



November 1, 2024

To: envcomments@cityofchicago.org

Opposition to Chicago Rail and Port, LLC Variance Request (Follow Up)

On October 15, 2024, the Southeast Environmental Taskforce (SETF) and Natural Resources Defense Council (NRDC) timely submitted a written comment in opposition to a variance request made by Chicago Rail and Port, LLC (CRP). CRP seeks to remove three out of the five PM₁₀ monitors that CDPH has required them to maintain at their site. Prior to filing comments, SETF and NRDC had made a public records request for complete monitoring data from CRP; however, even after invoking an extension, CDPH missed their statutory deadline to respond and only provided the data on October 18, 2024. As a consequence of CDPH's delay, our comment was not able to provide analysis of the full CRP PM₁₀ dataset. In light of the newly available data, SETF and NRDC seek to submit this short supplementary follow-up to their original comment and request that it be considered timely submitted.

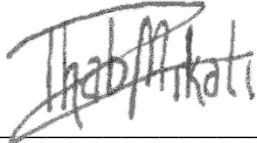
The data we reviewed for this supplement are “raw” and therefore allow us to examine all recorded exceedances. Figures 1 – 5 depict all datapoints from the Northwest (NW), Northeast (NE), Southwest (SW), Southeast (SE), and Central East (CE) monitors, respectively. On the issue of data completeness, we estimate that across the five monitors only 74% of possible datapoints included a numerical measurement. This conservatively assumes that measurements recorded as “0” are “complete” and accurate zero-measurements; if one removes zeroes from the data, we estimate that only 60% of possible datapoints actually convey information.

Within the information that is conveyed, we find over 3,900 instances of exceedances of the 150 µg/m³ NAAQS threshold. In addition, it is possible (and in fact highly likely) that the missing data also included exceedances. Again taking the conservative estimate that measurements of zero were accurate recordings and leaving out all blank entries, these exceedances account for 0.79% of all available data and 0.34% of all data since October 28,

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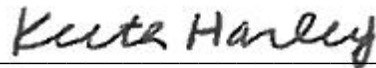
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2022. This is in contrast to CRP's assertion that their monitors "only" exceeded 0.25% of measurements since October 2022. We reiterate here the sentiment in our original comment that, while 0.34% may seem like a small proportion of measurements to a layperson, the NAAQS threshold for PM10 is to be exceeded no more than once per year on average. A look at the past year of data at, for instance, the SW monitor (Figure 4) gives an intuitive sense for how frequent exceedances actually are. CDPH should understand that CRP's air quality presents a potential danger to the human health of its neighbors and demands continued thorough monitoring. The request for variance should be **denied**.



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FIGURE 1

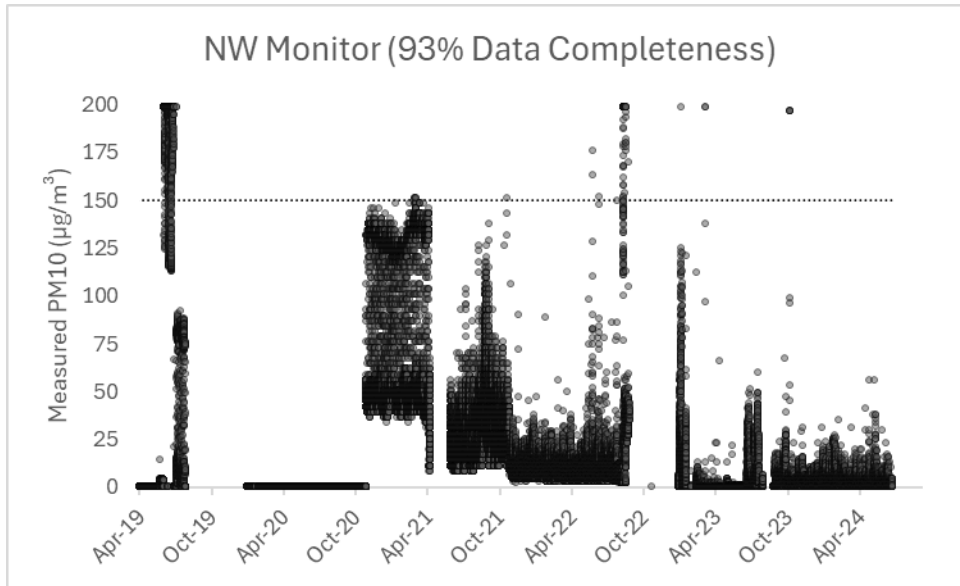


Figure 1: PM₁₀ measurements from the NW monitor. Data completeness refers to the number of 15-minute periods where numerical data, including zeroes, were recorded. If zeroes are not included, data completeness drops to 67%. Calculations are since April 1, 2019. There were 2,497 exceedances at this monitor during the time period. Measurements greater than 200 $\mu\text{g}/\text{m}^3$ are depicted as 200 $\mu\text{g}/\text{m}^3$.

