



August 6, 2024

Mr. Abraham Perez Kiamber  
Chicago Department of Public Health  
Environmental Permitting and Inspections  
333 South State Street, 2<sup>nd</sup> Floor  
Chicago, Illinois 60604

**Re: Chicago Rail and Port Reprocessable Construction/Demolition  
Material Facility, Application for Variance  
CEC Project 180-215**

Dear Mr. Perez Kiamber:

Civil & Environmental Consultants, Inc. (CEC) respectfully submits this letter and attachments on behalf of Chicago Rail and Port, LLC (CRP) as an application for a variance (Application) for CRP's reprocessible construction/demolition material facility located at 3236–3258 East 106<sup>th</sup> Street in Chicago, Illinois. The Permit was originally issued for the facility on March 10, 2022, and was most recently renewed on June 10, 2024 (Permit).

This Application is being submitted in general accordance with the Chicago Department for Public Health Rules for Reprocessible Construction/Demolition Material Facilities (Revised March 7, 2023), Section 10.1, Requirements of the Variance Application.

If you have any questions or comments regarding this submittal, please feel free to contact the undersigned at (630) 963-6026.

Sincerely,

**CIVIL & ENVIRONMENTAL CONSULTANTS, INC.**

Samarjeet S. Kadam  
Assistant Project Manager

David A. Kamano, P.E., LEED AP  
Vice President

Enclosure: Application for Variance

cc: Mr. David Zenere, Chicago Rail and Port, LLC (*electronic delivery*)  
Mr. Austin Zenere, Chicago Rail and Port, LLC (*electronic delivery*)

**APPLICATION FOR VARIANCE**

**CHICAGO RAIL AND PORT, LLC**

**Prepared For:  
CITY OF CHICAGO  
DEPARTMENT OF PUBLIC HEALTH**

**Prepared By:  
CIVIL & ENVIRONMENTAL CONSULTANTS, INC.  
NAPERVILLE, ILLINOIS**

**CEC PROJECT 180-215**

**AUGUST 2024**



**Civil & Environmental Consultants, Inc.**

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## DRAWINGS

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## 1.0 INTRODUCTION

The following information is submitted to apply for a variance from the City of Chicago Department of Public Health (CDPH) for the existing reprocessable construction/demolition material facility located at 3236–3258 East 106<sup>th</sup> Street in Chicago, Cook County, Illinois (facility). The facility is an approximate 21.3-acre property located along the east perimeter of the Calumet River between 106<sup>th</sup> Street and 103<sup>rd</sup> Street. Chicago Rail and Port, LLC (CRP) purchased the facility from Carmeuse in 2016 and has performed material handling operations at the facility since that time.

A Reprocessable Construction/Demolition Material Facility Permit was originally issued for the facility on March 10, 2022 and was most recently renewed on June 10, 2024 (Permit).

This application for variance (Application) is being submitted in general accordance with the CDPH Rules for Reprocessable Construction/Demolition Materials Facilities (Revised March 7, 2023) (Rules), Section 10.1, Requirements of the Variance Application.

We understand that the Rules include the following definitions.

- “Existing Facility” means a facility that holds a current and valid operating permit issued by the department.
- “Reprocessable Construction/Demolition Material” means broken concrete, bricks, rock, stone, or paving asphalt generated from construction or demolition activities.
- “Reprocessable Construction/Demolition Material Facility” means a parcel of land used for purposes of receiving, storing, reprocessing, and transporting of Reprocessable Construction/Demolition Material, and includes all structures, equipment, and ancillary fixtures on said parcel to Process, store, or transfer Reprocessable Construction/Demolition Material, incidental debris, and waste residue.
- “Reprocessed” or “Reprocessing” or “Reprocessing Activity” means crushed or broken into smaller constituent parts by a reprocessing device.
- “Reprocessing Device” means a device designed to crush or break reprocessable material into smaller constituent parts for the purpose of reprocessing such material and for which a permit has been issued by the department pursuant to the Chapter 11-4 of the Code.

We understand that this Application must include the information in Section 10.1 of the Rules. Each of the items in Section 10.1 of the Rules are addressed in this Application. For ease of reference, each requirement (i.e., each requested piece of information required under *Section 10.1*) is summarized below followed by a response to each. In addition, for clarity and convenience, the applicant and facility summaries included in the reprocessable construction/demolition material

facility reprocessible facility renewal application from March 2024 are additionally provided below.

