide the CDPH, if so requested, with copies of all correspondence to or from the IEPA and USEPA pertaining to the Facility, including, but not limited to notices of violation, letters, permit applications, reports, groundwater monitoring reports, and annual reports.
10. The Permittee shall comply with all requirements and conditions set forth in this permit. Should any portion of this permit be declared illegal or non-binding, the conditions of the remainder of the permit shall remain in effect.

ATTACHMENT B SPECIAL CONDITIONS

The following Special Conditions are attached to the operating permit for the Reserve FTL LLC dba Reserve Marine Terminal Class II-B Recycling Facility located at 11600 S Burley Ave:

OPERATING HOURS

1. The Permittee may operate 7:00 a.m to 9:00 p.m. Monday through Saturday. CDPH reserves the right to amend the Permittee's operating hours and days of operation if the facility operation causes a nuisance to neighborhood uses.

MATERIAL HANDLING

2. The Facility is permitted to accept and handle Type A recyclable materials consisting of aluminum scraps; ferrous metal scrap; and non-ferrous metal scrap. The Permittee may also receive packaging materials (e.g. cardboard, wood, plastic, etc.) that are shipped with the above-authorized recyclables.

The Facility is not allowed to receive other recyclable materials not explicitly listed above. The Facility shall not accept hazardous special waste, reactive metals, sealed containers, municipal solid waste, or stolen goods. The Permittee shall not accept charred wire unless it is accompanied by proper documentation stating that the material was obtained from a properly licensed company that uses adequate emission control devices for removing the wire coating.

The Permittee shall inspect all loads entering the Facility for unauthorized wastes. Loads containing waste other than recyclable materials as authorized above shall not be accepted at this Facility.

3. The Permittee shall handle all unauthorized wastes inadvertently admitted into the Facility as follows:
 - a. The Permittee shall separately containerize special waste, including hazardous waste, non-hazardous special waste, and PCB waste, and arrange for the immediate removal of such waste by a waste hauler authorized to accept such wastes for transport to a disposal facility that has obtained all necessary Federal, State, and local authorization.
 - b. The Permittee shall isolate reactive metals upon discovery and place such material in a sealed, waterproof container. The Permittee shall arrange for proper disposal of the reactive metals and shall immediately notify the CDPH.
 - c. The Permittee shall isolate all municipal solid waste and properly store such waste in an enclosed waste receptacle for disposal at a properly permitted facility.
 - d. The Permittee shall isolate all suspected stolen property upon discovery and immediately notify the City of Chicago Police Department ("CPD").
 - e. After unauthorized waste has been removed from the Facility, the Permittee shall thoroughly clean the affected area in a manner consistent with the type of unauthorized waste managed.

ATTACHMENT B SPECIAL CONDITIONS

4. The Permittee shall not accept, receive, purchase or acquire any material that is delivered to the Facility in any city- owned or government-owned garbage container or cart; or city-owned or government-owned recycling container or cart; or retail store shopping cart of the type commonly provided by big-box stores and supermarkets for use by customers to transport merchandise to the checkout counter during shopping.
5. The Permittee may accept regulated or prohibited recyclable materials as defined in [the Ordinance and the Regulations](#) under the following conditions:
 - a. The regulated or prohibited material is consistent with the types of recyclable materials authorized under Special Condition No. 2;
 - b. The Facility is in compliance with all surveillance requirements specified in 11-4-2640(g) of [the Ordinance](#); and
 - c. The Permittee complies with the documentation requirements set forth in Section 9 of [the Regulations](#).
6. The Facility may receive and process no more than 750 tons per day of recyclable materials as specified in Special Condition No. 2. If the Permittee desires additional capacity, the Permittee must submit a revised application to the CDPH for approval. A revised application must demonstrate that the Facility is adequately handling the currently permitted volumes and is sufficiently sized and staffed to accept, store, and process the desired quantity of material.
7. When transporting material to and from the site, the material shall fit entirely within the truck or trailer. Additionally, the truck or trailer shall have its tailgates in place, and the load covered with a tarp as necessary to control dust or loss of material.
8. When transporting material to and from the site, the Permittee shall prevent any fluids or material from spilling into the streets.
9. Material handling at the Facility shall be limited to breaking; cutting with torches and cutters; shearing; sorting, and screening using a McCloskey or similar screener. The Permittee is authorized to move materials at the Facility with the aid of vehicles; front-end loaders; fork lifts; cranes; and magnets.
10. The Permittee shall operate the McCloskey screener or similar screener, with attached generator and associated conveyors, in accordance with Mr. Dennis V. Stropko's letter dated June 21, 2013 and subject to the following requirements:
 - a. The Permittee shall secure and maintain all necessary air permits and approvals from the Illinois Environmental Protection;
 - b. The Permittee shall suppress dust and other air-borne materials generated by screening activities. At a minimum, the screener and related equipment (i.e. hoppers, conveyors, etc.) shall be outfitted with a spray/watering system to suppress dust;
 - c. The Permittee shall ensure that sufficient water is available for dust suppression pursuant to Special Condition No. 31;
 - d. The screener and associated equipment may be moved around the Facility to support various processing operations so long as a minimum setback of 20 feet from the river is maintained.; and

