

RMG/General Iron Expansion on Southeast Side - Comment

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To: envcomments <envcomments@cityofchicago.org>

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RMG_General Iron Comment_final.pdf;

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RESPIRATORY HEALTH ASSOCIATION®

Dedicated to Community Lung Health Since 1906

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December 10, 2020

Re: RMG Expansion on Southeast Side

It is our opinion that the Large Recycling Facility Permit Application for the General III, LLC/Southside Recycling (aka RMG/General Iron) facility proposed for 11600 S. Burley Avenue Chicago, Illinois 60617 does not meet the applicable requirements for the Rules for Large Recycling Facilities with regards to “any substance or material that may become airborne or be scattered by the wind,” and “potential to harm human health and the environment, and cause a public nuisance or adversely impact the surrounding area or surrounding users.” A detailed explanation of why is included below.

We at Respiratory Health Association are very concerned about the proposed relocation of RMG/General Iron, a metal shredding company, from the North Side of Chicago in Lincoln Park to the Southeast Side of Chicago. The company has been in violation multiple times with EPA rules about “fugitive dust,” so we know it is already polluting the community in which it is currently located. When it moves to the Southeast Side, in addition to adding itself to a constantly growing number of sites dedicated to polluting heavy industry, it will only be a half-mile from Washington High School.

Though in the permit application for the facility, an [Air Quality Impact Assessment](#) was included, RMG/General Iron is a company that hasn’t proven it is a good neighbor. In Lincoln Park, it has operated without appropriate Title V permits, was noted to emit or “have the potential to emit more than 100 tons per calendar year of volatile organic compounds”^[1] (VOCs) as well as particulate matter, and consistently had fine dust from its operations seen around the community over a half-mile from the facility. The November 11, 2020 permit application for the Southeast side location itself lists as a byproduct the creation of “150,000 tons” of shredder fluff annually. At the Lincoln Park location, that fluff was also found up to a half-mile from RMG/General Iron, and community members saw employees of the facility in protective equipment picking it up from areas around the vicinity. In Lincoln Park, it has been discovered in large quantities in air filters and ducts in the neighborhood.

As you may know, air pollution, and particularly fine particle air pollution, can pose a serious threat to health. These particles can get deep into the lungs: exposure to PM2.5 has been linked to illness and death, most notably from lung and heart disease. That particulate matter can also trigger asthma attacks and worsening of COPD symptoms. A recent report issued by the Union of Concerned Scientists² found that Cook County, including Chicago, ranks 8th among the nation’s metropolitan counties with the highest exposure to on-road pollution. The county’s exposure rate is 90 percent higher than the average of all U.S. counties with populations greater than one million residents. That report only includes vehicular sources, not additional sources like the heavy industry already prevalent in areas like the 10th Ward.

VOCs can be carcinogenic, as can heavy metals released into the air during the recycling process. Per a study published in the International Journal of Chronic Obstructive Pulmonary Disease, “exposure of the lungs to airborne toxicants from different sources in the environment may lead to acute and chronic pulmonary or even systemic inflammation.”³ In 2017, the most recent year for which we have available data, the difference in the rate of emergency department (ED) visits for children with asthma in the 60617 zip code is 41.2% higher than the citywide rate. In the zip codes 60827/60633 the rate is 34% higher than the citywide rate. Also, in Hegewisch, which is near the proposed RMG/General Iron site, there is a higher rate of lung cancer incidence (25%) and death (34%), as well as higher mortality rates from chronic obstructive pulmonary disease (COPD) (53%).

This proposed move has been in process for a long time, and the Southeast Side community has continually expressed concern and displeasure regarding the facility’s relocation. Despite the continual requests for assessments of cumulative pollution impacts, neighborhood inclusion in the permitting process, and an acknowledgement of the community’s concerns, permits have been granted and the process has moved forward. The community was given a ten-day notice to review a highly technical application and be prepared to make meaningful comments which reflects the environmental racism that the community has experienced for decades. In a time where we have seen heavily industrialized neighborhoods affected more by the global coronavirus pandemic, which has a higher level of serious health consequences with communities that have even slightly elevated levels of air pollution, it is even more important that we do not add another massive polluter on the Southeast Side. It is time to protect the health of this community for future generations.

[1] https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc_nov-fov.pdf

2 Reichmuth, D. Exposure to air pollution from vehicles in Illinois is inequitable – It doesn't have to be. Union of Concerned Scientists. February 19, 2020

3 Int J Chron Obstruct Pulmon Dis. 2016; 11: 1391–1401.

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Monique Howard
Board Chair

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Chair Elect

Formerly known as:

American Lung Association
of Metropolitan Chicago*
(1993-2007)

Chicago Lung Association
(1972-1993)

Tuberculosis Institute of
Chicago and Cook County
(1937-1972)

Chicago Tuberculosis
Institute
(1906-1937)

*Respiratory Health
Association is not affiliated
with American Lung
Association.

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¹ https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc_nov-fov.pdf

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