Exhibit 208

From: Guy, Jeff on behalf of EPA.PublicHearingCom

To: <u>EXT Harley, Keith</u>

Subject: RE: [External] General III, LLC Draft Permit Southeast Environmental Task Force Comments

Date: Monday, June 15, 2020 9:56:31 AM

Attachments: <u>image001.png</u>

Mr. Harley,

Thank you for your comments, which will be included as an exhibit with the hearing record. The Agency will prepare a responsiveness summary that will include a summary of all the views, significant comments, criticisms, and suggestions - in addition to the Agency's specific response and final action. You will be notified of the final decision in this matter and of the availability of the responsiveness summary.

Thanks.

Jeffrey J. Guy

Hearing Officer, Illinois Environmental Protection Agency Office of Community Relations (217) 785-8724

Jeff.Guy@illinois.gov



From: Harley, Keith <kharley@kentlaw.iit.edu>

Sent: Sunday, June 14, 2020 7:22 PM

To: EPA.PublicHearingCom <EPA.PublicHearingCom@Illinois.gov>; Guy, Jeff <Jeff.Guy@Illinois.gov> **Subject:** [External] General III, LLC Draft Permit Southeast Environmental Task Force Comments

Please be advised that I represent the Southeast Environmental Task Force (SETF). I'm attaching SETF's comments on Illinois EPA's Draft Permit for General III, LLC, 11600 S. Burley, Chicago, IL. As you will see, SETF's comments are supported by the Natural Resources Defense Council and the Chicago South East Side Coalition to Ban Petcoke. With SETF's support, these organizations will also be submitting comments addressing other aspects of the Draft Permit.

Please contact me if you have any questions or comments regarding these comments.

Keith Harley, Attorney for the Southeast Environmental Task Force Chicago Legal Clinic, Inc. 211 W. Wacker, Suite 750 Chicago, IL 60606 (312) 726-2938

SETF General III Draft Permit Comments Exhibit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

AUG 2 2 2019

REPLY TO THE ATTENTION OF

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Adam Labkon General Iron Industries, Inc. 1909 N. Clifton Ave. Chicago, Illinois 60614

Re:

Administrative Consent Order EPA-5-19-113(a)-IL-08

Dear Mr. Labkon:

Enclosed is an executed original of the Administrative Consent Order regarding the above captioned case. If you have any questions about the Order, please contact me at (312) 886-3850.

Sincerely,

Nathan A. Frank, Chief

Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure

cc:

Susan Tennenbaum/C-14J

Kent Mohr, Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

In the Matter of:)	EPA-5-19-113(a)-IL-08			
General Iron Industries, Inc.)	Proceeding Under Sections 113(a)(1) and			
Chicago, Illinois)	114(a)(1) of the Clean Air Act, 42 U.S.C.			
)	§§ 7413(a)(1) and 7414(a)(1)			
)				

Administrative Consent Order

1. The Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Order to General Iron Industries, Inc. (General Iron) under Sections 113(a)(1) and 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. §§ 7413(a)(1) and 7414(a)(1).

Statutory and Regulatory Background

- 2. The Administrator of EPA may require any person who owns or operates an emission source who is subject to any requirement of the CAA to provide information required by the Administrator under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division.
- 3. Title V of the CAA, 42 U.S.C. §§ 7661a-7661f, establishes an operating permit program for certain sources, including "major sources" and "major stationary sources."
- 4. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.

- 5. 40 C.F.R. § 70.1(b) provides that all sources subject to the Part 70 regulations shall have a permit to operate that assures compliance by the source with all applicable requirements, as defined in 40 C.F.R. § 70.2
- 6. Section 503(c) of the CAA, 42 U.S.C. § 7661b(c), and 40 C.F.R. § 70.5(a) provide that any person required to have a permit under Title V must timely submit a complete application for a permit.
- 7. 40 C.F.R. § 70.5(a)(2) requires that, among other things, that a complete application include all emissions of regulated air pollutants and air pollutant emission rates.
- 8. U.S. EPA granted full approval to the Illinois Title V operating permit program (CAAPP) on December 4, 2001, set forth at 415 Illinois Compiled Statutes (ILCS) Section 5/39.5. The program became effective on November 30, 2001. 66 Fed. Reg. 62946.
- 9. Section 39.5(6)(b) of the Illinois Environmental Protection Act states that no person shall operate a CAAPP source without a CAAPP permit unless a CAAPP permit or renewal application has been timely submitted. 415 ILCS § 5/39.5(6)(b).
- 10. Sections 39.5(1.1)(a) and (b) of the Illinois Environmental Protection Act states that an owner or operator of a source may seek exclusion from the CAAPP prior to the date the CAAPP application for the source is due by submitting a permit application, consistent with the State permit program, requesting exclusion through the imposition of federally enforceable conditions limiting the potential to emit to below major source thresholds.
- 11. Section 502 of the CAA, 42 U.S.C. § 7661a, applies to all major stationary sources, defined at Section 501 of the CAA, 42 U.S.C. § 7602.
- 12. Section 39.5 of the Illinois Environmental Protection Act applies to any source defined as a major source or major stationary source. 415 ILCS § 5/39.5(2)(a)(ii).

- 13. The definition of "major stationary source" includes any stationary source located in a "marginal" or "moderate" ozone non-attainment area that emits or has the potential to emit 100 tons per year or more of volatile organic compounds. 415 ILCS § 5/39.5(2)(c)(iii).
- 14. Each state must submit to the Administrator of EPA a plan for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the CAA, 42 U.S.C. § 7410.
- 15. The Administrator of the EPA approved Illinois' plan for the attainment and maintenance of the NAAQS under Section 110 of the CAA (Illinois SIP). *See* 40 C.F.R. § 52.722 and 55 Fed. Reg. 40661 (October 4, 1990).
- On September 9, 1994, EPA approved Part 211 of the IAC as part of the federally enforceable Illinois SIP. 59 Fed. Reg. 46567.
- 17. 35 IAC § 211.3690 defines "maximum theoretical emissions" as the quantity of volatile organic material emissions that theoretically could be emitted by a stationary source before add-on controls based on the design capacity or maximum production capacity of the source and 8760 hours per year.
- 18. 35 IAC § 211.4970 defines "potential to emit" as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restriction on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is federally enforceable. *See also* 40 C.F.R. § 70.2; 415 ILCS § 5/39.5(1).

- 19. On March 12, 1997, EPA approved 35 IAC § 218.980, as part of the federally enforceable SIP. 62 Fed. Reg. 11327.
- 20. 35 IAC § 218.980(a)(1) states that a source is subject to 35 IAC Part 218, Subpart TT, if it contains process emission units not regulated by the Subparts identified in 35 IAC § 218.980(a)(1) which as a group have a maximum theoretical emissions of 100 tons or more per calendar year of volatile organic matter (VOM) and are not limited to less than 100 ton of VOM emissions per calendar year in the absence of air pollution control equipment through production or capacity limitations contained in a federally enforceable permit or SIP revision.
- 21. 35 IAC § 218.980(b)(1) states, in pertinent part, that a source is subject to 35 IAC Part 218, Subpart TT, if it has the potential to emit 25 tons or more of VOM per year, in aggregate, from emission units, that are not regulated by the Subparts identified in 35 IAC § 218.980(b)(1)(A) and not included in the categories listed in 35 IAC § 218.980(b)(1)(B).
- 22. On October 21, 1996, EPA approved 35 IAC §§ 218.986 and 218.987 as part of the federally enforceable SIP. 61 Fed. Reg. 54556.
- 23. 35 IAC § 218.986 states that every owner or operator of an emission unit subject to 35 IAC Part 218, Subpart TT shall comply with 35 IAC § 218.986(a).
- 24. 35 IAC § 218.986(a) requires every owner or operator to operate emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit.
- 25. 35 IAC §§ 218.987 and 218.106(c) require every owner or operator of an emission unit which is subject to 35 IAC Part 218, Subpart TT to comply with the requirements of 35 IAC Part 218, Subpart TT, by March 15, 1995 or upon startup.

26. Under Section 113(a)(1) and (a)(3) of the CAA, 42 U.S.C. § 7413 (a)(1) and (a)(3), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a SIP and Title V of the CAA. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division.

Findings

- 27. General Iron owns and operates a metal shredding and recycling facility at 1909 North Clifton Ave, Chicago, Illinois (Facility), which is located in Cook County.
- 28. General Iron receives, processes, and recycles ferrous and non-ferrous scrap metals from cars and post-consumer scrap metal at the Facility.
- 29. Scrap metal is shredded in a hammermill shredder at the Facility that is equipped with a "Pedcon UHF High-Efficiency Roll Filter System" consisting of a capture hood, cyclone and roll-media filter system.
- 30. On or about June 13, 2017, May 24 and 25, 2018 and June 13, 2018, EPA conducted onsite inspections at the Facility, including inspections during emissions testing conducted by the Facility.
- 31. On or about November 11, 2017, EPA issued an Information Request pursuant to Section 114 of the CAA (2017 Information Request) to General Iron regarding the Facility. The 2017 Information Request, among other things, required General Iron to conduct emission testing of the hammermill shredder at the Facility and to provide the results of the emission testing to EPA. The required emissions testing included VOM, particulate matter (PM) and metals emissions rates.
- 32. On December 13, 2017 and May 21, 2018, General Iron met with EPA to discuss the 2017 Information Request.

- 33. General Iron conducted testing as required by the 2017 Information Request on May 24, 2018, and May 25, 2018, including testing for VOM, PM, and metals emissions, and on June 13, 2018 and June 14, 2018, including testing for PM and metals emissions.
- On or about January 12, 2018 and June 25, 2018, General Iron submitted to EPA responses to the 2017 Information Request, including the results of emissions testing for VOM conducted on May 25, 2018 and emissions testing for PM and metals conducted on June 13 and 14, 2018, and an impact assessment for metals emissions.
- 35. On July 18, 2018, EPA issued General Iron a Notice and Finding of Violation (NOV/FOV) for violations of the Clean Air Act and the Illinois SIP.
- 36. General Iron provided to EPA the results of the emissions testing for PM and metals conducted on May 24, 2018 in submittals on July 23, 2018 and August 21, 2018.
- 37. General Iron submitted a written response to the NOV/FOV on August 23, 2018.
- 38. General Iron met with EPA to discuss the NOV/FOV on July 24, 2018 and September 14, 2018.
- 39. Based on the results of the emissions testing, the Facility is below the permitted hammermill shredder emission limits for PM and the Facility emits or has the potential to emit more than 100 tons per calendar year of volatile organic compounds.
- 40. General Iron is a "major stationary source" as defined at 42 U.S.C. § 7661(2) and 415 ILCS § 5/39.5(2)(c)(i).
- 41. By operating as a major source, General Iron is subject to the requirements of the CAA's Title V, 42 U.S.C. §§ 7661a-7661f, at the Facility.

- 42. Based on the December 12, 2017 response and the results of the emissions testing, the hammermill shredder at the Facility has maximum theoretical emissions rate of more than 100 tons per calendar year of VOM.
- 43. Based on the December 12, 2017 response and the results of the emissions testing, the hammermill shredder emits 25 tons or more of VOM per year.
- 44. To date, General Iron does not comply with the VOM control requirements of 35 IAC Part 218, Subpart TT, nor does it have in place a federally enforceable alternative control plan that qualifies for an exemption from these requirements.
- 45. By operating as a major stationary source without a Title V permit, General Iron has violated Section 502 of the CAA, the regulations at 40 C.F.R. §§ 70.1(b) and 70.7(b), and the Illinois Environmental Protection Act at 415 ILCS § 5/39.5(6)(b).
- 46. On July 16, 2019, General Iron completed installation of a regenerative thermal oxidizer (RTO) at the Facility.

Compliance Program

- 47. The RTO shall be appropriately designed, operated and maintained in a manner that ensures the minimum destruction efficiency of the RTO for VOM from the hammermill shredder is 98%.
- 48. Within 90 days of the effective date of this Order, General Iron must conduct a performance test to demonstrate the VOM destruction efficiency of the RTO.
- 49. At least 30 days prior to the date of the performance test, General Iron must submit to EPA for review and approval a proposed testing protocol describing the methods and procedures to be conducted during the test. General Iron shall conduct performance testing using, at a

- minimum, EPA Methods 1 or 1A, 2 or 2A, 2B or 2C, 3, 4, and 25A, to demonstrate that the RTO achieves the required VOM destruction efficiency.
- 50. General Iron shall use the RTO operating data from a successful performance test to establish a set point temperature for the RTO that achieves the demonstrated VOM destruction efficiency of the RTO.
- 51. Within 60 days of the completion of the performance testing conducted according to the approved testing protocol, General Iron shall submit to EPA the results of the performance testing including:
 - A summary of the results including inlet and outlet organic material concentrations,
 destruction efficiency of the RTO, visual observations of capture efficiency and
 RTO operating temperatures.
 - b. A description of the facility operations at the time of the test, including operating parameters;
 - c. A description of the sampling and analytical procedures; and
 - d. All copies of data and measurements obtained during the testing.
- 52. Within 90 days of the completion of the performance testing, General Iron must submit a permit application to the Illinois EPA to incorporate the following conditions into a federally enforceable state operating permit (FESOP):
 - a. Control Device: operate an RTO to control emissions from the hammermill shredder at the Facility;
 - b. Operation requirements:
 - i. Minimum combustion temperature must be maintained in the RTO, as determined by the performance test; and

- ii. Minimum air flow or fan power must be maintained, as determined by the performance test;
- c. Control equipment requirements: 98 percent or greater VOM destruction efficiency, by weight, of the RTO;
- d. Emission limits: Annual VOM emission limits and RTO destruction efficiency requirements;
- e. Monitoring requirements:
 - i. Continuous monitoring of temperature; and
 - ii. Continuous monitoring of air flow or fan power;
- f. Recordkeeping requirements:
 - i. A log of the operating times for the shredder;
 - ii. A log of temperature and air flow or fan power operating records from continuous monitoring; and
 - iii. A log of any deviations from the operational limits for combustion temperature in the RTO.
- 53. General Iron must submit a copy of the FESOP permit application to EPA within 7 days of submitting the application to Illinois EPA.
- 54. General Iron must send all responses, deliverables, submittals or reports required by this Order to connolly.scott@epa.gov, and r5airenforcement@epa.gov. If electronic responses are not possible, send all documents to:

Attention: Compliance Tracker (AE-18J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

General Provisions

- 55. This Order does not affect General Iron's responsibility to comply with other federal, state, and local laws.
- 56. This Order does not restrict EPA's authority to enforce the CAA and its implementing regulations.
- 57. Failure to comply with this Order may subject General Iron to penalties up to \$99,681 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.
- 58. The terms of this Order are binding on General Iron, its assignees and successors. General Iron must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.
- 59. General Iron may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If General Iron fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.
- 60. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts,

please furnish an electronic copy on physical media such as compact disk, flash drive or other similar item. If it is not possible to submit the information electronically, submit the response to this Order without staples; paper clips and binder clips, however, are acceptable.

- 61. EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.
- 62. General Iron agrees to the terms of this Order. General Iron waives any remedies, claims for relief, and otherwise available rights to judicial or administrative review that it may have with respect to any issue of fact or law set forth in this Order, including any right of judicial review under Section 307(b) of the CAA, 42 U.S.C. § 7607(b).
- 63. This Order is effective on the date of signature by the Director of the Enforcement and Compliance Assurance Division. This Order will terminate on the earlier of either two years from the effective date of the Order, provided that General Iron certifies that it has complied with all terms of the Order, or at the time General Iron certifies that it has complied with all terms of the Order and that it is no longer operating at the Facility.

General Iron Industries, Inc.

8/20/19

Adam Labkon Vice President

General Iron Industries, Inc.

United States Environmental Protection Agency

8/22/2019 Date

Michael D. Marris

Michael D. Harris Acting Director

Enforcement and Compliance Assurance Division U.S. Environmental Protection Agency, Region 5

CERTIFICATE OF MAILING

I certify that I sent the Administrative Consent Order, EPA-5-19-113(a)-IL-08, by certified mail, return receipt requested, to:

Adam Labkon General Iron Industries, Inc. 1909 N. Clifton Ave. Chicago, Illinois 60614

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-19-113(a)-IL-08, by E- mail to:

Kent Mohr, Manager Compliance Section Bureau of Air Illinois Environmental Protection Agency Kent.Mohr@Illinois.gov

On the 22 day of August 2019

Kathy Jones

Program Technician

AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

7019 0140 0000 0722 3680



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JUL 1 8 2018

CERTIFIED MAIL RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Adam Labkon General Iron Industries, Inc. 1909 N. Clifton Ave. Chicago, Illinois 60614

Re:

Notice and Finding of Violation General Iron Industries, Inc.

Chicago, Illinois

Dear Mr. Labkon:

The U.S. Environmental Protection Agency (EPA) is issuing the enclosed Notice and Finding of Violation (NOV/FOV) to General Iron Industries, Inc. (you) under Sections 113(a)(1) and 113(a)(3) of the Clean Air Act (CAA), 42 U.S.C. §§ 7413(a)(1) and 7413(a)(3). We find that you are violating and have violated the Illinois State Implementation Plan, Title V of the CAA, 42 U.S.C. §§ 7661a-7661f, and Section 114 of the CAA, 42 U.S.C. § 7414, at your facility in Chicago, Illinois.

Section 113 of the CAA gives the EPA several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

While we have been in discussions with you for some time regarding conditions at your facility, the emissions tests you have performed, and possible options for pollution controls, this letter provides formal notice of the violations, and offers you an opportunity to confer with us about those violations as alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV/FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Mr. Scott Connolly. You may call or email him at (312) 886-1493 or connolly.scott@epa.gov to request a conference. You may also have your attorney contact Erik Olson at (312) 886-6829 or colson.erik@epa.gov. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

Edward Nam

Director

Air and Radiation Division

Enclosure

cc: Julie Armitage, Chief, Bureau of Air

Ann Zwick Freeborn and Peters LLP 311 South Wacker Drive Suite 3000 Chicago, IL 60606

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

IN THE MATTER OF:)	
General Iron Industries, Inc.) NOTICE ANI	FINDING
) OF VIOLA	
Chicago, Illinois) EPA-5-18-IL-	14
Proceedings Pursuant to)	
Section 113(a)(1) of the)	
Clean Air Act, 42 U.S.C.)	
§ 7413(a)(1))	

NOTICE AND FINDING OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice and Finding of Violation (NOV/FOV) under Sections 113(a)(1) and 113(a)(3) of the Clean Air Act (CAA), 42 U.S.C. §§ 7413(a)(1) and 7413(a)(2). EPA finds that General Iron Industries, Inc. (General Iron) is violating Section 114(a)(1) of the CAA, 42 U.S.C. §7414, Title V of the CAA, 42 U.S.C. §§ 7661a-7661f, and the Illinois State Implementation Plan (SIP), as follows:

Statutory and Regulatory Background

- 1. The Administrator of EPA may require any person who owns or operates an emission source who is subject to any requirement of the CAA to provide information required by the Administrator under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.
- 2. Title V of the CAA, 42 U.S.C. §§ 7661a-7661f, establishes an operating permit program for certain sources, including "major sources" and "major stationary sources."
- 3. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.
- 4. 40 C.F.R. § 70.1(b) provides that all sources subject to the Part 70 regulations shall have a permit to operate that assures compliance by the source with all applicable requirements, as defined in 40 C.F.R. § 70.2.
- 5. Section 503(c) of the CAA, 42 U.S.C. § 7661b(c), and 40 C.F.R. § 70.5(a) provide that any person required to have a permit under Title V must timely submit an application for a permit.

- U.S. EPA granted full approval to the Illinois Title V operating permit program
 (CAAPP) on December 4, 2001, set forth at 415 Illinois Compiled Statutes (ILCS)
 Section 5/39.5. The program became effective on November 30, 2001. 66 Fed. Reg.
 62946.
- 7. Section 39.5(6)(b) of the Illinois Environmental Protection Act states that no person shall operate a CAAPP source without a CAAPP permit unless a CAAPP permit or renewal application has been timely submitted. 415 ILCS § 5/39.5(6)(b).
- 8. Section 502 of the CAA, 42 U.S.C. § 7661a, applies to all major stationary sources, defined at Section 501 of the CAA, 42 U.S.C. § 7602.
- 9. Section 39.5 of the Illinois Environmental Protection Act applies to any source defined as a major source or major stationary source. 415 ILCS § 5/39.5(2)(a)(ii).
- 10. The definition of "major stationary source" includes any stationary source located in a "marginal" or "moderate" ozone non-attainment area that emits or has the potential to emit 100 tons per year or more of volatile organic compounds. 415 ILCS § 5/39.5(2)(c)(iii).
- 11. Section 110 of the CAA, 42 U.S.C. § 7410, requires each state to adopt and submit to EPA for approval a SIP that provides for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS).
- 12. The Administrator of the EPA approved Illinois' plan for the attainment and maintenance of the NAAQS under Section 110 of the CAA. See 40 C.F.R. § 52.722 and 55 Fed. Reg. 40661 (October 4, 1990).
- On May 31, 1972, EPA approved Section 201.122 of Title 35 of the Illinois Administrative Code (IAC) as part of the federally enforceable Illinois SIP. 37 Fed. Reg. 10862.
- 14. 35 IAC § 201.122 states that evidence that specified air contaminant emissions, as calculated on the basis of standard emission factors or other factors generally accepted as true by those persons engaged in the field of air pollution control, exceed the limitations prescribed under 35 IAC, Chapter 1, shall constitute adequate proof of a violation, in the absence of a showing that actual emissions are in compliance.
- 15. On September 9, 1994, EPA approved Part 211 of the IAC as part of the federally enforceable Illinois SIP. 59 Fed. Reg. 46567.
- 16. 35 IAC § 211.3690 defines "maximum theoretical emissions" as the quantity of volatile organic material emissions that theoretically could be emitted by a stationary source before add-on controls based on the design capacity or maximum production capacity of the source and 8760 hours per year.
- 17. 35 IAC § 211.4970 defines "potential to emit" as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restriction on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is federally enforceable. *See also* 40 C.F.R. § 70.2; 415 ILCS § 5/39.5(1).

- 18. On February 21, 1980, EPA approved 35 IAC § 212.301 as part of the federally enforceable Illinois SIP. 45 Fed. Reg. 11493.
- 19. 35 IAC § 212.301 states that no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the emission source.
- 20. On March 12, 1997, EPA approved 35 IAC § 218.980, as part of the federally enforceable SIP. 62 Fed. Reg. 11327.
- 21. 35 IAC § 218.980(a)(1) states that a source is subject to 35 IAC Part 218, Subpart TT, if it contains process emission units not regulated by the Subparts identified in 35 IAC § 218.980(a)(1), which as a group have a maximum theoretical emissions of 100 tons or more per calendar year of volatile organic matter (VOM) and are not limited to less than 100 ton of VOM emissions per calendar year in the absence of air pollution control equipment through production or capacity limitations contained in a federally enforceable permit or SIP revision.
- 22. 35 IAC § 218.980(b)(1) states, in pertinent part, that a source is subject to 35 IAC Part 218, Subpart TT, if it has the potential to emit 25 tons or more of VOM per year, in aggregate, from emission units, that are not regulated by the Subparts identified in 35 IAC § 218.980(b)(1)(A) and not included in the categories listed in 35 IAC § 218.980(b)(1)(B).
- 23. On October 21, 1996, EPA approved 35 IAC §§ 218.986 and 987, as part of the federally enforceable SIP. 61 Fed. Reg. 54556.
- 24. 35 IAC § 218.986 states that every owner or operator of an emission unit subject to 35 IAC Part 218, Subpart TT shall comply with 35 IAC § 218.986(a).
- 25. 35 IAC § 218.986(a) requires every owner or operator to operate emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit.
- 26. 35 IAC §§ 218.987 and 218.106(c) require every owner or operator of an emission unit which is subject to 35 IAC Part 218, Subpart TT to comply with the requirements of 35 IAC Part 218, Subpart TT, by March 15, 1995.