ATTACHMENT B SPECIAL CONDITIONS

- e. The Permittee shall ensure that no process or storm water from the screening operation drains into the river or storm-only sewer system.

REFRIGERANTS

11. If the Facility accepts any small appliance, room air conditioning appliance, motor vehicle air conditioner (MVAC), or MVAC-like appliance, as those terms are defined in [40 CFR Part 82 Subpart F](#), where applicable, the Permittee shall comply with all requirements of [40 CFR Section 82.156\(f\)](#) in connection with any such appliance or item. Specifically, the Permittee shall either:

- a. Verify that the refrigerant was evacuated from the appliance or item in accordance with [40 CFR Section 82.156\(f\)](#) by:
 - i. Obtaining a written and signed statement from each customer stating that all refrigerant was removed in accordance with EPA standards. This statement must include the name and address of the person who removed the refrigerant and the date the refrigerant was removed; or
 - ii. Maintaining a contract between the Permittee and the customer that specifies that refrigerant will be properly removed before delivery.

Or

- b. Recover any remaining refrigerant from the appliance in accordance with [40 CFR Section 82.156\(f\)](#) using EPA-certified refrigerant recovery equipment;

12. The Permittee shall not accept any appliance or item that has been previously vented of CFCs without the proper documentation in Special Condition 11(a) above.

MATERIAL STORAGE

13. The Permittee shall store all materials within the permitted property at all times. At no time shall material be stored on neighboring properties or the public way.

14. The Permittee shall maintain a minimum aisle width of 36 inches, or wider to accommodate workers, equipment, cleaning, and emergency response.

15. The Permittee shall handle and store all recyclable materials that may leak fluids or leave an oily residue on a dedicated, impervious concrete pad. The concrete pad shall be sloped, bermed, or otherwise constructed to minimize storm water run-on and run-off, and facilitate the capture and collection of fluids. The Permittee must properly dispose of all liquid waste collected at the Facility.

16. The Permittee shall segregate and store recyclable materials in durable receptacles or enclosures such as drums, boxes, bins, or storage bunkers. The Permittee may store recyclables in cardboard boxes provided they are placed indoors, on pallets or otherwise kept off the ground.

ATTACHMENT B SPECIAL CONDITIONS

17. The Permittee may store recyclable materials on sturdy racks or shelving provided the stored materials are kept at least 18 inches off the ground and are not leaking.
18. The Permittee shall store newsprint, paper, corrugated paper and cardboard in closed containers.
19. The Permittee shall clearly mark all storage receptacles with the type of recyclable material stored. Letters shall not be less than three inches high, outward facing and not hidden. The Permittee shall not deposit other materials than that specified on the receptacle.
20. The Permittee shall maintain the area surrounding all storage containers in a clean and neat manner. No recyclable materials or waste materials of any kind shall be allowed to accumulate around any receptacle or to overflow from any receptacle.
21. The Permittee may stockpile bulk recyclable materials that require large machinery (such as a backhoe, front-end loader, crane, or grapple) to move or process. The Permittee shall maintain such inventories no taller than 30 feet in height as shown by a pile height marker. Further, such stockpiles shall be set back at least 8 feet away from the public way, as measured from the edge of the stockpile closest to the public way.
22. The Permittee shall maintain a twenty (20) foot setback between any waterway and any stockpile, as measured from the edge of the stockpile closest to the waterway and the top bank of the waterway.
23. The Permittee shall not allow the discharge of storm water or waste water into the waterway without a valid National Pollutant Discharge and Elimination System (NPDES) permit issued by IEPA.
24. The Permittee may not store recyclable materials at the Facility for a period longer than 90 days except materials ready for shipment offsite as finished product or raw material in the manufacturing of new, reused or reconstituted products.
25. The Permittee shall store all waste materials in such a way as to ensure adequate site safety. Flammable materials shall be stored away from sources of heat, sparks and open flames, and in accordance with applicable fire codes. Incompatible materials shall be segregated or stored away from each other.
26. The Permittee shall ensure that all tanks, drums or other vessels containing liquid materials such as, but not limited to, solvents and petroleum products, are:
 - a. Kept in good condition. The Permittee shall immediately replace, repair, or overpack damaged containers;
 - b. Compatible with their contents to avoid reactions or impairment of the container's integrity;
 - c. Kept closed at all times except when adding or removing materials;
 - d. Appropriately labeled in accordance with all local, state, and federal requirements; and
 - e. Are provided with secondary containment complying with all local, state, and federal requirements.

