Southside Recycling-Status 3-25-21

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1). Is the new location a former metals recycler as well? If not, what type of facility was there? When did it operate/close?

The current parcel is home to 4 existing metals recycling operations. Southside Recycling would be the 5th facility. The parcel was formerly Republic Steel/LTV:

"This large American steel company was formed in 1899 as the Republic Iron & Steel Co. through the merger of 30 small mills in Alabama; Youngstown, Ohio; and the Chicago area. In 1910, it employed about 900 men at its plant in East Chicago, Indiana. In 1930, following more mergers, the company changed its name to the Republic Steel Corp. The company operated a large mill in South Chicago that employed about 1,300 men during the mid-1930s. At that time its production capacity stood at 400,000 tons, less than 10 percent of the total capacity of Republic's plants across the country. By the late 1940s, the capacity of the South Chicago plant was over one million tons, representing about one-seventh of Republic's total capacity. As late as the 1970s, Republic still employed about 5,000 people in the Chicago area. Republic was purchased by Texas-based steel conglomerate LTV Corp. in 1984. The proliferation of inexpensive imported steel around that time, however, hurt the entire American steel industry, and LTV declared reorganization bankruptcy in 1986, one of several bankruptcies it endured through the 1980s and 1990s. While some of Republic's operations continued in southeastern Chicago for a time, a successive wave of additional LTV bankruptcies over the next 15 years prompted the closing of all of its mills and refineries by the early 2000s.

In 1962 Republic Steel had its Illinois office at 332 South Michigan Avenue, Chicago and its Chicago plant was located at **11600 Burley Avenue on Chicago's south side** next to the Calumet River and employed over 4,000."

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Figure 1. Republic Steel, 1920s or 30s.