Findings

- General Iron owns and operates a metal shredding and recycling facility at 1909
 North Clifton Ave, Chicago, Illinois (Facility), which is located in Cook County.
- 28. Cook County is part of the Chicago-Naperville, IL-IN-WI nonattainment area which is classified as "marginal" or "moderate."
- 29. General Iron stores, processes, and recycles ferrous and non-ferrous scrap metals from cars and post-consumer sheet metal at the Facility.
- 30. Scrap metal is shredded in a hammermill shredder at the Facility.
- 31. On or about June 13, 2017, May 24 & 25, 2018 and June 13, 2018, EPA conducted onsite inspections at the Facility, including inspections during emissions testing conducted by the Facility.
- 32. On or about November 11, 2017, EPA issued a Section 114 Information Request (2017 Information Request) to General Iron regarding the Facility. The 2017 Information Request, among other things, required General Iron to conduct emission testing at the facility and to provide the results of the emission testing to EPA. The required emissions testing included evaluations of VOM, particulate matter (PM) and metals emissions.
- 33. On December 13, 2017 and May 21, 2018, General Iron met with EPA to discuss the 2017 Information Request.
- 34. General Iron conducted testing as required by the 2017 Information Request on May 24, 2018, May 25, 2018, including testing for VOM, PM, and metals emissions, and on June 13, 2018 and June 14, 2018, including testing for PM and metals emissions.
- 35. During the May 24 & 25, 2018 inspection, EPA observed and recorded hydrocarbons exiting the hammermill shredder with a FLIR infrared camera.
- 36. During the June 13, 2018 inspection, EPA observed fugitive particulate matter emitted from the hammermill shredder crossing the property line.
- 37. On or about December 12, 2017 and June 27, 2018, General Iron provided responses to the 2017 Information Request, including the results of emissions testing for VOM conducted on May 24 and 25, 2018 and emissions testing for PM and metals conducted on June 13 and 14, 2018.
- 38. General Iron did not provide to EPA the results of the emissions testing for PM and metals conducted on May 24 and 25, 2018.
- 39. Based on the results of the emissions testing, the Facility emits or has the potential to emit more than 100 tons per calendar year of volatile organic compounds.

- 40. General Iron is a "major source" as defined at 42 U.S.C. § 7661(2) and 415 ILCS § 5/39.5(2)(c)(i).
- 41. By operating as a major source, General Iron is subject to the requirements of the CAA's Title V, 42 U.S.C. §§ 7661a-7661f, at the Facility.
- 42. To date, General Iron has not submitted a complete CAAPP permit application to Illinois EPA.
- 43. To date, General Iron has not received a CAAPP permit from Illinois EPA.
- 44. Based on the December 12, 2017 response and the results of the emissions testing, the hammermill shredder at the Facility has maximum theoretical emissions rate of more than 100 tons per calendar year of VOM.
- 45. Based on the December 12, 2017 response and the results of the emissions testing, the hammermill shredder alone emits 25 tons or more of VOM per year.
- 46. To date, General Iron does not have any emission capture or control equipment that achieves an overall reduction of uncontrolled VOM emissions of at least 81 percent at the hammermill shredder nor does it have in place a federally enforceable alternative control plan that achieves an overall reduction of uncontrolled VOM emissions of at least 81 percent at the hammermill shredder.

Violations

- 47. By failing to submit a timely and complete CAAPP permit application to Illinois EPA, General Iron has violated of Section 503 of the CAA, the regulations at 40 C.F.R. §§ 70.5(a) and 70.7(b), and the Illinois Environmental Protection Act at 415 ILCS § 5/39.5(4)(c).
- 48. By operating as a major stationary source without a Title V permit, General Iron has violated Section 502 of the CAA, the regulations at 40 C.F.R. §§ 70.1(b) and 70.7(b), and the Illinois Environmental Protection Act at 415 ILCS § 5/39.5(6)(b).
- 49. General Iron allowed fugitive particulate matter from the hammermill shredder that was visible by an observer looking generally toward the zenith to cross the property line of the Facility on at least June 13, 2018, in violation of 35 IAC § 212.301 and the SIP.
- 50. To date, General Iron has failed to install any emission capture or control equipment that achieves an overall reduction of uncontrolled VOM emissions of at least of 81 percent at the hammermill shredder or, alternatively, obtain a federally enforceable equivalent control plan at the hammermill shredder, in violation of 35 IAC § 218.986(a) and the SIP.

51. To date, General Iron has failed to provide the results of the May 24 and 25 PM and metals emissions testing as required by the 2017 Information Request, in violation of Section 114 of the CAA, 42 U.S.C. § 7414.

Environmental Impact of Violations

- 52. These violations can cause and have caused excess emissions of VOMs and particulate matter.
- VOMs are photochemical oxidants associated with a number of detrimental health effects, which include birth defects and cancer, as well as environmental and ecological effects. In the presence of sunlight, VOMs are influenced by a variety of meteorological conditions and have the ability to create photochemical smog. VOMs react with oxygen in the air to produce ground-level ozone.
- 54. Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame lung tissue. Repeated exposure may permanently scar lung tissue.
- 55. Particulate matter, especially fine particulates, contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. Particulate matter exposure contributes to:
 - · irritation of the airways, coughing, and difficulty breathing;
 - decreased lung function;
 - aggravated asthma;
 - chronic bronchitis;
 - · irregular heartbeat;
 - · nonfatal heart attacks; and
 - premature death in people with heart or lung disease.

7/18/18

Date

Edward Nam

Director

Air and Radiation Division

CERTIFICATE OF MAILING

I certify that I sent a Notice of Violation, No. EPA-5-18-IL-14, by Certified Mail, Return

Receipt Requested, to:

Adam Labkon Vice President General Iron Industries Inc. 1909 North Clifton Street Chicago, IL 60608

I also certify that I sent copies of the Notice of Violation by email to:

Julie Armitage Chief Bureau of Air Julie.armitage@Illinois.gov

Ann Zwick azwick@freeborn.com

On the 19th day of July 2018.

Kathy Jones

Program Technician

AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

7017 1070 0000 1030 0162

October 30, 2019

John Kim, Director Illinois Environmental Protection Agency 1021 Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276

Re: General III, LLC, 11600 S. Burley, Chicago, IL 60617: Request for an Environmental Justice Analysis, a Public Hearing and a Subsequent Written Comment Period

To the Director,

We are writing on behalf of the Southeast Environmental Task Force ("SETF")¹ and the Chicago South East Side Coalition to Ban Petcoke², community-based organizations that are dedicated to the health, safety and welfare of the people who live, work and recreate in the Calumet region. We are also writing on behalf of the Natural Resources Defense Council ("NRDC") and our thousands of members and activists in the City of Chicago, including those who reside on Chicago's southeast side.³ For purposes of this letter, these groups will be referred to as the NGO coalition.

On October 1, 2019, the Illinois EPA distributed a notice that General III, LLC submitted a Construction Permit application to construct a scrap metal recycling facility at 11600 S. Burley, Chicago Illinois 60617. This facility would operate at this location with four existing, affiliated businesses – Reserve Marine Terminals, South Chicago Recycling, LLC, Napauk Salvage of Waupaca, LLC and RSR Partners, LLC doing business as Regency Technologies. General III, LLC, which is wholly owned by RMG Investment Group, will be a fifth RMG-related operation on the site. General III will be located on an approximately 23 acre portion of the site that extends from the intersection of 116th and Burley to the Calumet River. General III will purchase the "business and substantially all of the assets" of General Iron Industries, which currently processes 740,000 tons of scrap per year.

The NGO coalition is making a formal request that IL EPA incorporate a public hearing and a subsequent written comment period into its permitting activities. The NGO coalition is asking IL EPA to post current information during the duration of this permitting transaction on its document explorer website. Moreover, considering the characteristics of the immediately surrounding area, the NGO coalition is formally requesting IL EPA to conduct an environmental justice analysis as part of its permitting process.

There is a strong justification for an environmental justice analysis and for a full and complete opportunity for public participation. According to information derived from the demographic feature of U.S. EPA's ECHO database, there are 68,947 people living within a three-mile radius of General III's proposed facility. 49% of the people who live in that three-mile radius are Hispanic, and 30% are African American. The ECHO database also indicates that there are

¹ http://setaskforce.org/

²https://www.facebook.com/SSCBP60617/

³ https://www.nrdc.org/

⁻Named one of Chicago's Top Charities by Chicago magazine, Nov. 2015 -

26,624 households in this area as well as 19,051 minors younger than 18. Nearby residential communities include the East Side, South Deering and Hegewisch. The facility would operate immediately adjacent to the Calumet River. In addition, the facility is less than one mile from a school, Washington High School. This area scores above 90% in eleven categories assessed by U.S. EPA's EJ screening tool, including PM 2.5, diesel PM, NATA air toxics cancer risk, NATA respiratory hazard index, traffic proximity, lead paint indicator, superfund proximity, risk management plan proximity, hazardous waste proximity and wastewater discharge proximity.

The Southeast Environmental Task Force obtained a copy of General III's construction permit application through a FOIA request. After reviewing this application, the NGO coalition is concerned about the cumulative impact of this new facility in combination with the existing, affiliated facilities that already operate at this location. In light of the nearby residential neighborhoods and the existing environmental problems they face, the NGO coalition is concerned that this facility could cause and contribute to pollution that creates a significant, adverse and disproportionate impact on public health and safety, the use and enjoyment of property, children's health and environmental quality. The NGO coalition is concerned that new emissions produced by the facility are not accurately characterized, particularly in light of the use of outdoor storage piles.

IL EPA, as a federally funded entity, has a legal obligation to consider environmental justice issues in compliance with Title VI. ⁴ As articulated in Title VI, recipients of federal funds have an affirmative obligation to ensure non-discrimination. Because IL EPA is a state agency that receives funding from a federal entity, the U.S. Environmental Protection Agency (U.S. EPA), it has a legal duty to ensure non-discrimination in this case. ⁵ IL EPA will violate its legal responsibilities under Title VI if it allows the permitting of the facility in question without an environmental justice analysis, and without providing a full and complete opportunity for public participation. Because the area surrounding the proposed facility is disproportionately minority, it is exactly the type of area that is meant for protection under Title VI and Illinois environmental justice policies.

In the resolution of <u>United States Environmental Protection Agency Administrative Complaint Number 13R-10-R5</u>, IL EPA made a commitment to revise its environmental justice public participation policy "...so that permitting activities in areas identified as potential EJ communities will be given an appropriate level of outreach...". As part of its subsequently revised Environmental Justice Public Participation Policy, IL EPA identified a series of public participation initiatives that apply to "all permitting transactions." These commitments include:

- 1. providing early and meaningful public involvement throughout the permitting process;
- 2. making a determination of the appropriate outreach based on factors like the type of permit, potential impact of the project, type of source or level of interest;

⁴ "No person in the United States shall, on the ground of race, color or national origin, . . . be subjected to discrimination under any program or activity receiving Federal financial assistance." Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d.

⁵ Illinois EPA's obligations also include the commitments it made to resolve three previous Title VI Complaints, which are documented at: http://www.epa.illinois.gov/topics/environmentaljustice/grievances/index

- 3. encouraging the permit applicant to meet with community stakeholders, to provide notice and information about the project or to develop a Community Relations Plan;
- 4. providing the community with information via mailed EJ notifications;
- 5. making and distributing fact sheets or project summaries;
- 6. developing and publishing a Public Notice;
- 7. conducting an informational meeting or a public hearing;
- 8. publishing a draft permit for public review;
- 9. conducting a public written comment period on the permit; and,
- 10. prior to issuing a permit, making an effort to make information available to residents in a timely and efficient manner.

There is a final factor that is important evidence of the need for public participation and an environmental justice analysis. This permitting process represents a vital juncture for IL EPA to provide public engagement to ensure that this facility operates in manner which meets federal, state and local environmental standards, and to take steps to avoid any significant, adverse and disproportionate effects that could occur. Consequently, there is a high degree of public interest regarding General III and IL EPA's permitting activities in relation to the proposed facility.

Thank you for your consideration of this request. Please contact us if you have any questions or comments. I look forward to your response.

Sincerely,

Keete Harley

Keith Harley, Attorney for Southeast Environmental Task Force Chicago Legal Clinic, Inc.

211 W. Wacker Drive, Suite 750

Chicago, IL 60606 Tel: (312) 726-2938

E-Mail: kharley@kentlaw.iit.edu

/s/ Nancy C. Loeb
Attorney for Chicago South East Side Coalition to Ban Petcoke
Clinical Associate Professor of Law
Director, Environmental Advocacy Clinic
Bluhm Legal Clinic
Northwestern Pritzker School of Law
375 East Chicago Avenue, Chicago, IL 60611-3069

Tel: 312-503-0052

E-Mail: n-loeb@northwestern.edu

/s/Meleah Geertsma Senior Attorney, Natural Resources Defense Council 20 N. Wacker Drive, Suite 1600 Chicago, IL 60606

Tel: 312-651-7904

E-Mail: mgeertsma@nrdc.org

cc Chris Pressnall, Illinois EPA Environmental Justice Officer via E-Mail



Environmental Justice Notification: Napuck Salvage of Waupaca LLC, Chicago

Harley, Keith <kharley@kentlaw.iit.edu>

Wed, Jan 15, 2020 at 3:19 PM

To: "Pressnall, Chris" <chris.pressnall@illinois.gov>, "Lenkart, Maggie" <Maggie.Lenkart@illinois.gov> Cc: "Geertsma, Meleah" <mgeertsma@nrdc.org>, Nancy Loeb <n-loeb@northwestern.edu>, Daryl Grable <DGrable@clclaw.org>

Hi Chris and Maggie -

Please be advised that I represent the Southeast Environmental Task Force which, as you know, has a strong interest in the cluster of existing and proposed facilities located at 11600 S. Burley. The Natural Resources Defense Council (Meleah Geertsma) and Northwestern Law School's Environmental Clinic (Nancy Loeb, on behalf of the Southeast Side Coalition to Ban Petcoke) are working with SETF on this matter.

I'm writing to request your assistance in facilitating a conversation between our organizations and the IL EPA staff members who are now working on permitting and other matters related to the 11600 S. Burley facilities, which include Napuck Salvage, Reserve Marine Terminals, South Chicago Recycling, RSR Partners/Regency Technologies, General III LLC and, perhaps, Calumet Transload. Based on our review of IL EPA documents we acquired using FOIA, it appears that IL EPA concludes that these facilities constitute a single source for purposes of permitting activities pursuant to the Clean Air Act. Despite this, the agency appears to be conducting separate permitting activities for Napuck and, perhaps, General III. We would like to understand how the agency views the air permitting protocols for this cluster of facilities which traditionally have been treated separately but which now appear to be classified as a single source. Our goal in making this request is to gain an understanding that will help avoid misunderstanding, miscommunication and unnecessary conflict.

As you know, this matter triggers the IL EPA's environmental justice responsibilities. My request is also consistent with the invitation Director Kim offered during a phone call with NGOs earlier today, encouraging public interest organizations to communicate early and often with II EPA.

In this spirit, I look forward to your response and to speaking with you and other relevant IL EPA staff members as soon as possible.

- Keith Harley (312) 726-2938

[Quoted text hidden]





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

January 10, 2020

Re:

Napuck Salvage of Waupaca LLC (Illinois EPA BOA ID# 031600GYI)

Lifetime Operating Permit (12020006)

To Distribution List:

In accordance with the Illinois EPA's Environmental Justice Policy, the Illinois EPA wants to provide you with information about a potential Illinois EPA action. The Illinois EPA is sending this letter to notify you of an application received by the Illinois EPA Bureau of Air (BOA).

The Illinois EPA has received a Lifetime Operating Permit application from South Chicago Properties Ltd. for Napuck Salvage of Waupaca LLC located at 11600 S. Burley Avenue in Chicago. Napuck Salvage of Waupaca LLC is currently enrolled in the Registration of Smaller Source (ROSS) Program and is now requesting an initial Lifetime Operating Permit because this facility is considered a single source with Reserve Marine Terminals, South Shore Recycling, and Regency Technologies and no longer meets the ROSS criteria. The facility processes automotive engine blocks, clean auto cast, and foundry steel.

The application is currently under review by the Illinois EPA's Bureau of Air.

If you are receiving paper notifications and would like to sign up to receive notifications by email instead, please visit the Illinois EPA Environmental Justice webpage: https://www2.illinois.gov/epa/topics/environmental-justice/Pages/EJ-Notice-Sign-up.aspx

If you have questions about the application, please contact Chris Pressnall, Environmental Justice Coordinator at (217) 524-1284, chris.pressnall@illinois.gov.

Sincerely,

Chris Pressnall

Environmental Justice Coordinator

Distribution List

Builders Asphalt LLC

State Senator Elgie Sims - State Senate District #17

State Representative Marcus C. Evans - State Representative District #33

U.S. Representative Robin Kelly - U.S. Congressional District #2*

U.S. Senator Richard J. Durbin*

U.S. Senator Tammy Duckworth*

City of Chicago - Lori Lightfoot, Mayor

City of Chicago - Alderwoman Susan Garza Sadlowski

Cook County Board of Commissioners*

Cook County Department of Environment & Sustainability*

Chicago Southside NAACP

Illinois NAACP - Gregory Norris*

Illinois NAACP - Teresa Haley*

American Lung Association of Illinois - Angela Tin*

Respiratory Health Association - Brian P. Urbaszewski*

Sierra Club - Jack Darin*

Sierra Club - Christine Nannicelli*

Prairie Rivers Network - Elliot Brinkman*

Faith in Place - Rev. Brian Sauder*

Illinois Environmental Regulatory Group - Alec Davis*

Chemical Industry Council of Illinois - Lisa Frede*

Illinois EPA - Crystal Myers-Wilkins*

Chicago Legal Clinic - Keith Harley*

CPI - Natalie Warkenthien*

Grumman/Butkus Associates - Sumeta Medicherla*

Natural Resource Defense Council - Meleah Geertsma*

Natural Resource Defense Council - Ivan Moreno*

Illinois Environmental Council - Colleen Smith*

University of Chicago Law School - Elizabeth Lindberg*

Illinois Dept. of Transportation – John Sherrill*

Friends of the Chicago River - Adam Flickinger*

Shawnee Hills & Hollers - Georgia de la Garza*

Shawnee Hills & Hollers - Sabrina Hardenbergh*

Illinois Environmental Council - Jennifer Walling*

LVEJO - Juliana Pino*

Environmental Law & Policy Center – Jeffrey Hammons*

Environmental Law & Policy Center - Kiana Courtney*

Illinois Farm Bureau - Lauren Lurkins*

ComEd - Kareena Wasserman*

Earthjustice - Jennifer Cassel*

Earthjustice - Debbie Chizewer*

Bluhm Legal Clinic - Cary Shepherd*

Bridgeport Alliance - Anna Schibrowsky*

Chicago Dept. of Public Health - Alfonso Martel*

City of Chicago - Liliana Escarpita*

Indian Creek E.E.C. - Jayme Boberek*

Veterans Park Improvement Association - Janey Zavala*

Southeast Environmental Taskforce - Peggy Salazar



Harley, Keith <kharley@kentlaw.iit.edu>

General Iron aka GII LLC

Harley, Keith <kharley@kentlaw.iit.edu>

Mon, Jan 27, 2020 at 10:45 AM

To: "Pressnall, Chris" < Chris. Pressnall@illinois.gov>

Cc: Nancy Loeb <n-loeb@northwestern.edu>, "Geertsma, Meleah (mgeertsma@nrdc.org)"

<mgeertsma@nrdc.org>, "Layman, Robb" <Robb.Layman@illinois.gov>, "Frost, Brad"

<Brad.Frost@illinois.gov>, "Mohr, Kent" <Kent.Mohr@illinois.gov>, "Bernoteit, Bob"

<Bob.Bernoteit@illinois.gov>, "Barria, German" <German.Barria@illinois.gov>, "Jones, Eric E."

<Eric.E.Jones@illinois.gov>

Hi -

Thank you for participating in our conversation about the active and proposed facilities located at 11600 S. Burley in Chicago.

I'm writing to follow up on our commitment to provide information about the General Iron's operations at its existing location. As we discussed, these operations are one basis for community concerns about the transfer of this business and its operations to 11600 S. Burley. More specifically, our clients are concerned that this business and its operations could be a source of poorly controlled shredder emissions, fugitive particulate matter and releases of auto shredder residue. Moreover, in the context of permitting, our clients are concerned that actual and potential emissions from the shredder and other operations at 11600 S. Burley are not well characterized, and do not form the basis for making fundamental permitting choices.

Part of this concern is based on inspection and enforcement activity which is occuring at the existing General Iron facility. I'm attaching a packet which relates to this concern. The packet includes: 1. a Narrative Evaluation prepared by a Chicago Inspector on December 18, 2019; 2. a Narrative Evaluation prepared by a Chicago Inspector on December 23, 2019; and, 3. eight Chicago Notices of Violation issued based on observations that took place on 12/10/19, 12/16/19, 12/18/19 and 12/23/19. As you will see, City Inspectors consistently observed a failure to control and suppress dust to prevent off-site migration, auto fluff that "became scattered by the wind and migrated off-site", and releases of untreated shredder emissions that occurred despite the RTO and scrubber.

Again, thank you for meeting and for engaging the public health, environmental and environmental justice concerns we are expressing on behalf of our clients.

- Keith Harley, Attorney for Southeast Environmental Task Force



General Iron Chicago Inspections and Violation Notices December 2019.pdf



CITY OF CHICAGO

DEPARTMENT OF PUBLIC HEALTH PERMITTING AND ENFORCEMENT

NARRATIVE EVALUATION

INSPECTION DATE: 12/18/2019

SITE NAME: GII, LLC

SITE ADDRESS: 1909 N CLIFTON AVE, CHICAGO, IL 60614

SITE CODE: GII, LLC

PERMIT #: ENVAIR112607

TIME: 2:05 pm

EMPLOYEE:STEPHANIE SAMPRA

COUNTY:COOK / CHICAGO

INSPECTION #: 1494955

SUMMARY

Chicago Department of Public Health Environmental Engineer (Sampra) responded to an colleague's observation of a plume of smoke coming from facility at 1909 N Clifton Ave, General Iron Industries (GII, LLC). GII LLC operates a recycling facility pursuant to a Class IVB Recycling Permit (ENVREC1063430) issued by CDPH.