ATTACHMENT B SPECIAL CONDITIONS

SITE REQUIREMENTS

27. The Facility shall be entirely surrounded by a solid fence eight feet in height that obscure all material stored or kept outdoors at the Facility. Such fencing must be located at least eight feet from all public ways surrounding the property
28. The Permittee shall adequately pave and maintain all material handling areas, driveways, and access/haul roads to prevent migration of contaminants off-site. The acceptable paving material shall include, but not be limited to, asphalt, concrete or gravel. The CDPH reserves the right to require any additional or alternate paving as deemed necessary by CDPH.
29. The 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, the types of materials prohibited, and the Facility's operating hours.

HOUSEKEEPING, DUST CONTROL, AND MAINTENANCE

30. The Permittee shall sweep Facility pavements and affected adjacent streets each working day, and on an as-needed basis. Such sweeping shall be performed using a mechanical street sweeper equipped with a water spray and vacuum system to effectively remove dust and litter.
31. The Permittee shall make a water source available at all times for purposes of Facility cleaning, and dust control. If the water source is a public waterbody or a City of Chicago fire hydrant, the Permittee shall secure all necessary permits and approvals prior to drawing water from such sources.
32. The Permittee 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. This control and suppression may include, but are not limited to:
 - a. Employing watering methods as often as necessary;
 - b. Adequately sheltering dust-emitting activities from the wind or temporarily suspending such activities during high wind conditions; and
 - c. Enclosing and containerizing materials that are susceptible to becoming wind-borne.
33. The Permittee shall promptly repair damaged or broken pavements to sustain their integrity, prevent standing water, and minimize the generation of dust and mud. The Permittee shall promptly backfill all potholes and depressions at the Facility with aggregate or suitable fill material. In addition, The Permittee shall resurface worn gravel pavements with fresh aggregate as needed.
34. The Permittee shall place garbage inside a covered container. The Permittee shall not allow such containers to overflow and shall immediately empty, or remove and replace them when full.
35. The Permittee shall install and maintain filter inserts in all Facility catch basins and storm water inlets to keep sediments, oily liquids, and floatables from discharging into the City of Chicago sewer system.

ATTACHMENT B SPECIAL CONDITIONS

36. The Permittee shall promptly contain, and clean-up spilled or leaked fluids. The Permittee shall provide spill response kits in all areas of the Facility where chemical, oil, and fuel spills or leaks of one gallon or more may occur. Such kits shall be fully stocked with appropriate materials such as socks, brooms, adsorbent material, and proper personal protective equipment.
37. The Permittee shall routinely remove oil and grease stains off of site pavements, walls, and equipment by steam cleaning, pressure washing, or scrubbing these surfaces clean. Such cleaning shall be conducted at least bi-weekly and as needed.
38. The Permittee shall inspect the Facility for vectors twice per month or retain the services of a vector control specialist to conduct said inspections. The Permittee shall employ vector control measures that may include, but are not limited to, bait stations and traps, as often as necessary.
39. The Facility shall have personnel for patrolling adjacent properties for litter. The Permittee shall promptly remove and dispose of any litter that is observed at any affected off-site areas.
40. The Permittee shall maintain the streets, sidewalks and sewers adjacent to the Facility, free and clear at all times of all material and debris transported to or from, handled or stockpiled at the Facility.
41. The Permittee shall follow applicable requirements in [Part 722](#) of the Illinois Administrative Code, Title 35 in the management and disposal of potentially hazardous waste such as, but not limited to, spilled battery acids, mercury-containing waste, and spent oils or chemicals.

