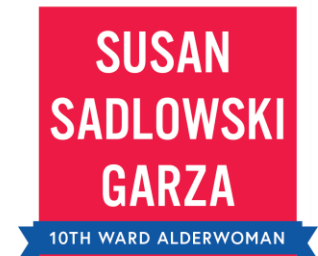




RMG EXPANSION PROPOSAL

Community Town Hall
July 25, 2020





AGENDA

- **Welcome**

- Town Hall Overview – Ald. Susan Sadlowski Garza, 10th Ward

- **Information Sharing**

- Commitment to Environmental Justice – Angela Tovar, Chief Sustainability Officer, City of Chicago
- Large Metal Recycler Rules, Permitting Process, and RMG proposal – Commissioner Allison Arwady, CDPH
- Insights from Community Adviser – Nancy Loeb, Director, Environmental Advocacy Center, Northwestern

- **Community Conversation**

- Comments / Q&A
- Next Steps



TOWN HALL PURPOSE

- To provide information about the City's permitting process for recycling facilities
- To listen to community input about the RMG expansion proposal that will help inform the permitting process



COMMITMENT TO ENVIRONMENTAL JUSTICE

- Mayor Lightfoot's administration is committed to working with residents to improve quality of life and mitigate air pollution in low-income communities and communities of color disproportionately impacted by pollution.
- Recent air quality initiatives – including the Air Quality and Health Report and large recycler rules - advance community protections. Building on this progress we are now taking further steps to advance environmental justice:
 - Creation of an environmental equity working group to help advise a reform agenda
 - Development of new and revised rules for industrial facilities
 - Development of a zoning ordinance and cumulative burden ordinance requiring new and more stringent permitting requirements
 - Evaluation and updates of environmental permitting and inspection processes

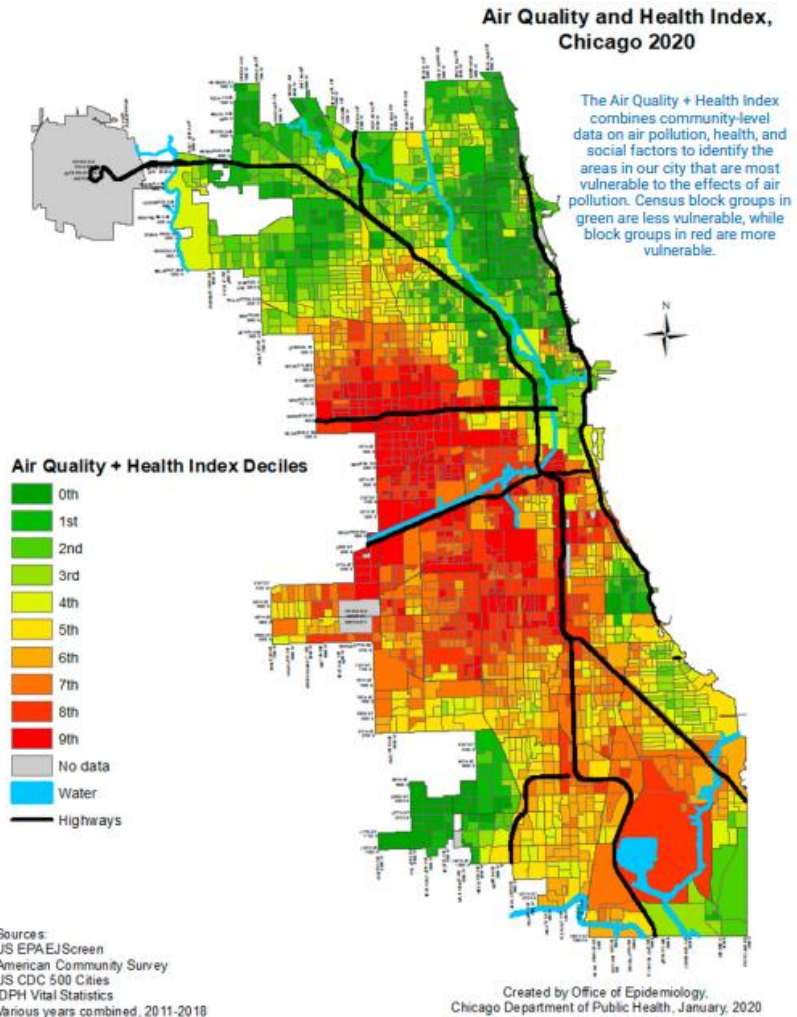


NEW AIR QUALITY AND HEALTH INDEX

CDPH analyzed community-level data on:

- air quality
- health conditions, and
- social factors

...to identify neighborhoods that should be prioritized for efforts to mitigate air pollution.





***NEW* LARGE RECYCLING FACILITY RULES**

CDPH issues environmental permits to facilities that will operate regulated equipment or that engage in certain kinds of business activities.

