

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PROTECT WEST CHICAGO,)
)
 Petitioner,)
)
 v.) PCB 23-107
) (Third-Party Pollution Control Facility
) Siting Appeal)
 CITY OF WEST CHICAGO, WEST)
 CHICAGO CITY COUNCIL and)
 LAKESHORE RECYCLING SYSTEMS,)
 LLC,)
)
 Respondents.)

PEOPLE OPPOSING DUPAGE)
 ENVIRONMENTAL RACISM,)
)
 Petitioner,)
)
 v.) PCB 23-109
) (Third-Party Pollution Control Facility
) Siting Appeal)
 CITY OF WEST CHICAGO and)
 LAKESHORE RECYCLING SYSTEMS,)
 LLC,)
)
 Respondents.)

MOTION TO SUPPLEMENT THE RECORD

EXHIBIT A

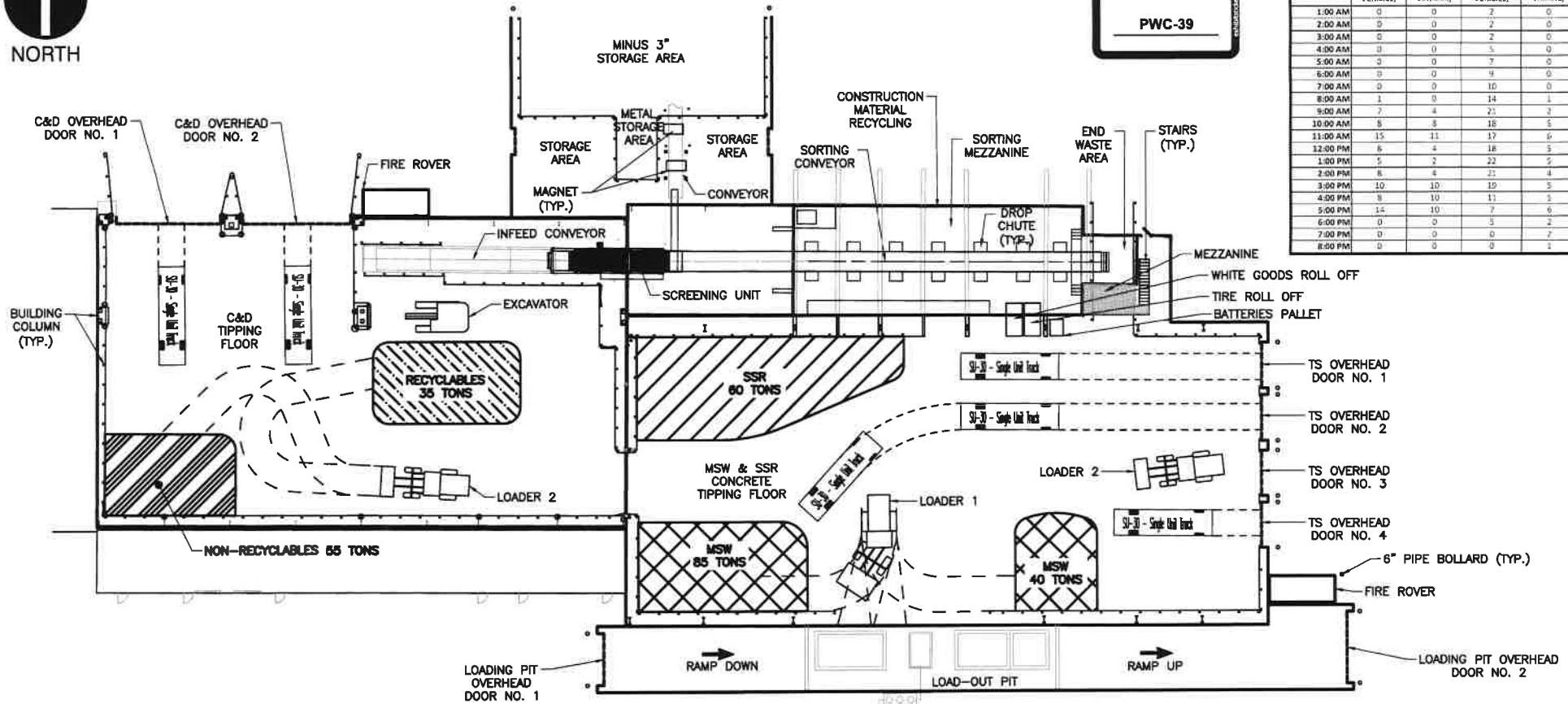


NORTH

EXHIBIT
PWC-39

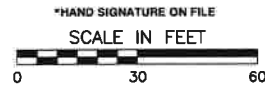
Summary of Incoming/Outgoing Vehicles - Maximum Daily Rates

