



## PERRO's Reasons for Opposing the Pure Metal Recycling Proposal

1. All the existing metal scrap recyclers we have seen and researched are a real problem from an environmental justice perspective. SIMS Metal Management Midwest is a perfect example, both at their Pilsen operations and around the country. So are Acme Refining's existing facilities in Bridgeport. They are all dirty facilities that release pollutants into the air, soil and water, produce noise pollution and are fire hazards. General Iron's shredder on the northside of Chicago is considered a "high priority violator" of the Clean Air Act by the EPA. Pure Metal Recycling promises to be completely different but we see no evidence of what they are claiming in practice by this industry. This industry really doesn't belong anywhere near a residential community.
2. Much of the the decision rests on how much we trust Pure Metal Recycling's claims that they will be completely different than all other existing metal recyclers. But the company's trustworthiness is put in serious doubt by the legal problems they are facing with the IRS and their existing dirty operations in Bridgeport. It does not make sense to green light a company that is facing potential criminal prosecution over their current operations in Bridgeport. The people behind Pure Metal Recycling have tried to distance themselves from Acme Refining, but several of the key people behind Pure Metal Recycling are associated with Acme and therefore should be held accountable for Acme's current practices.
3. Air pollution from shredding operations continues to be our biggest concern. Shredding operations lead to the release of particulate pollution, the same type of hazard we had with the coal fired power plants. Pure Metal Recycling claims this will be housed indoors, but this seems to be in the three sided building pictured in their architectural drawings. A three sided building is not really indoors. We have also seen no other existing metal recyclers that are successfully addressing this problem. We have made major strides reducing air pollutants in Pilsen with the closure of the Fisk plant and with the new pollution controls at H. Kamer and Co. We don't want to reverse course on these improvements now.
4. Fires and explosions are a common occurrence at scrap metal facilities. In the past year, there have been several major fires at scrap metal facilities around the country. See attached articles, which include references to a nearly a dozen examples from just 2013. Because the problem was so widespread, in 2012, the State of California launched a task force to deal with the issue. The problem is so bad around Houston Texas, that the City did a study of the industry in 2012, which found serious environmental problems.
5. The industry is largely unregulated by the EPA despite their serious pollution problems. This lack of regulation makes it harder to monitor the facility or go after them for violations. This has been the problem at SIMS. We know that EPA regulations do not totally prevent pollution problems, but it can provide the tools with which to address

it. H. Kramer and Co. is an excellent case in point. The lack of regulations of metal recyclers makes them even more dangerous.

6. Scrap metal dealers handle a lot of hazardous materials, including battery acid, lead, cadmium, chromium, arsenic, VOCs, etc.

7. Scrap metal litter is a regular problem outside of scrap metal facilities. At Acme's Bridgeport facilities this has been a constant hazard. Car and bike tires are punctured on a regular basis. All of the Bridgeport residents we talked to who live near the Acme facilities in Bridgeport complained about this.

8. Noise. One of the biggest complaints we hear from those near such facilities around the country is the loud noise that is generated by the shredding facilities. Along with the noise people living near metal recyclers frequently complain of vibrations from the shredding equipment which has even damaged homes in proximity to shredders.

9. Increased truck traffic is a big concern. We think diesel emissions are now the biggest source of air pollution in the community. Even if the trucks are not left idling, there will certainly be increased diesel emissions as a result of this facility. All of the experts we asked for input on the proposal, including people from the Respiratory Health Association, Environmental Law and Policy Center, and environmental attorneys Keith Harley and Mike Klima, raised this as a major concern with the facility. Residents have also expressed concern over the increased traffic congestion. We are concerned that there is no traffic study by the City to evaluate the impact of increased traffic congestion and wear and tear of local roads as a result of this facility.

10. All of these problems are compounded by the fact that the facility is so close to Juarez High School. Whether it is noise pollution, air pollution, fires, explosions, or increased diesel truck traffic, none of these things should be happening so close to a high school. The Chicago Teachers Union recently reached out to us to express their opposition to the project given its proximity to the school. The facility is also just blocks away from residential areas of the neighborhood.

11. Despite our serious problems with SIMS, we also recognize that SIMS is a union company and we are concerned that Pure Metal Recycling will ultimately replace union jobs with lower paying non-union jobs if they lead to SIMS closure. If SIMS doesn't close, than Pure Metal Recycling's claims to be leading to better environmental conditions in Pilsen falls apart, as they will just be adding an additional source of pollution rather than replacing a dirty facility with a clean one as they claim. But if they do lead to SIMS closure, they will be eliminating good paying union jobs. We need to support industries that will create good paying union jobs in facilities that do not threaten the community's environmental and public health. Pure Metals Recycling fails by all of these measures.

Results of surveys:

Overall PERRO collected 86 surveys from community residents. The responses were as follows:

Support the metal recycling facility proposal (Yes): 25

Oppose the metal recycling facility proposal (No): 56

Neutral (neither yes or no): 5

So that is 65% opposed, 29% in favor, and 5% neutral

Of those who supported the proposal, the primary reason was jobs. But as stated above, the jobs created by Pure Metal Recycling may just replace high paying union jobs with low paying non-union jobs. We are also talking about less than a hundred jobs. There is no guarantee these will be local jobs and since it appears this facility maybe replacing operations in Bridgeport the jobs may just be shifting from those existing facilities. PERRO wants to see living wage jobs created in the community but in regards to this project, PERRO was not convinced by this argument.

The secondary reason given for support was people thought the facility would be cleaner than SIMS and would put SIMS out of business. Therefore eventually pollution would be reduced in the community. But there is no guarantee this will happen. Pure Metal Recycling's argument in this regard is unfounded. They themselves acknowledged during the forum that they do not compete on a location-specific based market, and they cannot guarantee that they will displace SIMS, so their operations will most certainly add to pollution in the community, rather than reduce it. So PERRO was also not convinced by that argument.

Those who opposed it did so primarily over fears of increased pollution in the community (air, water, noise, diesel admissions) and we feel all the research we have done indicates this will likely be the case. Please see the included articles and reports for abundant evidence of this.

A secondary consideration was increased vehicle traffic, which we also see as a likely outcome of the facility. The only way their business can be successful is if there is near continuous traffic of trucks dropping of metal scrap at the facility. There really is no way around the fact that vehicle traffic will dramatically increase.

Overall, PERRO's membership has concluded we can not support the project and we call on Alderman Solis to oppose giving Pure Metal Recycling the zoning variance they require to move forward with the project.