



RMG/SOUTHSIDE RECYCLING HIA: Process and Lessons

May 18, 2022



AGENDA

- **Background on the RMG/Southside Recycling Permit**
- **HIA Process**
 - Values
 - Screening & Scoping
 - Assessment
 - Decision-Making
- **Lessons Learned**

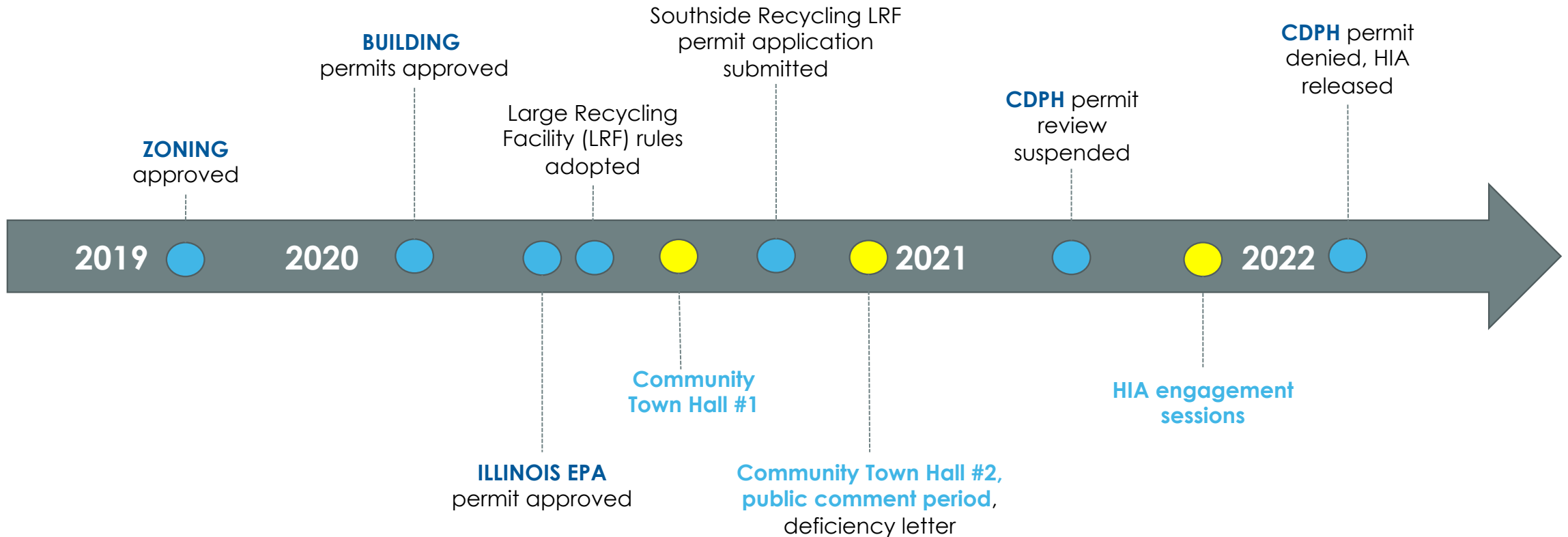
BACKGROUND

★ RMG/SOUTHSIDE RECYCLING



- Reserve Management Group (RMG) is an Ohio based metal recycling company
- Purchased General Iron, then operating in Lincoln Park, in 2019
- Seeking permit for Southside Recycling at 11600 S. Burley
 - Planned Manufacturing District (PMD) 6
 - Calumet Industrial Corridor
- Has operated recycling facilities in the ward for 30+ years
- Would accept scrap metal, including end of life vehicles, for processing and recycling