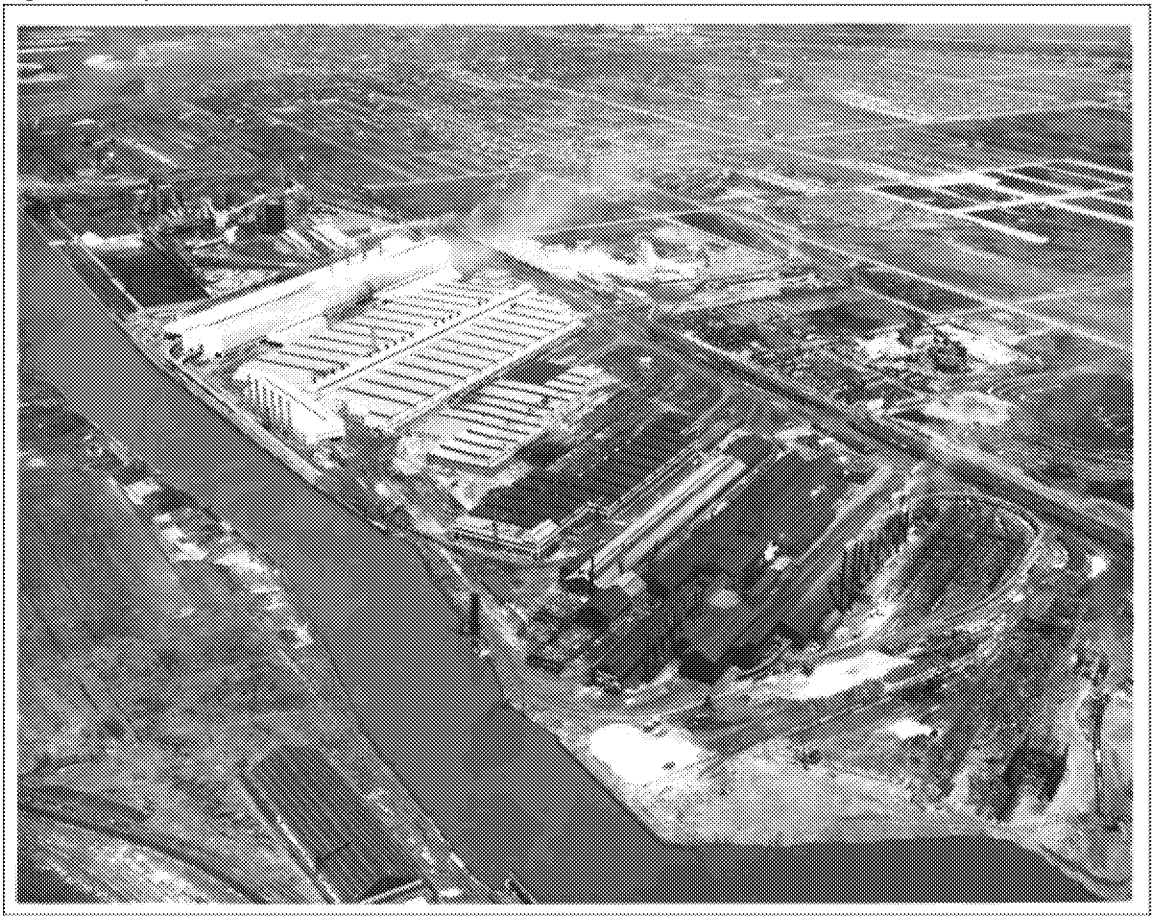
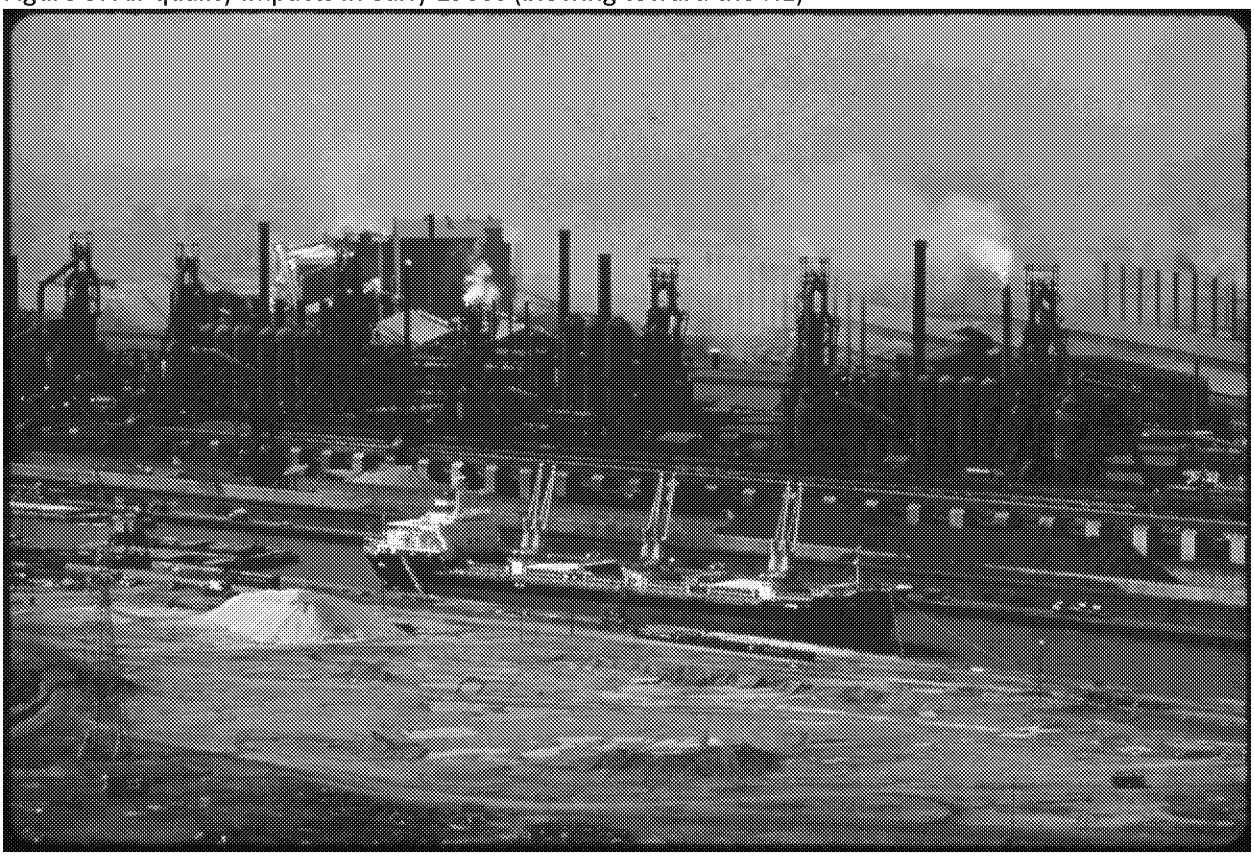