While canvassing the area surrounding GII, LLC on December 18, 2019, odors were observed at the following intersection: Clifton Ave & Marcey St and Kingsbury St & Cortland St. It is a pungent odor of sweet metal that burns my nostrils.

No plumes of smoke were observed but untreated emissions were seen escaping the top and side of the shredder. The shredder is not an enclosed piece of equipment. It does contain a hood to capture the emissions and process them through a Regenerative Thermal Oxidizer (RTO) and a wet scrubber to remove volatile organic compounds (VOCs), hazardous air pollutants (HAPs), and other airborne solvents. Being able to observe emissions escaping the shredder leads me to believe that the equipment capturing the emissions is insufficient. Consequently, this does not allow the recently installed air pollution control equipment to remove the emissions since they are escaping at the shredder before the treatment process.

Auto fluff/auto shredder residue was observed at the intersection of Clifton Ave and Marcey St. Auto fluff is a product of shredding operations and it consist of fine particles of glass, fibers, rubber, metal, plastic, dirt, and automotive fluids. Fugitive dust was also observed onsite when workers disturbed material piles and moved materials to and from truck trailers. Dust was also observed on the vehicles parked on the southeast side of Clifton Ave between Marcey St & Kingsbury St, which is diagonally across from Gll, LLC. Misting cannons were observed to not be in operation to control airborne particles at the time of the inspection. Observing auto fluff in the public way and dust on the vehicles diagonally across from GII LLC without operating misting cannons leads me to believe that reasonable measurements were not and are not being taken to ensure dust, debris, and dirt won't migrate off site and into the public way. A NOV citation #E000034125 was issued for Air Pollution Prohibited (11-4-730) and Handling of Material Susceptible to Becoming Windborne (11-4-760[a]). A NOV citation #E000035576 was issued for violating any condition imposed by the permit (11-4-030[b]) special condition 46 which requires the permittee to control and suppress dust and other materials to prevent off-site migration. The hearing date for the citations will be on March 26, 2020 at 1:00 p.m. at 400 W. Superior St. The citation will be served via US Mail to General Iron Industries (GII, LLC) Agent listed on the Illinois Secretary of State Corporation file detail report. The agents name and address Illinois Corporation Service C at 801 Adlai Stevenson Drive, Springfield, IL 62703.



CITY OF CHICAGO

DEPARTMENT OF PUBLIC HEALTH PERMITTING AND ENFORCEMENT

NARRATIVE EVALUATION

INSPECTION DATE: 12/18/2019

SITE NAME: GII, LLC

SITE ADDRESS: 1909 N CLIFTON AVE, CHICAGO, IL 60614

SITE CODE: GII, LLC

PERMIT #: ENVAIR112607

TIME: 2:05 pm

EMPLOYEE:STEPHANIE SAMPRA

COUNTY:COOK / CHICAGO

INSPECTION #: 1494955

SUMMARY

REPORT COMPLETED	Bosond	YES YES		NO NO	NOV ISSUED? ATTACHMENTS?		YES YES		NO NO	
I, STEPHANIE SAMPRA, an employee of the City of Chicago, Department of Public Health, declare that I have conducted an inspection of the above mentioned property on the date indicated. I further declare that the observations set forth on the report are true and accurate.										
147										
STAR#		****		SIC	NATIDE					

Page 2 of 8

R 004522

DATE: 12/18/2019

SITE: 1909 N CLIFTON AVE

SITE CODE: GII, LLC

PERMIT #: ENVAIR112607

TIME: 12/18/2019 2:05:00PM

INSPECTOR: STEPHANIE SAMPRA COUNTY: COOK / CHICAGO

INSPECTION #: 1494955



COMMENTS: 1909 N Clifton Ave - GII, Inc - Auto Fluff observed at the Eastern corner at the intersection of Clifton Ave and Marcey St.



COMMENTS: 1909 N Clifton Ave - GII, Inc - Auto Fluff observed at the Eastern corner at the intersection of Clifton Ave and Marcey St.

DATE: 12/18/2019

SITE: 1909 N CLIFTON AVE

SITE CODE: GII, LLC

PERMIT #: ENVAIR112607

TIME: 12/18/2019 2:05:00PM INSPECTOR: STEPHANIE SAMPRA COUNTY: COOK / CHICAGO

INSPECTION #: 1494955



COMMENTS:

1909 N Clifton Ave - GII, Inc - Dust observed on vehicles park diagonally from GII, Inc at the intersection of

Clifton Ave and Kingsbury St.

DATE: 12/18/2019

SITE: 1909 N CLIFTON AVE

SITE CODE: GII, LLC

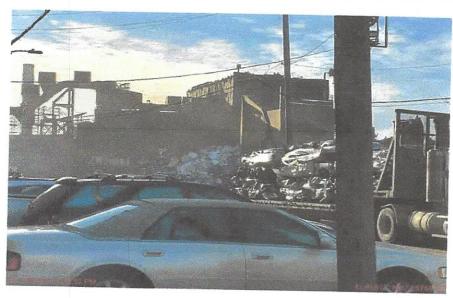
PERMIT #: ENVAIR112607

TIME: 12/18/2019 2:05:00PM

INSPECTOR: STEPHANIE SAMPRA

COUNTY: COOK / CHICAGO

INSPECTION #: 1494955



COMMENTS: 1909 N Clifton Ave - GII, Inc - View of GII, Inc at the intersection of Clifton Ave and Marcey St. Dust

observed when workers are unloading materials from trucks.

DATE: 12/18/2019

SITE: 1909 N CLIFTON AVE

SITE CODE: GII, LLC

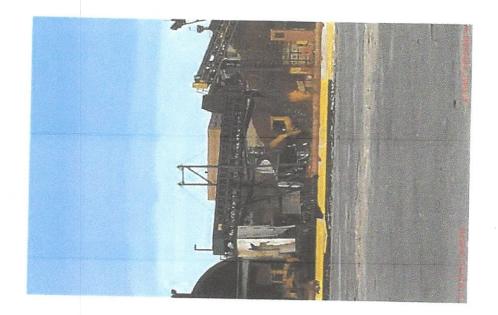
PERMIT #: ENVAIR112607

TIME: 12/18/2019 2:05:00PM

INSPECTOR: STEPHANIE SAMPRA

COUNTY: COOK / CHICAGO

INSPECTION #: 1494955



COMMENTS: 1909 N Clifton Ave - GII, Inc - View of GII, Inc from across the river at Home Depot's parking lot (1232 W

North Ave). Dust observed when workers are loading materials onto trucks.

DATE: 12/18/2019

SITE: 1909 N CLIFTON AVE

SITE CODE: GII, LLC

PERMIT #: ENVAIR112607

TIME: 12/18/2019 2:05:00PM INSPECTOR: STEPHANIE SAMPRA

COUNTY: COOK / CHICAGO

INSPECTION #: 1494955



COMMENTS: 1909 N Clifton Ave - GII, Inc - View of GII, Inc from across the river at Home Depot's parking lot (1232 W

North Ave). Dust observed when works are loading materials.

DATE: 12/18/2019

SITE: 1909 N CLIFTON AVE

SITE CODE: GII, LLC

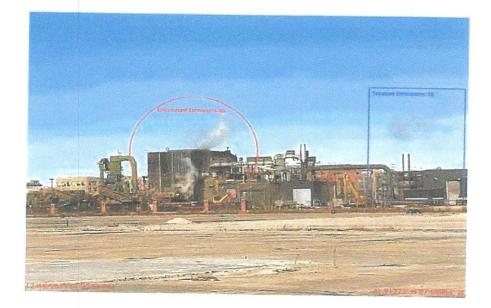
PERMIT #: ENVAIR112607

TIME: 12/18/2019 2:05:00PM

INSPECTOR: STEPHANIE SAMPRA

COUNTY: COOK / CHICAGO

INSPECTION #: 1494955



COMMENTS:

1909 N Clifton Ave - GII, Inc - View of GII, Inc from across the river at Home Depot's parking lot (1232 W North Ave). Untreated emissions escaping from the shredder.



***Not drawn to scale.



SITE SKETCH

CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
PERMITTING AND INSPECTIONS

December 18, 2019	
13:15 – 14:05	
1909 N Clifton Ave GII Inc	
S. Sampra	
COOK COUNTY/CHICAGO	
	13:15 – 14:05 1909 N Clifton Ave GII Inc S. Sampra



CITY OF CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL PERMITTING AND INSPECTIONS

CITY OF CHICAGO

OTHER COPH PERMITS

Permit Number	Permit Type	Expiration Date
ENVAIR1054996	ENV_AIR	
ENVAIR1055014	ENV_AIR	
ENVAIR1091684	ENV AIR	
ENVAIR1091741	ENV AIR	
ENVAIR131135	ENV_AIR	
ENVAIR140994	ENV_AIR	
ENVAIR587523	ENV_AIR	
ENVAIR589856	ENV_AIR	
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ENVAIR723712	ENV_AIR	
ENVREC102815	ENV_RCYCLE	
ENVREC102823	ENV_RCYCLE	



CITY OF CHICAGO DEPARTMENT OF PUBLIC HEALTH

	NARRATIVE EVALUATIO	N	
Address:	1840 N MOHAWK ST, CHICAGO, IL 60614	Date:	12/23/2019
Inspector:	STEPHANIE SAMPRA	Time:	1:10 pm to 1:50 pm
Complaint Number:	600768606	Log #:	10746578
Complaint was received ur	nder the 1840 N Mohawk Street. The actual add	Allebasia	
Clifton Ave. Chicago Deparcitizen's complaint regardi GII LLC operates a recyclin CDPH. While canvassing the area following intersection: Cliff sweet metal that burns my Untreated emissions were a shredder is not an enclosed process them through a Reorganic compounds (VOCs observe emissions escapin is insufficient. Consequentl remove the emissions since Auto fluff/auto shredder resis a product of shredding of dirt, and automotive fluids. and moved materials to and control airborne particles at dust without operating mistiare not being taken to ensur A NOV citation #E000035577 Susceptible to Becoming Wiccondition imposed by the peand suppress dust and othe be on March 26, 2020 at 1:00 Iron Industries (GII, LLC) Agagents name and address III 62703.	nere is a bad chemical smell coming from Genetiment of Public Health Environmental Engineing odors from a facility at 1909 N Clifton Ave, ag facility pursuant to a Class IVB Recycling Pursuant to a December 23, 2019, con Ave & Marcey St and Kingsbury St & Cortle	eral Iron Industrier (Sampra) resp General Iron Ind Permit (ENVREC1 Didors were observed and St. It is a pure redder and migration capture the emiscrubber to remove airborne solvents pulpment capturing pollution control treatment processury St & Cortiass, fibers, rubber workers disturber served to not be served to not be served to not be served into the public with the public with the public requires the permited and into the public requires the permited and into file details and provided in the served of the serv	ies at 1909 N conded to a ustries (GII, LLC). 063430) issued by rved at the ingent odor of ting off-site. The issions and ove volatile is. Being able to ing the emissions of equipment to iss. and St. Auto fluff ir, metal, plastic, in operation to vay and fugitive its were not and lic way. ing of Material id for violating any mittee to control the citations will Mail to General ail report. The ingfield, IL.
147			
STAR#	SIGNATURE	Series control	

Page 1 of 5



Department of Public Health Inspector Photo Log

Address:	1840 N MOHAWK ST
Inspector:	STEPHANIE SAMPRA

Photo Date:

12/23/2019

STEPHANIE SAMPRA

Service Request #:

600768606



1909 N Clifton Ave - GII LLC - Auto Fluff observed at Kingsbury St and Cortland St. COMMENTS:

Address: 1840 N MOHAWK ST STEPHANIE SAMPRA Inspector:

Photo Date:

12/23/2019

Service Request #:

600768606



COMMENTS: 1909 N Clifton Ave - GII LLC - Auto Fluff observed at Kingsbury St and Cortland St.



Department of Public Health Inspector Photo Log

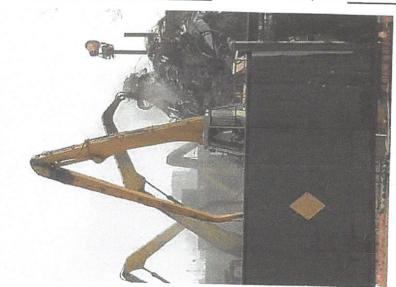
Address:	1840 N MOHAWK ST	Photo Date:	12/23/2019
Inspector:	STEPHANIE SAMPRA	***	
		Service Request #:	600768606



COMMENTS: 1909 N Clifton Ave - GII LLC - Dust observed when workers disturbed and move material piles.

 Address:
 1840 N MOHAWK ST
 Photo Date:
 12/23/2019

 Inspector:
 STEPHANIE SAMPRA
 Service Request #:
 600768606

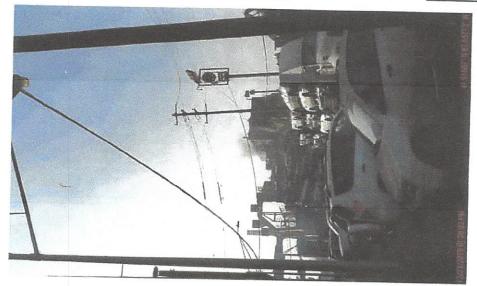


COMMENTS: 1909 N Clifton Ave - GII LLC - Dust observed when workers disturbed and move material piles.



Department of Public Health Inspector Photo Log

Address:	1840 N MOHAWK ST	Photo Date:	12/23/2019
Inspector:	STEPHANIE SAMPRA	Service Request #:	
		ocivice inequest #.	600768606



COMMENTS: 1909 N Clifton Ave - GII LLC - Untreated emissions observed escaping the shredder.

 Address:
 1840 N MOHAWK ST
 Photo Date:
 12/23/2019

 Inspector:
 STEPHANIE SAMPRA
 Service Request #:
 600768606



COMMENTS: 1909 N Clifton Ave - GII LLC - Untreated emissions observed escaping the shredder.



Department of Public Health Inspector Site Sketch

Address:	1840 N MOHAWK ST	Photo Date:	12/23/2019
Inspector:	STEPHANIE SAMPRA	Service Request #:	600768606



***Not drawn to scale.



SITE SKETCH

CITY OF CHICAGO
DEPARTMENT OF PUBLIC HEALTH
PERMITTING AND INSPECTIONS

COUNTY:	COOK COUNTY/CHICAGO	
INVESTIGATOR:	S. Sampra	
SITE CODE:		***************************************
SITE ADDRESS:	1909 N Clifton Ave Gll Inc	
TIME:	13:10 - 13:50	
DATE:	December 23, 2019	

ADMINISTRATIVE NOTICE OF ORDINANCE VIOLATION in the City of Chicago Department of Administrative Hearings City of Chicago, a Municipal Corporation, Petitioner, vs	ADMINISTRATIVE NOTICE OF ORDINR NO04533 ATION In the City of Chicago Department of Administrative Hearings City of Chicago, a Municipal Corporation, Petitioner, vs.
Respondent If Chicago Business, use name on ficense Last Name, First Name Mil	Respondent if Chicago Business, use name on license GFI, LLC
Resp. Address No. Dir. Street Name 1909 N Clifton AV	Resp. Address No. Dir. Street Name N Cli.F.ton AV
Chicago State Other: ZIP 60614 Person Served If other than the respondent Last Name, First Name Mil	Chicago Chicago Other: Chicago Other: Content Last Name First Name MI
Phone Acct. No. or DREV No. on business license	Phone Acct. No. or DREV No. on business license
Identification DLN State DLN State DLN State Other: Helght Weight Sex Race Eyes Hair Service Request Number Officer, Investigator, Inspector, and/or Complainant on oath states that the Respondent	Identification DLN State DLN St
DUMPING ON REAL ESTATE WITHOUT A PERMIT 7-20-40 DOPERATING A FACILITY WITHOUT A PERMIT 11-4-030 HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE() 11-4-70 TREATMENT AND DISPOSAL OF SOLID OR LIQUID WASTE 11-1-20 SAMPBLASTING, GRINDING, CHEMICAL WASHING VIOLATION () 11-4-219 RECYCLING FACILITY PERMIT 11-4-220 CONSTRUCTION SITE CLEANLINESS () 13-32-12502 YOU MUST Describe Actions for Each Count below: Count 1, in That:	DUMPING ON REAL ESTATE WITHOUT A PERMIT 7-28-40 OPERATING A RACILITY WITHOUT A PERMIT 11-4030 I MANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDEDGRNE (3) I MANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDEDGRNE (3) TREMTMENT AND DISPOSAL OF SOLID DR LIQUID WASTE 11-1-1500 SANDELATING, GENEDING, CHEMICAL WASHING VIOLATION (1) 1-4-230 CONSTRUCTION SITE CLEANLINESS 1 13-32-125(2) YOU MUST DESCRIBE Actions for Each Count below: Count 1, In That: Respondent landed Material High Count 2, In That: Respondent Canada dust particular and may and BET SITE WITHOUT A DESCRIPTION OF THE MATERIAL HIGH COUNT 2, In That: Respondent Canada dust particular and may and BET SITE WITHOUT A DESCRIPTION OF THE MATERIAL HIGH COUNT 2, In That: Respondent Canada dust particular and may and BET SITE WITHOUT A DESCRIPTION OF THE MATERIAL HIGH COUNT 2, In That: Respondent Canada dust particular and may and BET SITE WITHOUT A DESCRIPTION OF THE MATERIAL HIGH AND AND MATERIAL HIGH AND MAT
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l acknowledge receipt of this notice. Signature of Respondent or Respondent or X Comments	l acknowledge receipt of this notice. Signature of Respondent or X Person Served: X Comments
Served Via Us mail (4)	Served Via US mail
DEPARTMENT OF ADMINISTRATIVE HEARING COPY	DEPARTMENT OF ADMINISTRATIVE HEARING COPY

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HEARING COPY

ADMINISTRATIVE NOTICE OF ORDIN	204534 OLATION
In the City of Chicago Department of Admir City of Chicago, a Municipal Corporation Respondent if Chicago Business, use name on license	istrative Hearings , Petitloner, vs.
GII, LLC	Last Name, First Name Mi
Resp. Address No. Dir. Street Name	ST Suffix Apt/Ste.
1909 N Clifton	AV
Chicago	LAGIU
Person Served if other than the respondent	Last Name, First Name MI
Phone	
Acct.No. or DREV No. or	business license
Identification DLN State DLN/ID	D.O.B. (M/D/Y)
Other Other:	//
Race Eyes Hair Service Requir	est Number
Officer, Investigator, Inspector, and/or Complainant on oath states	that the Respondent
did then and there violate the following section(s) of the Municip	
DUMPING ON REAL ESTATE WITHOUT A PERMIT 7-28-440 OPERATING A FACILITY WITHOUT A PERMIT (OFFICE W OUNTER)	-730
MANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE A Prohibi	Hultton tod
THEATMENT AND DISPOSAL OF SOLID OR LIQUID WASTE 11-4-1500	Topic St. St.
OPERATING A FACILITY WITHOUT A PERMIT (11-4-030) MANDLING OF MATERIAL SUSCEPTIBLE TO ECCOMING WINDBORNE (11-4-150) TREATMENT AND DISPOSAL OF SOLID OR LIQUID WASTE 11-4-1500 SANDBLASTING, GRINDING, CHEMICAL WASHING VIOLATION (11-4-2190) RECYCLING FACILITY PERMIT CONSTRUCTION STITE CLEANLINESS (1-2-2-3-17-17-17-17-17-17-17-17-17-17-17-17-17-	SEC RULE
RECYCLING FACILITY PERMIT	
10 13-32-125/2	Control of the second
You Must Describe Actions for Each Count be	elowa
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ount 2. in That Respondent Caused and allows	able Pravotice
of air Pollution including dust Partice	alates
olation Location Nos. Dir. Street Name in the City of Chicaga County of Cool	Solvents,
1904 . N Clifton	AV
to, Date: Mo/Day Year Time of Violation OAM Notice Date: Mol I 2 1 6 20 1 9 0 2 : 30 AM Hilliferent than No. 6	Day Year of Notice
omplainant's Name II not issuing offices, investigator, or inspector	Public Health
nit Star/Badge Flowshire	(Environment) Version 10-24-15
X Stephonical Su	ector
Administrative Hearing Appearance	
IMPORTANT: You must appear for a mandatory hearing te: Mo/Day Year Time And at the second sec	
13 2 6 20 20 01:00 ON DO 400 W. Superior	112
ILURE TO APPEAR may result in the imposition of a fine not to exce nalties for each violation as specified in the Municipal Code of Chicago pl d fees. Failure to comply with the administration	
d fees. Fallure to comply with the administrative law judge's order may resu ditional sanctions.	us costs, restitution, It in the issuance of
knowledge receipt of this notice.	
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Served Via Us Mall

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Respondent Cirkogo Rusiness, use name on Ricense CTTT LLC Pessp. Address No. Dic. Street Name GTTT LLC Desp. Address No. Dic. Street Name GTTT LLC Desp. Address No. Dic. Street Name GTTT LLC Desp. Address No. Dic. Street Name GTTT LLC Desp. Address No. Dic. Street Name GTTT LLC Desp. Address No. Dic. Street Name GTTT LLC Desp. Address No. Dic. Street Name GTTT LLC Desp. Address No. Dic. Street Name GTTT LLC Desp. Address No. Dic. Street Name Desp. Address No. Dic. Street Name Desp. Address No. Dic. Street Name Desp. No. or DREV No. or DREV No. or DREV No. or DREV No. Dic. D	"A	4	ADM In	the Ci	ty of Chica	ago Der	artn	nen	ORDINA	stratis	VIC	
RESP. Address No. 1909 N CIFFON City Chi Cago Person Served if other than the respondent Acct. No. or DREV No. and business ilcense Last Name, Flest Name Acct. No. or DREV No. and business ilcense Cother: Last Name, Flest Name Acct. No. or DREV No. and business ilcense Cother: Acct. No. or DREV No. and business ilcense Cother: DUMPO Other:	Respor	ident is	Chicago B				icipa	ıı C	orporation.			
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DEPARTMENT OF ADMINISTRATIVE

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Dir. Street Name ST Suffix Apt./Ste. Clifton AV ZIP State Chicago Other: Person Served If other than the respondent Last Name, First Name | Mi Phone Acct. No. or DREV No. on business license Identification

DLN/ID DLN State D.O.B. (M/D/Y) OIL Other Other: Helght Service Request Numbe Hair did then and there violate the following section(s) of the Municipal Code of Chicago: DUMPING ON REAL ESTATE WITHOUT A PERMIT 7-28-440 OPERATING A FACILITY WITHOUT A PERMIT (Pollution 0000355 HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE () 11-4-760 rohibited TREATMENT AND DISPOSAL OF SOLID OR LIQUID OTHER: TITLE CHASEC WASTE 11-4-1500 SANDBLASTING, GRINDING, CHEMICAL WASHING VIOLATION () 11-4-2190 fience of others RECYCLING FACILITY PERMIT CONSTRUCTION SITE CLEANLINESS [] OFF Site count 2, In That Proportent Called and a Newad the emission of air Pollution, including dust, Particulates HAPS, and other air borne Solvents Oders, VOCs, 1909 AV Vio. Date: Mo/Day Year Time of Violation OAM Notice Date: Mo/Day Year of Notice 23 20 19 01 20 Complainant's Name if not issuing officer, investigator, or inspector Public Health (Environment) Version 10-24-15 DEE Star/Badge Signature of issuing officer, investigator, or inspecto 147 Stephon Sum Administrative Hearing Appearance IMPORTANT: You must appear for a mandatory hearing on: Date: Mo/Day 400 W. Superior 62020 112 FAILURE TO APPEAR may result in the Imposition of a fine not to exceed the maximum penalties for each violation as specified in the Municipal Code of Chicago plus costs, restitution, and fees. Fallure to comply with the administrative law judge's order may result in the issuance of additional sanctions. I acknowledge receipt of this notice. Signature of Respondent or Person Served: Served Via US Mail DEPARTMENT OF ADMINISTRATIVE **HEARING COPY**

Respondent if Chicago Business, use name on license

R 004536



General Iron aka GII LLC

Harley, Keith <kharley@kentlaw.iit.edu>

Wed, Mar 11, 2020 at 12:54 PM

To: "Pressnall, Chris" < Chris. Pressnall@illinois.gov>

Cc: Nancy Loeb <n-loeb@northwestern.edu>, "Geertsma, Meleah (mgeertsma@nrdc.org)"

<mgeertsma@nrdc.org>, "Layman, Robb" <Robb.Layman@illinois.gov>, "Frost, Brad"

<Brad.Frost@illinois.gov>, "Mohr, Kent" <Kent.Mohr@illinois.gov>, "Bernoteit, Bob"

<Bob.Bernoteit@illinois.gov>, "Barria, German" <German.Barria@illinois.gov>, "Jones, Eric E."

