



DEPARTMENT OF PUBLIC HEALTH  
CITY OF CHICAGO

**Via Electronic Mail**

March 17, 2021

Mr. Hal Tolin  
General III, LLC  
11554 S. Avenue O  
Chicago, Illinois 60617

**Subject: Class IVB Large Recycling Facility Application  
Detailed Request for Additional Information**

Dear Mr. Tolin:

I write in furtherance of my letter of March 15, 2021 and in preparation for our meeting scheduled for March 18, 2021, concerning the permit application submitted on behalf of General III, LLC d/b/a Southside Recycling (“the Applicant”) to operate a large recycling facility at 11600 S. Burley Avenue. As previously stated, the Chicago Department of Public Health (“CDPH”) has determined a need for additional information related to potential environmental impacts of the proposed operation, especially in conjunction with the existing facilities on the same property.

Pursuant to Section 3 of the Rules for Large Recycling Facilities (“Rules”), “Permit applications shall contain Documentation sufficient to Demonstrate that the Facility is designed and will be operated in a manner that protects public health, safety, and the environment.” Further, pursuant to Section 11-4-2530 of the Chicago Municipal Code, applicants for a permit for a recycling facility shall provide certain information, including: “(I) Any other information requested by the commissioner.”

To this end, CDPH requests further information as follows:

**I. Information to Inform Single Source Determination**

Pursuant to Rule 4.7.1 of the Rules for Large Recycling Facilities (“Rules”), facilities must possess a certificate of operation issued in accordance with Section 11-4-660 of the Air Pollution Control Ordinance. Rule 4.7.1 further provides that CDPH may “impose dust control requirements, in addition to the requirements set forth in these rules, as conditions of the Facility’s certificate of operation or air pollution control permit.”

As you know, the Illinois Environmental Protection Agency (“IEPA”) previously determined that all of the facilities operating at the subject site (the “Campus Property<sup>1</sup>”) constitute a single source for air permitting purposes. Thus, in order to determine whether these operations should be considered a single source under CDPH’s programs, CDPH requests the following information:

For each of the businesses operating at the Campus Property:

- a. Primary SIC Codes of all businesses operating on the Campus Property;
- b. Plot map depicting the boundaries of individual businesses operating on the Campus Property;
- c. Shared staffing and resources between businesses, both currently and as expected in connection with the proposed new General III operation, including:
  - i. Shared workforces;
  - ii. Shared management;
  - iii. Shared administrative functions;
  - iv. Shared equipment (e.g., scale, storage tanks, loading/processing equipment, fueling and vehicle-maintenance);
  - v. Shared intermediates or byproducts (i.e., the transfer of materials from one business to another for storage, handling, or additional processing or treatment). An example may be Southshore Recycling LLC taking engines to Napuck for processing;
  - vi. Shared pollution control responsibilities (i.e., street sweeper, refrigerant-recovery, etc.);
  - vii. A description of support/dependency relationships;
  - viii. Copy of current IEPA air permit(s), including Registration(s) of Small Sources (“ROSSs”); and
  - ix. Copy of all IEPA annual air emission reports within the last three years, as applicable.

---

<sup>1</sup> Reserve Marine Terminals (terminal operations), Reserve FLT LLC, dba Reserve Marine Terminals (recycling operations), South Shore Recycling, Napuck Salvage of Waupaca, and Regency Technologies

## **II. Information to Inform Air Quality Assessment and Environmental Impact**

Pursuant to Rule 4.7.7.2 of the Rules, with respect to Consequential Facilities, CDPH may require the installation of additional air monitors or the relocation of existing air monitors if CDPH determines that the current number or placement of air monitors at the Facility is ineffective or inadequate. In addition, pursuant to Rule 4.7.7.3, the Department may require the installation, operation, and maintenance of other monitoring methods when PM<sub>10</sub> monitoring does not provide sufficient information regarding Fugitive Dust for the Commissioner to adequately assess the health impacts of such emissions.

Accordingly, CDPH requests the following information:

- a. A revised Air Quality Assessment report that accounts for all PM<sub>10</sub> and metal-emission sources within the ambient air boundary, as depicted in section 3.3 of RK & Associates, Inc.'s Air Dispersion Modeling Report for Assessment of Particulate PM<sub>10</sub> Impact. Such modeling shall include detailed accounting and modeling of emissions from all processes, vehicle travel over paved and unpaved surfaces, material storage and staging piles, non-road diesel engines, and torch or plasma cutting. The revised air quality assessment shall include a percent-silt and metals analysis for all unpaved surfaces and stockpiles.
- b. With respect to the existing facilities on the Campus Property, and in accordance with the conditions of their respective recycling facility permits, please provide the following information for each facility:
  - i. A listing and associated quantities of all procured fuels and chemicals over the last three years, including all diesel-fuel, propane, gasoline, acetylene gas, chemical solvents, degreasers, detergents, motor oil, grease, paint, and other coating product. The list shall include Safety Data Sheets (SDSs) for all the above chemicals stored and used by the business.
  - ii. Monthly reports of all material receipts and shipments to and from each of the businesses within the last three years. Such summary shall include quantities in tons shipped or received (including receipts and shipments from and to other Campus Property businesses), the source business for inbound loads, the destination facility for outbound loads, and the recyclable material type or product name.