RECORD KEEPING

42. All logs, receipts, and other documentation required under this permit shall be kept at the Facility a minimum of three years and shall be made available to the CDPH and the CPD upon request.
43. The Permittee shall maintain a written record of all vector inspections and vector control installations including date, time and a detailed description of each inspection and any installations or applications to control vectors.
44. The Permittee shall keep a log of liquid waste pickups that documents the dates and the volumes of liquid waste removed and disposed of offsite. Further, the Permittee shall keep all disposal receipts as proof of proper waste disposal.
45. The Permittee shall maintain a log of all vehicles entering and leaving the Facility. This log shall indicate the date, vehicle type, hauling company name if any, and the material type and quantity being transported. The Permittee shall maintain copies of all load ticket receipts.
46. The Permittee shall maintain a written log documenting all cleaning and maintenance activities performed at the Facility under the Housekeeping, Dust Control, and Maintenance section of this permit. Such log shall include a description of the cleaning operation or maintenance activity performed, the signature of the employee that performed it, and the date and time the employee started and completed the task.
47. The Permittee shall maintain a written record of all emergencies occurring at the Facility,

ATTACHMENT B SPECIAL CONDITIONS

including the date and time of each incident, along with a detailed description of the emergency. The Permittee shall notify the CDPH each day that the Facility is affected by the emergency. Such notification shall be sent by email to EnvWastePermits@cityofchicago.org.

48. The Permittee shall timely comply with the requirements contained in [Chapter 11-5](#), Reduction and Recycling Program of the Chicago Municipal Code. The Permittee shall submit semi-annual reports to the Department of Streets and Sanitation ("DSS") Recycling Coordinator, on forms provided by the DSS.

SITE SAFETY

49. The Permittee shall undertake all necessary steps to ensure that the Facility is secure from unauthorized entry, is sufficiently screened from the surrounding area and is adequately lighted after dark.
50. The Permittee shall provide training to all Facility employees on fire prevention, emergency procedures and hazardous material identification and handling procedures.
51. The Permittee shall install and maintain fire suppressant equipment in accordance with the Municipal Code of the City of Chicago.
52. The Permittee shall correct any and all violations identified by the City of Chicago Fire Department inspections. Failure to comply with these actions may result in revocation of this permit.
53. The Permittee shall conduct all torch cutting activities in a designated area located away from flammable material storage areas. Gas cylinders used for cutting or welding purposes shall be stored in an upright position and properly secured to avoid accidental jarring or impact.

PERMITS

54. The Permittee shall maintain an active Certificate of Operation from the CDPH, pursuant to Section [11-4-660](#) of the Code, for all existing regulated equipment or areas requiring an Air Pollution Control (APC) permit. The Permittee shall obtain an [APC Permit](#) from CDPH, pursuant to Section [11-4-620](#) of the Code, for any new regulated equipment or area installed at the Facility.
55. The Permittee shall acquire all necessary permits and approvals for the Facility including but not limited to those required by the CDPH, Department of Business Affairs and Consumer Protection, Zoning Board of Appeals, Metropolitan Water Reclamation District of Greater Chicago and the IEPA. The Permittee shall provide copies of all such permits and approvals to the CDPH upon request.
56. The Permittee shall maintain copies of all Facility permits on site at all times and shall make these available for inspection upon request by the CDPH.

CLOSURE

57. If the Permittee permanently closes or ceases operations at the site ("closure"), the Permittee must submit a written closure notification to the CDPH within 30 days of closure.

ATTACHMENT B SPECIAL CONDITIONS

If the permit is not renewed for any reason, or the Permittee ceases operations at the site, the Permittee must clean up, remove and properly dispose of or recycle all material and waste on the site within 30 days of permit expiration or closure. The Permittee must submit disposal and recycling receipts as proof of proper disposal.

VEHICLES

58. Every vehicle used by the Facility for the collection, transportation or disposal of any recyclable material shall display on each side of the vehicle in letters not less than two inches in height, in contrasting color, the name, address, telephone number and permit number of the recycling facility.

