



City Manager's Office
2100 Ridge Avenue
Evanston, Illinois 60201
T 847.866.2936
www.cityofevanston.org

Erika Storlie
City Manager

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John Mooney
Director
Air and Radiation Division
US EPA
77 W. Jackson Blvd (AT-18J)
Chicago, IL 60604
mooney.john@epa.gov

Julie Armitage
Bureau Chief
Bureau of Air
Illinois EPA
1021 North Grand Avenue East
Springfield, IL 62794
julie.armitage@illinois.gov

Subject: Request for Assistance in Ongoing Investigation of Impact of Waste Transfer Station on Surrounding Residential Community

Dear Director Mooney and Chief Armitage,

I am writing to request assistance from your agency in responding to a chronic community concern that has been impacting Evanston residents for over a decade. It has reached a level that, as a local jurisdiction, we are no longer equipped to continue investigating.

The matter at hand is the ongoing operations of a privately owned and operated waste transfer station, located at 1711 Church St. in Evanston. It is important to note that the location of the facility is within a lower-income, Black residential neighborhood with homes directly adjacent to the station. Under the IL EPA's current guidelines, similar facilities are required to be a minimum of 1000 feet from a residential structure (415 ILCS 5/22.14) (from Ch. 111 1/2, par. 1022.14). In Evanston, the facility is within mere feet of multiple homes, .2 miles from Evanston Township High School and .1 mile from a community park. The station has come under scrutiny with a high volume of complaints from residents and neighbors due to concerns that the operation of the

station generates litter, noise, traffic, offensive odors, air pollution, negative health impacts for neighbors and attracts rodents.

In 2010, due to the mounting complaints, the City hired a contractual staff person who solely dealt with the complaints and administrative adjudication hearings for non-compliance. The fines and summons were not impactful nor did they reduce the complaints. In 2011, the City imposed a per ton transfer fee on the penalty and was promptly sued by the former operator of the station. In 2016, the City settled the suit and was able to keep \$1.2 million in collected fees and the new operator agreed to sign a [Host Agreement](#).

Since 2016, the City has worked with community organizations and leaders to respond specifically to the concerns around air pollution and human health. This work included a [community survey](#) to better understand community concerns and needs. This culminated in the City launching a 6-month initial community air quality monitoring project in 2019 (May-November). The study was designed to evaluate the level and source of over a dozen parameters that are typically associated with waste transfer station operations.

With the study completed, the City acknowledges that the future work of interpreting the results of this study and its human health impacts, as well as comparing the collected data to regulatory levels, is beyond the scope and expertise of City staff.

The City is requesting assistance from Regional, State and Federal officials to provide expert guidance on the study and its findings. The City is specifically requesting four types of support:

1. Support validating data collected in the initial study
2. Evaluation and comparison of study findings to Federal and State ambient air quality standards and requirements
3. Analysis of the human health impact based on the study findings
4. Guidance on any additional steps the City should take in order to evaluate the effect of the station operations beyond air quality concerns to evaluate the effect of the WTS on the surrounding neighborhood.

The City is requesting this assistance in order to continue our due diligence in protecting Evanston residents from potential health and environmental harms. It is the City's goal to ensure the safety and health of residents. The City is hopeful that with support from regulatory expertise and authorities the City will be able to more clearly understand the environmental and health impact of the station on the surrounding community.

The City recognizes that the different types of assistance requested may be divided between different regulatory agencies and officials. The intention of sending this letter to multiple agencies is to ensure that all regulatory bodies are aware of the request and may coordinate as they see fit in responding to the request.

The City is committed to providing answers to residents to help them better understand the health and environmental impact of the operation of this station within the community.

City staff are available for a meeting should any of the addressed agencies determine that would be beneficial prior to responding to the request.

Sincerely,

Erika Storlie

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City Manager

Attachments and Links:

[Study Overview](#)

[Study Final Report Executive Summary](#)

[Study Final Report](#)

[Study Data](#)