<Eric.E.Jones@illinois.gov>

Hi -

Thank you for participating in our recent conversation about the active and proposed facilities located at 11600 S. Burley in Chicago.

I'm writing to follow up on our commitment to provide information about the General Iron's operations at its existing location. As we discussed, these operations are one basis for community concerns about the transfer of this business and its operations to 11600 S. Burley. More specifically, our clients are concerned that this business and its operations could be a source of poorly controlled shredder emissions, fugitive particulate matter and releases of auto shredder residue. Moreover, in the context of permitting, our clients are concerned that actual and potential emissions from the shredder and other operations at 11600 S. Burley are not well characterized, and do not form the basis for making fundamental permitting choices.

Part of this concern is based on inspection and enforcement activity which is occuring at the existing General Iron facility. I'm enclosing the results of a city inspection that took place on February 10, 2020 that identifies facility practices that are relevant to assessing actual shredder operations and emissions, the release of fugitive particulate matter, releases of auto shredder residue and the history of compliance at this facility.

Thank you for your attention to this matter and for taking this information into account as part of pending permitting transactions.

Keith Harley, Attorney for Southeast Environmental Task Force (312) 726-2938

CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL RESPONDED TO A CITIZEN?S COMPLAINT REGARDING ODORS AND AN EXPLOSION HEARD IN THE MORNING COMING FROM THE FACILITY AT 1909 N CLIFTON AVE, GENERAL IRON INDUSTRIES (GII, LLC). GII LLC OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC1063430) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING GII, LLC ON FEBRUARY 10, 2020, ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: HOME DEPOT (1232 W NORTH AVE) PARKING LOT, INTERSECTION OF THROOP ST WABANSIA AVE, AND INTERSECTION OF THROOP ST WABANSIA AVE. IT IS A PUNGENT ODOR OF SWEET METAL THAT BURNS MY NOSTRILS. I ALSO OBSERVED AN ODOR OF BURNING MATERIAL. THE SAME ODORS OF SWEET METAL WERE ALSO OBSERVED ONSITE UNTREATED EMISSIONS WERE OBSERVED ESCAPING THE TOP AND THE SIDES OF THE SHREDDER. I ALSO OBSERVED SMOKE LEAVING THE SHREDDER AND TRAVELING THROUGH THE PROPERTY ACROSS FROM THE NORTH BRANCH CHICAGO RIVER. THE SHREDDER IS NOT AN ENCLOSED PIECE OF EQUIPMENT. IT DOES CONTAIN A HOOD TO CAPTURE THE EMISSIONS AND PROCESS THEM THROUGH A REGENERATIVE THERMAL OXIDIZER (RTO) AND A WET SCRUBBER TO REMOVE VOLATILE ORGANIC COMPOUNDS (VOCS), HAZÀRDÓUS AIR POLLUTANTS (HAPS), AND OTHER AIRBORNE SOLVENTS. BEING ABLE TO OBSERVE EMISSIONS ESCAPING THE SHREDDER LEADS ME TO

BELIEVE THAT THE EQUIPMENT CAPTURING THE EMISSIONS IS INSUFFICIENT. CONSEQUENTLY, THIS DOES NOT ALLOW THE RECENTLY INSTALLED AIR POLLUTION CONTROL EQUIPMENT TO PROCESS THE EMISSIONS SINCE THEY ARE ESCAPING AT THE SHREDDER BEFORE THE TREATMENT PROCESS.AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED ON THE PROPERTY DIRECTLY SOUTHWEST AND ACROSS THE NORTH BRANCH CHICAGO RIVER. AUTO FLUFF IS A PRODUCT OF SHREDDING OPERATIONS AND IT CONSIST OF FINE PARTICLES OF GLASS, FIBERS, RUBBER, METAL, PLASTIC, DIRT, AND AUTOMOTIVE FLUIDS. FUGITIVE DUST WAS ALSO OBSERVED ONSITE WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS TO AND FROM TRUCK TRAILERS. MISTING CANNONS WERE OBSERVED TO NOT BE IN OPERATION TO CONTROL AIRBORNE PARTICLES AT THE TIME OF THE INSPECTION. OBSERVING AUTO FLUFF IN THE OUTSIDE OF GII, LLC?S PROPERTY AND FUGITIVE DUST WITHOUT OPERATING MISTING CANNONS LEADS ME TO BELIEVE THAT REASONABLE MEASUREMENTS WERE NOT AND ARE NOT BEING TAKEN TO ENSURE DUST, DEBRIS, AND DIRT WON?T MIGRATE OFF SITE AND INTO THE PUBLIC WAY I SPOKE TO JIM AND HE INFORMED ME THAT THERE WAS AN EXPLOSION IN THE SHREDDER DURING THE MORNING HOURS BETWEEN 7:30AM ? 7:40AM. HE SAID THIS IS A COMMON OCCURRENCE.A NOV CITATION #E0000***** WAS ISSUED FOR AIR POLLUTION PROHIBITED (11-4-730) AND HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]). A NOV CITATION #E0000***** WAS ISSUED FOR VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 46 WHICH REQUIRES THE PERMITTEE TO CONTROL AND SUPPRESS DUST AND OTHER MATERIALS TO PREVENT OFF-SITE MIGRATION AND NUISANCE IN CONNECTION WITH BUSINESS (7-28-080). THE HEARING DATE FOR THE CITATIONS WILL BE ON APRIL 30, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO GENERAL IRON INDUSTRIES (GII, LLC) AGENT LISTED ON THE ILLINOIS SECRETARY OF STATE CORPORATION FILE DETAIL REPORT. THE AGENTS NAME AND ADDRESS ILLINOIS CORPORATION SERVICE C AT 801 ADLAI STEVENSON DRIVE, SPRINGFIELD, IL 62703.

[Quoted text hidden]



Harley, Keith <kharley@kentlaw.iit.edu>

General III Public Participation Request

Harley, Keith <kharley@kentlaw.iit.edu>

Tue, Mar 17, 2020 at 3:34 PM

To: "Pressnall, Chris" <chris.pressnall@illinois.gov>, Brad Frost <Brad.Frost@illinois.gov> Cc: "Geertsma, Meleah" <mgeertsma@nrdc.org>, Nancy Loeb <n-loeb@northwestern.edu>

Hi -

As you know, several organizations including SETF requested a public hearing and a written comment period related to the General III construction permit. On behalf of these organizations, I'm writing to inquire what effect coronavirus state/city policies will have on IL EPA's plans for the requested public hearing and a subsequent written comment period. I've spoken to SETF, NRDC and the Ban Petcoke Coalition members who still want an in-person public hearing and see no substitute for this as a venue for local residents to participate in this permitting process. At the same time, they see no alternative to delaying this until the current public health crisis is resolved and public gatherings are again safe for the community and IL EPA.

Thanks,

Keith Harley, Attorney for Southeast Environmental Task Force Chicago Legal Clinic (312) 726-2938





General III Public Hearing

Harley, Keith <kharley@kentlaw.iit.edu>

Wed, Apr 22, 2020 at 3:22 PM

To: Brad Frost <Brad.Frost@illinois.gov>, "Pressnall, Chris" <chris.pressnall@illinois.gov>

Cc: Peggy Salazar <peggy_setf@sbcglobal.net>

Hi -

Please be advised that I represent the Southeast Environmental Task Force. As you know, SETF and its community partners have placed the highest priority on public participation in IL EPA permitting transactions related to the General III facility, which would be co-located with several existing, related facilities at 11600 S. Burley in southeast Chicago.

SETF prides itself on being a responsible community partner with IL EPA when, as in the present case, it requests public participation. Specifically, SETF has played a central role in publicizing and facilitating public hearings with IL EPA over a 25+ year period. Even when it disagrees with IL EPA, SETF has been a good faith partner with IL EPA because its interests in public participation align with the Agency.

Unfortunately, SETF believes IL EPA's proposed virtual hearing for the General III air construction permit will not be successful. SETF cannot remedy the problems it foresees. It's concerned that large segments of the public will not be heard as part of this important permitting process.

Neither SETF's members nor other local residents have participated in this type of hearing. Many do not have the technology and/or technical capability to participate. SETF cannot provide training to remedy this problem because its office is closed and its leadership, members and local residents are required to be distant from one another. As a small non-profit, SETF is experiencing almost insurmountable complications to continue functioning, let alone to mount a major campaign to facilitate public participation in an unfamiliar venue.

Under these circumstances, SETF is concerned that a public hearing will suppress public participation, effectively exclude many potentially affected residents and skew the public record in favor of more sophisticated participants who may not represent community members and their interests. Even though I will prepare written comments on behalf of SETF, this is not a surrogate for the testimony of the full range of local residents who would participate in a traditional public hearing.

SETF acknowledges that you and other IL EPA personnel are working under very difficult circumstances due to the pandemic. Having said this, the legislators who mandated intractable permit decision deadlines were not contemplating a pandemic. Surely, the permit applicant wouldn't want to foreclose public participation or gain any advantage by virtue of a pandemic that no one could foresee. SETF believes there should be a moratorium on further permit proceedings in this case until the Governor concludes Illinois can return to in-person social interactions.

- Keith Harley



Harley, Keith <kharley@kentlaw.iit.edu>

Major Explosion At General Iron Scrap Plant Rocks Neighborhood, Company Suggests 'Potential Sabotage' – Block Club Chicago

1 message

Keith Harley <kharley@kentlaw.iit.edu> Mon, May 18, 2020 at 2:38 PM To: Brad Frost <Brad.Frost@illinois.gov>, Chris Pressnall <Chris.Pressnall@illinois.gov>

https://blockclubchicago.org/2020/05/18/major-explosion-and-fire-at-general-iron-scrap-plant-rocks-neighborhood/

Sent from my iPhone



Fire crews were called to General Iron Industries in the 1900 north block of Clifton Avenue Monday after a "major explosion," Ald. Brian Hopkins (2nd) said on May 18, 2020.

COLIN BOYLE/BLOCK CLUB CHICAGO

LINCOLN PARK, OLD TOWN

Major Explosion At General Iron Scrap Plant Rocks Neighborhood, Company Suggests 'Potential Sabotage'

"It shook our whole place, the whole building shook," a nearby resident said. "We could see some smoke coming up immediately."

MAY 18, 2020 9:33AM CDT



Hannah Alani



Colin Boyle

LINCOLN PARK — An explosion rocked a controversial metal shredding plant on the banks of the Chicago River's North Branch Monday morning, sending a plume of smoke into the air and hazardous material response teams to the scene.

No one was hurt in the 9:10 a.m. blast at the General Iron scrap plant at 1909 N. Clifton Ave., officials said.

Chicago Fire Department spokesperson Larry Merritt confirmed the explosion took place on the shredder's conveyor system. Upon arrival, he said, firefighters tested the air quality and found "no apparent immediate health risk." The Chicago Department of Public Health performed further testing and evaluation, Merritt said.

"Should any environmental violation be determined, the city will issue citations immediately," he said. "Work at the site has stopped as a result of the incident and will not resume until the city has determined the cause of the explosion. The health and safety of Chicago's residents remain a top priority, and we will continue to provide more information as details are gathered."

Witnesses on the scene and blocks away reported two loud blasts in succession. Although there were initial reports of an ensuing fire, a spokesman for the company denied that.

What caused the blast wasn't immediately clear, although the company spokesman raised the idea of "sabotage."

"Shredding operations have ceased for the present time," General Iron spokesman Randall Samborn said in a statement. "We are thoroughly investigating all possible causes, including potential sabotage. We are fully cooperating with city officials."

He declined to elaborate on the sabotage suggestion, saying, "We have no further information to provide at this time and we're not going to speculate. Suffice to say what happened this morning was not normal. We will conduct a thorough investigation that looks at all possibilities."



Pieces of burnt and bent metal lay on the ground as fire crews were called to General Iron Industries in the 1900 north block of Clifton Avenue Monday after a Òmajor explosion,Ó Ald. Brian Hopkins (2nd) said on May 18, 2020. | Colin Boyle/Block Club Chicago

COLIN BOYLE/BLOCK CLUB CHICAGO

The blast happened within the metal shredding process, he said

Ald. Brian Hopkins (2nd) described it as "major explosion and fire" that led to a "sudden increase" in pollution readings. Pollution from the plant has long been protested by Lincoln Park neighbors. General Iron is already slated to leave the neighborhood for the Far South Side's East Side neighborhood. Hopkins said he want it shut down now.

"Permanent and immediate closure of this hazardous facility is no longer a discussion point, it must happen NOW, by executive order," Hopkins tweeted.

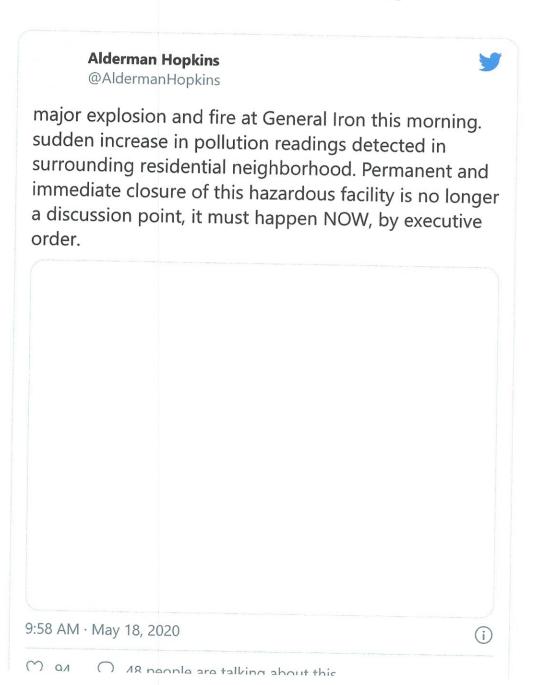




Fire crews were called to General Iron Monday after a "major explosion," Ald. Brian Hopkins (2nd) said.

IAN WHITAKER

Ald. Michele Smith (43rd) said she spoke with Mayor Lori Lightfoot's staff and will receive details on what happened later in the day.





Albert Muniz, an employee of General Iron, told a Block Club reporter the explosions were simultaneous."It felt like we were getting bombed," Muniz said.

An employee of General Iron who asked not to be named told a Block Club reporter on the scene he heard two explosions, back to back.

"We might be unemployed now," he said.





Pieces of burnt and bent metal lay on the ground as fire crews were called to General Iron Industries in the 1900 north block of Clifton Avenue Monday after a Òmajor explosion,Ó Ald. Brian Hopkins (2nd) said on May 18, 2020. | Colin Boyle/Block Club Chicago

COLIN BOYLE/BLOCK CLUB CHICAGO

In Lincoln Park, it felt like an "earthquake" inside the home of Jillian Dixon. The shaking feeling was followed by two "loud booms," she said.

"It shook our whole place, the whole building shook," she said. "We could see some smoke coming up immediately."

Dixon quickly saw two to three fire trucks, a "handful" of police cars and ambulance arrive on the scene.





I'm here now at General Iron Industries after reports of loud noises heard throughout the neighborhood. More information via @CWBChicago's thread (quoted below) #ChicagoScanner

From across the river in Bucktown, workers at Local Foods, 1427 W. Willow St., heard and saw what appeared to be a fiery explosion, said Jamie Phelps Proctor.

"We all heard the loud explosion from inside the Local Food store. It shook the building and the windows," he said. "We could see smoke starting to rise across the river. We went outside and saw the gray smoke rising from one of the buildings. ... The smoke kept rising and started to smell. There were lots of sirens audible within less than a minute of the explosion."



Fire crews were called to General Iron Industries in the 1900 north block of Clifton Avenue Monday after a Òmajor explosion,Ó Ald. Brian Hopkins (2nd) said on May 18, 2020. | Colin Boyle/Block Club Chicago

COLIN BOYLE/BLOCK CLUB CHICAGO

Iain Whitaker, another neighbor, said he also witnessed an "explosion" that "shook the houses" nearby.

"I ran out to investigate and it appears that one of the buildings at the site collapsed due to the incident," he said. "This is just another reason General Iron needs to be closed down immediately. They are not only poisoning the air we breathe but putting the neighborhood in danger."

By 9:30 a.m. the smoke dissipated, Phelps Proctor said.

Dixon, in Lincoln Park, hoped the incident would propel Lightfoot to shut down the metal shredder during the coronavirus pandemic — a move neighbors have been pleading the mayor to consider for months.

"This is just another example of why it's important to get it shut down," she said. "It feels like an egregious use of resources right now, to send out emergency personnel ... [increase their] exposure."

Gov. JB Pritzker said at an unrelated news conference Monday that the Illinois Environmental Protection Agency also is looking into the explosion.

"We're actually, as you can imagine, paying very close attention, want to make sure people are kept safe," Pritzker said.



Fire crews were called to General Iron Industries in the 1900 north block of Clifton Avenue Monday after a Òmajor explosion,Ó Ald. Brian Hopkins (2nd) said on May 18, 2020. | Colin Boyle/Block Club Chicago

COLIN BOYLE/BLOCK CLUB CHICAGO

General Iron plans to relocate to 11600 S. Burley Ave. by the end of the year. The Illinois Environmental Protection Agency must first issue an "air pollution control construction permit," which neighbors protested in a public meeting last week.

Last fall, General Iron promised Lightfoot and Hopkins to leave the North Side.

That agreement followed a 2015 fire, a 2016 city-ordered shutdown, a 2017 harassment lawsuit and a 2018 citation for excessive air emissions.

Lincoln Park neighbors have long complained about the health risks associated with fluff, a substance that routinely coats the neighborhood's sidewalks, roads, porches and playgrounds.

The Environmental Protection Agency defines fluff as "fugitive dust."

An air quality monitoring device is currently being used by Hopkins and neighbors to monitor the PM2.5 in the air near General Iron. You can see the ratings here.







Fire crews were called to General Iron Monday after a "major explosion," Ald. Brian Hopkins (2nd) said.

COLIN BOYLE/ BLOCK CLUB CHICAGO



Fire crews were called to General Iron Monday after a "major explosion," Ald. Brian Hopkins (2nd) said.

COLIN BOYLE/ BLOCK CLUB CHICAGO



Fire crews were called to General Iron Monday after a "major explosion," Ald. Brian Hopkins (2nd) said.

COLIN BOYLE/ BLOCK CLUB CHICAGO



Fire crews were called to General Iron Monday after a "major explosion," Ald. Brian Hopkins (2nd) said.

COLIN BOYLE/ BLOCK CLUB CHICAGO





Fwd: [EXTERNAL] GI Shutdown

Keith Harley keith Harley <a hr

Sent from my iPhone

Begin forwarded message:

From: Nancy Loeb <n-loeb@northwestern.edu>
Date: May 18, 2020 at 10:01:59 PM CDT
To: "Geertsma, Meleah" <mgeertsma@nrdc.org>, Keith Harley <kharley@kentlaw.iit.edu>, Olga Bautista <obautista@greatlakes.org>, Gina Ramirez <gramirez@nrdc.org>, Martita

North Side alderman says city's ordering shutdown of controversial shreddi after explosion



By KATHERINE ROSENBERG-DOUGLAS

CHICAGO TRIBUNE

MAY 18, 2020 | 8:32 PM



General Iron Industries scrap yard at work along Cortland Street near the Lincoln Yards development is shown on April 9, 2019. (Brian Chicago Tribune)

The city's building commissioner has ordered the indefinite closure of a controversial North Side shredding plant after fire crews were explosion there Monday morning, according to a Chicago alderman.

In a newsletter to her 43rd Ward constituents, Ald. Michele Smith said she was told in a briefing from Mayor Lori Lightfoot's office closure order would stop operations at General Iron Industries "including all shredding operations and acceptance of materials for shr said in the newsletter that she learned from the mayor's office briefing that the explosions "damaged critical facilities of General Iron."

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Lightfoot's office did not immediately respond to a request for comment.

No injuries were reported at General Iron Industries, and the Chicago Fire Department said tests found no increased pollution levels a immediate health risk to residents and the surrounding community." The plant has been shut down while the cause is investigated.

Ald. Brian Hopkins, 2nd, who has previously asked the mayor to shut down the plant because of a history of pollution violations, tweet "fireball" and "mushroom cloud" raised pollution readings in the gentrifying neighborhood.

He did not release any details but said later in a statement that "permanent and immediate closure of this hazardous facility is no long point, it must happen now."

The company said the incident was "not a normal event" and added, "We are thoroughly investigating all possible causes, including pc Company spokesman Randall Samborn would not elaborate. "We don't want to speculate about what occurred."



The General Iron Industries plant on the North Branch of the Chicago River in Chicago on Sept. 28, 2018. (Zbigniew Bzdak / Chicago

Smith said in her newsletter that she learned in the briefing with Lightfoot's office that there were two explosions at the plant — the fir newly installed Regenerative Thermal Oxidizer. "The heat was so intense that it flowed back to the initial point of entry, triggering the doors' of the filter building and damaging it significantly. A building to the north also was damaged," Smith said.

Police and fire crews were called to the 1900 block of North Clifton Avenue shortly after 9 a.m. after a loud boom was reported in the I neighborhood, which is close to Lincoln Park and Bucktown. An explosion occurred on the company's conveyor system, Chicago Fire I spokesman Larry Merritt said earlier.

While initial tests found no threat, he said the Chicago Department of Public Health was conducting more tests. "Should any environm be determined, the city will issue citations immediately," Merritt said.

Neighbors have complained for years about the odors from General Iron's scrap yard. They renewed their objections in March when stay-at-home order would prolong their exposure to the plant's emissions and maybe make them more susceptible to the novel corona attacks the lungs and upper respiratory tract.