PERMITTING TIMELINE



HIA PROCESS: VALUES

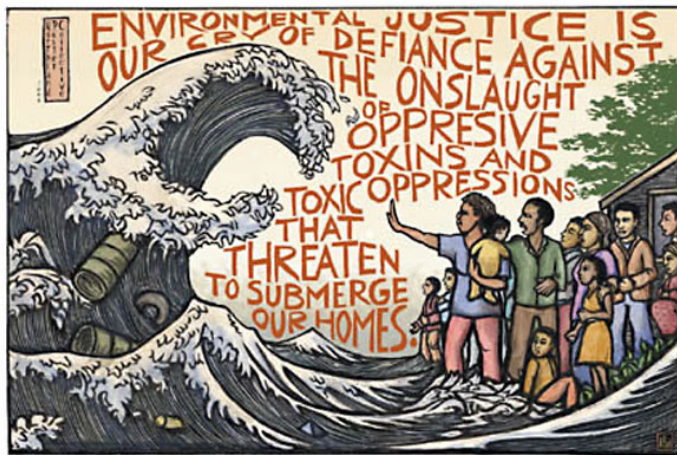
★ HEALTHY CHICAGO 2025



- CDPH's citywide community health improvement plan
- **Goal is to close the racial life expectancy gap**: 10 years between Black and white Chicagoans, life expectancy declining for Latinx
- Focus on the **root causes of health** – including institutional racism – and supporting community power in decision-making

★ EQUITY & ENVIRONMENTAL JUSTICE

Equity is both an **outcome** and a **process** that results in fair and just access to opportunity and resources that provide everyone the ability to thrive.



Source: Illustration by Ricardo Levins Morales

- **Define** the problem/opportunity
- **Acknowledge** history
- **Compare** conditions on Southeast Side to non-EJ community areas
- **Look** at numbers and narratives
- **Shift** power through authentic engagement
- **Measure** the benefits and burdens
- **Embrace** transparency and accountability
- **Commit** to action

Sources: Chicago's Equity Statement of Principles; Health and Race Equity Impact Assessment Guiding Questions, developed by HREIA Community Accountability Committee

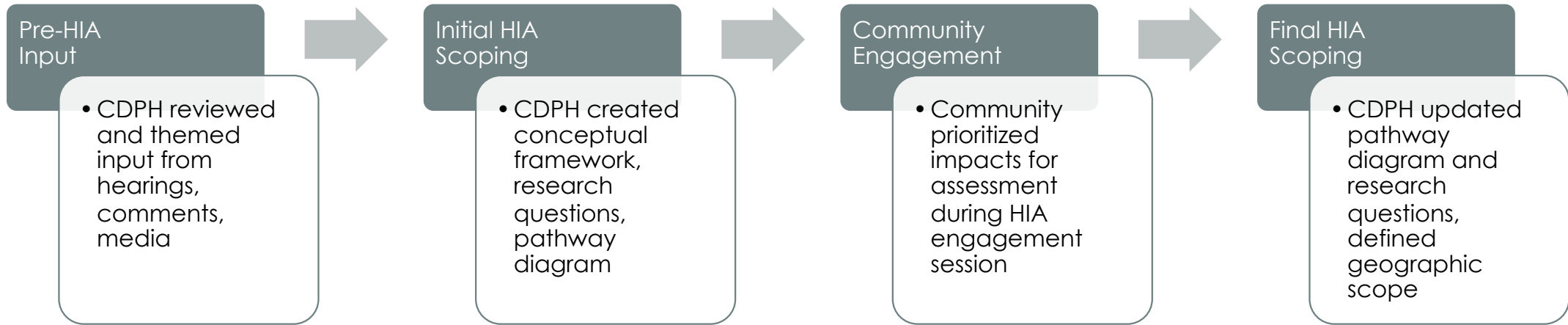
HIA PROCESS: SCREENING & SCOPING



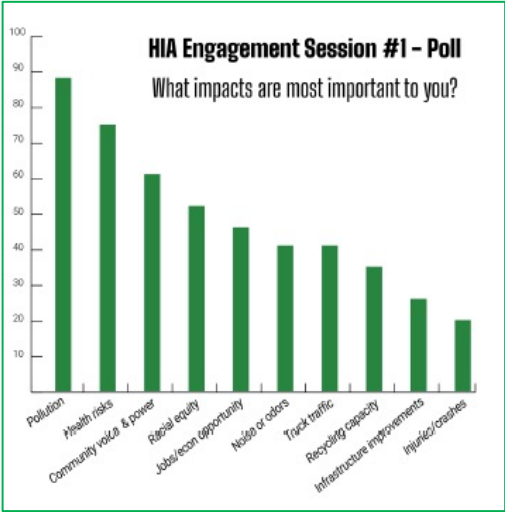
SCREENING FACTORS

- The potential to explicitly consider environmental justice and health equity in the review of this permitting decision;
- The opportunity to comprehensively review pertinent data not limited to just environmental impacts of the permitted facility, but existing and potential environmental, social and health impacts;
- The support of U.S. EPA;
- CDPH authority to review applications to determine whether or not to grant permits, request additional information, and recommend special conditions or mitigation strategies in the event a permit is granted; and
- The opportunity to highlight broader recommendations for broader policy and process change and discuss these potential strategies with community partners.