COMMUNITY-INFORMED PROCESS

- Chicago's first-ever rules for large recycling facilities are in effect as of June 2020
- Engaged stakeholders for input - environmental justice organizations provided thoughtful feedback to make these rules even stronger

SUMMARY OF COMMENTS

- Received **31** written comments, including one submitted on behalf of 9 health and environmental advocacy groups

EXAMPLES OF CHANGES MADE IN RESPONSE

- Facilities with a greater potential to impact the environment must do an air quality impact assessment to model potential emissions and inform the air monitoring plan.
- Require all large recycling facilities to have fugitive dust plans, do opacity monitoring and ensure no visible emissions leave the site.
- Require storage of auto shredder residue (ASR) and impose control measures if issues are found.
- Monitor stockpiles for hot spots to prevent fires.



WHAT'S IN THE NEW RULES?

Large recycling facilities, including RMG expansion, will be required to provide:

- Air impact study and ongoing air monitoring for particulate matter
- Traffic studies for new facilities
- Real-time notification of airborne particulate matter and a mitigation plan to prevent public health impacts
- Noise impact assessment and monitoring
- Enclosure of post processed auto-fluff and auto shredder equipment at new and expanding facilities
- More stringent record keeping
- Public notice and opportunity to comment on permit variances





CDPH PERMITTING OVERVIEW

- Businesses must apply to CDPH for two types of permits:
 - **Air Pollution Control (APC) permit**
 - **Recycling Facility permit**
- Permits are issued only if applicants meet existing zoning and environmental requirements.
- CDPH Commissioner can require special conditions on permits based on past violations or other concerns.
- Recycling cannot begin until CDPH reviews and approves all required permits.






AIR POLLUTION CONTROL PERMIT

- **Required for:** Installation and operation of all regulated process, pollution control equipment and areas on site under 11-4-620
 - **Standards for issuance:**
 - Owner/operator must not currently be in violation of any substantive standards set forth in the Municipal Code or CDPH regulations
 - Any control equipment or technology to control emissions must be appropriate for the facility operations
 - Application must meet all applicable requirements in the Municipal Code
 - Applicant must have paid all fees required by this Code and any outstanding debts owed to the City
 - **Status for RMG Expansion:** Application not yet submitted to CDPH (we will post when documents are available)
- 



RECYCLING FACILITY PERMIT

- **Required for:** Operation of a recycling facility
 - **Standards for issuance:**
 - Zoning approval (11-4-2520)
 - Applicant has not had a prior recycling facility permit revoked for cause within the past three years (11-4-2525)
 - Application must meet all applicable requirements set forth in the Code (11-4-040(a)(1); 11-4-2530; 11-4-2640)
 - Applicant must have paid all fees required by this Code and any outstanding debts owed to the City
 - Applicant must meet all conditions for permit issuance set forth in existing recycling facility rules and new rules for large recycling facilities
 - **Status for RMG Expansion:** Application not yet submitted to CDPH (we will post when documents are available)
- 



CDPH AUTHORITY

CDPH Will...

- Ensure that all permits meet requirements
- Add special conditions to permits as necessary to protect public health, based on community input and other expert advice
- Actively enforce permits that are issued in partnership with community
- Continue to strengthen environmental rules/regulations

CDPH Cannot...

- Deny permits that meet existing environmental and zoning requirements
- Impose quantitative emissions standards beyond what is allowable per IEPA
- Collect data on emissions, as IEPA does in annual emissions reports
- Close facilities without documented violations of applicable laws



RMG PROPOSAL

Reserve Management Group (RMG), a metal recycling company, purchased General Iron and will transition their assets to its site at T1600 S. Burley, where they currently run several recycling operations.

Consistent with our agreements with the company and requirements under the new rules, the facility will include the following environmental protections:

Emissions Controls and Monitoring

- Physical barriers include shredder enclosure and capture hood
- Equipment includes cyclone separator, roll-media filter system, regenerative thermal oxidizer (RTO), wet scrubber
- Installation of air and noise monitors

Dust Control

- Water trucks, street sweepers and misters for dust suppression

Other Site Controls

- Larger buffer between operations and surrounding neighbors
 - Capture, filter, and treat all storm water runoff
 - Planting 200 trees and other landscaping improvements
- 



INSIGHTS FROM COMMUNITY ADVISER



COMMUNITY CONVERSATION

- What questions do you have about the CDPH recycling facility rules or permitting process?
- What would you like CDPH to consider if/when RMG applies for its permits?





NEXT STEPS

- Permits, proposals, public notices, response documents and other materials related to the RMG expansion will be posted online at <https://www.chicago.gov/city/en/sites/rmg-expansion/home.html>.
- Additional comments or questions can be submitted to cdphpermits@cityofchicago.org. CDPH will post responses to comments received by August 1st.
- CDPH will conduct additional community outreach once permit applications are received.