Time Period	Incoming MSW (Collection Vehicles)	Incoming SSR (Collection Vehicles)	Incoming C&D (Collection Vehicles)	Outgoing MSW or SSR (Transfer Trailers)
1:00 AM	0	0	2	0
2:00 AM	0	0	2	0
3:00 AM	0	0	2	0
4:00 AM	0	0	5	0
5:00 AM	0	0	7	0
6:00 AM	0	0	4	0
7:00 AM	0	0	10	0
8:00 AM	1	0	14	1
9:00 AM	7	4	21	2
10:00 AM	8	3	18	5
11:00 AM	15	11	17	6
12:00 PM	8	4	18	5
1:00 PM	5	2	22	5
2:00 PM	8	4	21	4
3:00 PM	10	10	19	5
4:00 PM	8	10	11	5
5:00 PM	14	10	7	6
6:00 PM	0	0	3	2
7:00 PM	0	0	0	7
8:00 PM	0	0	0	1



REFERENCE

- DRAWING BASE IS 9/29/2020 "BARRIER WALL & BOLLARD PLAN" BY SANDMAN, INC.
- I-BEAMS IN OVERHEAD PORTION OF LOADING PIT AREA WERE REMOVED FROM THIS DRAWING FOR CLARITY PURPOSES. REFER TO SHEET A1B FOR AN ARCHITECTURAL SECTION VIEW OF THE LOADING PIT AREA.
- LOADER 1 SIZE AND DIMENSIONS ARE BASED ON A CAT 980K. OVERALL LENGTH OF LOADER 1 IS 31.10 FT. WITH AN OVERALL WIDTH OF 10.60 FT. A SMALLER LOADER MAY BE USED DEPENDING ON INCOMING MATERIAL VOLUMES AND OTHER OPERATIONAL FACTORS.
- LOADER 2 SIZE AND DIMENSIONS ARE BASED ON A CAT 950M. OVERALL LENGTH OF LOADER 2 IS 26.90 FT. WITH AN OVERALL WIDTH OF 9.25 FT.
- EXCAVATOR SIZE AND DIMENSIONS ARE BASED ON A KAMATSU PC210. OVERALL LENGTH WITH ARM ON THE GROUND IS 31.3 FT. WITH AN OVERALL WIDTH OF 9.2 FT. EXCAVATOR REPRESENTED ON DRAWINGS IS POSITIONED WITH THE ARM RAISED.



<p>Civil & Environmental Consultants, Inc. 1230 East Diehl Road, Suite 200 - Naperville, IL 60563 630-963-6026 · 677-963-6026 www.ccecinc.com</p>	<p>WEST DUPAGE RECYCLING AND TRANSFER STATION 1655 POWIS ROAD WEST CHICAGO, ILLINOIS</p>	
	<p>STORAGE PLAN - MAXIMUM DAILY RATES</p>	
<p>DRAWN BY: MMS CHECKED BY: JEH APPROVED BY: JEH* FIGURE NO.: 2-4</p>	<p>DATE: AUGUST 2022 DWG SCALE: 1"=30' PROJECT NO: 163-899.0005</p>	

P:\2016\163-899-0005\Drawings\CAD\2-4 Local Staging Application\163899-0005-Plans Storage Plan.dwg[2-4] LS:09/13/2022 -- mbrmpf -- LP: 9/13/2022 7:29 AM



December 5, 2022

The Honorable JB Pritzker
Governor of Illinois
401 S. Spring St.
Springfield, IL 62704

Dear Governor Pritzker,

As physicians, nurses, public health professionals and healthcare workers dedicated to providing our patients with a healthy future in Illinois, we are writing to call for strong actions on protecting our communities against harmful truck pollution. While we applaud your leadership on getting the Climate and Equitable Jobs Act (CEJA) passed and signed into law, we know that there is more work to do—and we call on you to join other states in signing on to the Medium- and Heavy-Duty Zero-Emission Vehicle Memorandum of Understanding (MOU). This action would ensure greater cooperation with other states on bringing the health benefits of zero-emission trucks here. The MOU is an important step, and should be followed by actions to adopt life-saving state trucking rules like the Advanced Clean Trucks (ACT) and Low NOx Heavy-Duty Omnibus (HDO) rules in a growing number of states.