MISCELLANEOUS

59. Within 45 days from the date of this permit, the Permittee shall submit a plan and timeline to effectively reduce dust generation and track-out from vehicles. Such plan may include the following:

- a. A thorough cleaning of underlying concrete pavement to remove dust buildup;
- b. Application of a gravel layer over worn surfaces in accordance with Section Three of the [Federal Highway Administration's Gravel Roads Maintenance and Design Manual](#) (available at the Illinois Department of Transportation's website at <http://1.usa.gov/1Woytmg>), and/or as directed by a qualified pavement engineer or professional;
- c. Posting and enforcement of speed limits at the Facility to 15 miles per hour or less;
- d. Daily sweeping of concrete pavements with a street sweeper to pick up dust accumulation;
- e. Use of alternate environmentally-responsible dust suppressant to reduce water usage and prevention of mud;
- f. Construction of a stabilized surface at Facility ingress and egress points to remove dirt and mud from vehicles before entering the public way; and
- g. Incorporation of temperature, humidity, and roadway condition information to the *Facility's Monthly Water Log - Road Dust Suppression Control Record* form, and consideration of these factors to prevent the excessive application of water that contributes to mud generation.

VARIANCES

60. The Permittee is authorized to stockpile recyclables materials outdoors, with or without markings or labels as required in Special Condition No.19.



DEPARTMENT OF BUILDINGS

CITY OF CHICAGO

**BEFORE THE COMMISSIONER OF THE DEPARTMENT OF BUILDINGS
CITY OF CHICAGO**

ADMINISTRATIVE ORDER

Date:September 7th, 2021

RE: Dangerous Building at: 11600 South Burley ave
WHEREAS, on or about July 23rd, 2021 the Department of Buildings inspected the above reference property in response to an immediate response call for a building collapse. The building failure resulted constituted an actual and imminent danger to the public a Emergency Permit must be applied within 72 hours.

WHEREAS, the Department's inspection report is attached here as Exhibit A and

WHEREAS, the Commissioner, through his duly designated representative, has reviewed the inspection report.

NOW, THEREFORE, based upon a review of the inspection report and other information, the Commissioner finds that the building at the location above referenced

1. Building was damaged during construction;
2. Building collapsed due to being structurally unsound;
3. Constitutes an actual and imminent danger to the public.

FURTHER, IT IS HEREBY ORDERED pursuant to the Commissioner's authority under section 14A-3.311 of the City of Chicago Municipal Code, that the building at the location referenced above be immediately demolished on an EMERGENCY BASIS .

SIGNED: Jorge Herrera, Chief Demolition Inspector

Marlene Hopkins
First Deputy Commissioner



CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
PERMITTING AND ENFORCEMENT

NARRATIVE EVALUATION

INSPECTION DATE: 08/02/2021
SITE NAME: Property Owner/Manager
SITE ADDRESS: 11600 S BURLEY AVE, CHICAGO, IL 60617
SITE CODE: Property Owner/Manager
PERMIT #: ENVGEN1573908

TIME:12:00 pm
EMPLOYEE:JOHN SINGLER
COUNTY:COOK / CHICAGO
INSPECTION #: 1711230

SUMMARY

On August 2, 2021 City of Chicago Department of Public Health Inspectors Francisco Flores Silva and John Singler conducted an inspection at 11600 S. Burley Ave., Chicago, IL. The inspection was prearranged with South Chicago Property Management Company, LTD., manager Hal Tolin. Tolin was aware that the inspection was for the purposes of sampling various media from Building "32" the unofficial name of the warehouse structure that sustained damage during a partial collapse in or about April 2021. Tolin, the reporting agent, Flores Silva and an employee of Tolin's walked the northern edge of "32" and a sample was taken approximately 20 yards from the eastern end of the building on its north side. The sample was of black rubberized material that likely fell from the roof. The sample, Sample #1, did not test positive for asbestos containing materials (ACM). Approximately 20 yards further to the east Sample #2, was taken. Sample #2 was of material used for wall panels throughout the complex. The white, concrete-like material commonly referred to as transite, fell from the exterior wall above. The transite material tested positive for ACM, with a 20-25% content of Chrysotile asbestos. The final sample, Sample #3, was taken within the collapsed area of "32." The sample is a tar-like substance covering concrete roofing tiles. The substance tested positive for ACM, with a 10-15% content of Chrysotile asbestos. The three samples were analyzed by STAT Analysis Corporation, see attached sampling results. On August 3, 2021 Inspectors Flores Silva and Singler contacted Tolin with the results of the sampling activity. Citation E000038062, 11-4-2180(a), Maintenance of ACM in Facilities, was signed by Tolin. Hearing Date October 21, 2021.



**CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
PERMITTING AND ENFORCEMENT**

NARRATIVE EVALUATION

INSPECTION DATE: 08/02/2021
SITE NAME: Property Owner/Manager
SITE ADDRESS: 11600 S BURLEY AVE, CHICAGO, IL 60617
SITE CODE: Property Owner/Manager
PERMIT #: ENVGEN1573908

TIME: 12:00 pm
EMPLOYEE: JOHN SINGLER
COUNTY: COOK / CHICAGO
INSPECTION #: 1711230

SUMMARY

REPORT COMPLETED? YES NO
INVESTIGATION COMPLETED? YES NO

NOV ISSUED? YES NO
ATTACHMENTS? YES NO

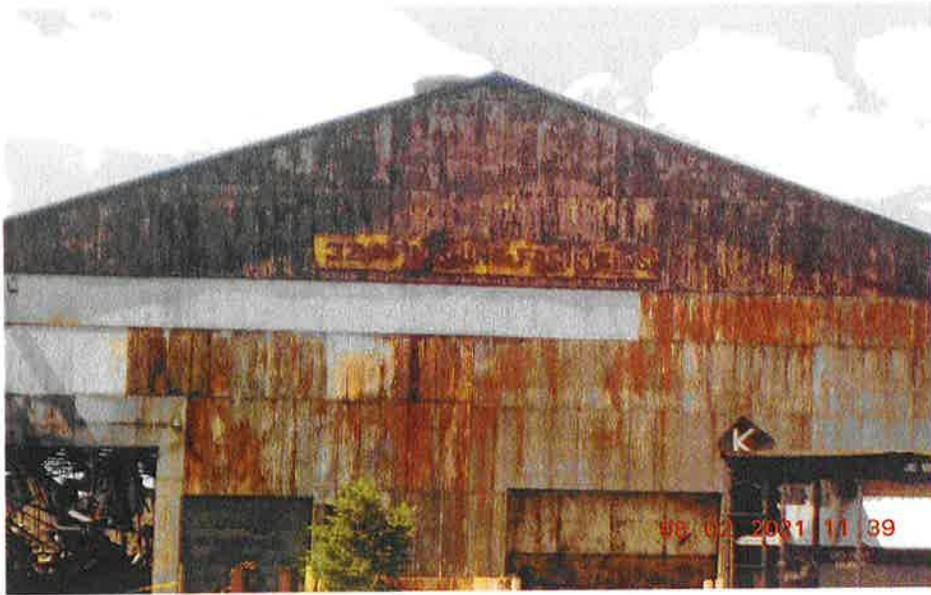
I, JOHN SINGLER, an employee of the City of Chicago, Department of Public Health, declare that I have conducted an inspection of the above mentioned property on the date indicated. I further declare that the observations set forth on the report are true and accurate.

39

STAR #



SIGNATURE



COMMENTS: Photo A-11600 S. Burley, Building commonly referred to as the "32" Building" with no further address

DATE: 08/02/2021
SITE: 11600 S BURLEY AVE
SITE CODE: Property Owner/Manager
PERMIT #: ENVGEN1573908

TIME: 8/2/2021 12:00:00PM
INSPECTOR: JOHN SINGLER
COUNTY: COOK / CHICAGO
INSPECTION #: 1711230



COMMENTS: Photo B- 11600 S. Burley, Furthest to the south complex of remaining buildings

DATE: 08/02/2021
SITE: 11600 S BURLEY AVE
SITE CODE: Property Owner/Manager
PERMIT #: ENVGEN1573908

INSPECTOR: JOHN SINGLER
COUNTY: COOK / CHICAGO
INSPECTION #: 1711230



COMMENTS: Photo C- 11600 S. Burley, Sample #1, rubber roofing, NO Detect for ACM

DATE: 08/02/2021
SITE: 11600 S BURLEY AVE
SITE CODE: Property Owner/Manager
PERMIT #: ENVGEN1573908

TIME: 8/2/2021 12:00:00PM
INSPECTOR: JOHN SINGLER
COUNTY: COOK / CHICAGO
INSPECTION #: 1711230



COMMENTS: Photo D- 11600 S. Burley, Transite panels from Bldg. 32 lying across the roadway where they had fallen. Samples taken reflect Chrysotile ACM at 20-25%



COMMENTS: Photo E- 11600 S. Burley, Transite strewn across the roadway and ground following panel failure on north side of the 32" building

DATE: 08/02/2021
SITE: 11600 S BURLEY AVE
SITE CODE: Property Owner/Manager
PERMIT #: ENVGEN1573908