## 1.1 APPLICANT SUMMARY

*Section 4.3 - The application shall contain an Applicant summary that clearly identifies the Person that is applying for the permit renewal or modification. In the case of a sole proprietorship, the Application shall include the name, address, email address, and phone number of the owner of the proprietorship. In the case of a partnership or corporation, the application shall include the name, address, contact name, email address, and phone number of the partnership or corporation.*

### **Response:**

**Owner:** South Chicago Property Development, LLC  
700 East Joe Orr Road, Chicago Heights, Illinois 60411  
Contact Person: Austin Zenere  
Email: [azenere@zforcetransportation.com](mailto:azenere@zforcetransportation.com)  
Phone: 815-530-1678

**Applicant/Operator:** Chicago Rail and Port, LLC  
3236–3258 East 106<sup>th</sup> Street  
Chicago, Illinois 60617  
Contact Person: Austin Zenere  
Email: [azenere@zforcetransportation.com](mailto:azenere@zforcetransportation.com)  
Phone: 815-530-1678

South Chicago Property Development, LLC and CRP are affiliated with Z Force Transportation, Inc. (Z Force). Z Force is a multi-generation, family-owned business that provides trucking and related services to a number of large industrial and waste hauler operations.

## 1.2 FACILITY SUMMARY

*Section 4.4 - The application shall include a Facility and Property summary containing the following:*

- a. The Facility's street address and telephone number;*
- b. The Facility's and the Property's Property Index Numbers (PINs);*
- c. A description of any Operator-utilized Area that includes other operations by the Operator or Owner occurring at the Property, outside the scope of the permit; and*
- d. A list of businesses, other than the Applicant, that are operating on the Property, if any.*

**Response:**

Facility Information: Chicago Rail and Port, LLC  
3236–3258 East 106<sup>th</sup> Street  
Chicago, Illinois 60617  
On-site Manager: Austin Zenere  
Phone: 815-530-1678

Property Index Numbers:

- 26-07-401-003-0000
- 26-07-401-006-0000
- 26-07-401-007-0000
- 26-07-401-008-0000
- 26-07-401-009-0000

Other Operations: The facility also has a Class V recycling facility permit (Class V Permit). The Class V Permit (permit number ENVREC1025078) was originally issued on April 29, 2019. The Class V Permit allows the facility to accept mixed loads of uncontaminated soils, broken concrete without protruding metal bars, bricks, rock, stone, or reclaimed asphalt pavement generated from construction or demolition activities. Incoming materials are separated via a screener in accordance with the Class V Permit, which results in reprocessible construction/demolition material. In addition, the facility may accept reprocessible construction/demolition material that does not need to be separated in accordance with the Class V Permit. Reprocessible construction/demolition material is sized to customer specifications as described in this application. Reusable materials are hauled off-site and returned to the economic mainstream. Remaining materials are barged or trucked to a permitted clean construction or demolition debris (CCDD) fill site.

CRP also performs material handling of various stone and bulk products, such as salt and granite, at the facility. Materials are generally delivered via self-unloading vessels, temporarily staged, and then transloaded into rail cars, barges, or trucks. CRP is the material handling operator and Z Materials is the seller of the product.

List of other businesses: Parcel 3, as depicted on Drawing 1, which is located east of the existing railroad (i.e., the “east property”), was not part of the original planned development approval and is also not part of the Class V recycling facility and reprocessible construction/demolition material facility. Parcels 1 and 2, which comprise the property located west of the existing railroad (i.e., the “west property”), is the property that was part of the planned development approval and is the Class V recycling facility and reprocessible construction/demolition material facility. Both

properties are owned by “South Chicago Property Development” but lessees are different for each site—the west property is leased to CRP, while the east property is leased to Z Force. All three businesses have the same ownership group.

The use of the east property is covered under the existing PMD-6 zoning. No operations are performed on the east property other than the parking of out-of-service trucks and equipment for parts.