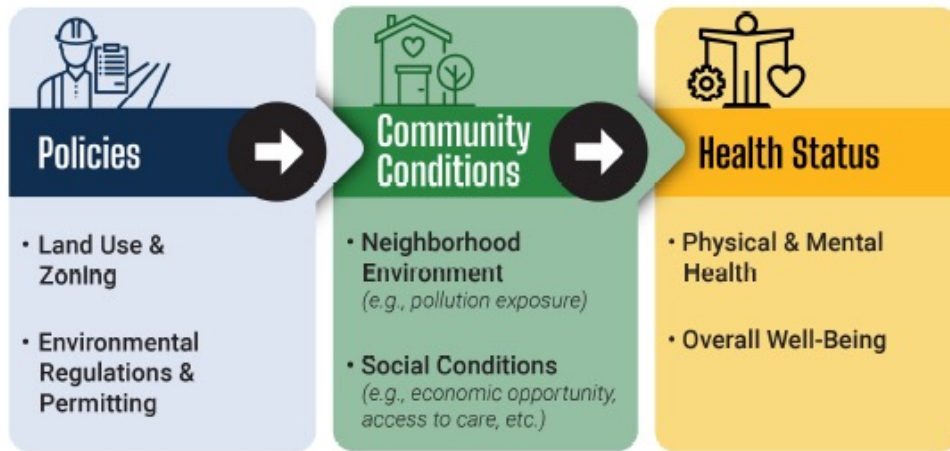
★ SCOPING PROCESS



“As a business owner myself in the 10th Ward, I would question why a city that is losing revenue and population daily would not be supporting a local business that has been in this community for over 29 years, they provide a living wage that feeds and supports local families and children.”