Alderman Hopkins@AldermanHopkins

investigation now underway in the aftermath of a HazMat Level 1 explosion at General Iron



11

10:35 AM - May 18, 2020

Twitter Ads info and privacy

See Alderman Hopkins's other Tweets

General Iron — which has been targeted by federal environmental regulators three times since the 1990s — was allowed to continue of the pandemic under recycling and solid waste exemptions from the stay-at-home order that has forced nonessential businesses to clos has been cited with city health code violations seven times since December.

That group Clean the North Branch released a statement after the incident calling General Iron "a serial polluter and rule breaker that families. What more do Mayor (Lori) Lightfoot and Gov. Pritzker need? Shut. Them. Down. Now."



Breaking News Newsletter

As it happens

Get updates on the coronavirus pandemic and other news as it happens with our breaking email alerts $\frac{1}{2}$

Illinois Gov. J.B. Pritzker was asked Monday about the General Iron explosion and why the company was allowed to continue operatir pandemic. Pritzker said the EPA and the city were looking into the explosion. He said the state referred to federal guidelines set by the Homeland Security in deciding its list of essential businesses.

"We're actually, as you can imagine, paying very close attention. I want to make sure that people are kept safe," Pritzker said of Genera unaware of what the latest is on the matter, but it's certainly something of great concern to me." Chicago Tribune's Gregory Pratt contributed.

kdouglas@chicagotribune.com Twitter @312BreakingNews



Katherine Rosenberg-Douglas

CONTACT



DEPARTMENT OF BUILDINGS DEPARTMENT OF FIRE CITY OF CHICAGO

EFFECTIVE 5/18/2020

Re: Commissioner Closure Order, General Iron Industries, 1900-1942 North Marcy Street/1900 -1926 North Clifton "Yard and Shredding Facility", 1901-1925 North Clifton/1864 North Kingsbury "North Building", 1800-1840 North Kingsbury "South Building"

EMERGENCY CLOSURE ORDER

I, Judith Frydland, Commissioner of the City of Chicago Department of Buildings and Richard C. Ford II, Commissioner of the City of Chicago Department of Fire, hereby find that the property commonly known General Iron Industries located at 1900-1942 North Marcy Street/1900 -1926 North Clifton, 1901-1925 North Clifton/1864 North Kingsbury, 1800-1840 North Kingsbury; Chicago, Illinois meets the requirements for closure as set forth in Section 14A-3-307.1 of the Municipal Code.

As a result of two separate explosions at the property located at 1909 North Clifton, on May 18, 2020, the structural stability of the structures that were directly affected by the blasts is unknown. These conditions are hazardous to any occupant or emergency responder in an emergency situation. It has therefore been determined that the site poses an immediate danger and constitutes an imminent threat to the public at large.

A review of the entire operations has to be conducted by the City of Chicago to ensure the appropriate safety measures are in place to prevent this from happening in the future.

Architectural plans must be submitted for review and issuance of a building permit. In addition, a structural engineer report regarding the structures that were affected must be submitted for review.

THEREFORE, by the police powers vested in Judith Frydland as Chicago Building Commissioner and Richard C. Ford II as Fire Commissioner, we hereby order that General Iron Industries located at 1900-1942 North Marcy Street/1900 -1926 North Clifton, 1901-1925 North Clifton/1864 North Kingsbury, 1800-1840 North Kingsbury, Chicago, IL, be immediately closed, and remain vacant, and that entry be denied except by licensed and bonded contractors engaged to examine, repair, and otherwise correct the aforemention conditions, or otherwise by authorized City of Chicago personnel until further order. During the period of the closure, the operator is allowed to conduct routine maintenance on the site and to remove accumulated recycled materials from the site, but is ordered to cease intake of any new materials for recycling. This closure order is to be enforced by the City of Chicago Police Department.

Judith Frydland

Judith Frydland Buildings Commissioner Richard C. Ford II

Richard C. Ford II Fire Commissioner



CHICAGO LEGAL CLINIC, INC.

Sharon A. Hwang, President · Adam Salzman, Executive Director

Downtown Office 211 W. Wacker Dr. Suite 750 Chicago, IL 60606

Phone: 312-726-2938 Fax: 312-726-5206 TDD: 773-731-3477 Keith I. Harley Greta M. Doumanian Marta C. Bukata Daryl Grable

May 29, 2020

John Kim, Director Illinois Environmental Protection Agency 1021 N. Grand Ave. East P.O. Box 19276 Springfield, IL 62794-9276

Re: General III Air Construction Permit

Dear Director Kim:

Please be advised that I represent the Southeast Environmental Task Force (SETF). SETF is supported in this matter by the South East Chicago Coalition to Ban Petcoke and the Natural Resources Defense Council.

During the recent General III public hearing, IL EPA indicated that the equipment employed by General Iron would be moved to the new General III facility, including the RTO and other pollution control equipment. Consistent with this, the pending application and the draft permit are based on the operating characteristics of existing equipment employed by General III.

SETF now asserts that the pending permit application and the resulting draft permit do not accurately represent the operation of the equipment that will be employed at the new General III facility. The permit application is an inadequate basis for permit review and is incomplete. SETF's assertion is based on the explosion that occurred at General Iron shortly after the public hearing. Initial reports suggest the explosion originated in the RTO, one of the pieces of pollution control equipment that is to be transferred to the General III facility. Moreover, even if the operation of the RTO is not the only cause of the explosion, the transfer of any equipment that can cause this kind of catastrophic failure suggests the applicant's representations must be revisited as part of any credible permit review.

The pending application is incomplete because the applicant's representations about the proposed use of any equipment, its control efficiency, and the applicant's ability to operate the equipment safely and effectively can no longer be accepted without a complete investigation of the explosion incident. Existing emission estimates and air quality models that do not account for emissions during periods of catastrophic failure also must be reassessed. Additional permit terms and conditions may be necessary to prevent future accidents and to ensure the integrity of the equipment and the applicant's operating systems, all of which are relevant permitting considerations. This analysis is also consistent with the health, safety and welfare of nearby schools, parks, river users and residential neighborhoods.

For this reason, SETF asserts the pending permit application is incomplete and does not provide a basis for IL EPA to make permitting decisions about the General III facility. IL EPA must not proceed to final permit decisions until it acquires information about the equipment that the applicant is proposing to transfer and its ability to operate this equipment in a safe and effective manner. In the meantime, we urge IL EPA issue a Notice of Incompleteness regarding the pending permit application and/or a permit denial.

Thank you for your consideration of this matter. I look forward to your response.

Sincerely,

Keete Harley

Keith Harley, Attorney for the Southeast Environmental Task Force Chicago Legal Clinic, Inc.

cc Chris Pressnall, Environmental Justice Officer, Illinois Environmental Protection Agency, via email: chris.pressnall@illinois.gov



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June 15, 2020

Illinois EPA Attn: Jeff Guy, Hearing Officer P.O. Box 19276 1021 North Grand Avenue Springfield, IL 627-94-9276

Submitted Via Email To:

epa.publichearingcom@illinois.gov

jeff.guy@illinois.gov

Re: Public Comments on the Draft Permit for General III, LLC, 11600 S. Burley, Chicago, IL 60617, Application No. 19090021, I.D. No. 031600SFX

To The Hearing Officer:

Please be advised that I represent the Southeast Environmental Task Force ("SETF"). SETF is an environmental education and advocacy organization based on Chicago's southeast side. 1 SETF's members include individuals who live, work and recreate on the southeast side. SETF's mission is to ensure a healthy and safe environment for its residents, to preserve regional ecological resources and to achieve a sustainable economy that enhances local communities.

SETF's comments are supported by the Natural Resources Defense Council ("NRDC") and its thousands of members and activists in the City of Chicago, including those who reside on Chicago's southeast side.² These comments are also supported by the Chicago South East Side Coalition to Ban Petcoke³, a community-based organization that is dedicated to the health, safety and welfare of the people who live, work and recreate in the Calumet region. Because of the scope of their public comments, it wasn't possible for these aligned organizations to coordinate fully on a single set of comments. Consequently, additional comments that are also supported by SETF will also be submitted by these organizations focusing on other aspects of the proposed rules.

SETF's comments are divided into two sections. In its first set of comments, SETF asserts the draft permit fails to meet critical legal requirements that are designed to protect public health, safety and welfare. Neither the permit process nor the draft permit achieves environmental justice mandates imposed by federal and state law and Illinois EPA's own environmental justice

¹ http://setaskforce.org/

² https://www.nrdc.org/

https://www.facebook.com/SSCBP60617/

commitments. SETF's second set of comments assert additional permit measures are needed to address the air pollution impacts of fugitive releases of auto shredder residue, volatile organic emissions and odors.

For purposes of the record, I'm attaching and incorporating by reference several correspondences with Illinois EPA that SETF submitted regarding this permitting transaction:

- 1. An October 30, 2019 request for IL EPA to conduct its permitting activities in a manner consistent with its environmental justice commitments, including a request for a full opportunity for public participation and for an environmental justice analysis to ensure the permitting of this facility will not create a significant adverse and disproportionate impact on the adjacent environmental justice community.
- 2. Correspondences regarding the operating history of the existing General Iron facility, from which General III's business, operations and several pieces of equipment will be transferred. Page 50 is the City of Chicago's May 18, 2020 Emergency Closure Order following two separate explosions at the General Iron facility that also mandates:
 - "A review of the entire operations has to be conducted by the City of Chicago to ensure the appropriate safety measures are in place to prevent this from happening in the future."
- 3. A request for the public process regarding this permit be delayed until the Governor's and Mayor's Covid-19 restrictions on public gatherings are lifted.
- 4. A request for all adjacent and integrated business operations located at or near 11600 S. Burley, Chicago, IL to be regarded as a single source for purposes of permitting.

All of these correspondences are compiled and attached to these comments and labelled as SETF General III Draft Permit Comments Exhibit One.

<u>Comment</u> - Illinois EPA failed to conduct an environmental justice analysis as part of its permit review.

SETF made the following request at the opening bell of this permit transaction:

"Moreover, considering the characteristics of the immediately surrounding area, the NGO coalition is formally requesting IL EPA to conduct an environmental justice analysis as part of its permitting process.

There is a strong justification for an environmental justice analysis and for a full and complete opportunity for public participation. According to information derived from the demographic feature of U.S. EPA's ECHO database, there are 68,947 people living within a three-mile radius of General III's proposed facility. 49% of the people who live in that three-mile radius are Hispanic, and 30% are African American. The ECHO database also indicates that there are 26,624 households in this area as well as 19,051 minors younger than 18. Nearby residential communities include the East Side, South Deering and Hegewisch. The facility would operate immediately adjacent to the Calumet

River. In addition, the facility is less than one mile from Washington High School. This area scores above 90% in eleven categories assessed by U.S. EPA's EJ screening tool, including PM 2.5, diesel PM, NATA air toxics cancer risk, NATA respiratory hazard index, traffic proximity, lead paint indicator, superfund proximity, risk management plan proximity, hazardous waste proximity and wastewater discharge proximity."

The complete October 30, 2019 correspondence that includes this request is in SETF Exhibit One.

Notably, Illinois EPA characterized this permit transaction as triggering its environmental justice obligations when it distributed a public notice announcing the submission of a permit application by General III. In its public notice about the draft permit, Illinois EPA provided a link to its general environmental justice policies, but offers no description about how these environmental justice commitments affected its review of the permit application, its interactions with the permit applicant or its Draft Permit.

Neither the Notice of Comment Period, the Project Summary nor the Draft Permit make any reference to an environmental justice analysis. The Illinois EPA's Environmental Justice Officer did not testify at the virtual public hearing. Consequently, it's entirely unclear if and how Illinois EPA incorporated environmental justice into its permit review process. By contrast, like SETF, most public participants in the hearing specifically invoked environmental justice issues, including Mark Valez, Gina Ramirez, Meleah Geertsma, Andy Douglas, Olga Bautista, Charles Stark, Kijana Courtney, Juan Rojas, Alfredo Romo, Peggy Salazar, Jocelyn Rangel, James Kinney, Corrina Mendoza and Damon Watson. Consistent with the metrics presented in U.S. EPA's EJ screening tool, all of these individuals expressed concern about the significant, adverse and disproportionate harm that will result by permitting General III in an already overburdened, primarily minority community.

For example, East Side resident Mark Valez questioned the impacts of General III's operations and emissions on a nearby neighborhood park, Rowan Park, that includes outdoor baseball diamonds, playgrounds and a football field. Charles Stark is a teacher at nearby Washington High School who pointed out that the prevailing wind direction will transport General III's emissions to this nearby High School as well as Washington Elementary School and Rowan Park, where already overburdened populations of susceptible children will experience the cumulative impacts of this new source in combination with many other nearby polluting facilities. Jocelyn Rangel, a lifelong southeast side resident and locally employed registered nurse questioned the potential impacts of this facility on a local population that already experiences high asthma rates and prevalent co-morbidities.

IL EPA is prohibited from engaging in actions that have the effect of discriminating on the basis of race, color and national origin. Pursuant to Title VI of the Civil Rights Act of 1964, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity which, like Illinois EPA, receives federal financial assistance. The Illinois Civil Rights Act of 2003 (740 ILCS 23/5) similarly prohibits discrimination on the basis of "[R]ace, color, national origin, or gender". Section (a)(2) also prohibits using methods and policies that have disparate, discriminatory impacts on any of these protected classes.

At the opening bell of this permit transaction, SETF alerted Illinois EPA that its responsibilities in this case included conducting an environmental justice analysis to ensure that its permitting actions do not result in a significant, adverse and disproportionate harm on a predominantly Lantinx and African American community. In response, Illinois EPA's Public Notice, Project Summary, Draft Permit and public hearing comments are devoid of any evidence of any effort to address these issues. This months-long omission – which continued at the public hearing in the face of public testimony about the environmental injustices being perpetrated by Illinois EPA – fails to meet the requirements of federal and state law and Illinois EPA's own environmental justice policies. Moreover, this months-long omission cannot be remedied post-hoc; the public will not have the opportunity to review and comment on any analysis the Illinois EPA jerry rigs once the public comment period concludes.

In fact, Illinois EPA repeatedly exercised its discretion in ways that will result in a significant, adverse and disproportionate harm on the surrounding environmental justice community. At multiple decision points in this permitting process, IL EPA made discretionary choices that have a discriminatory effect on the environmental justice community near this facility. In the following comments, SETF identifies multiple discretionary choices made by Illinois EPA that are discriminatory and also fail to comply with clear legal mandates designed to protect the health, safety and welfare of Illinois residents.

Comment – Contrary to its own well-established permitting standards, Illinois EPA fails to incorporate several related, co-located facilities in its Draft Permit. Consequently, the Draft Permit is based on an incorrect source determination that does not include all of the pollutant-emitting activities that are part of a single source. General III and the other facilities co-located at 11600 S. Burley are a single source, but are being segmented into constituent operations for purposes of permitting. Illinois EPA's decision to allow this single source to be segmented for purposes of permitting is to the advantage of the permit applicant, but is contrary to the health, safety and welfare of the nearby environmental justice community. This is especially problematic because other related, co-located facilities that will operate with General III as a single source are being registered and/or permitted by Illinois EPA in contemporaneous but completely separate processes. Even more egregious, for these other facilities, these activities are necessary because Illinois EPA apparently completely neglected to require proper registration and/or permitting over many years.

IL EPA's standard permit language states that separate facilities can be considered a single stationary source if they:

"a. belong to the same industrial grouping or operate as a support facility,

b. are located on contiguous or adjacent properties, and,

c. are under common ownership or common control.

Common control differs from common ownership in that there is an inherent limitation on a facility's ability to operate "but for" another facility providing its services."⁴

In the present case, the 11600 S. Burley facilities include Napuck Salvage, Reserve Marine Terminals, South Chicago Recycling, RSR Partners/Regency Technologies, General III LLC and, perhaps, Calumet Transload. Based on a review of Illinois EPA documents acquired using FOIA, it appears that Illinois EPA concludes that these facilities constitute a single source. Despite this, the agency appears to be conducting separate permitting activities which inappropriately segment a single source into its constituent operations.

Illinois EPA has not received a permit application or issued a Draft Permit that properly characterizes this entire source, its complete operations, its aggregate emissions, the full range of its emission controls, its source-wide protocols for testing and monitoring emissions, and its comprehensive recordkeeping and reporting protocols to verify compliance. In keeping with its history of neglect in ensuring compliance for the operations located at 11600 S. Burley, Illinois EPA only has a partial and incomplete picture of this single source, and consequently has an inadequate, incomplete basis to grant or deny any request for any constituent operation including General III. For this reason, Illinois EPA must deny any request by any current or proposed segmented facility that will, in fact, operate as part of a single source at 11600 S. Burley.

Illinois EPA's claim that the facilities can be integrated as part of a subsequently issued operating permit must be viewed of its failure to complete an operating permit for the predecessor General Iron facility – and indeed for many Illinois facilities – for years and decades. General Iron's operating permit application hasn't been acted on by Illinois EPA since it was submitted in 2005. Deferring the single source determination to an operating permit is an inadequate response to this comment.

<u>Comment</u> – Contrary to the Illinois Environmental Protection Act, Illinois EPA fails to take account of the compliance history of General Iron, which is transferring its business, operations and equipment to the 11600 S. Burley facility. Illinois EPA's decision is to the advantage of the permit applicant, but contrary to the health, safety and welfare of the nearby environmental justice community.

Illinois EPA's first authority pursuant to 415 ILCS 5/39(a) is this:

"In making its determinations on permit applications under this Section the Agency may consider prior adjudications of noncompliance with this Act by the applicant that involved a release of a contaminant into the environment."

Illinois EPA's second authority pursuant to 415 ILCS 5/39(a) is this:

⁴ On November 26, 2019, U.S. EPA issued a new guidance document regarding single source determination that clarified that adjacency, not functional relatedness, is the decisive factor is establishing a single source. While this doesn't change the analysis for the co-related, adjacent operations at 11600 S. Burley, this may necessitate a change in Illinois EPA's standard permit language.

"In granting permits, the Agency may impose reasonable conditions specifically related to the applicant's past compliance history with this Act as necessary to correct, detect, or prevent noncompliance."

Illinois EPA's third authority pursuant to 415 ILCS 5/39(a) is this:

"The Agency may impose such other conditions as may be necessary to accomplish the purposes of this Act, and as are not inconsistent with the regulations promulgated by the Board hereunder."

As an initial matter, SETF believes that Illinois EPA's lawyer fundamentally mischaracterized the law on this matter during the public hearing, misleading public participants and unfairly discouraging them from testifying on compliance matters relevant to the permit application. Illinois EPA's lawyer did not refer to the three constituent parts of 415 ILCS 5/39(a), but rather conflated them in a completely confusing and misleading fashion. The lawyer justified Illinois EPA's position by alluding to court decisions, but provided no reference to any specific case. The lawyer did not distinguish between cases that preceded the legislation described above by contrast to cases that interpret these specific provisions. In response to testimony that was clearly relevant under the second and third parts cited above, the lawyer incorrectly stated that Illinois EPA was precluded from considering this testimony. This is part of an overall pattern of Illinois EPA's misleading and unfair conduct in the public process that will be discussed later in these comments. Illinois EPA's interpretation of its authority of 415 ILCS 5/39(a) is problematic and its public statements are confusing and misleading; in the present case, this created an unfair public process.

The three authorities granted to Illinois EPA in 415 ILCS 5/39(a) are all at issue in the present matter. In terms of specifically adjudicated matters, neither the Draft Permit nor the Project Summary reference In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-19-113(a)-IL-08. In this case, U.S. EPA asserts that General III significantly underestimated its metal shredder's VOM emissions when the shredder, in fact, had a potential to emit more than 100 tons of VOM per year. Despite this, General Iron did not have any emission capture or control equipment to achieve an overall reduction of uncontrolled VOM emissions of at least 81 percent, nor did it have the appropriate operating permit that corresponded with its VOM emissions. U.S. EPA identified the magnitude of the VOM emissions through inspections using its FLIR camera and a Section 114 Information Request.

⁵ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 4. Attached and also available at: https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc._nov-fov.pdf

⁶ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 5. Attached and also available at: https://www.epa.gov/sites/production/files/2018-07/documents/general iron industries inc. nov-fov.pdf

⁷ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 4. ("35. During the May 24 & 25, 2018 inspection, EPA observed and recorded hydrocarbons exiting the hammermill shredder with a FLIR infrared camera."). Attached and also available at: https://www.epa.gov/sites/production/files/2018-07/documents/general iron industries inc. nov-fov.pdf

As part of an August 22, 2019 Administrative Consent Order, General Iron agreed to complete the installation of a regenerative thermal oxidizer (RTO) with a minimum VOM destruction efficiency of 98%. This is legally relevant to the present case because the RTO mandated by U.S. EPA's Administrative Consent Order is to be transferred to the proposed General III facility. This U.S. EPA-mandated RTO is the very piece of pollution control equipment that exploded at the General Iron facility a few days after the public hearing. By not incorporating U.S. EPA's August 22, 2019 Administrative Consent Order, Illinois EPA is improperly ignoring an adjudication and creating perilous conditions for an environmental justice community.