## 2.0 APPLICATION FOR VARIANCE

This section of the application outlines the standard requirements for a variance application as detailed in Section 10.1.1 of the Rules. It demonstrates that the facility is designed to ensure continuous protection of public health, safety, and welfare. Importantly, the variance sought will not result in the creation of a public nuisance or adversely affect the surrounding area, environment, or neighboring properties.

This section has been organized to include language from the Rules describing required components of the variance request in italics, followed by a response that includes the requested information.

### 2.1 REQUIREMENTS OF THE VARIANCE APPLICATION

#### *Section 10.1.1 – Standard Requirements*

- a. A statement identifying the rule or requirement for which the variance is requested;*

**Response:**

CRP is requesting a variance from Section 5.5.a. of the Dust Monitoring Plan requirements. This section mandates the placement and operation of PM10 monitors along or near the Facility's boundary at each 45-degree direction relative to the center of the Facility if a Sensitive Area is within 660 feet of the Facility or its property boundary.

CRP currently operates five Met One Instruments PM10 monitors located in the northwest, southwest, central-east, northeast, and southeast regions. This application seeks a variance to remove the monitors in the northwest, southwest, and central-east region regions while retaining the two in the northeast, and southeast regions. The monitors that are planned to be retained are adjacent to residential areas to the east, in compliance with Section 5.5.a.ii of the Rules.

- b. A description of the Process or activity for which the variance is requested, including pertinent data on location, size, and the population and geographic area affected by, or potentially affected by, the Process or activity;*



**Response:**

The activity for which a variance is requested is the reprocessing of concrete in accordance with the CRP's current reprocessable construction/demolition material facility reprocessable facility permit. As shown on Drawing 1, the facility is located on parcels 1 and 2. Immediately east of parcels 1 and 2 is a railroad right of way, followed by parcel 3, which, as described above, is leased to Z Force Transportation. East of parcel 3 is a residential area.

The residential area is located between 103<sup>rd</sup> Street and 106<sup>th</sup> Street. Approximately 61 homes abut parcel 3 and additional residences are located further eastward. Please note, as described above, the CRP reprocessable construction/demolition material facility does not abut the residential properties.

- c. The quantity in tons and types of materials used in the Process or activity in connection with which the variance is requested, as appropriate;*

**Response:**

The facility is permitted to accept up to 4,200 tons per day of reprocessable material.

- d. Documentation to Demonstrate that the variance will not create a public nuisance or adversely impact the surrounding area, surrounding environment, or surrounding property uses;*

**Response:**

CRP has conducted air monitoring for the past five years to ensure compliance with air quality standards and to monitor the levels of particulate matter (PM<sub>10</sub>) around the Facility. The raw data, together with meteorological data collected by the site Met Station, collected by the northwest, southwest, northeast and southeast ESamplers were utilized to calculate the downwind concentration at each location.

The following summary presents the findings and supports CRP's request for a variance. The data presented is a summary of air monitoring results showing the number of measurements exceeding 150 µg/m<sup>3</sup> of particulate matter (PM) across four different locations (southeast, northeast, northwest, southwest) from April 2019 to August 2022.

**Chicago Rail and Port, LLC**  
**Summary of Air Monitoring Results**  
**Number of Measurements >150 µg/m<sup>3</sup>**

<b>Month</b>	<b>Southeast</b>	<b>Northeast</b>	<b>Northwest</b>	<b>Southwest</b>
April 2019	0	0	0	0
May 2019	0	0	0	1
June 2019	0	0	0	0
July 2019	0	0	0	1
August 2019	0	0	0	0
September 2019	0	0	0	2
October 2019	0	0	0	0
November 2019	0	0	927	0
December 2019	9	0	196	9
January 2020	0	0	0	1
February 2020	0	0	0	0
March 2020	9	0	0	2
April 2020	0	8	0	0
May 2020	9	0	0	2
June 2020	3	0	0	5
July 2020	0	0	0	0
August 2020	0	1	0	0
September 2020	0	0	0	0
October 2020	0	0	0	0
November 2020	0	0	0	0
December 2020	0	0	0	0
January 2021	0	0	0	9
February 2021	0	0	0	0
March 2021	0	0	0	0
April 2021	0	0	0	0
May 2021	0	0	0	0
June 2021	0	0	0	0
July 2021	0	0	0	0
August 2021	0	0	0	0
September 2021	0	0	0	0
October 2021	0	0	0	229
November 2021	0	1	0	229
December 2021	0	0	0	0
January 2022	0	0	0	0
February 2022	0	0	0	0
March 2022	0	0	0	0
April 2022	0	0	0	0