FIGURE 2

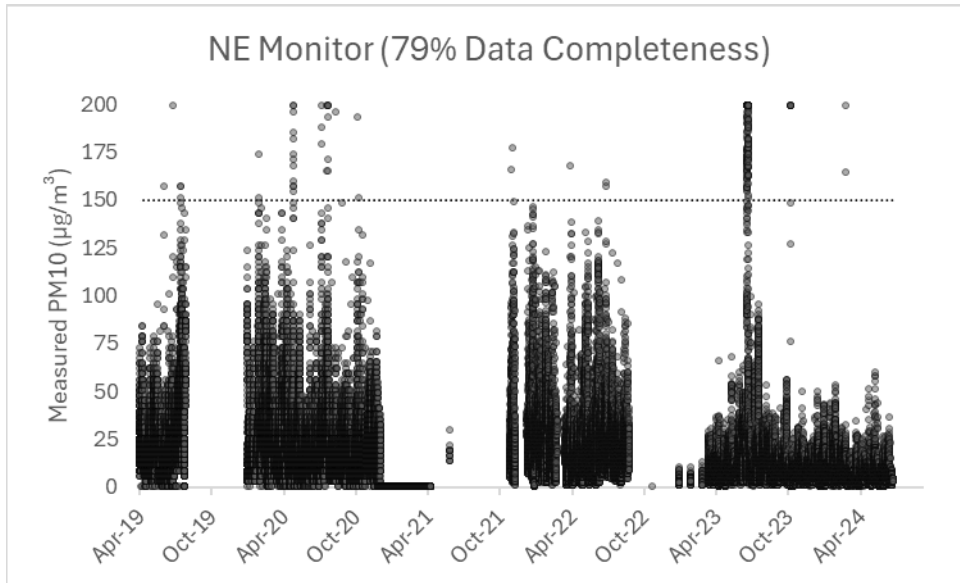


Figure 2: PM₁₀ measurements from the NE monitor. Data completeness refers to the number of 15-minute periods where numerical data, including zeroes, were recorded. If zeroes are not included, data completeness drops to 70%. Calculations are since April 1, 2019. There were 211 exceedances at this monitor during the time period. Measurements greater than 200 $\mu\text{g}/\text{m}^3$ are depicted as 200 $\mu\text{g}/\text{m}^3$.

FIGURE 3

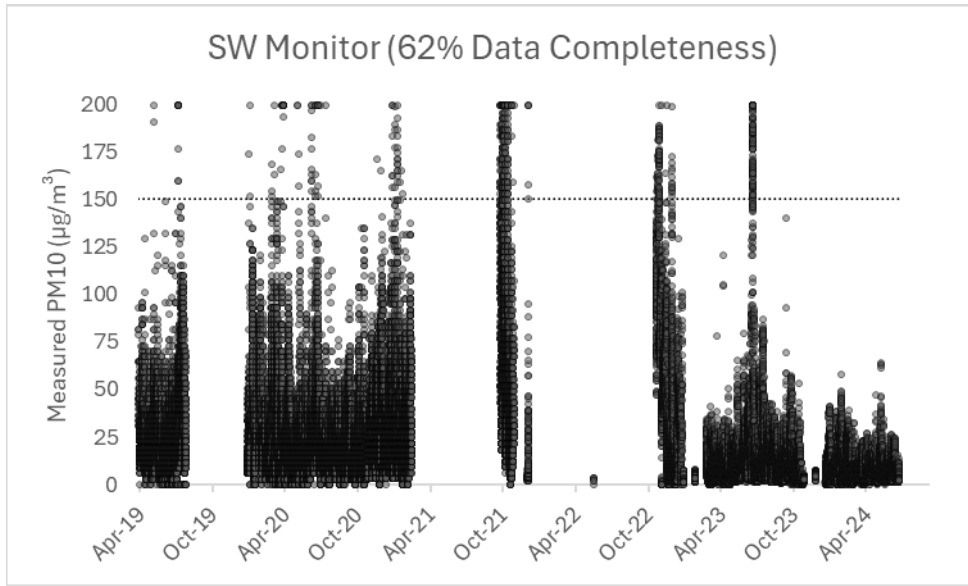


Figure 3: PM₁₀ measurements from the NW monitor. Data completeness refers to the number of 15-minute periods where numerical data, including zeroes, were recorded. If zeroes are not included, data completeness drops to 62%. Calculations are since April 1, 2019. There were 654 exceedances at this monitor during the time period. Measurements greater than 200 µg/m³ are depicted as 200 µg/m³.