As you know, pollution from transportation sources like cars, buses and trucks is the largest source of smog-forming emissions and climate pollution in the U.S. While all forms of air pollution are concerning, emissions from diesel truck engines are particularly harmful for the health of communities. This is especially true in lower-income communities and communities of color which too often bear disproportionate health burdens due to increased pollution exposures from freeways, railyards, warehouses and other freight hubs. Recent data suggest that some of Illinois' most populous communities are disproportionately harmed by diesel exhaust pollution. Particle

pollution comes directly from sources that include fuel combusting vehicles. Exposure to particle pollution, even at low levels, can be deadly. Consider the following:

- With an average diesel PM2.5 concentration of 0.309 µg/m³, Illinois' diesel engine pollution exposure levels are 21 percent greater than the national average of 0.255 µg/m³ and translate into 1,019 tons of on-road engine air pollution and 2,476 tons non-road engine air pollution annually.¹
- Illinois is expected to have the **fifth highest number of deaths from PM2.5 diesel engine pollution per capita in 2023**. While Illinois residents comprise just 3.8 percent of the U.S. population, the 416 projected deaths in 2023, represent 4.7 percent of the 8,822 expected deaths due to diesel engine PM2.5 pollution nationally.²
- **Twelve of Illinois' 102 counties, the "Dirty Dozen," rank in the top nine percent of all U.S. counties at risk of the health, societal, and economic impacts caused by diesel fine particle air pollution.**³ Additionally, Chicago ranks in the top 25 most polluted cities for both ozone and year round particle pollution.⁴

In 2023, Illinois residents will account for 6.3 percent of asthma related emergency department visits and 5.3 percent of non-fatal heart attacks due to diesel engine PM2.5 air pollution nationwide.⁵ These and other health impacts will also impact the work lives of residents. The Clean Air Task Force projects a total of 24,601 missed workdays in Illinois next year and 144,930 days of "minor restricted activity" where people need to change their normal activities because of poor health.⁶ Of those days, 120,665 days (83 percent) will come from Dirty Dozen counties. Over half of those days will be from the impact on Cook County residents.⁷

Using a computer model developed by U.S. Environmental Protection Agency consultants, the Clean Air Task Force calculated monetized health damages from the human health impacts, including deaths, medical treatments and other health-related economic losses caused by diesel engine PM2.5 air pollution. For Illinois, these monetized health damages will exceed \$4.6 billion in 2023, with 77 percent of those damages experienced in Dirty Dozen county residents.⁸

While not legally binding, the MOU is viewed as an important step towards adopting enforceable state policies that foster vehicle electrification. In addition, passing policies like the ACT rule and the HDO rule would reduce the dangerous diesel pollution emitted in the state.

¹ Clean Air Task Force. 2022. Deaths by diesel: Mapping the health impacts of diesel nationwide.

<https://www.caf.us/deathsbydiesel/>

² Id.

³ Respiratory Health Association. 2022. The Dirty Dozen: The Impacts of Diesel Engine Pollution in Illinois.

<https://resphealth.org/wp-content/uploads/2022/05/Dirty-Dozen-Impact-of-Diesel-Engine-Pollution-in-Illinois.pdf>

⁴ American Lung Association. 2022. State of the Air Report. <https://www.lung.org/getmedia/74b3d3d3-88d1-4335-95d8-c4e47d0282c1/sota-2022.pdf>

⁵ Respiratory Health Association. 2022. The Dirty Dozen: The Impacts of Diesel Engine Pollution in Illinois.

<https://resphealth.org/wp-content/uploads/2022/05/Dirty-Dozen-Impact-of-Diesel-Engine-Pollution-in-Illinois.pdf>

⁶ Clean Air Task Force. 2022. Deaths by diesel: Mapping the health impacts of diesel nationwide.