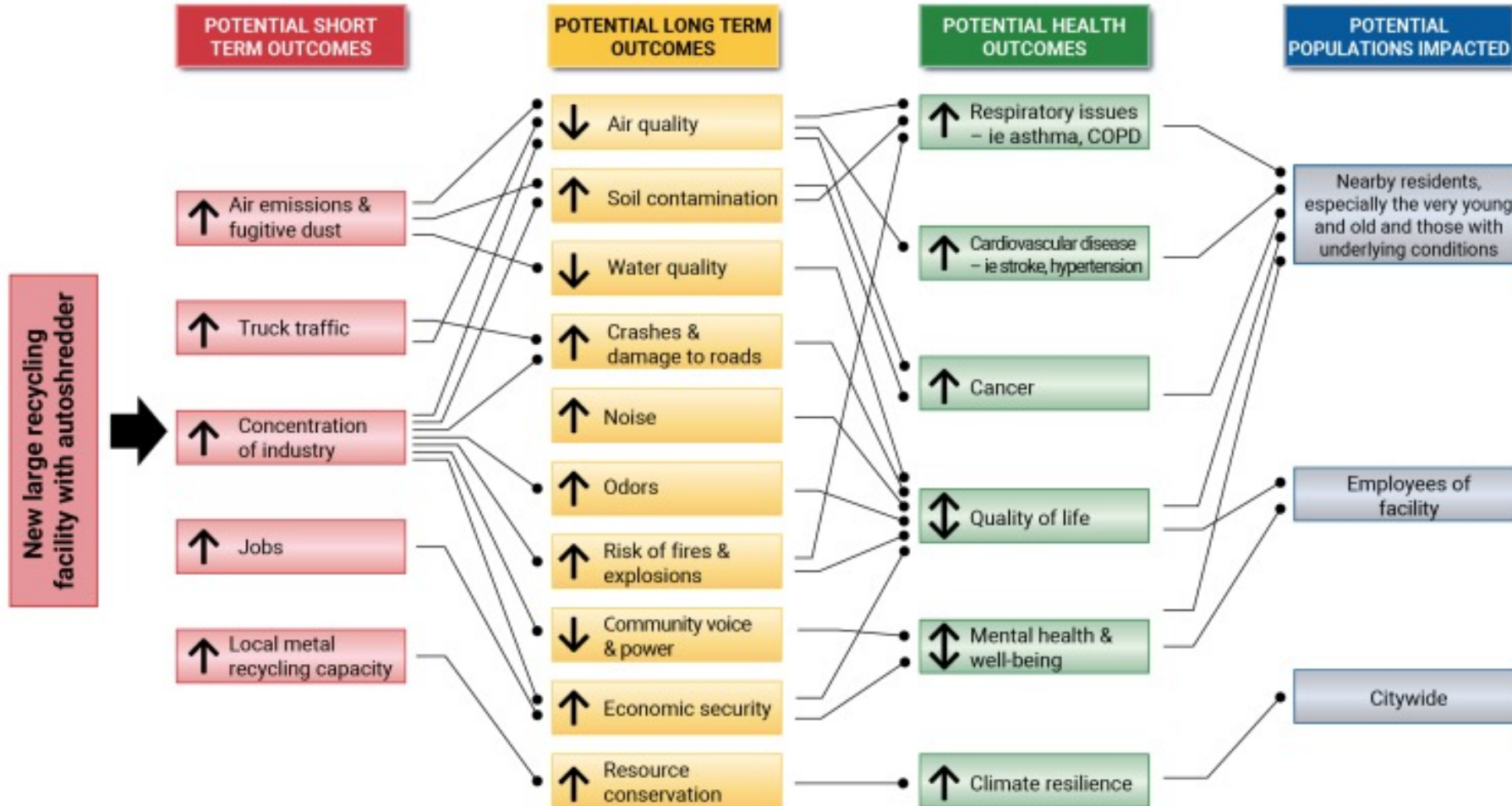


HIA RESEARCH QUESTIONS

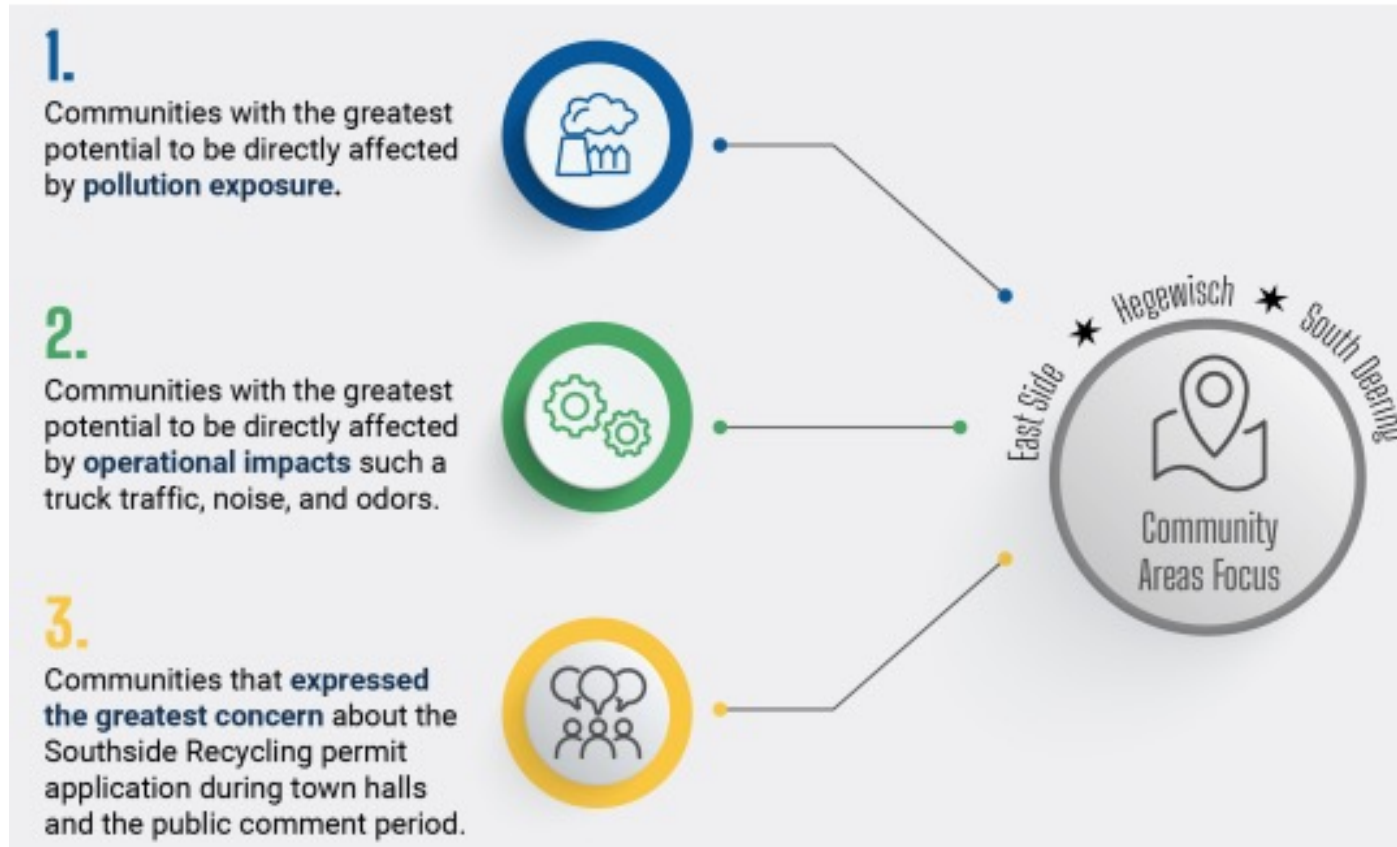


- What are the **current community conditions** on the Southeast Side?
- What are the **potential impacts** of the proposed Southside Recycling operations on the **environment, health, and quality of life** for Southeast Side residents?
- Who would **benefit** and who would be **burdened** by a decision to grant the permit? How could we minimize burdens and maximize benefits?
- What could we learn through this process about ways to **improve City and other policies and practices** to promote health and racial equity?

★ PATHWAY DIAGRAM



GEOGRAPHIC SCOPE



HIA PROCESS: ASSESSMENT

MIXED METHODS

PERMIT APPLICATION MATERIALS

- Modeling
- Mitigation Plans
- Traffic Study
- Zoning Materials

COMMUNITY INPUT ANALYSIS

- 2 town halls
- 4,000+ public comments
- Media monitoring
- Facilitated small group discussions and surveys

EXISTING CONDITIONS ANALYSIS

- Public health data sets
- U.S. EPA Ambient Air Quality Report
- ATSDR Health Consultation

ENVIRONMENTAL AND HEALTH RISK ASSESSMENT

- Emissions inventory and calculations
- On-site soil sampling
- Risk modeling

LITERATURE REVIEW

- EJ and cumulative impact frameworks
- Mental health and well-being

★ VALUING LIVED EXPERIENCE

HIA Engagement Session #2 - Small Group Discussion Notes

Benefits?

- “ Recycling keeps consumers scrap out of the landfill, supports other companies and vendors.”
- “ Employed hundreds of people over the years. Around 80% minority. Operation has been compliant. Good paying jobs with benefits.”
- “ Potential benefit by not having abandoned property, which attracts fly dumpers.”

Burdens?

- “ The facility is one mile from high school and elementary school, exposing students and teachers, who deserve to breathe clean air and not fumes.”
- “ Having the facility here takes away the opportunity to use this land for natural space.”
- “ We do not want to experience the clouds of metal dust.”
- “ Cumulative impact of all industries should be considered. On top of fumes from vehicles and other industry, City should look at cumulative impact on air.”

Lived Experience?

- “ This is a community that has suffered too much from burdens of pollution, lack of investment, lack of representation. This is going to further harm people.”
- “ We need to move in a new direction. The SE side does not have to continue to be home to dirty industry.”
- “ RMG purchased the old Republic Steel property 20+ years ago and employed over 200 people. Everything is starting to get developed and we are poised for a great comeback.”