FIGURE 4

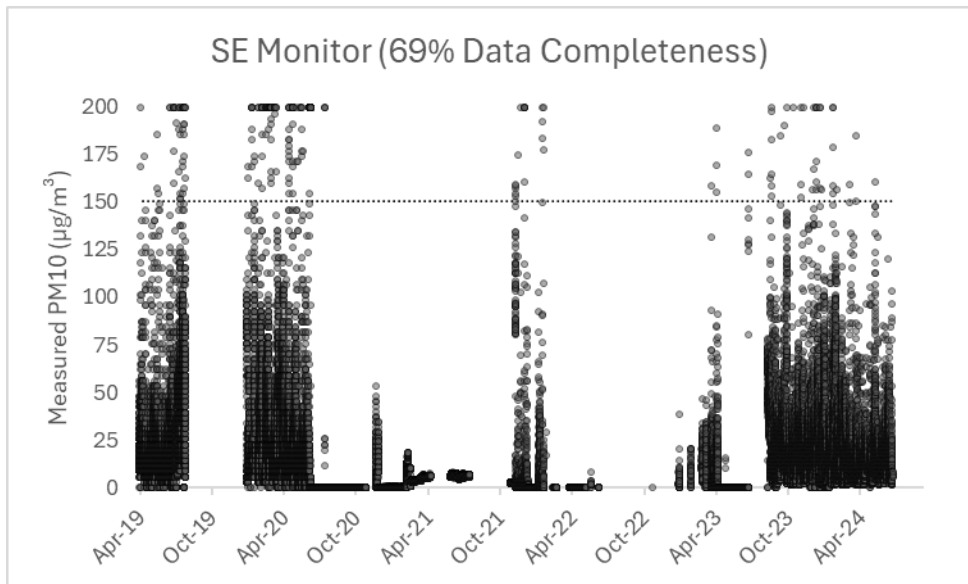


Figure 4: PM₁₀ measurements from the NW monitor. Data completeness refers to the number of 15-minute periods where numerical data, including zeroes, were recorded. If zeroes are not included, data completeness drops to 46%. Calculations are since April 1, 2019. There were 386 exceedances at this monitor during the time period. Measurements greater than 200 µg/m³ are depicted as 200 µg/m³.

FIGURE 5

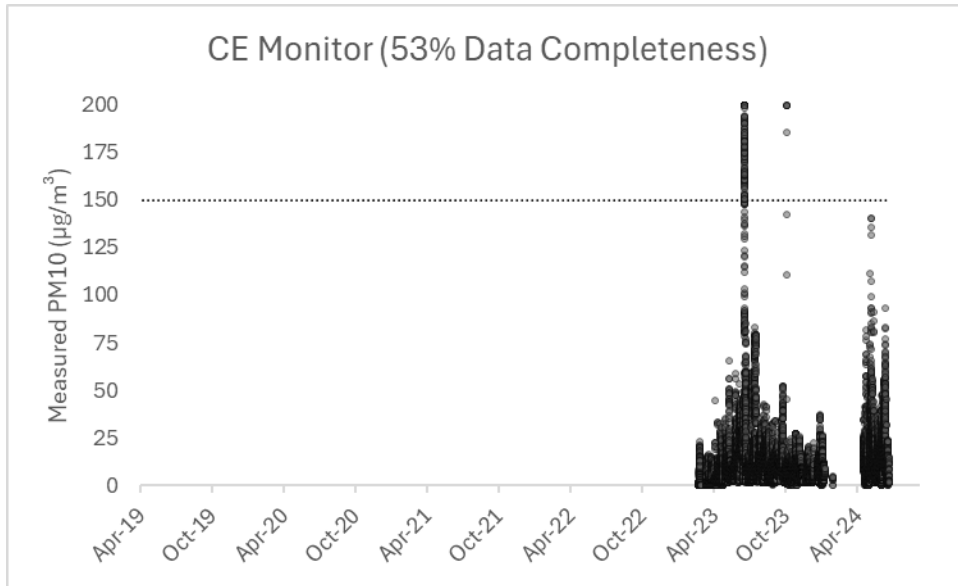


Figure 5: PM10 measurements from the NW monitor. Data completeness refers to the number of 15-minute periods where numerical data, including zeroes, were recorded. If zeroes were not included, data completeness drops to 50%. Calculations are since October 28, 2022. There were 159 exceedances at this monitor during the time period. Measurements greater than 200 µg/m³ are depicted as 200 µg/m³.