TIME: 8/2/2021 12:00:00PM
INSPECTOR: JOHN SINGLER
COUNTY: COOK / CHICAGO
INSPECTION #: 1711230



COMMENTS: Photo F- 11600 S. Burley, Sampling of transite reflects an asbestos content of 20-25%



COMMENTS: Photo G- 11600 S. Burley, Roofing tiles containing ACM/Galbestos verified by STAT Analysis Corporation

DATE: 08/02/2021
SITE: 11600 S BURLEY AVE
SITE CODE: Property Owner/Manager
PERMIT #: ENVGEN1573908

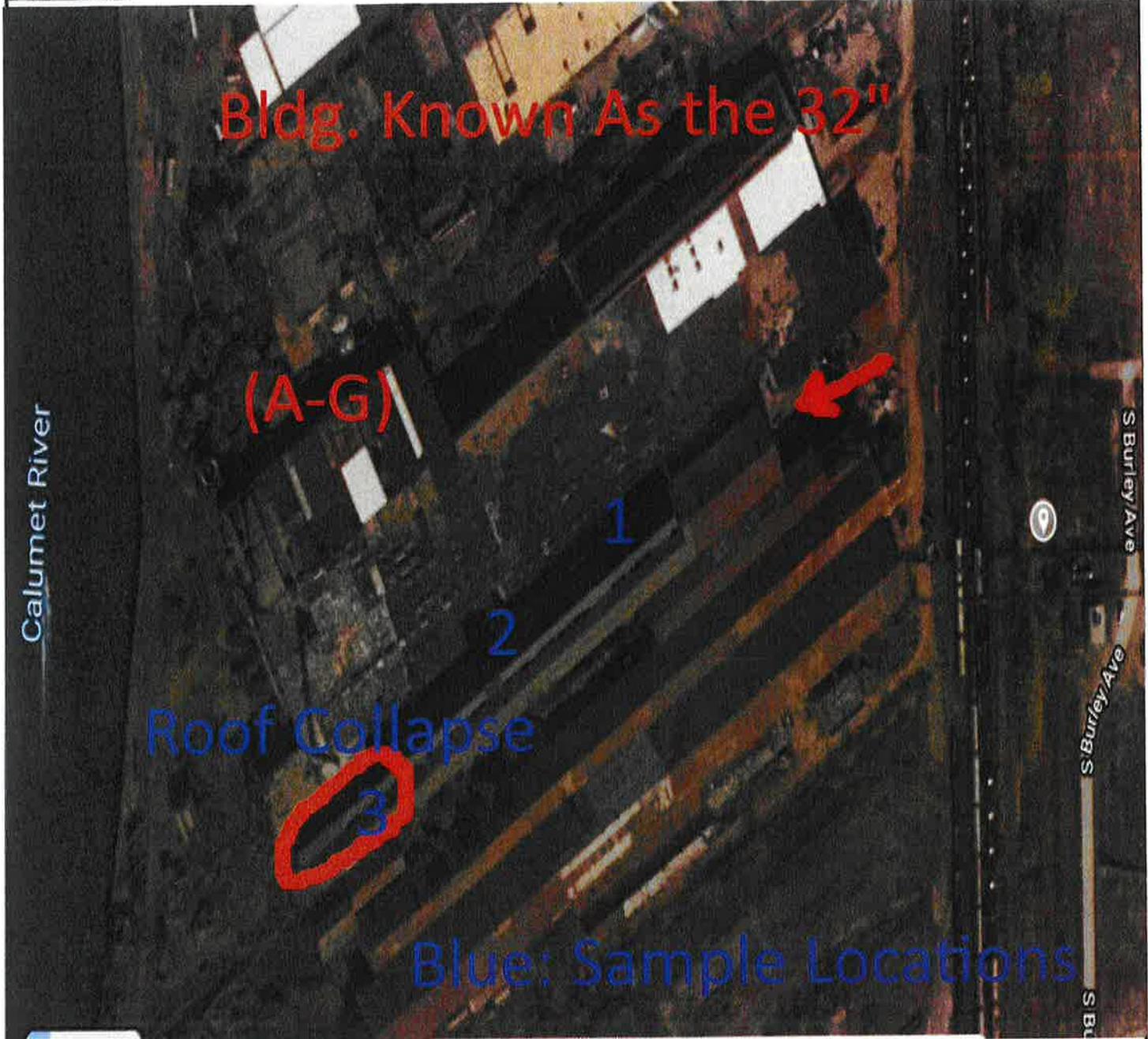
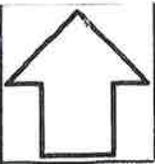
TIME: 8/2/2021 12:00:00PM
INSPECTOR: JOHN SINGLER
COUNTY: COOK / CHICAGO
INSPECTION #: 1711230