HIA PROCESS: DECISION-MAKING

★ IMPACT RATING



	Assessment Findings	Impact Rating
Environmental Impacts	Recycling Capacity Under its current proposal, Southside Recycling has the capacity to process up to 500 tons per hour of obsolete metal products.	Positive impact
	Explosions/Fires Explosions/fires are an inherent risk for any metal shredding operation. The permit application includes a Feedstock Management Plan and the RTO system is equipped with controls to prevent explosions. But the risk cannot be reduced to zero.	Potential negative impact
	Water Pollution Industrial facilities on the riverfront pose a risk for pollution. Application includes a Stormwater Pollution Prevention Plan to reduce potential stormwater contamination. Facility treats water before it drains to the City sewers.	Potential negative impact
	Soil Pollution On-site soil sampling identified lead concentrations on the RMG property that exceed the industrial Removal Management Level. This presents a risk to workers as well as the potential for particles to be blown or tracked off the site.	Potential negative impact
	Air Pollution Emission sources at the site include the stockpiling, loading, and unloading of materials; onsite operations such as the crushing, shredding, screening, cutting scrap metal; and mobile equipment and vehicles. Emissions consist primarily of particulates, volatile organic compounds (VOCs), and other gases such as nitrogen oxides (i.e., NOx). Emissions from the shredder will be treated using various pollution control devices, including an RTO, roll-media filter, and scrubber. Dust controls include watering materials and cleaning pavements with a street-sweeper, dust cannons to suppress airborne dust as well as covered conveyors and dust collection and treatment systems. Even with controls in place, emissions are not entirely prevented.	Negative impact

	Assessment Findings	Impact Rating
Quality of Life Impacts	Traffic & street conditions During weekday morning peak hours, there would be 70 new trips (personal vehicles and trucks); at weekday evening peak hours, there would be 30 new trips. The traffic study shows that this would maintain an adequate level of service at nearby intersections.	Negative impact
	Economic development & job opportunity Southside Recycling would employ in excess of 100 people (35 jobs currently unfilled). The company will prioritize hiring from the community and continue to support small recyclers, many of which are led by people of color.	Positive impact
	Noise Modeling indicates that the operations will not cause noise above standards outside of the manufacturing district boundary but did not account for noise from any potential explosions.	Potential negative impact
	Concentration of industry Southside Recycling would bring a new metal recycling facility to the area. This would continue a trend of industrial development rather than shift to a different type of land use as proposed by some community members.	Negative impact

	Assessment Findings	Impact Rating
Health Impacts	Acute & Chronic Risks (Non-cancer) Human health risk assessment modeling does not indicate an increased risk of non-cancer adverse health effects due to Southside Recycling and other RMG businesses on the property. The Southeast side community areas are in the top half of all Chicago neighborhoods for current rates of chronic disease (COPD, asthma, heart disease).	Maintain status quo
	Carcinogenic Risks (Cancer) Human health risk assessment modeling does not indicate an increased risk of cancer due to Southside Recycling and other RMG businesses on the property. South Deering and Hegewisch are in the top half of all Chicago neighborhoods for cancer rates.	Maintain status quo
	Mental Health & Wellbeing Living near industrial activity negatively impacts mental health. This impact is both direct and mediated by individuals' perceptions of neighborhood disorder and personal powerlessness, and the impact is greater for minorities and the poor than it is for whites and wealthier individuals.	Negative impact



FACTORS FOR PERMIT DECISION-MAKING

- Extent of current community **burden and vulnerability**
- Extent of potential **benefits** to Southeast Side residents
- Extent of potential **negative impacts** on environment, health, and quality of life that cannot be adequately addressed through **mitigations**
- Actions of the company, including **compliance history**

HIA PROCESS: LESSONS LEARNED



PROCESS, TOOLS & METHODS

- Need for **new frameworks** that unite racial equity impact assessment, EJ analysis, and traditional environmental impact and human health risk assessment
 - Lends to interdisciplinary, mixed methods approach
 - Consider organizing around conceptual model and research questions rather than pathways given complex, interrelated impacts
 - Requires deriving from theory, literature review
- Develop **screening tools** for when/how HIA will be applied
 - Challenging to 'retrofit' the HIA onto an ongoing permitting process
- Conduct **process evaluation** to show accountability and honest reflection
 - Ensure process meets the HIA minimum elements, strive for best practices



EQUITY & STAKEHOLDER ENGAGEMENT

- Consider how to advance equity and engagement given the **decision context**
 - E.g., legal constraints, timeline, status of community partnerships
- Successful, authentic engagement takes **specialized expertise**
 - Support needed for facilitation, conflict resolution, trust building
- Use tools like the **Spectrum of Public Participation** to determine how the community will be involved in each step of the HIA
 - Be clear about when you are informing versus co-designing
- Consider how to **proactively engage media** to shift public narratives
 - Media has a strong influence on public perception and trust



CORE ELEMENTS OF HIA

*Going back to
our equity and
engagement
values....*

- **Define** the problem/opportunity
- **Acknowledge** history
- **Compare** conditions to non-EJ community areas
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