- iii. Monthly reports of all waste shipments, including all used-oil, waste oil, liquid waste, municipal solid waste, and special waste shipments. Indicate if there are any quantities of waste shipments to other Campus Property businesses for consolidation or treatment prior to final disposition off of the Campus Property.
- iv. A detailed assessment of all pavement conditions and a schedule for the repair or improvement of broken or damaged pavements. All graveled surfaces shall be analyzed for percent-silt content (as required under paragraph II.a of this letter) to determine if supplemental gravel coating or a complete resurfacing is required.
- v. The amount of refrigerants recovered and recycled or disposed offsite within the last three years.
- vi. The make, model, and USEPA engine rating (Tier) of all non-road vehicles and equipment kept or used at each business, including their ownership or lease status.
- vii. An operations and maintenance plan that describes procedures and protocols in the handling, management, and storage of universal waste.
- viii. An emergency response plan and a fire-prevention plan.
- ix. A copy of the vector control contract.
- x. A copy of all City of Chicago business licenses and hazmat licenses.
- xi. A copy of all MWRD discharge permits.

### **III. Additional Information to Inform Application Review**

CDPH requests the following additional information:

- a. Pursuant to Rule 3.9.18 of the Rules, the Applicant must submit a Stormwater Pollution Prevention Plan (SWPPP) containing information specified therein. Further, Rule 3.9.18.4 provides that a copy of the SWPPP prepared in accordance with the Facility's National Pollutant Discharge Elimination System ("NPDES") permit may satisfy the requirements of this section and that "CDPH may require additional information or measures to supplement the SWPPP based on site-specific conditions."

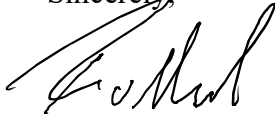
Accordingly, please provide a revised SWPPP for the areas of the Campus Property subject to NPDES. The revised SWPPP shall include best management practices ("BMPs") to prevent material from washing into the

water from land at barge areas, and periodic inspection protocols to detect these occurrences, as well as any illicit discharge and deposition of dust and litter on the waterway. The SWPPP shall include a detailed plan for cleaning or remediating spilled or deposited materials and illicit discharges, including seeps and oily sheen that may be found emanating from the Campus Property.

- b. Pursuant to Rule 4.12, shredders must be designed to withstand internal explosions, safely deflect objects that may be ejected from the shredder box by mechanical force or explosions and must be covered or hooded as necessary to meet state and federal air quality capture-efficiency requirements. Accordingly, please provide drawings of the shredder and shredder enclosure in plan, elevation, and isometric views, that make clear any and all openings where emissions may escape without treatment. Provide calculations on the estimated capture efficiency of the shredder exhaust capture system, including sizing calculations for all fans, blowers, ducting systems, and hood.
- c. Rule 4.4.2 requires Post-Processed Auto Shredder Residue (“ASR”) to be stored inside a covered, fire-proof enclosure that effectively protects the stored material from precipitation and potential ignition sources, and that prevents this material from becoming windborne.” Further, Rule 4.17.4 requires Facilities that generate, treat, and/or store ASR to provide quarterly reports showing the tonnage of ASR shipped offsite for disposal and a description of any methods used to stabilize or solidify heavy metals to meet waste-disposal requirements. Thus, for the proposed facility, should treatment of the post-processed ASR (“auto fluff”) become necessary or desired, please describe the application process including where the process would be conducted, the stabilizing-chemical name(s) and their application quantities, personal protective equipment (“PPE”) requirements, and copies of all SDSs.
- d. Pursuant to Rule 4.14.2, the required street sweeper shall be equipped with a water spray for use during nonfreezing weather and a vacuum system to prevent Fugitive Dust during street sweeping. Further, a “dry vacuum-assisted street sweeper may be used upon demonstration, to the satisfaction of the Commissioner, that such sweeper has a 90% efficiency, or better, in removing fine particulates.” Accordingly, please provide documentation that the proposed mechanical streetsweeper is equipped with a vacuum system designed to pick up fine particulates. If the current mechanical sweeper is not equipped with such a system, please propose an alternate mechanical sweeper that meets the requirements set forth in the Rules. Please note that CDPH encourages the use of PM10 mechanical sweepers certified by South Coast Air Quality Management District (“SCAQMD”) or Canada’s Environmental Technology Verification Program.

CDPH will review the above request and answer any questions you may have at our scheduled meeting this Thursday. CDPH will post your response to these items on the City's website within five (5) business days from receipt. In addition, upon receipt of the requested information, CDPH will complete its evaluation of the Application.

Sincerely,

A handwritten signature in black ink, appearing to read "Renante Marante". The signature is fluid and cursive, with a large initial "R" and "M".

Renante Marante,  
Environmental Engineer III