COMMENTS: Photo H- 11600 S. Burley, Samples brought to STAT for analysis



COMMENTS: Photo H- 11600 S. Burley,SS



Not to Scale
All Boundaries are Approximate

DATE:	August 2, 2021
TIME:	11:00-12:00 P.M.
SITE ADDRESS:	116000 S. Burley Ave.
SITE CODE:	
INVESTIGATOR	J. Singler
COUNTY:	COOK COUNTY/CHICAGO

SITE SKETCH
 CITY OF CHICAGO
 DEPARTMENT OF ENVIRONMENT
 FIELD OPERATIONS DIVISION



ASBESTOS ANALYSIS BY POLARIZED LIGHT MICROSCOPY

Method: EPA/600/R-93/116

Luse Environmental Services
3990 Enterprise Court
Aurora, IL 60504
Phone: (630) 862-2600
Fax: (630) 862-2673

Reference:

Location: 11600 S Burley Ave

Batch No.: 354000

Customer No.: 898

Date Received: 08/02/2021

Date Analyzed: 08/02/2021

Date Reported: 08/02/2021

Turn Around Time: 8 Hour

Laboratory Sample	Customer Sample Number	Asbestos Components (%)	Non-Asbestos Components (%)
354000001	S-1	ND	Cellulose 80-85% Binder 15-20%
354000002	S-2	Chrysotile 20-25%	Binder 75-80%
354000003	S-3	Chrysotile 10-15%	Binder 85-90%

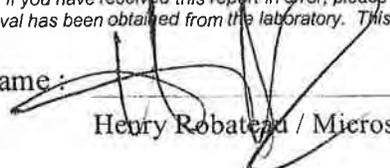
ND = Asbestos Not Detected (Not Present) NA = Not Analyzed NS = Not Submitted

Components of inhomogeneous samples are analyzed per our Standard Operating Procedure, or per customer request.

The use of the NVLAP logo does not imply endorsement by NVLAP or any agency of the US Government.

The information contained in this report and any attachments is confidential information intended only for the use of the individual or entities named above. The results of this report relate only to the samples tested. If you have received this report in error, please notify us immediately by phone. This report shall not be reproduced, except in its entirety, unless written approval has been obtained from the laboratory. This report remains property of STAT Analysis until payment is received in full (see invoice).

Analyzed by Name :


Henry Robateau / Microscopist

Date: 08/02/2021

Client: USE Environmental Services

Project Address: 3990 Enterprise Court

City, State, Zip: Aurora, IL 60504

Phone: 630.862.2646

Fax: Jim Clarke

Project Number: 116005. Berkeley Ave.

Project Location:

Project Manager:

Job Number:

Client Sample Number/Description:

Turn Around: Immediate: 4 Hrs 8 Hrs 24 Hrs 1 Day 2 Days 3 Days 5 Days

Date Due: Time Due:

OFFICE USE ONLY BELOW

Batch No.: 359000

Samples Acceptable: Yes: No:

Checked by (Initial/Date): J.Singer 8/1/21

QC by (Initial/Date): J.Singer 8/1/21

Reported By (Initial/Date/Time/Method):

Comments:

Note: Not all turn around times are available for all analysis.

Relinquished by: J.Singer Date/Time: 8/1/21 1:00 pm

Received by: Date/Time: 8/2/21 14:00

Relinquished by: Date/Time:

Received by: Date/Time:

Relinquished by: Date/Time:

Received by: Date/Time:

Client Sample Number/Description	Date Taken	Time		Rate (ipm)	Volume (Liters)	Area Wiped (ft ²)	Laboratory Sample No.	Analysis Type											
		On	Off					PCM Asbestos	PLM Asbestos (Bulk)	PLM Point Count	PLM Gravimetric	TEM Air Asbestos	TEM Bulk Asbestos	TEM Gravimetric Asb.	TEM Microvac Asb.	TEM Water	Other:		
S-1	8/1/21	11:45	11:48					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>										
S-2	8/1/21	11:50	11:53					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>										
S-3	8/1/21	12:00	12:03					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>										

Comments: Please send results to: John.Singer@cityofchicago.org