Illinois EPA's second authority pursuant to 415 ILCS 5/39(a) - "In granting permits, the Agency may impose reasonable conditions specifically related to the applicant's past compliance history with this Act as necessary to correct, detect, or prevent noncompliance" – is also directly relevant to the present case. An adjudication is only one way that relevant information related to compliance can be presented to Illinois EPA. Another way is information derived by partner agencies, for example, the City of Chicago. NRDC will be submitting extensive information about multiple enforcement initiatives currently underway on the city level. NRDC's analysis doesn't need to be repeated in SETF's comments apart from a specific example that was presented to the Illinois EPA during its permit deliberations. In this example, a city inspector completed a written report based on a firsthand inspection of the General Iron facility (something Illinois EPA rarely if ever did). In presenting this December, 2019 inspection report, I will highlight all of the inspector's observations that are directly relevant to the subject of compliance with the Illinois Environmental Protection Act, <u>especially because General Iron's pollution control equipment will be transferred to the proposed General III facility</u>:

"CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL RESPONDED TO A CITIZEN'S COMPLAINT REGARDING ODORS AND AN EXPLOSION HEARD IN THE MORNING COMING FROM THE FACILITY AT 1909 N CLIFTON AVE. GENERAL IRON INDUSTRIES (GII, LLC). GII LLC OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC1063430) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING GII, LLC ON FEBRUARY 10, 2020, ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: HOME DEPOT (1232 W NORTH AVE) PARKING LOT, INTERSECTION OF THROOP ST WABANSIA AVE, AND INTERSECTION OF THROOP ST WABANSIA AVE. IT IS A PUNGENT ODOR OF SWEET METAL THAT BURNS MY NOSTRILS. I ALSO OBSERVED AN ODOR OF BURNING MATERIAL. THE SAME ODORS OF SWEET METAL WERE ALSO OBSERVED ONSITE.UNTREATED EMISSIONS WERE OBSERVED ESCAPING THE TOP AND THE SIDES OF THE SHREDDER. I ALSO OBSERVED SMOKE LEAVING THE SHREDDER AND TRAVELING THROUGH THE PROPERTY ACROSS FROM THE NORTH BRANCH CHICAGO RIVER, THE SHREDDER IS NOT AN ENCLOSED PIECE OF EQUIPMENT. IT DOES CONTAIN A HOOD TO CAPTURE THE EMISSIONS AND PROCESS THEM THROUGH A REGENERATIVE THERMAL OXIDIZER (RTO) AND A WET SCRUBBER TO REMOVE VOLATILE ORGANIC COMPOUNDS (VOCS), HAZARDOUS AIR POLLUTANTS (HAPS), AND OTHER AIRBORNE SOLVENTS. BEING ABLE TO OBSERVE EMISSIONS ESCAPING THE SHREDDER LEADS ME TO BELIEVE THAT THE EQUIPMENT CAPTURING THE EMISSIONS IS INSUFFICIENT. CONSEQUENTLY, THIS DOES NOT ALLOW THE RECENTLY

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⁸ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-19-133(a)-IL-08, U.S. EPA Region 5, August 22, 2019 at 7. Attached and also available at: https://www.epa.gov/sites/production/files/2019-08/documents/general iron industries inc aco.pdf

INSTALLED AIR POLLUTION CONTROL EQUIPMENT TO PROCESS THE EMISSIONS SINCE THEY ARE ESCAPING AT THE SHREDDER BEFORE THE TREATMENT PROCESS.AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED ON THE PROPERTY DIRECTLY SOUTHWEST AND ACROSS THE NORTH BRANCH CHICAGO RIVER. AUTO FLUFF IS A PRODUCT OF SHREDDING OPERATIONS AND IT CONSIST OF FINE PARTICLES OF GLASS, FIBERS, RUBBER, METAL, PLASTIC, DIRT, AND AUTOMOTIVE FLUIDS. FUGITIVE DUST WAS ALSO OBSERVED ONSITE WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS TO AND FROM TRUCK TRAILERS. MISTING CANNONS WERE OBSERVED TO NOT BE IN OPERATION TO CONTROL AIRBORNE PARTICLES AT THE TIME OF THE INSPECTION. OBSERVING AUTO FLUFF IN THE OUTSIDE OF GII, LLC?S PROPERTY AND FUGITIVE DUST WITHOUT OPERATING MISTING CANNONS LEADS ME TO BELIEVE THAT REASONABLE MEASUREMENTS WERE NOT AND ARE NOT BEING TAKEN TO ENSURE DUST, DEBRIS, AND DIRT WON?T MIGRATE OFF SITE AND INTO THE PUBLIC WAY.I SPOKE TO JIM AND HE INFORMED ME THAT THERE WAS AN EXPLOSION IN THE SHREDDER DURING THE MORNING HOURS BETWEEN 7:30AM? 7:40AM. HE SAID THIS IS A COMMON OCCURRENCE.A NOV CITATION #E0000***** WAS ISSUED FOR AIR POLLUTION PROHIBITED (11-4-730) AND HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]). A NOV CITATION #E0000***** WAS ISSUED FOR VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 46 WHICH REQUIRES THE PERMITTEE TO CONTROL AND SUPPRESS DUST AND OTHER MATERIALS TO PREVENT OFF-SITE MIGRATION AND NUISANCE IN CONNECTION WITH BUSINESS (7-28-080). THE HEARING DATE FOR THE CITATIONS WILL BE ON APRIL 30, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO GENERAL IRON INDUSTRIES (GII, LLC) AGENT LISTED ON THE ILLINOIS SECRETARY OF STATE CORPORATION FILE DETAIL REPORT. THE AGENTS NAME AND ADDRESS ILLINOIS CORPORATION SERVICE C AT 801 ADLAI STEVENSON DRIVE, SPRINGFIELD, IL 62703."

This information is directly relevant to the applicant's past compliance history with this Act as necessary to correct, detect, or prevent noncompliance, particularly since the pollution control equipment from this facility will be transferred to the General III facility. Illinois EPA's categorical refusal to consider this evidence is contrary to its authority pursuant to 415 ILCS 5/39(a) and will create perilous conditions for the nearby environmental justice community.

Illinois EPA's third authority pursuant to 415 ILCS 5/39(a) - "[T]he Agency may impose such other conditions as may be necessary to accomplish the purposes of this Act, and as are not inconsistent with the regulations promulgated by the Board hereunder" – is also directly relevant to the present case. The plain language of this provision stands in stark contrast to another fundamentally misleading statement made by an Illinois EPA representative at the public hearing, whose testimony was subsequently introduced into the permit repository in written form. By contrast to the cited authority granted in 415 ILCS 5/39(a), he stated:

"In its review of an application, the Illinois EPA has no choice legally but to issue a construction permit to a source if the source will be in compliance with all state and federal air pollution control regulations."

Illinois EPA is not at liberty to ignore the authorities and responsibilities provided by the legislature, and it is not at liberty to misstate the plain language of the Illinois Environmental Protection Act. In permitting, Illinois EPA is expressly authorized to impose conditions that 1.

are necessary to accomplish the purposes of the Act, and, 2. are not inconsistent with the regulations. Illinois EPA can impose conditions that go beyond the regulations if they are "not inconsistent" with the regulations and accomplish the purposes of the Act. Again, Illinois EPA's interpretation of its authority of 415 ILCS 5/39(a) is problematic and its public statements are confusing and misleading; in the present case, this created an unfair public process.

As a practical matter, critical measures beyond technical regulatory compliance are authorized by law and are essential to health, safety and welfare of the environmental justice community. For example, 415 ILCS §5/9(a) states:

No person shall: (a) Cause of threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, so as to violate regulations or standards adopted by the Board under this Act.

This same provision is repeated in 35 Illinois Administrative Code 201.102, approved as part of the federally enforceable SIP for the State of Illinois on May 31, 1972. 37 Fed. Reg. 10842. This SIP approval also included 35 Illinois Administrative Code 201.101, which defines air pollution as "...the presence in the atmosphere of one or more air contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant or animal life, to health, or to property, or to unreasonable interfere with the enjoyment of life or property."

Public testimony and written comments that address air pollution that is injurious to human, plant or animal life, to health, or to property, or which unreasonably interferes with life or property is legally relevant to this permitting. This is especially true because the same pollution control equipment used by General Iron will be transferred to the proposed facility. If these issues are raised — as they have been repeatedly in the present case - mere assurances of technical compliance are not adequate. To this point, Laura Compton, a resident who lives near the current General Iron facility testified about years of poor performance, serial violations and specific health impacts (burning eyes) she experienced as a result of that facility's operations. Jordan Diaz, another resident living near General Iron, testified about negative health consequences and a history of violations, prompting the Illinois EPA attorney to immediately intervene to discount this testimony. Another General Iron neighbor, Brian Kavanaugh, testified that there were severe impacts from its current operations that have no place in the city or anywhere else because of negative effects on its neighbors.

Illinois EPA will be tempted to respond to this comment by asserting these are enforcement not permitting matters. If so, SETF requests Illinois EPA to include the record of its enforcement activities at the General Iron facility, the record of its enforcement referrals to the Attorney General for this facility as well as any operating permit it issued anytime over the past 15 years. It is hypocritical for Illinois EPA to fail to fulfill fundamental enforcement and permitting responsibilities and then rely on these failures to justify agency inaction in the present case. Using Illinois EPA's past omissions to justify present inaction is a vicious cycle and evidence of a failed Agency, unfortunately at the expense of the health, safety and welfare of Illinois residents.

<u>Comment</u> – Illinois EPA is ignoring the catastrophic failure of the pollution control equipment that will be transferred from General Iron to General III. Illinois EPA's decision is to the advantage of the permit applicant, but contrary to the health, safety and welfare of the nearby environmental justice community.

During the recent General III public hearing, IL EPA indicated that the equipment employed by General Iron would be moved to the proposed General III facility, including the RTO and other pollution control equipment. Consistent with this, the pending application and the draft permit are based on the operating characteristics of existing equipment employed by General Iron. In this way, General III's permit application is not typical because it proposes to move existing pollution control equipment from General Iron to a new location. This may be a new facility, but it's utilizing used parts, specifically the emissions capture hood, cyclone, filter and RTO and associated pollution control equipment. Provisions relating to the air pollution control equipment that will be transferred from General Iron include Paragraphs 9a and 11a – 11h. Equally important, the emission limits in the Draft Permit are based on the effective operation of this transferred pollution control equipment. If this transferred pollution control equipment does not operate effectively, it is also uncertain if the facility can maintain a potential to emit for air pollutants consistent with a minor source designation.

Much of the Draft Permit is based on the performance of this transferred equipment. In turn, the performance of this equipment is legally relevant because of the mandate imposed by 35 IAC 201.160 "Standards for Issuance":

- a) No construction permit shall be granted unless the applicant submits proof to the Agency that:
 - 1) The emission unit or air pollution equipment will be constructed or modified to operate so as not to cause a violation of the Act or of this Chapter

Pursuant to 35 IAC 212.324(f), the owner or operator shall maintain and repair all pollution control equipment in a manner that assures that emission limits and standards in 35 IAC 212.324 shall be met at all times.

Consequently, it's essential for Illinois EPA to ask this simple question – has the pollution control equipment that is being transferred to the General III worked effectively at General Iron? Especially in light of the explosion, the answer is unmistakably no.

Because of this, SETF now asserts that the pending permit application and the resulting Draft Permit do not accurately represent the operation of the equipment that will be employed at the proposed new General III facility. The permit application is an inadequate basis for permit review and is incomplete. SETF's assertion is based on the explosion that occurred at General Iron shortly after the public hearing, coupled with the long history of compliance issues related to this equipment that are detailed in NRDC's comments. Initial reports suggest the explosion originated in the RTO, one of the pieces of pollution control equipment that is to be transferred to the proposed General III facility. Moreover, even if the operation of the RTO is not the only cause of the explosion, the transfer of any equipment that can cause this kind of catastrophic

failure suggests the applicant's representations must be revisited as part of any credible permit review.

The pending application is incomplete because the applicant's representations about the proposed use of any equipment, its control efficiency, and the applicant's ability to operate the equipment safely and effectively can no longer be accepted without a complete investigation of the explosion incident. In light of the explosion, the applicant cannot prove this transferred air pollution equipment will be constructed so as to not cause the violations of the Act that result from catastrophic failure, fires, explosions and the uncontrolled release of pollutants. Moreover, existing emission estimates and air quality models that do not account for emissions during periods of catastrophic failure also must be reassessed. Additional permit terms and conditions may be necessary to prevent future accidents and to ensure the integrity of the equipment and the applicant's operating systems, all of which are relevant permitting considerations. This analysis is also consistent with the health, safety and welfare of nearby schools, parks, river users and residential neighborhoods.

For this reason, SETF asserts the pending permit application is incomplete and does not provide a basis for Illinois EPA to make permitting decisions about the General III facility. Illinois EPA must not proceed to final permit decisions until it acquires information about the equipment that the applicant is proposing to transfer and its ability to operate this equipment in a safe and effective manner, as required by 35 IAC 201.160. In the meantime, we urge IL EPA issue a Notice of Incompleteness regarding the pending permit application or an outright permit denial.

<u>Comment</u> - Despite the pleas of local residents, Illinois EPA conducted a virtual public hearing during the pandemic and the written comment period during a period of civil unrest. This is contrary to Illinois EPA's own environmental justice guidelines and unfairly impedes public participation. Illinois EPA's decision is to the advantage of the permit applicant, but contrary to the health, safety and welfare of the nearby environmental justice community.

On April 22, 2020, SETF sent the following communication to Illinois EPA via Brad Frost and the Agency's Environmental Justice Coordinator:

Please be advised that I represent the Southeast Environmental Task Force. As you know, SETF and its community partners have placed the highest priority on public participation in IL EPA permitting transactions related to the General III facility, which would be co-located with several existing, related facilities at 11600 S. Burley in southeast Chicago.

SETF prides itself on being a responsible community partner with IL EPA when, as in the present case, it requests public participation. Specifically, SETF has played a central role in publicizing and facilitating public hearings with IL EPA over a 25+ year period. Even when it disagrees with IL EPA, SETF has been a good faith partner with IL EPA because its interests in public participation align with the Agency.

Unfortunately, SETF believes IL EPA's proposed virtual hearing for the General III air construction permit will not be successful. SETF cannot remedy the problems it

foresees. It's concerned that large segments of the public will not be heard as part of this important permitting process.

Neither SETF's members nor other local residents have participated in this type of hearing. Many do not have the technology and/or technical capability to participate. SETF cannot provide training to remedy this problem because its office is closed and its leadership, members and local residents are required to be distant from one another. As a small non-profit, SETF is experiencing almost insurmountable complications to continue functioning, let alone to mount a major campaign to facilitate public participation in an unfamiliar venue.

Under these circumstances, SETF is concerned that a public hearing will suppress public participation, effectively exclude many potentially affected residents and skew the public record in favor of more sophisticated participants who may not represent community members and their interests. Even though I will prepare written comments on behalf of SETF, this is not a surrogate for the testimony of the full range of local residents who would participate in a traditional public hearing.

SETF acknowledges that you and other IL EPA personnel are working under very difficult circumstances due to the pandemic. Having said this, the legislators who mandated intractable permit decision deadlines were not contemplating a pandemic. Surely, the permit applicant wouldn't want to foreclose public participation or gain any advantage by virtue of a pandemic that no one could foresee. SETF believes there should be a moratorium on further permit proceedings in this case until the Governor concludes Illinois can return to in-person social interactions.

Illinois EPA never responded to this message and proceeded to its virtual public hearing. Predictably, most of the participants who testified asserted that Illinois EPA's decision was fundamentally unfair and defeated the purpose for a public hearing. From my notes, the testimony of participants included the following:

Mark Valez – His family has lived on the East Side for 70 years, and he has a petition with 2,000 signatures of local residents opposing General III. Despite this, because there was no information in Spanish, very few local residents knew about the hearing or how to participate, including people who use nearby Rowan Park and families whose children attend nearby Washington High School.

Gina Ramirez – It's unfair to have a hearing during the pandemic. This reflects the racism that causes southeast Chicago to be a sacrifice zone.

Olga Bautista – Many members of the public are unable to login because they are required to download an app on their phones but either don't have the storage for the app or can't afford to purchase additional storage. The hearing is inaccessible for them. Spanish speaking and hearing-impaired individuals face obstacles preventing their participation. Is this ADA compliant? It's unfair to hold a public hearing in such desperate times when people are facing so many other challenges.

Meleah Geertsma – In light of the emergency conditions, this is an unfair process that excludes many community members.

Kiana Courtney – The compressed timeline for the public process unfairly inhibits public participation. There was a lack of outreach for Spanish speakers. Was the public notice available in Spanish?

Peggy Salazar – Holding a meeting during the pandemic is unjust and an insult to the community, and disregards local residents.

Carolyn Pedroza – East Side resident who strongly objects to the "pandemic hearing". The hearing excludes poor people who lack the technology and technical skills to participate. The Spanish-speaking residents who are the most directly affected are the most excluded. Many of her own family members are unable to participate.

Damon Watson (NAACP) – The disproportionate impact of the pandemic on southeast and southwest side communities is compounded by the environmental injustice being perpetrated by IL EPA.

Illinois EPA's conduct is contrary to its own environmental justice commitments, developed in large part to resolve earlier civil rights complaints against the Agency for this type of unfair conduct. Illinois EPA's Environmental Justice Public Participation Policy identifies a series of public participation initiatives that apply "to all permitting transactions." These commitments include:

- 1. providing early and meaningful public involvement throughout the permitting process;
- 2. making a determination of the appropriate outreach based on factors like the type of permit, potential impact of the project, type of source or level of interest.

Illinois EPA's failure to provide early and meaningful public involvement, appropriate outreach, a meaningful public hearing and an adequate written comment period works to the advantage of the permit applicant, but is contrary to Illinois EPA's own environmental justice commitments.

Comment – Illinois EPA has not assessed the air quality impacts of emissions from new truck traffic that will move through local communities to access the General III facility. On a weekly basis, General III's operations will attract hundreds of trucks carrying junk automobiles, appliances and other scrap metal; this is an essential part of General III's business. Even if Illinois EPA cannot regulate tailpipe emissions from these mobile sources, it is Illinois EPA's responsibility to assess these emissions to determine if they will cause or contribute to unhealthy air quality for nearby residents. This omission is compounded by the Illinois EPA's failure to include well-established standards in Illinois law to reduce the release of materials from the kinds of vehicles that will be aggregating on local roadways. This omission is also compounded by the lack of anti-idling provisions is the draft permit for trucks on the proposed General III property and waiting to enter this property. Illinois EPA's omissions are to the advantage of the permit applicant, but contrary to the health, safety and welfare of the nearby environmental justice community.

The General III facility cannot operate unless it receives deliveries of scrap metal by truck. This essential aspect of General III's operations will bring hundreds of trucks – and their associated tailpipe emissions – to its location every week. These trucks and their cumulative emissions will be a new, permanent source of air pollution in nearby residential neighborhoods, both when they come to and go from the General III facility using local roadways. These impacts will be compounded if trucks are allowed to idle at or near the facility.

Pursuant to 40 CFR 51.160 - "Legally enforceable procedures" – Illinois EPA has both the authority to include an assessment of the air quality impacts from mobile sources in its permitting decisions. Illinois EPA must assure that the construction or modification of a facility will not result in interference with attainment or maintenance of a national standard in the State in which the proposed source (or modification) is located. 40 CFR 51.160 (a)(2). Such procedures must include means by which the State or local agency responsible for final decisionmaking on an application for approval to construct or modify will prevent such construction or modification if it will interfere with the attainment or maintenance of a national standard. 40 CFR 51.160 (b)(2). The nature and amount of emissions to be emitted by mobile sources associated with a facility is expressly referenced as a relevant inquiry. 40 CFR 51.160 (c)(1). Illinois EPA must assess its activities in the context of a broader control strategy that includes consideration of "changes in relocation of residential, commercial, or industrial facilities or transportation systems." 40 CFR 51.100.

The relocation of the business and operations of General Iron to the proposed General III facility will result in the introduction of hundreds of trucks every week of every year into southeast Chicago, including many diesel vehicles. Despite this, Illinois EPA has taken no steps to assess if this result, directly associated with the proposed General III facility, will interfere with attaining and maintaining healthy air standards in the environmental justice community on Chicago's southeast side.

In fact, at the opening bell of this permitting, SETF provided information about the potential impacts of truck traffic and tailpipe emissions on the southeast side. It appears this information was ignored. Even absent General III, the area surrounding the proposed General III facility scores above the 90% percentile in several risk-based, transportation related categories assessed as part of U.S. EPA's EJ screening tool, including PM 2.5, diesel PM, NATA air toxics cancer risk, NATA respiratory hazard index and traffic proximity. The tailpipe emissions that will result from the trucks needed to service the proposed General III facility will only exacerbate these risks, but remain unassessed by Illinois EPA. This omission is to the advantage of the permit applicant, but places the environmental justice community in peril.

In addition, Illinois EPA's draft permit fails to incorporate the existing mandates of Illinois law designed to prevent the release of pollution from truck loads, specifically, the requirements contained in 35 IAC 212.315 "Covering for Vehicles":

No person shall cause the operation of a vehicle of the second division as defined by 625 ILCS 5/11-127 or a semi-trailer as defined by 625 ILCS 5/1-187 without a covering sufficient to prevent the release of particulate matter into the atmosphere, provided that this rule shall not pertain to automotive exhaust emissions.

Finally, as to trucks, Illinois EPA could have but did not incorporate provisions to prevent idling by vehicles on the General III property or waiting to enter the General III facility in a manner consistent with state statute and Chicago Municipal Code. In order to protect human health and the environment, 625 ILCS 5/11-1429 prohibits diesel vehicles in Cook County from idling for more than a total 10 minutes within any 60 minute period, with only specifically delineated exceptions. The Chicago Municipal Code Section 9-80-095 limits idling of on-road diesel powered vehicles within City borders to a total of three minutes within a sixty-minute period, also for air quality and public health purposes. For air quality and public health purposes, Illinois EPA should impose a three minute standard to limit truck idling on the General III facility and for trucks waiting to enter the facility.

<u>Comment</u> – Illinois EPA should require a FLIR monitoring system to detect releases of volatile organic materials, coupled with permit obligations to engage in corrective action when these releases are detected.

Metal shredders – whether classified as large recycling facilities or consequential facilities - are significant sources of volatile organic materials (VOMs). VOMs are photochemical oxidants associated with a number or detrimental health effects, which include birth defects and cancer, as well as environmental and ecological effects. In the presence of sunlight, VOMs are influenced by a variety of meteorological conditions that have the ability to create photochemical smog, reacting with oxygen in the air to produce ground-level ozone. In

As noted, in the case In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-19-113(a)-IL-08, U.S. EPA concluded that General Iron significantly underestimated its metal shredders' VOM emissions when it, in fact, had a potential to emit more than 100 tons of VOM per year. Despite this, General Iron did not have any emission capture or control equipment to achieve an overall reduction of uncontrolled VOM emissions of at least 81 percent, nor did it have the appropriate operating permit that corresponded with its VOM emissions. U.S. EPA identified the magnitude of the VOM emissions through inspections using its FLIR camera and a Section 114 Information Request. As part of an August 22, 2019 Administrative

⁹ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 6. Attached and vailable at: https://www.epa.gov/sites/production/files/2018-07/documents/general iron industries inc. nov-fov.pdf

¹⁰ <u>Id</u>.

¹¹ <u>Id</u>.

¹² In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 4. Attached and vailable at: https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc._nov-fov.pdf

¹³ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 5. Attached and available at: https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc._nov-fov.pdf

¹⁴ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 4. ("35. During the May 24 & 25, 2018 inspection, EPA observed and recorded hydrocarbons

Consent Order, General Iron agreed to complete the installation of a regenerative thermal oxidizer with a minimum VOM destruction efficiency of 98%. 15

The General III permit should include mandatory FLIR monitoring requirements for processing equipment and storage piles. The permit should include monitoring using an infrared camera that is capable of detecting fugitive VOM releases. This protocol should be implemented and/or verified by qualified, independent third party vendors. This monitoring protocol should be incorporated into permit provisions that include appropriate recordkeeping, reporting and corrective action requirements. Mere projections regarding VOM emissions are inadequate given the history of the equipment that will be transferred to General III, and also fail to meet the requirements imposed as part of every State Implementation Plan.

"Projections of the effect of planned air pollution control measures contained in the SIPs are not merely assumed but are enforced by regulations adopted as part of the SIP. Therefore, if the control measures are not implemented sufficiently to result in required reductions, the State or local agency, or EPA, can take action to enforce implementation of the regulations. 57 F.R. 13498, 13567 (April 16, 1992). The fundamental principles for SIPs/Control Strategy include: (1) baseline emissions from the source and the control measures must be quantified (specific amount of reductions can be ascribed to measures) (2) measures must be enforceable (specify clear, unambiguous, and measurable requirements) (3) source-specific limits must be permanent and reflect assumptions used in SIP demonstrations and contain means to track emission changes at sources and provide for corrective action. Id. at 13567-13568.