Month	Southeast	Northeast	Northwest	Southwest
May 2022	0	0	0	0
June 2022	0	0	0	0
July 2022	0	0	0	0
August 2022	0	0	7	0

From April 2019 to August 2022, a total of 119,808 air quality measurements were taken at the facility for the northwest, southwest, northeast and southeast region air monitors, in 15-minute increments. Out of these, 1660 measurements exceeded the threshold of 150 µg/m<sup>3</sup>, representing approximately only 1.39% of the total measurements. For these exceedances, virtually all of them were a result of an issue unrelated to site operation, such as:

- Smoke from Leon’s BBQ located on the south side of 106<sup>th</sup> Street (directly south of the CRP facility);
- Instrument failure due to issues with Met One’s PM10 monitor such as issues with flow, filters, and/or concentration. On at least one occasion, a monitor was sent back to Met One for maintenance, however, the real-time data collection continued and indicated PM10 spikes as the instrument was worked on;
- Smoke from fires (local or distant); and
- Heavy fog.

These issues have predominantly been documented including providing CDPH period summary emails describing the issues surrounding the exceedance. Additionally, as CDPH is aware, CRP has been providing air data for the site air monitors in real-time since February of 2023 through use of CDPH’s Envirosuite system.

While CDPH has access to the air monitor data since February 2023, the data presented below is a summary of air monitoring results for Chicago Rail and Port, showing the number of raw data measurements exceeding 150 µg/m<sup>3</sup> of particulate matter across the air monitors from October 2022 to June 2024. Please note, the central-east monitor was added in October 2022.

**Chicago Rail and Port, LLC**  
**Summary of Air Monitoring Results**  
**Number of Measurements >150 µg/m<sup>3</sup>**

Month	Southeast	Northeast	Northwest	Southwest	Central-East
October 2022	0	0	25	0	0
November 2022	0	0	101	0	0
December 2022	0	0	14	0	0
January 2023	0	0	1	0	0

Month	Southeast	Northeast	Northwest	Southwest	Central-East
February 2023	0	0	0	0	0
March 2023	2	0	2	0	0
April 2023	3	0	0	0	0
May 2023	0	0	0	0	0
June 2023	2	195	0	184	179
July 2023	0	0	0	0	0
August 2023	7	0	0	0	0
September 2023	2	0	0	0	0
October 2023	3	7	4	0	6
November 2023	5	0	0	0	0
December 2023	12	0	0	0	0
January 2024	3	0	0	0	0
February 2024	4	0	0	0	0
March 2024	3	2	0	0	0
April 2024	0	0	0	0	0
May 2024	1	0	0	0	0
June 2024	0	0	0	0	0

From October 2022 to June 2024, a total of approximately 302,400 air quality measurements were taken at the Chicago Rail and Port facility for the five monitors described above, in 15-minute increments. Out of these, only 767 measurements exceeded the threshold of 150 µg/m<sup>3</sup>, representing approximately 0.25% of the total measurements. In addition to the above explanations relative to typical reason for an exceedance, as noted, the above data between October 2022 and June 2024 is “raw” only so has not been adjusted to remove exceedances that were caused by an off-site source.

Based on the air monitoring data from the past five years, the requested variance to remove the PM10 monitors in the northwest, southwest, and central-east regions will not create a public nuisance or adversely impact the surrounding area, environment, or property uses. The retained monitors in the northeast and southeast regions will continue to ensure air quality compliance, particularly adjacent to the residential areas to the east of the facility.

Finally, in addition to the above, CRP has never received an air quality complaint from the residents located east of the facility, which further supports that the facility operations have been compliant with the intent of the dust monitoring requirements of the Rules. As further evidence to this, CRP recently received a nomination from the Calumet Area Industrial Commission (CAIC) for the City of Chicago Positive Community Impact award. In a July 1<sup>st</sup>, 2024 email from Beth Dybala, Vice-President of Economic Development for CAIC, “The Calumet Area Industrial Commission (CAIC) wishes to nominate Chicago Rail & Port for the

city's Positive Community Impact category. Such a nomination will recognize your company for its purchase and investment in a vacant industrial site in the Lake Calumet Corridor and for working with the 10th Aldermanic Office & the City of Chicago to co-exist within the surrounding community.”

