



December 15, 2021

Dear Mayor Lightfoot, Dr. Arwady, and Administrator Regan:

We – the ownership and management of Reserve Management Group and Southside Recycling along with a broad group of stakeholders including employees; former, current, and hopefully future suppliers; our neighbors on the Southeast Side; and the Chicago business community at large – write again to invite you to tour our new facility on the Southeast Side.

Southside Recycling – like the now closed General Iron – has been the subject of multiple years of slanted media coverage instigated by a small but vocal group of activists that long ago made clear that their opposition to this new metal recycling business was unequivocal and would persist regardless of any facts, data, or evidence that may arise in the course of its construction, permitting, and operation. In spite of the significant negative attention that media has given this story, none of you have felt it necessary to actually visit our facility to see firsthand the business that you have repeatedly damaged through your unfounded decisions to continually delay the issuance of our operating permit. We hope that each of you will finally take the time to come see what we have built so that we might be granted a fair chance to set the record straight.

Those who claim that the new, state-of-the-art Southside Recycling facility would add to the problems faced by the Southeast Side or the City of Chicago do so despite all evidence and scientific data to the contrary. The Southeast Side has faced more than its fair share of environmental concerns that residents have bravely brought to light and fought to remedy, but RMG and its constituent businesses have never been the target of those fights. Instead of harming the community, RMG has been a responsible neighbor and employer while operating recycling businesses in the 10<sup>th</sup> Ward for more than 30 years.

We revitalized the former site of a bankrupt steel mill. If not for our purchase of and investment in this property, it would almost certainly have become another abandoned industrial site left to be cleaned up with taxpayer dollars. We have seen other properties around us sit vacant for as long we have been operating and investing in the Southeast Side. Now, after making by far our largest investment ever to build a new business on property we have owned and operated for many decades, our operations are being unduly delayed in clear contravention of a signed agreement between our business and the City of Chicago.

Southside Recycling was built with private funds. No expense was spared to incorporate the industry's best technology that ensures we will far exceed all applicable ordinances, laws, and regulations. This operation will establish a new standard for responsible metal recycling in the United States. But, rather than being applauded for our innovation, both the city and federal governments are allowing their actions to be dictated by those who baselessly call us racists and polluters. Instead of gathering the facts and following the laws as they are written, your actions are allowing these loud voices to render hollow your claims to be pro-growth. The same individuals and organizations who oppose Southside Recycling also lament decades of disinvestment on the Southeast Side. Imagine the further disinvestment that will surely result – on the Southeast Side and elsewhere in the city – as the business community realizes that Chicago regards its own laws and regulations as mere suggestions to be ignored at the first sign of any pushback.

The opposition to our project refuses to acknowledge or accept the vital role that metal recycling plays in promoting a circular economy, strengthening our nation's crumbling infrastructure, protecting the



environment, and conserving natural resources. Metal is the most recycled commodity on Earth. Every pound of recycled metal used in manufacturing new products reduces the need for mining of iron ore and other virgin resources that disrupts the environment and uses massive amounts of energy – much of which is still produced from carbon-intensive fossil fuels that further worsen the climate change that is already drastically affecting our planet and its inhabitants.

Your decision to embark upon an ambiguous and unwarranted Health Impact Assessment that lacks any objective standards not only goes outside the boundaries of relevant law and regulations, but also ignores and diminishes the significant work and robust analysis already completed by both our team and the experts at the Illinois EPA, Chicago Zoning Board of Appeals, Chicago Department of Public Health, and U.S. EPA. Southside Recycling has properly and successfully undergone review and approval from all of these regulatory agencies. IEPA requested – and we agreed to – two extensions of its standard 90-day review and public comment period for an air permit to build and operate the new facility. The review period eventually totaled 270 days and included outreach to U.S. EPA Region 5 staff who praised the IEPA's process for adequately addressing environmental justice concerns.

Administrator Regan: Your May 7 letter stated, "I do not believe U.S. EPA's public comments submitted by the prior administration during the state permitting process were adequate, and they do not reflect the current priorities and policies of the U.S. EPA." That statement fails to acknowledge that all five of the U.S. EPA employees included on correspondence between IEPA and U.S. EPA (which was only discoverable through a byzantine search of the Illinois Pollution Control Board website and which are the only publicly available comments related to Southside Recycling made by U.S. EPA officials during the Trump administration that we are aware of) are environmental scientists or engineers, not political appointees. According to their LinkedIn profiles, four of these U.S. EPA staffers' tenures at the agency (including that of Genevieve Damico, Chief of the Air Permits Section) predate the Trump administration by multiple years or decades. Those same LinkedIn profiles also show that all five EPA employees continue their work at the agency under the Biden administration. It is unclear what is not robust or rigorous about this review process that resulted in the issuance of Southside Recycling's state air permit to build and operate our facility.

Commissioner Arwady: Slides from the Community Town Hall held on July 25, 2020 state, "CDPH cannot...Deny permits that meet existing environmental and zoning requirements." While you have not denied our permit, the ongoing delay in issuance is unwarranted given the above statement. CDPH's own guidelines spell out timelines and processes that have not been followed. No one from CDPH has communicated to us how our application does not meet the permit requirements. In fact, we have on multiple occasions been told the opposite – that the application is complete and no further information is required before a permit is issued. Further, in your May 10, 2021 letter regarding the status of Southside Recycling's Large Recycling Facility permit application, you stated, "In the coming weeks, CDPH will be developing a project plan in coordination with U.S. EPA and a timeline for that undertaking. As soon as a schedule is known, we will promptly notify you." As of December 15, 2021, we have not received any communication from you regarding such a schedule.

Mayor Lightfoot and Commissioner Arwady: It has been more than eight months since we responded to the City's last request for additional information related to Southside Recycling's Large Recycling Facility permit application.

Administrator Regan: It has been more than six months since you suggested that the City complete an environmental justice analysis. In comments following the recent release of EPA's National Recycling



Strategy, you said, "Together with the historic investments in recycling from the Bipartisan Infrastructure Deal, the strategy will help transform recycling and solid waste management across the country while creating jobs and strengthening our economy." Why has our facility – one that was designed and will be operated to set a new national standard for environmental protection in the metal recycling industry – had our operations delayed rather than being held up as a model of this exact type of transformation?

It has been more than a year since our initial Large Recycling Facility permit application (the first application under this stringent new set of rules) was submitted. Your inaction and delay have left our business, hundreds of other businesses in Chicago and the surrounding area, and the lives of thousands of employees and their families in limbo. We respectfully urge you to issue the permit immediately in order to provide relief to all those you have harmed with your delay.

Our many previous requests have been ignored, but we respectfully ask again – please contact us to arrange for you to visit our facility. A tour of the operation will demonstrate with facts and science that we are a model business that is both critical in promoting sustainable economic growth while simultaneously serving as an example of how industry can innovate to protect human and environmental health in order to safely and responsibly coexist with surrounding communities.

To sign this letter urging the issuance of Southside Recycling's operating permit, please click [HERE](#).  
Southside Recycling and Reserve Management Group greatly appreciate your support.

Best regards,

Steve Joseph  
CEO  
Reserve Management Group

Hal Tolin  
COO  
Reserve Management Group

Mark A. Weintraub  
Priscilla Deanda  
Mitchell Joseph  
Julius Hess  
Mandy Lunceford  
Albert Hollingsworth  
Joshua R Weitzman

Sharmon Odisho  
Jorge Gonzalez  
Moises Flores  
Leonel Jaimes  
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