Absent a real-time VOM monitoring system like FLIR, fugitive VOM releases will be undetected and unaddressed.

In order to demonstrate the technical credibility of this technology – commonly referred to as FLIR (Forward Looking Infrared Radiation) monitoring – SETF is attaching an Environmental Technology Verification Report prepared by Batelle under a cooperative agreement with U.S. EPA. Generally speaking, FLIR cameras are a technology that uses infrared detectors to take pictures or videos. It works by having sensors take in infrared radiation (IR) and using differences in the wavelengths of radiation to create images. Variations in temperature cause the variations in IR wavelength that the detectors can register. This allows the detector to pick up objects or trends that are not necessarily visible to the naked eye, such as colorless gases, if they have a different temperature than their surrounding environment. IR also passes through some solid objects that visible light is not able to, allowing FLIR systems to effectively see through walls in some contexts.

exiting the hammermill shredder with a FLIR infrared camera."). Attached and available at: https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc._nov-fov.pdf

¹⁵ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-19-133(a)-IL-08, U.S. EPA Region 5, August 22, 2019 at 7. Attached and available at: https://www.epa.gov/sites/production/files/2019-08/documents/general iron industries inc aco.pdf

The technology was originally developed in the late 50's to early 60's. It has historically been used mostly for police and military reconnaissance and surveillance due to its portability (such as being attached to aircraft and drones), its ability to see through walls, and it being harder to detect than other systems like radar. FLIR systems have only begun being used in a larger variety of uses in the past few decades due to decreasing production costs and improved software that increases resolution and sensitivity. More recently, the technology has seen wider applications in security, public safety, and manufacturing. In particular, FLIR technology has proven useful for detecting and monitoring gas leaks in industrial settings.

For gas leaks, the cameras rely on detecting minute differences in temperature between the gas and the surrounding environment. The software on the cameras can be calibrated to look for very specific, pre-defined temperature differences that are known to be associated with very specific gases. Studies have shown these cameras are very accurate and precise for the compounds they are programed to detect. There are multiple companies that produce FLIR cameras. However, the largest one is a company called FLIR Systems. FLIR Systems produces a camera that is specifically designed to detect VOMs and Methane, called the FLIR GF320. The camera was first released in 2005, and it is still available through the company directly as well as specialized dealers.

For these reasons, IL EPA should mandate FLIR monitoring for processing equipment along with corresponding recordkeeping, reporting and corrective action requirements. This is the only credible way for facilities to detect and, in turn, respond to VOM releases that otherwise would pose an undetected, unaddressed danger to the local community.

<u>Comment</u> – All auto shredder residue processing equipment and storage areas must be enclosed to prevent this material from becoming airborne and being deposited on nearby residential areas and the Calumet River. The permit should include requirements to (a) conduct all auto shredder residue ("ASR") processing in fully enclosed buildings outfitted with robust air pollution controls, (b) move all ASR between the shredder and any subsequent enclosed residue processing buildings via fully enclosed conveyors, and (c) store any ASR in fully enclosed structures with appropriate air pollution controls. ¹⁶

 $^{^{16}}$ According to court documents in the case regarding Northern Metals, the former Minneapolis shredder created significant amounts of dust from processing of ASR subsequent to the auto shredder but before any treatment or storage of residue. See: In the Matter of Revocation of Air Emission Permit 05300480-003, OAH Docket No. 60-2200-33647, Memorandum in Support of MPCA's Motion for Summary Judgment, at paragraphs 22, 26 and 57-67 (describing processing of shredder residue to recover additional metals, including (a) at a Metals Recovery Plant in which "particulate matter coated the equipment in the building, as well as the floors and fixtures" and which had garage doors that remained open during processing and openings for conveyors, as well as (b) outdoors next to the Metals Recovery Plan without any controls). The proposed replacement shredding operation in Becker, Minnesota, appears to better control this processing step, with materials conveyed between the new shredder and the new Metals Recovery Plant via a covered conveyor, and the Metals Recovery Plant itself controlled by a baghouse. See: In the Matter of the Decision on the Need for an Environmental Impact Statement for the Proposed Northern Metals, LLC Becker Sherburne County City of Becker, Minnesota, Findings of Fact, Conclusions of Law and Order, June 13, 2018, available at https://www.pca.state.mn.us/sites/default/files/p-ear2-134b.pdf, at paragraphs 12 and 13. (Note that our citation of this decision is not an endorsement of its findings or conclusions, but is included solely to show that measures can and should be taken to control fugitive dust from the shredder residue processing step. We also note our concerns with allowing the Becker facility to store auto fluff in a covered three-walled bin instead of a full

Automotive shredder residue ("ASR" or "auto-fluff") is a byproduct of scrap metal recycling facilities. ASR is usually generated by hammermill industrial shredders when vehicles, household appliances, and other manufactured metal products are collected and reprocessed for commercial value. ¹⁷ Chemically, ASR is primarily composed of aluminum, carbon, and zinc. ¹⁸ However, ASR may also contain polymers and/or hazardous contaminants, including heavy metals, PCB's, and petroleum hydrocarbons. ASR can vary in chemical and physical composition depending on the treatment process. Untreated ASR may contain a heterogeneous mixture of materials, including plastics, rubber, foam, fabric, carpet, glass, wood, road dirt, debris, and other residual metals. Physically, ASR can range from small granular particles to identifiable pieces of material (i.e. small pieces of glass, wood, etc.).

Table 1
WET Metal Values in Untreated ASR (mg/L)

Sample Date	Cd	Pb	Zn	Cu
6/18/2009	0.086	58.7	925	1.25
7/28/2009	1.29	41.8	1320	2.66
8/21/2009	0.657	88.3	1423	0.426
11/12/2009	1.25	49.6	1456	5.98
5/19/2010	2.57	155	864	6.83
10/26/2010	2.09	109	2603	9.1
1/5/2011	1.62	86.7	1685	3.97
1/25/2011	0.64	74.4	1025	3.35
4/28/2011	1.26	68.9	1110	4.51
10/31/2011	1.86	29.4	1970	4.60
11/7/2011	1.79	51.0	1525	2.03
Regulatory Values (CCR, Title 22 Ch. 11, § 66261.24)	1	50*	250	25

Bold numbers indicate values at or above the STLC value.

ASR can be a characteristic hazardous waste under RCRA because of the toxicity of entrained metals and other components of the waste. As described in its Material Data Safety Sheet, ASR contains multiple toxic substances in addition to cadmium, lead and zinc. In Illinois, ASR is characterized as a special waste (specifically, "a waste material generated by shredding recyclable metals"). PAccording to 35 IAC § 808, special wastes are given a "toxic score." The generator of a special waste has the burden of characterizing their waste according to ASTM test methods to determine the toxic score of the waste, Because of the hazardous constituents of ASR, Illinois EPA should mandate specific measures to control every aspect of ASR management. These measures include screening scrap materials, rejecting components in these

Commented [GM1]: Can someone confirm that 35 IAC 808.121(a) is the right provision here?

^{*} Each of the reclassification letters issued to the shredders allows a soluble lead concentration of 50 mg/L. The requirements of the reclassification letters vary with respect to other Title 22 metals.

¹⁷ Institute of Scrap Recycling Facilities (California Chapter): Treatment of Auto Shredder Residue, available at https://www.dtsc.ca.gov/HazardousWaste/upload/ISRI_ASR_Study_JPM_8_2_13.pdf

¹⁸ Gerdau: Material Data Safety Sheet for ASR, available

 $[\]frac{athttps://www2.gerdau.com/sites/default/files/downloadable_files/Automobile\%20Shredder\%20Residue\%20_ASR_\%20MSDS\%20_NA_\%202-15-12.pdf$

¹⁹ Illinois EPA, "Do I Have a Special Waste?" available at https://www2.illinois.gov/epa/topics/waste-management/waste-disposal/special-waste/Pages/do-i-have.aspx

²⁰ See 35 Ill. Admin. Code 808.121(a)

wastes that commonly include hazardous substances and managing and storing ASR in full enclosures.

Illinois EPA should mandate strict controls to screen for and exclude hazardous materials to minimize the quantity of hazardous substances that will be entrained in ASR, to prevent these hazardous constituents from becoming airborne. This should include should prohibitions on components that can accompany scrap metal wastes, including switches, batteries, gas and propane tanks and any components that contain traces of transmission fluid, gasoline, diesel fuel, lubricating oils and antifreeze. These prohibitions require stringent enforcement practices by the facilities. Visual gate inspections of incoming loads of scrap materials for prohibited components are essential but not adequate. Facilities should be required to employ photoionization detectors to screen for volatile organic compounds and other gases, as well as radiation detectors. Based on screening, facilities should be required to categorically reject "materials requiring special handing", and maintain documentation detailing the supplier, the screening technique that was utilized and the basis for rejecting the materials.

Illinois EPA should mandate that all ASR-related operations (storage, management, processing and transportation) should take place in fully enclosed and controlled structures. This is necessary to prevent the release of hazardous substances into two environmental media. First, as discussed elsewhere in these comments, material, including entrained hazardous substances, can be released from outdoor ASR piles into the air. Second, rainfall and snowmelt can penetrate outdoor ASR piles, causing contaminated leachate (containing suspended solids and hazardous constituents) that can be resuspended as airborne particles. Enclosure prevents the uncontrolled release of airborne particulate matter. Enclosure also prevents rainfall and snowmelt from penetrating ASR piles, minimizing the release of contaminated leachate and the resuspension of airborne particles.

<u>Comment</u> - Provisions of Illinois law that are part of the approved Illinois SIP characterize odors as contaminants that should not be released in a manner that injures nearby residents. Under 415 ILCS §5/9(a):

No person shall: (a) Cause of threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, so as to violate regulations or standards adopted by the Board under this Act.

This same provision is repeated in 35 Illinois Administrative Code 201.102, approved as part of the federally enforceable SIP for the State of Illinois on May 31, 1972. 37 Fed. Reg. 10842. This SIP approval also included 35 Illinois Administrative Code 201.101, which defines air pollution as "...the presence in the atmosphere of one or more air contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant or animal life, to health, or to property, or to unreasonable interfere with the enjoyment of life or property." The definition of contaminant explicitly includes odors:

Sec. 3.165. Contaminant. "Contaminant" is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source. (Source: P.A. 92-574, eff. 6-26-02.)

The concerns of the local environmental justice community about releases of odors from the proposed General III facility are legally relevant to the proposed permit. As revealed by the analysis prepared by NRDC, odor concerns are not mere speculation, but rather are identified as a recurrent problem at the existing General Iron facility despite the use of the same pollution control equipment that will be transferred to General III. These odors are not merely unpleasant, they evidence fugitive releases of categories of regulated pollutants including metals, volatile organic materials and particles. Even in the single Inspection Report included in these comments, the city inspector experienced from an off-site location "a pungent odor of sweet metal that burns my nostrils," an "odor of burning material" and fugitive dust. She was able to attribute these releases to General Iron because she observed the same effects on-site as well.

Because General Iron's existing pollution control equipment – which will be transferred to General III – is inadequate to control these releases, Illinois EPA's approach in Paragraph 11a of the Draft Permit is uninformed and inadequate. General III should be required to develop an odor management plan proactively that will address the severe, recurrent releases that are constantly reported at the General Iron facility, and which are clearly injurious to human health and the use and enjoyment of property. As a precondition for commencing construction, the permittee must be required to develop and implement a comprehensive odor management plan that identifies changes in material, installation of controls and other measures to control odors, and that mandates a corrective action plan if odors are observed or odor complaints are received by facility operators or regulators. The odor management plan should require General III to identify and implement odor monitoring equipment to detect the characteristic odors that are related to its characteristic metallic, volatile and particulate emissions. Illinois EPA's deferral of this issue in the Draft Permit is to the advantage of the permit applicant, but damaging to the nearby environmental justice community.

Please contact me if you have any questions or comments or if I can provide additional information.

Sincerely,

Keete Harley

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Environmental Technology Verification Report

FLIR SYSTEMS
GASFINDIRTM MIDWAVE (MW) CAMERA

Prepared by Battelle

BattelleThe Business of Innovation

Under a cooperative agreement with

EPA U.S. Environmental Protection Agency



Environmental Technology Verification Report

ETV Advanced Monitoring Systems Center

FLIR SYSTEMS
GASFINDIRTM MIDWAVE (MW) CAMERA

by Brian Boczek and Amy Dindal, Battelle John McKernan, U.S. EPA

Notice

The U.S. Environmental Protection Agency, through its Office of Research and Development, funded and managed, or partially funded and collaborated in, the research described herein. It has been subjected to the Agency's peer and administrative review. Any opinions expressed in this report are those of the author(s) and do not necessarily reflect the views of the Agency, therefore, no official endorsement should be inferred. Any mention of trade names or commercial products does not constitute endorsement or recommendation for use.

Foreword

The EPA is charged by Congress with protecting the nation's air, water, and land resources. Under a mandate of national environmental laws, the Agency strives to formulate and implement actions leading to a compatible balance between human activities and the ability of natural systems to support and nurture life. To meet this mandate, the EPA's Office of Research and Development provides data and science support that can be used to solve environmental problems and to build the scientific knowledge base needed to manage our ecological resources wisely, to understand how pollutants affect our health, and to prevent or reduce environmental risks.

The Environmental Technology Verification (ETV) Program has been established by the EPA to verify the performance characteristics of innovative environmental technology across all media and to report this objective information to permitters, buyers, and users of the technology, thus substantially accelerating the entrance of new environmental technologies into the marketplace. Verification organizations oversee and report verification activities based on testing and quality assurance protocols developed with input from major stakeholders and customer groups associated with the technology area. ETV consists of six environmental technology centers. Information about each of these centers can be found on the Internet at http://www.epa.gov/etv/.

Effective verifications of monitoring technologies are needed to assess environmental quality and to supply cost and performance data to select the most appropriate technology for that assessment. Under a cooperative agreement, Battelle has received EPA funding to plan, coordinate, and conduct such verification tests for "Advanced Monitoring Systems for Air, Water, and Soil" and report the results to the community at large. Information concerning this specific environmental technology area can be found on the Internet at http://www.epa.gov/etv/centers/center1.html.

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List of Abbreviations

ACC American Chemistry Council AMS Advanced Monitoring Systems

CH₄ Methane

DQI Data Quality Indicator

EPA Environmental Protection Agency

ETV Environmental Technology Verification

FLIR Systems, Inc.

ft Foot, feet

GC Gas Chromatography

g/hr Grams per hour

Hz Hertz IR Infrared

kg/hr Kilogram per hour LOD Limit of Detection

LW Longwave
mm Millimeter
mph Miles per hour

MW Midwave

NRMRL National Risk Management Research Laboratory

PID photoionization

ppmv Parts per million by volume

QA Quality assurance QC Quality control

QMP Quality Management Plan

SF₆ Sulfur hexafluoride

TCC Texas Chemical Council TQAP Test Quality Assurance Plan

TVA Toxic Vapor Analyzer

U.S. United States

VOC Volatile organic compounds

°F Degrees Fahrenheit

Chapter 1 Background

The U.S. Environmental Protection Agency (EPA) supports the Environmental Technology Verification (ETV) Program to facilitate the deployment of innovative environmental technologies through performance verification and dissemination of information. The goal of the ETV Program is to further environmental protection by accelerating the acceptance and use of improved and cost-effective technologies. ETV seeks to achieve this goal by providing high-quality, peer-reviewed data on technology performance to those involved in the design, distribution, financing, permitting, purchase, and use of environmental technologies.

ETV works in partnership with recognized testing organizations; with stakeholder groups consisting of buyers, vendor organizations, and permitters; and with the full participation of individual technology developers. The program evaluates the performance of innovative technologies by developing test plans that are responsive to the needs of stakeholders, conducting field or laboratory tests (as appropriate), collecting and analyzing data, and preparing peer-reviewed reports. All evaluations are conducted in accordance with rigorous quality assurance (QA) protocols to ensure that data of known and adequate quality are generated and that the results are defensible. The definition of ETV verification is to establish the performance of a technology under specific, pre-determined criteria or protocols and a strong quality management system. High quality data are assured through implementation of the ETV Quality Management Plan. ETV does not endorse, certify, or approve technologies.

The EPA's National Risk Management Research Laboratory (NRMRL) and its verification organization partner, Battelle, operate the Advanced Monitoring Systems (AMS) Center under ETV. The AMS Center recently evaluated the performance of the GasFindIRTM Midwave (MW) camera by FLIR Systems, Inc. (FLIR), a portable, passive infrared (IR) camera operating in the spectral range of 3 to 5 micrometers.

Chapter 2 Technology Description

This verification report provides results for the verification testing of FLIR's GasFindIRTM MW. Following is a description of the FLIR GasFindIRTM MW camera technology (hereafter referred to as FLIR GasFindIRTM MW), based on information provided by the vendor. The information provided below was not verified in this test. Figure 1 shows the FLIR GasFindIRTM MW camera.

The GasFindIRTM MW camera takes focal plane arrays and optical systems that are tuned to very narrow spectral infrared ranges to enable the camera to detect the energy emitted from certain gases. Images are processed and enhanced by the GasFindIR High Sensitivity ModeTM feature to show the presence of gases against stationary backgrounds. Gases that are detectable by the GasFindIRTM camera appear on screen as smoke.

GasFindIRTM MW camera is designed for use in harsh industrial environments and operates in wide temperature ranges. The GasFindIRTM MW camera is a real-time

 $\begin{array}{c} Figure~1.~FLIR\\ GasFindIR^{TM}~MW~Camera \end{array}$

infrared camera that scans at 30 hertz (Hz) or 30 images per second. The camera includes a 25-millimeter (mm) wide-angle lens for scanning of a variety of components and operations. For longer-range needs, 50-mm and 100-mm lenses are available from FLIR Systems.

Chapter 3 Test Design and Procedures

3.1 Test Overview

This verification test was conducted according to procedures specified in the *Test/QA Plan for Verification of Leak Detection and Repair Technologies*⁽¹⁾(TQAP) and adhered to the quality system defined in the ETV AMS Center Quality Management Plan (QMP). Battelle conducted this verification test with support from British Petroleum (BP), Innovative Environmental Solutions, Inc., The Dow Chemical Company, Sage Environmental Consulting, and Enthalpy Analytical, Inc.

This verification test simulated gas leaks of various chemicals in a controlled laboratory environment. The ability of the FLIR GasFindIRTM MW camera to qualitatively detect gas leaks of select chemicals species by visual images under controlled environmental conditions – including varied stand-off distances, wind speeds, and background materials – was verified and the method detection limits under each test condition were determined. This passive IR camera has not been evaluated under the ETV Program for other compounds or species other than those tested under this verification test. The potential exists for the identification of other species that have an IR absorbance feature(s) in this spectral range under ideal test conditions.

Additionally during laboratory testing, the ability of the FLIR GasFindIRTM MW camera to qualitatively detect the gas leak by visual images relative to a quantitative concentration measurement made by a portable monitoring device acceptable under *U.S. EPA Method 21 – Determination of Volatile Organic Compound (VOC) Leaks*⁽³⁾ for the determination of VOC leaks from process equipment was verified for each chemical at each test condition during laboratory testing. During laboratory testing, acceptable under U.S. EPA Method 21 meant that the portable monitoring device met all of the performance requirements of Section 6 in U.S. EPA Method 21 with the exception of those requirements related to a specific leak definition concentration specified in any applicable regulation. A specific leak definition concentration was not used to qualify leaks during laboratory testing in a regulatory sense.

This verification test also verified the ability FLIR GasFindIRTM MW camera to detect gas leaks of various chemicals relative to a portable monitoring device acceptable under U.S. EPA Method 21 under "real world" conditions at a chemical plant in Freeport, TX. During field testing, acceptable under U.S. EPA Method 21 meant that the portable monitoring device met all of the performance requirements of Section 6 in U.S. EPA Method 21; a specific leak definition concentration of 500 parts per million by volume (ppmv) was utilized. Reference sampling was conducted to determine the mass rate of specific chemical species emitted from each leaking component observed with the FLIR GasFindIRTM MW camera and with the portable monitoring device acceptable under U.S. EPA Method 21.

This verification test of the GasFindIRTM MW camera was conducted October 20 through October 24, 2008 at the BP research complex in Naperville, Illinois (laboratory testing) and December 1 through December 5, 2008 at the Dow Chemical Company plants (field testing) in Freeport, TX in compliance with the data quality requirements in the AMS Center Quality Management Plan (QMP). The TQAP for this verification test indicated that field testing would be conducted at two field sites. Due to production scheduling issues, a second field site could not be obtained in a timely manner and this verification test was completed using only one field test location. Confirmation from a second field site was obtained during the writing of these reports and field testing occurred outside of this verification test in March 2010. The reader is encouraged to contact either FLIR Systems or the Texas Chemical Council (TCC) to obtain the results of testing completed at the second field site. As indicated in the test/QA plan, the testing conducted satisfied EPA QA Category III requirements. The test/QA plan, the verification statement, and this verification report were reviewed by the following experts.

- Dave Fashimpaur, BP
- Julie Woodward, Dow Chemical
- Jim Griffin, American Chemistry Council
- Christina Wisdom, Texas Chemical Council
- Eben Thoma, U.S. EPA.

One technical expert came to the laboratory testing, and one technical expert came to the field site to observe testing. Verification testing was conducted by appropriately trained personnel following the safety and health guidelines for BP and Dow's facilities.

The GasFindIRTM MW camera was verified by evaluating the following four parameters.

- Method detection limit The minimum mass leak rate that three separate individuals can observe using the GasFindIRTM MW camera under controlled laboratory conditions. This parameter was not evaluated during the field testing phase.
- Detection of chemical gas species relative to a portable monitoring device The ability of the GasFindIRTM MW camera to qualitatively detect a gas leak by visual images relative to a quantitative concentration measurement made by a portable monitoring device acceptable under U.S. EPA Method 21. This parameter was evaluated in both the laboratory and field testing phases.
- Confounding factors effect Background materials, wind speed, and stand-off distance
 were carefully controlled during laboratory testing to observe their effects on the method
 detection limit. During field testing, these variables as well as meteorological conditions
 were recorded.
- Operational factors Factors such as ease of use, technology cost, user-friendliness of vendor software, and troubleshooting/downtime were evaluated.

Due to unavailability of a second FLIR GasFindIRTM MW camera during the laboratory and field testing portions of this verification test, inter-unit comparability could not be completed during laboratory and field testing.

A FLIR GasFindIRTM LW camera was used during a portion of both the laboratory and field testing. This camera was not evaluated against the entire suite of chemicals used in the laboratory portion of this verification testing; rather the vendor used the FLIR GasFindIRTM LW camera for 1,3-butadiene, acetic acid, and acrylic acid because these compounds have an absorption peak within the 10 to 11 micrometer operating wavelength of the FLIR GasFinderIRTM LW camera. The camera was evaluated in the field for all chemical gas leaks identified, regardless of whether the gas leak contained compounds with an absorption peak within the 10 to 11 micrometer operating wavelength of the FLIR GasFinderIRTM LW camera on the days that the camera was available to the verification test team. Because the FLIR GasFindIRTM LW camera was not used during the entire portion of the laboratory and field testing phases of this verification test, test results obtained with the FLIR GasFindIRTM LW camera are not included in the body of this verification report. Rather, the results obtained with the FLIR GasFindIRTM LW camera are included as an appendix to this report for reference by the reader.