*e. A statement explaining:*

- i. Why compliance with the rules imposes an arbitrary or unreasonable hardship;*
- ii. Why compliance cannot be accomplished during the required timeframe due to events beyond the Facility Operator’s control such as permitting delays or natural disasters;*  
*or*
- iii. Why the proposed alternative measure is necessary.*

**Response:**

The implementation of the four original air monitors was perpetuated for the facility prior to promulgation of the current Rules as a condition of the original reprocessible permit; however, this requirement exceeds that which is required by the Rules. Section 5.5.a. of the Dust Monitoring Plan requirements mandates the placement and operation of PM10 monitors along or near the Facility’s boundary, with at least one monitor at each 45-degree direction relative to the center of the Facility if a Sensitive Area is within 660 feet of the Facility or its property boundary. Maintaining the northeast and southeast monitors, while removing the others, will be in accordance with the Rules and continue to appropriately monitor site air quality.

In addition, as described above, the data collected over the course of the last 5 years demonstrates that the site operations have not caused air quality issues to the surrounding areas.

*f. A description of the proposed methods to achieve compliance with the rules and a timeframe for achieving that compliance, if applicable;*

**Response:**

CRP will continue to operate the northeast and southeast monitors, with real-time data shared with CDPH, as is currently the case.

*g. A discussion of alternate methods of compliance and of the factors influencing the choice of applying for a variance; and*

**Response:**

CRP has not considered other alternate measures of complying with the air quality requirements of the Rules as the PM10 air monitoring requirement is already well-defined. CRP is applying for a variance at this time to remove the additional cost and effort associated with maintaining the northwest, southwest, and central-east air monitors. As CDPH is aware, this request was part of the renewal application submitted in March 2024.

*h. A statement regarding the Applicant's current status as related to the subject matter of the variance request.*

**Response:**

CRP was the first of the City reprocessible facilities to implement air monitoring. CRP has partnered with CEC through the course of the air monitoring program implementation, both of whom maintain a strong understanding of the air monitoring Rules and their intended purpose to improve air quality in the City.

### 3.0 PROFESSIONAL ENGINEER CERTIFICATION

*Section 4.1 - The permit application shall be prepared under the direction of, and shall contain the name, address, registration number, seal, and signature of, a Professional Engineer ("PE").*

**Response:**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



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David A. Kamano, P.E.

Illinois License Number 062-057977

Expiration Date: November 30, 2025

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August 6, 2024

Date



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**DRAWING 1**

**FACILITY LAYOUT**

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**LEGEND**

- STORM MANHOLE
- CURB INLET
- CATCH BASIN
- UNCLASSIFIED MANHOLE
- WATER METER
- ELECTRIC MANHOLE
- TRAFFIC SIGNAL POLE
- POWER POLE
- GUY WIRE
- LIGHT POLE
- BOLLARD
- MOORING POINT
- SIGN
- FLAG POLE
- PROPERTY BOUNDARY
- EASEMENT
- FEMA FIRM BOUNDARY
- CURB AND GUTTER
- CONCRETE
- BUILDING
- OVERHEAD WIRES
- SHEET PILING
- FENCE
- RAILROAD TRACKS
- GUARDRAIL
- AIR MONITOR
- TRAFFIC FLOW
- SETBACK LINE
- DRAINAGE SWALE
- EXISTING BUILDING TO BE PRESERVED
- ASPHALT PAVEMENT
- VARIANCE REQUEST TO REMOVE