Figure 2. Location of current proposed site of Southside Recycling with air monitoring site to the NE

Figure 3. Air quality impacts in early 1960s (blowing toward the NE)



2). ***It looks like the metals monitor at Washington Elementary is about 1 mile from the property line of the new location. Is it EPA's opinion that this adequately represents community exposure (it is in the predominate downwind direction)? While those data may represent exposures for some portions of the community, there are houses much closer due east that could theoretically have higher exposures to a facility sited there.***

It is in the predominate downwind direction from the former LTV STEEL MILL site 1 mile to the NE, which would have emitted fine heavy metals particles into the surrounding area. However, a grinding operation would likely emit coarse, larger particles that may result in greater exposures to closer residential properties due east of the site.

3). The Southside Recycling permit was issued in June 2020. Is Southside Recycling currently operating? Is the facility constructed but not operating? What is the status?

The facility is NOT operating. RMG will need two types of permits to operate as a recycling facility – an air pollution control permit and a recycling facility permit. While they have been issued a construction permit by Illinois EPA, they have not been issued a recycling permit by the city of Chicago or an operating permit from IL EPA.

CDPH issues air pollution control permits for applicants that meet the standards outlined in Section [HYPERLINK "https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2496063"

\t "_blank" \o "11-4-630"] of the Municipal Code of Chicago. An air pollution control permit has been issued to RMG for the installation, but not the operation, of pollution control equipment consistent with the permit previously issued by IEPA. See [HYPERLINK "https://www.chicago.gov/city/en/sites/rmg-expansion/home.html"] for specific details of the current status of Chicago's review of RMG's properties at this location and to get more information about the recycling facility permit ([HYPERLINK "https://www.chicago.gov/content/dam/city/sites/rgm-expansion/documents/2020-11-12-Southside-Recycling-LRF-Permit-App.pdf"]). Chicago has requested more information about the relationship of the existing four RMG businesses at this address and their relationship with the Southside Recycling facility. This has stalled the issuance of the Recycling permit issue. HUD has called for this to be delayed also because of the Civil Rights Act (Title VI) filing with U.S. EPA which prohibits recipients of federal funds (Chicago and Illinois) from discrimination based on race (this is an EJ area).

4). IL EPA is the official permitting authority. There was no reason to deny the construction permit, so it was issued. The Southeast Environmental Taskforce filed a Title VI complaint with EPA, and HUD filed a complaint with Chicago requesting a stay of the recycling facility permit while more investigation into the existing and proposed facilities is underway.

a) *Can you please explain the role of each agency with regulating this facility?*

1) IL EPA: issues construction and air permits
2) Chicago: issues permits for large recycling facilities

Modeling for the permit (p. 191): [HYPERLINK "https://www.chicago.gov/content/dam/city/sites/rgm-expansion/documents/2020-11-12-Southside-Recycling-LRF-Permit-App.pdf" \t "_blank" \o "https://www.chicago.gov/content/dam/city/sites/rgm-expansion/documents/2020-11-12-southside-recycling-lrf-permit-app.pdf"]

b) *Is HUD's complaint what is staying the permit?*

The city's large recycling facility permit, yes.

5). Our petition requests a review of the impacts of this facility and to "conduct a health consultation to review and analyze particulate matter and metal exposures in the air at the Reserve Marine Terminals facility and the South Shore Recycling facility located at 11600 S Burley Avenue, Chicago, IL 60617". The existing data we are aware of to review is the Washington Elementary School data and possibly other stations nearby. Are you aware of any stations closer than WATCO or SH Bell that may be of value to review?

EPA will make sure we are aware of all nearby sampling efforts (we are aware of most).

6). ***Has anyone already evaluated the Washington Elementary data***?

Yes. EPA reports that there are no exceedances except a few cadmium exceedances of the ATSDR chronic EMEG. CREGs are exceeded, and EPA has not conducted a risk assessment. To our knowledge, Illinois Dept of Public Health has not conducted a cancer incidence review.

EPA is investigating the exceedances to determine if regulatory action is warranted for the intermittent exceedance of cadmium health based screening values.