<https://www.caf.us/deathsbydiesel/>

⁷ Respiratory Health Association. 2022. The Dirty Dozen: The Impacts of Diesel Engine Pollution in Illinois.

<https://resphealth.org/wp-content/uploads/2022/05/Dirty-Dozen-Impact-of-Diesel-Engine-Pollution-in-Illinois.pdf>

⁸ Id.

The ACT and HDO rules work together to slash health-harming air pollution from new fossil fuel trucks while increasing the number of clean, zero-emitting trucks manufacturers have to sell in Illinois. The ACT rule requires manufacturers to sell an increasing number of zero-emission vehicles (ZEV) guaranteeing a minimum number of these clean, cost-saving vehicles are available in Illinois.

Meanwhile, the HDO rule establishes strong yet feasible NO_x and PM emission standards for new fossil fuel trucks that will continue to be sold, slashing emissions by up to 90 percent once fully implemented. The HDO rule also establishes testing and warranty requirements to ensure that emission control systems continue working throughout the vehicle's life.

Illinois is uniquely situated squarely in the middle of the country's transportation network. While it benefits from that economic impact, it also pays the price with a higher burden of deadly diesel exhaust. Unfortunately, that specific burden falls most heavily on communities in and near areas with large concentrations of activity that now involve diesel engines – intermodal freight terminals, warehousing and industry, and along major roadways and highways. In many cases those industrial areas overlap with or adjoin low-income communities and communities of color that are already at higher risk of lung disease and lung disease exacerbation. In fact, the U.S. Environmental Protection Agency estimates that over 70 million Americans face increased risk due to living in close proximity to major trucking routes and those people tend to be lower-income and people of color.

The shift to zero-emission transportation will yield major public health benefits. According to the Zeroing In on Healthy Air report, Illinois is one of the states with the most to gain in terms of reducing harmful emissions, saving lives and preventing asthma attacks through the shift to zero-emission transportation and clean power, including \$59.5 billion in cumulative health benefits and the prevention of 5,410 premature deaths and 138,000 asthma attacks by 2050.⁹

Illinois clearly wants to be a leader in the electric vehicle industry, but it must also simultaneously commit to eliminating a huge source of emissions that not only increase global warming but create local pollution that is often concentrated in vulnerable communities.

Governor Pritzker: you have the power to make this commitment by joining the 17 other states who have signed the Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding, and then follow up on that by adopting the Advanced Clean Truck Rule and Low NO_x Omnibus rules to assure the reduction of the harmful diesel pollution to which Illinois residents are exposed.

Sincerely,

The Undersigned Health Professionals in Illinois

⁹ American Lung Association. 2022. Zeroing in on Healthy Air. <https://www.lung.org/clean-air/electric-vehicle-report>

Tonya Winders, MBA
Allergy & Asthma Network

Sandra Blood, CRT
 Eva Book, CHES, CTTS
 Shonnel Blair, MPH
 Plesetta L. Clayton, MPA
 Shawn G. DeVillez, CRT
 Marilyn Felix, BS, CTTS
 Felicia Fuller, DrPH
 Sheila M. Guiracochoa, DNP, RN
 Kristina A. Hamilton, MPH
 Joenell Henry, MPH
 Christina M. Hildebrand, CRT
 Carol Ramm, RRT
 Jane Shehorn, CRT
 Vincent Tedjasaputra PhD
 Lori A. Younker, BA
American Lung Association

Esther Scimmarella, MS
Chicago Hispanic Health Coalition

Hassan Aboumerhi, MD
 Paige Adeli, RN, BSN
 Jeanette Avila, BA
 Gloria E. Barrera, MSN, RN, PEL-CSN
 Jason Blomquist, GBA
 Sangeeta Bhorade, MD
 Susan Buchanan, MD, MPH
 Iazsmin B. Bauer Ventura, MD, MSc
 Marie Cabiya, MD
 Amy Call, PA-C
 Cathy Catrambone, PhD, RN
 Emily Chase, PhD, RN, NE-BC, FACHE
 Stewart Chung, PharmD
 Gabriel J. Culbert, PhD, RN
 Neeraj Desai, MD
 Daniel F. Dilling, MD
 Jennifer Dixon-Johnson, MSN, AGPCNP
 Sydney C. Doe, MD
 Jessica S. Donington, MD
 Wesley Epplin, MPH
 Serap Edal, PhD
 Kim D. French, MHSA, CAPP, FCCP
 Sean M. Forsythe, MD
 Linda Forst, MD, MPH
 Molly Fuchs, MPH
 James Gagermeier, MD