**NOTES**

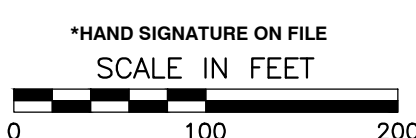
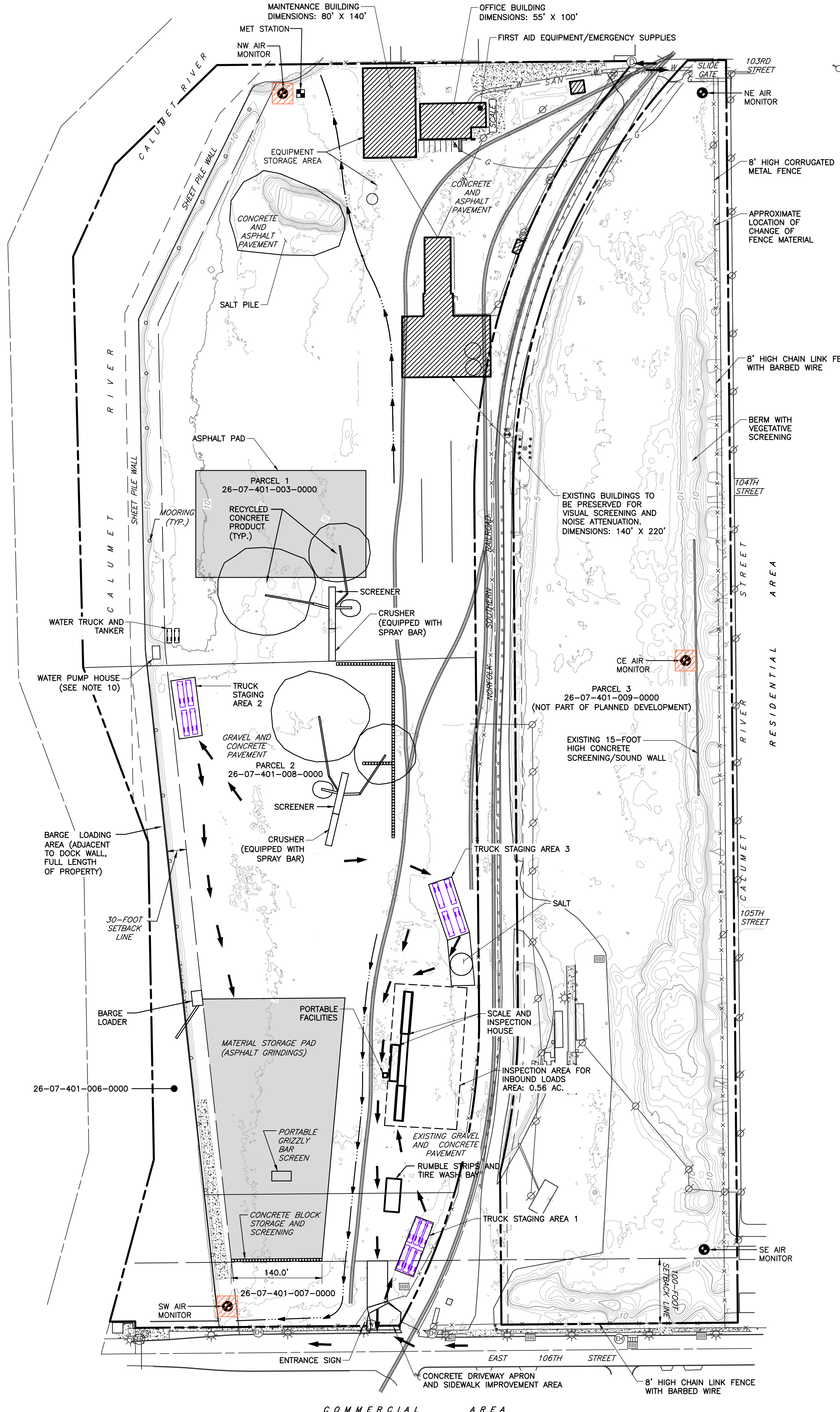
1. INCOMING REPROCESSABLE CONSTRUCTION/DEMOLITION MATERIALS ARE SEPARATED VIA A SCREENER AND RECYCLABLE CONCRETE IS SIZED TO CUSTOMER SPECIFICATIONS.
2. RECYCLABLE MATERIALS ARE HAILED OFF-SITE AND RETURNED TO THE ECONOMIC MAINSTREAM. REMAINING MATERIALS ARE BARGED OR TRUCKED OR TRAINED TO AN IEPA PERMITTED CCDD FILL SITE.
3. OUTGOING TRUCKS TRAVEL THROUGH A WASH BAY AND RUMBLE STRIPS TO PREVENT MUD FROM BEING TRACKED ONTO 106TH STREET.
4. A SCALE HOUSE AND SCALE IS USED TO INSPECT ALL INCOMING LOADS TO REVIEW THAT ONLY PERMITTED MATERIALS ARE ACCEPTED.
5. DEPENDING ON MARKET CONDITIONS, SITE MAY STORE OR TRANSLOAD OTHER COMMODITIES. SEASONAL SALT STORAGE AND TRANSLADING IS ANTICIPATED.
6. OFFICE INCLUDES BATHROOMS, LOCKER ROOMS, AND BREAKROOM. WATER, GAS, AND ELECTRIC UTILITIES ORIGINATE OFF OF 103RD STREET.
7. WATER PUMP HOUSE IS USED FOR WETTING STOCKPILES OR FIRE PROTECTION PURPOSES, AS NEEDED.
8. FIRE EXTINGUISHERS ARE LOCATED IN OFFICE, MAINTENANCE BUILDING, SCALE HOUSE, AND IN MOBILE EQUIPMENT.
9. AIR MONITORS ARE MOUNTED AT 5- FEET ABOVE GRADE.
10. PIN'S SHOWN ARE FROM COOK COUNTY GIS.