Matt Siemer
Chicago Asthma Consortium
Mobile Care Chicago

Kevie Lusby Smyre
EverThrive Illinois

Margie Schaps, MPH
Health & Medicine Policy Research Group

Gordana Krkic, CAE
Illinois Academy of Family Physicians

Janna Simon, MPH
Illinois Public Health Institute

Devin Cooley
 Syntyche Kanku, MPH
 Rachael Morkunas, MPH
 Kelly Nichols
 Erica Salem, MPH
Respiratory Health Association

Pat Schou, RN, MS, FACHE
The Critical Access Hospital Network

Elsa Garza, DNP, ACNP-BC
 Brenda Louise Giles, MD
 Regina D. Gomez, MD
 John J. Guido, MD
 Cindy Gronkiewicz, RN, MS, APN
 Elena Grossman, MPH
 Ruchi S. Gupta, MD, MPH
 Kevin P. Haas, MD
 Diana P. Hackbarth, PhD, RN
 Nisha Hakhu, DO
 Tamara Hamlisch, PhD
 Eva Hernandez, MSN
 Michelle Hicks-Turner, MPH
 Brian L. Hitsman, PhD
 Douglas Kyle Hogarth, MD
 Nicole Hovey, MPH
 Renea P. Jablonski, MD
 Howard A. Jaffe, MD
 Omar Jamil, MD
 William D. Jones, DNP, RN, CNL, CNML
 Mohammed Kassem, MD
 Kaitlyn Keen, MPH
 Kevin L. Kovitz, MD
 Anne Krantz, MD, MPH
 Seth B. Krantz, MD
 Julie Kuhn, MSW

Patricia Labellarte, MPH
Khoa Le, PharmD
Morgan Lotz, DNP
Daisy Magaña, MPH
Helen Margellos-Anast, MPH
Anthony M. Marinelli, MD
Laura C. Mazzenga, APRN-BC, CNP,
CUNP
Sabrina Moffat, RN
Rachel Morris, MPH
Steve Mosakowski, RRT
Eileen Moss, DNP, RN
Sara Murphy, RRT
Christopher Nemeh, MD
Ryan H. Nguyen, DO
Nathan C. Nowalk, MD
Xenia Oloju, MPH
Peter Orris, MD, MPH
Andrea A. Pappalardo, MD
Pahn P. Pataramekin, DO
Shruti Patel, MD, MBA
Amanda Peters, BS
Amber T. Pincavage, MD
Gail S. Prins, PhD
Kelsey N. Pruum, RN, BSN
Sheetal K. Rao, MS, MD
Eleanor Rivera, PhD, RN
Peter Rios, PhD
Margaret T. Russell, MD

Jennifer M. Ryan, PT, DPT, MS, CCS
Cindy V. San Miguel, MPH
Kavitha C. Selvan, MD
Nathan Schoettler, MD, PhD
Hilary Scott-Ogunrinde, MHA
Raj C. Shah, MD
Hameeda Shaikh, MD
Obada Shamaa, MD, PhD
Robin Adair Shannon, DNP, RN, NCSN
Darielle D. Sherrod, MPH
Janna Simon, MPH
Susan Sirota, MD
Leslie T. Stayner, PhD
Peter Sporn, MD
Kacey Lynn Strovers, RT(R)
Rachel Kate Strykowski, MD
Audrey L. Tanksley, MD
Ozuru Ukoha, MD
Almudena Veiga-Lopez, DVM, PhD
Anna Volerman, MD
Krishnan Warrior, MD
Michelle Wheeler, DNP
Santina J.G. Wheat, MD, MPH
Lori A. Wilken, PharmD
Elizabeth J. Wiseman-Chase, RRT-NPS,
RPFT
Krysta Wolfe, MD
Ruth Woroch, DNP