**REFERENCE**

1. PROPERTY BOUNDARY AND SITE FEATURES FROM CHICAGO GUARANTEE SURVEY COMPANY ALTA/NSPS LAND TITLE SURVEY, ORDER No. 2018-25124-001, DATED MARCH 7, 2018, AS PROVIDED BY PROFESSIONAL LAND AND CONSTRUCTION SURVEYORS (PLCS), CHICAGO, ILLINOIS.
2. THE HORIZONTAL DATUM IS THE ILLINOIS STATE PLANE COORDINATE SYSTEM EAST ZONE NAD 83 (IL63-EF).
3. THE VERTICAL DATUM IS THE CHICAGO CITY DATUM.
4. THE TOPOGRAPHIC CONTOUR DATA SHOWN HEREON WAS COLLECTED IN THE FIELD ON APRIL 17, 2018 USING AERIAL SURVEY EQUIPMENT (DJI INSPIRE 2). HORIZONTAL AND VERTICAL DATUM IS BASED UPON GROUND CONTROL SET USING A TRIMBLE R10 GNSS ROVER AND BASED ON THE CORS RTK NETWORK.

**LIST OF MAJOR EQUIPMENT**

- CRUSHERS - LIPPMMANN J3062-VGF6220 OR SIMILAR. ASSUME TWO FOR OPERATION.
  - TWO McCLOSKEY SCREENING PLANTS
  - GRIZZLY BAR SCREEN
  - BARGE LOADING/UNLOADING: SENNEBOGEN 870 WITH 5-6 YD CLAMHELL, TRACKED OR WHEELED
  - ASTEC TRACKED HOPPER FEEDER FOR LARGE BARGES
  - JOHN DEERE (JD) 850 BULLDOZER
  - TWO CAT 966 WHEEL LOADERS
  - JD270 EXCAVATOR WITH SWAPPABLE BREAKER ATTACHMENT
  - WATER TRUCK
  - ELGIN STREET SWEEPER
  - MISTERS
- SIMILAR OR EQUIVALENT EQUIPMENT TO THE ABOVE MAY BE USED.



REVISION RECORD	
NO.	DATE

1230 East Diehl Road  
Suite 200  
Naperville, IL 60563  
Ph: 630.963.6026  
www.cecinc.com

**CEC**  
Civil & Environmental  
Consultants, Inc.

**CHICAGO RAIL AND PORT, LLC**  
**REPROCESSABLE MATERIALS**  
**PERMIT APPLICATION**  
3236-3258 EAST 106TH STREET  
CHICAGO, ILLINOIS 60617

FACILITY LAYOUT	
DATE:	08/06/2024
DRAWN BY:	SSK
CHECKED BY:	DAK
PROJECT NO.:	180-216.0013
APPROVED BY:	DAK

DRAWING NO. **1**  
SHEET 1 OF 6

A:\2018\180-216\180-216-001-001.dwg (S:\180-216\180-216-001-001.dwg) Application: 2024/08/06 11:58:11 AM (User: ssk) - LP: 8/6/2024 11:58 AM