Prior to the start of the verification test, FLIR setup the FLIR GasFinderIRTM MW camera according to their recommended configuration for optimal performance.

3.2 Experimental Design

3.2.1 Detection of a Chemical Gas Leak Using FLIR GasFindIRTM

During both the laboratory testing and field testing, the FLIR GasFindIRTM MW camera was operated by a representative of FLIR. This verification test used two additional confirming individuals beyond the camera operator to confirm the observation of a leak in an effort to eliminate potential operator bias. The two additional confirming individuals were the Battelle verification test coordinator and an additional verification test team member. The use of three individuals to observe a chemical leak with the FLIR GasFindIRTM MW camera is not standard practice when using the FLIR GasFindIRTM MW camera; typical operation relies on a single camera operator to observe the presence of a chemical gas leak.

The detection of a chemical gas leak in either the laboratory or field setting was determined by the camera operator, as well as two confirming individuals who reported the results qualitatively as either "detect" or "non-detect" observation. All three individuals must have agreed on the results for the observation to be considered a "detect." When all three individuals did not agree on a detection, the observation was reported as a "non-detect." A non-detect was also recorded if the camera operator did not observe a detection (i.e., no confirmation of a non-detect was performed). Each observation was conducted using the eye piece of the FLIR GasFindIR MW camera.

The TQAP for this verification test required that camera observers have five seconds to identify the origin of the leak or be able to track the plume back to the leaking component when observing chemical gas leaks (i.e., identify the source of the leak). However, during laboratory and field testing, the observers were allowed two minutes. This change was made during laboratory testing to account for system hysteresis and upon discovering that several liquid compounds at very low flow rates did not generate a continuous plume. Rather, the leaks were observable as intermittent "puffs" of chemicals emanating from the valve at a frequency on the order of 10 seconds to two minutes. This time lag resulted from lower syringe pump feed rate settings, and the reduced hot nitrogen carrier gas volume flow rates.

3.2.2 Method Detection Limit

Method detection limits were determined only in the laboratory portion of this verification test. To determine the method detection limit, a known mass leak rate from the packing of a 1-inch valve attached to certified gas cylinders and calibrated flow meters was set at a nominally detectable level either specified by the vendor's limit of detection (LOD) for a particular test condition, or based on previous literature by Panek et al. When all three observers identified the leak, the leak rate was reduced by the testing staff using calibrated flow meters. Once a leak rate that was not identifiable by all three people was reached, the mass emission rate was again increased using the calibrated flow meters to the level where all three could again identify the leak using the FLIR technology (i.e. passive infrared imager). This rate was then established as the method detection limit for the passive infrared imager under the tested conditions. This process was completed for every testing trial identified in Section 3.2.3. Table 1 identifies the type of chemical leaks evaluated with the FLIR technology during laboratory testing.

Table 1. Chemical Leaks Evaluated with the FLIR GasFindIR $^{\rm TM}$ MW Camera During Laboratory Testing

Chemical	Chemical Group
1,3-butadiene	Olefin
Acetic acid	Acetate
Acrylic acid	Acid
Benzene	Aromatic
Methylene chloride	Chlorinated
(dichloromethane)	
Ethylene	Olefin
Methanol	Alcohol
Pentane	Alkane
Propane	Alkane
Styrene	Aromatic

The TQAP for this verification test stated that propylene dichloride (1,2-dichloropropane) and hydrochloric acid would also be used during laboratory testing. The stock solution of propylene dichloride was suspected by laboratory personnel of having been cross-contaminated by a different chemical compound. A second stock solution of propylene dichloride could not be obtained from a chemical vendor before the conclusion of laboratory testing. Thus, propylene dichloride was not used during laboratory testing. The laboratory staff also expressed concerns of causing damage to the delivery syringe in the chemical delivery system with the use of hydrochloric acid. Because hydrochloric acid could not be delivered through the chemical delivery system without causing damage to the system, a known leak rate could not be generated during laboratory analysis, therefore hydrochloric acid was not evaluated.

3.2.3 Confounding Factors

Because passive IR imagers such as the FLIR technology rely on the physical characteristics of the environment and the molecules being imaged to create an image viewed by the operator (via temperature/emissivity differences between naturally occurring ambient IR radiation and the thermal emission or absorption of the leaking gas), environmental characteristics may confound the measurement. For example, if there is not sufficient thermal emission or absorption by the

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leaking gas, the passive IR imager may not be able to detect a leak against the ambient thermal background.

During laboratory testing, experimental factors of background materials, wind speed, and stand-off distance were altered for each chemical tested. These experimental factors were chosen, because the performance of passive imagers is dependent on physical characteristics of the leak, atmospheric conditions, and background materials. The change of background material demonstrates the ability of the FLIR GasFindIRTM MW camera to detect the leak with a background scene similar to petrochemical process piping and vessels (curved metal gas cylinders) and with a background that is different than the leaking component and more uniform in nature (cement board – representing control buildings, sidewalks, and other uniform flat background surfaces). The wind speed variations and the stand-off distances inform on the atmospheric and optical pathway effects on the method detection limit, and in turn on real-world limitations. Table 2 presents the specific test conditions evaluated during laboratory testing.

It was originally intended that all test conditions would be completed for all chemicals; however, it was not possible for 1,3-butadiene, acrylic acid, methylene chloride, methane, and styrene for the following reasons.

Previous testing of the FLIR GasFindIRTM MW camera using methane had been completed by the laboratory facility outside of the verification test. Consequently, methane was used during test equipment setup to confirm that the equipment produced method detection limits for methane that were consistent with those produced during previous testing by the laboratory.

Table 2. Test Conditions Evaluated During Laboratory Testing

				I	aborat	tory Te	st Con	ditions				
Chemical Species	10 ft stand-off distance; 0-mph wind speed; cement board background	10 ft stand-off distance; 0-mph wind speed; curved metal gas cylinder background	10 ft stand-off distance; 2.5-mph wind speed; cement board background	10 ft stand-off distance; 2.5-mph wind speed; curved metal gas cylinder background	10 ft stand-off distance; 5-mph wind speed; cement board background	10 ft stand-off distance; 5-mph wind speed; curved metal gas cylinder background	30 ft stand-off distance; 0-mph wind speed; cement board background	30 ft stand-off distance; 0-mph wind speed; curved metal gas cylinder background	30 ft stand-off distance; 2.5-mph wind speed; cement board background	30 ft stand-off distance; 2.5-mph wind speed; curved metal gas cylinder background	30 ft stand-off distance; 5-mph wind speed; cement board background	30 ft stand-off distance; 5-mph wind speed; curved metal gas cylinder background
1,3-butadiene	✓	✓					✓	✓				
Acetic acid	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Acrylic acid	✓	✓					✓	✓				
Benzene	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Methylene chloride	✓	✓	✓	✓			✓	✓				
Ethylene	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Methanol	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Pentane	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Propane	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Styrene	✓	✓					✓	✓				

The 2.5 and 5-mile per hour (mph) wind speed test conditions were not completed for acrylic acid. After completion of the 0-mph wind speed test condition, laboratory personnel indicated that the acrylic acid was dissolving the rubber plunger gasket in the liquid delivery syringe in the vapor generator system. Laboratory personnel indicated that the rubber seemed to be "dissolving" inside the syringe and the syringe was no longer providing a steady flow of acrylic acid into the chemical delivery system. Additional testing using this compound was abandoned due to safety and chemical handling concerns.

The 2.5 and 5-mph wind speed test conditions were not completed for 1,3-butadiene and styrene due to safety and potential exposure concerns. During laboratory setup the week prior to verification testing, the exhaust of the test apparatus, which feeds into the general laboratory building exhaust, was balanced and smoke tested to ensure that compounds leaking from the system were captured in either the vertical hood canopy mounted over the leaking component or the downwind hood mounted adjacent to the test system. Unbeknownst to laboratory personnel, the building general exhaust system was operating at a lower setting during air balancing and smoke testing due to decreased occupancy in the building. During the week of the test, the general building exhaust was increased due to the presence of the test compounds entering the exhaust system. The change in building exhaust flows caused the capture of the chemical compound by the overhead hood and the hood mounted next to the test system to decrease. A possible solution to the lack of capture and control by the local hoods could have been to outfit

all personnel in respirators. However, documentation of respirator fit testing was not available for test team members. Respirators could not be used without this documentation. To address this problem, the leaking valve was placed next to the side hood during wind speed testing and testing of those chemical compounds which are liquids at standard conditions commenced in order of increasing boiling point. Upon completion of wind testing for acetic acid, the laboratory had a slight odor of acetic acid. This indicated to laboratory personnel that locating the leaking valve next to the side hood during wind speed testing did not adequately capture all of the chemical compounds exhausting from the test system. Rebalancing of the hood was attempted, but the problem was caused by an increase in general building exhaust, rather than at the local hoods. At this point, wind speed testing of 1,3-butadiene and styrene was abandoned because these compounds have higher chemical toxicity and exposure by the verification test team, vendor, and laboratory staff to these compounds would have occurred during wind speed testing.

During methylene chloride testing, several of the wind speed tests and background tests were not conducted because the method detection limit for lower wind speed (or background) conditions exceeded the highest reliable flow rate capable of being provided by the chemical leak delivery system at test conditions which were expected to produce a lower method detection limit (refer to Section 6.3 for discussion of the observed influence of confounding factors). For example, a 5-mph wind speed test was not conducted at a 10 ft stand-off distance with a cement board background because the method detection limit exceeded the highest reliable flow rate of the chemical delivery system for the 10 ft stand-off distance, cement board background, and 2.5-mph.

3.2.4 Detection of a Chemical Gas Species Relative to a Portable Monitoring Device

The detection of a single chemical gas leak in either the laboratory or field environments was determined by the operator as well as two confirming individuals as previously described in Section 3.2.1 and reported qualitatively as either "detect" or "non-detect."

During laboratory testing a portable monitoring device, a factory-calibrated Industrial Scientific IBRID MX6 with photoionization (PID) sensor and SP6 motorized sampling pump, acceptable under U.S. EPA Method 21, sampled the leak after the method detection limit was determined for the specified test conditions. During laboratory testing, "acceptable under U.S. EPA Method 21" meant that the PID met all of the performance requirements of Section 6 in U.S. EPA Method 21 with the exception of those requirements related to a specific leak definition concentration specified in any applicable regulation. A specific leak definition concentration was not used to qualify leaks during laboratory testing in a regulatory sense.

During field testing a portable monitoring device, a Thermo-Environmental Toxic Vapor Analyzer (TVA), acceptable under U.S. EPA Method 21 was used to screen each leaking component as part of the bagging reference method used. During field testing, "acceptable under U.S. EPA Method 21" meant that the TVA met all of the performance requirements of Section 6 in U.S. EPA Method 21; a specific leak definition of 500 ppmv was utilized.

3.2.5 Field Testing Procedures

Field testing was conducted to allow for performance evaluation under "real world" conditions. Chemicals that were tested in the laboratory were targeted for evaluation at the field sites. The mass flow rates of field leaks were quantitatively determined by a reference method called *EPA*

Protocol for Equipment Leak Emission Estimates, (5) referred to as the "bagging method." Specific details and procedures for this reference method are provided in the TQAP for this verification test. This method involves completely enclosing the leak with non-permeable material, collecting the leak with ambient air entering the bag, and performing mass measurement of the bagged leak by an analytical method. Only those leaks above the field test-assigned 500 ppmv leak definition concentration, as measured by the Thermo-Environmental TVA, were observed with the passive infrared imagers and collected as reference samples under this verification test.

The verification test team moved through the plant screening for possible leaking components using the Thermo-Environmental TVA. Once a leak was detected with the portable monitoring device, leak characteristics and environmental factors such as type of component, background material, temperature, and time were recorded qualitatively. Meteorological data were retrieved from the nearest meteorological station, which was on Dow Chemical's site. As space permitted, the camera operator took readings at three stand-off distances (10, 30, and greater than 30 ft if possible). Every reading was verified by an additional two confirming individuals and recorded as either "detect" or "non-detect" as specified in Section 3.2.1. Once the camera had scanned the leak, the bagging team members (Sage Environmental Consulting) commenced collecting duplicate reference samples of the leak into evacuated SUMMA canisters. Reference sampling concluded with a final screening by the TVA to verify that the leak concentration had not changed from the beginning to the end of testing the component. Only those leaks which showed less than a 20% difference between the pre- and post-screening with the TVA were considered consistent enough to report in the results without a data qualifier. The concentration of the collected reference samples was determined according to the analytical method in U.S. EPA Method 18 – Measurement of Gaseous Organic Compound Emissions by Gas Chromatography. (6) Upon conclusion of the five days of field testing, all reference samples were shipped to Enthalpy Analytical, Inc. for U.S. EPA Method 18 analysis.

3.3 Qualitative Evaluation Parameters

Operational factors such as maintenance needs, ease of use, data output, and software requirements were documented based on observations by Battelle.

Chapter 4 **Quality Assurance/Quality Control**

QA/quality control (QC) procedures were performed in accordance with the QMP for the AMS Center and the TQAP for this verification test. As noted throughout Chapter 3, there were deviations from the TQAP, but the work was performed as described in the previous sections. None of the deviations from the test/QA plan resulted in any adverse impacts on the quality of the data produced by this verification test. QA/QC procedures and results are described in the following subchapters.

4.1 Reference Method Quality Control

Laboratory testing did not use a specified reference method for determining the leak rate of the test conditions. Rather, certified gas cylinders and laboratory grade liquid compounds were used with calibrated flow meters and a calibrated syringe pump to generate a known leak rate in terms of mass per unit time from the leaking valve. As a laboratory QC measure, laboratory personnel, randomly and without the knowledge of the camera operator or the additional confirming individuals, increased or decreased the mass leak rate to reduce the opportunity to predetermine an outcome. In addition, laboratory blanks (i.e., pure nitrogen gas) and replicate tests were used to reduce uncertainties and verify method detection limits established in prior tests.

The field testing portion of this verification test used accepted methods to generate reference samples. Reference samples were collected using *EPA Protocol for Equipment Leak Emission Estimates* and the concentrations of compounds in the collected reference samples were determined according to the analytical method in U.S. EPA Method 18 *Measurement of Gaseous Organic Compound Emissions by Gas Chromatography*

The quality of the reference measurements collected during field testing was assured by adherence to the requirements of the data quality indicators (DQIs) and criteria for the reference collection and analytical method critical measurements, including requirements to perform initial calibrations and calibration checks of the portable monitoring device acceptable under U.S. EPA Method 21, confirming the leak rates changed less than 20% before and after bagging, assessing the bias and accuracy of the bagging procedure, and assessing the bias and accuracy of the gas chromatography (GC) laboratory analysis by developing calibration curves traceable to certified gas standards, and performing positive and negative control checks. The following sections present key data quality results from these methods.

4.1.1 Bias and Accuracy of Sample Screening Measurements Using Portable Monitoring Device

A DQI is established in the TQAP for this verification test for the bias and accuracy of sample screening measurements using a portable monitoring device. This DQI is assessed by performing calibrations of the Thermo-Environmental TVA used to screen leaking components during the field portion of the verification test and analyzing calibration check samples. During laboratory testing the portable monitoring device was an Industrial Scientific IBRID MX6 with PID sensor and SP6 motorized sampling pump which was supplied calibrated from the instrument supplier; per the TQAP for this verification test, no additional calibrations were performed during laboratory testing.

Calibration of the TVA was conducted using various levels of certified methane (CH₄)-in-air gas standards. The TQAP for this verification test required the use of five calibration points (an unspiked gas standard plus four additional concentrations); however, only three additional gas standard concentrations were obtained. Because component leaks were only bagged as reference samples if their concentration was greater than 500 ppmv and because the calibration response of the TVA was evaluated using an un-spiked gas standard (0 ppmv) and three additional concentrations of gas standards (500, 1000, and 9600 ppmv) thereby bounding the 500 ppmv reference sample bagging threshold, there was no effect on data quality.

The calibration response of the TVA was analyzed at the start and end of each verification test day or if the overall TVA sensitivity changed by greater than 10% (based on the calibration check data, which are presented in Table 5). The minimum acceptance criterion for this reference method DQI was that the TVA calibration response must agree within 10% of the concentration of each gas standard. Table 3 presents the results of all TVA calibration responses collected during this verification test. Inspection of the data present in Table 3 shows that all calibration response measurements were confirmed to be within 10% of the calibration gas standard concentration

The TQAP for this verification test required that a calibration check sample be analyzed using one concentration of the calibration gas standards at a minimum frequency of 5% of all bagged reference samples collected. Sixteen calibration check samples were analyzed with the TVA during the course of field testing and nine duplicate reference samples were collected resulting in a calibration check sample frequency of 178% of all bagged reference samples collected (i.e., 16 calibration check samples completed during the collection of nine duplicate reference samples). These checks were performed more frequently to ensure no drifting of the instrument occurred during downtimes to ensure optimum performance. The minimum acceptance criterion specified in the TQAP for this verification test is that the check standard must be within less than or equal to a 10% change in response from the previous calibration of the TVA. If the calibration check sample showed a change in response greater than 10%, then recalibration of the TVA was performed and any affected reference sample components collected would be rescreened. During this verification test, calibration check samples were performed using a certified 500 ppmv CH₄-in-air gas standard. Table 4 presents the results of all calibration check standards performed during verification testing. Inspection of the data presented in Table 4 indicate that reference samples 08A and 08B should have been rescreened after recalibration of the TVA and, therefore, are considered suspect data and reported with a data qualifier.

Table 3. TVA Calibration Responses

	Calibratio	Calibration Gas Standard Concentration (ppmv CH ₄)						
	0	500	1000	9600				
	TVA Output							
	Concentration							
Date [Time]	(ppmv CH ₄) ^(b)	TVA Cali	bration Response (as	s % Error) ^(c)				
12/1/2008 [13:33] ^(a)	0.70	0.40	-1.3	-0.80				
12/2/2008 [09:01]	0.40	-0.80	-0.10	-0.60				
12/2/2008 [14:08]	1.0	1.2	1.0	2.1				
12/2/2008 [16:05]	1.0	5.6	4.2	4.2				
12/3/2008 [08:41]	0.80	-1.4	ND	-0.70				
12/3/2008 [09:30]	0.70	-0.60	-4.4	-4.9				
12/3/2008 [10:12]	0.80	-1.2	-0.60	0.10				
12/3/2008 [17:06]	0.60	-7.2	-8.2	-8.0				
12/4/2008 [10:04]	0.60	-0.60	-0.30	-1.0				
12/4/2008 [13:20]	ND	ND	-0.10	-0.30				
12/4/2008 [16:12]	0.60	-0.80	-1.5	-1.0				
12/4/2008 [17:23]	0.20	-1.4	-1.7	-1.1				
12/5/2008 [08:59]	0.60	ND	-0.70	-0.70				
12/5/2008 [11:20]	1.2	4.0	3.0	-8.3				
12/5/2008 [14:01]	0.20	3.4	3.3	-3.1				

⁽a) An end-of-day TVA response was not collected on 12/1/2008. Data for leak location 1 is included but flagged because there are acceptable reference and bagging measurements.

4.1.2 Confirmation of Detected Leaks

A DQI is established in the TQAP for this verification test for the confirmation of detected leaks. This DQI is assessed by analyzing the concentration of a leaking component before and after bagging the component. These measurements were completed for all leaking components which were bagged and collected as reference samples. The acceptance criterion for this DQI is that the pre and post screening measurements collected with the TVA agree within 20%. Table 5 presents the results of all pre- and post-bagging measurements completed during the collection of reference samples.

4.1.3 Bias and Accuracy of Enclosure Equilibration Gas

A DQI is established in the TQAP for this verification test for bias and accuracy of the enclosure equilibration gas. This DQI requires that if the blow-through bagging procedure is used to collect reference samples, then the equilibration gas in the bag is collected and analyzed for contamination prior to collection of reference samples. During the verification testing, reference samples were collected using the vacuum-method which does not require the use of an equilibration gas; therefore, this DQI was not applicable.

⁽b) Concentration data presented for un-spiked gas standard, since % error calculation is not possible. This point is used in calibrating the Thermo-Environmental TVA.

⁽c) Percent (%) error is calculated as [(TVA calibration response, ppmv CH_4 – Calibration Gas Standard Concentration, ppmv CH_4)/ Calibration Gas Standard Concentration, ppmv CH_4] x 100%. ND - Not detected

Table 4. TVA Calibration Check Samples

	Calibration Check	
Date [Time]	Response (as % Error) ^(a)	Comments
12/2/2008 [11:17]	0.40	
12/2/2008 [12:15]	-5.2	
12/2/2008 [14:05]	-16	Recalibration only. No rescreening necessary because no reference samples had been collected between this calibration check sample and TVA calibration.
12/2/2008 [14:08]	1.2	•
12/2/2008 [15:10]	1.4	
12/2/2008 [15:43]	2.0	
12/3/2008 [9:23]	64	Found leak; recalibrated only. No rescreening necessary because reference samples had yet to be collected this day.
12/3/2008 [10:30]	0.80	·
12/3/2008 [11:32]	-0.60	
12/3/2008 [13:57]	0.60	
12/3/2008 [15:45]	0.60	
12/4/2008 [11:43]	1.6	
12/4/2008 [13:23]	-17	Recalibration only. No rescreening necessary because no reference samples had been collected between this calibration check sample and the previous check.
12/4/2008 [15:30]	24	Recalibration only. Reference samples 08A and 08B were inadvertently not rescreened and are therefore considered suspect and results reported with qualifier.
12/4/2008 [17:25]	-1.4	
12/5/2008 [10:38]	-3.0	

⁽a) Percent (%) error is calculated as [(TVA calibration check response, ppmv CH₄ – Calibration Gas Standard Concentration, 500 ppmv CH₄)/ Calibration Gas Standard Concentration, 500 ppmv CH₄] x 100%.

Table 5. Confirmation of Detected Leaks by TVA

Reference	Concentration	_		
Sample Numbers	Pre-bagging	Post-bagging	Relative % Difference ^(b)	Comments
01C, 01D	>100,000 ^(a)	>100,000 ^(a)	0%	
02A, 02B	20,500	20,500	0%	
03A, 03B	>100,000 ^(a)	>100,000 ^(a)	0%	
05A, 05B	>100,000 ^(a)	>100,000 ^(a)	0%	
06A, 06B	18,000	23,000	24%	Data is considered suspect and results reported with qualifier.
07A, 07B	18,000	17,000	5.7%	
08A, 08B	8,000	8,000	0%	
09A, 09B	800	870	8.4%	
10A, 10B	>100,000 ^(a)	>100,000 ^(a)	0%	

⁽a) The concentration of the leak at the component was high enough to cause the TVA to flameout. Concentration estimated as greater than 100,000 ppmv CH_4 .

⁽b) Relative percent (%) difference calculated using the following calculation:

Relative % difference =
$$\frac{2 \times |\text{Pre} - \text{bagging concentration} - \text{Post bagging concentration}|}{\text{Pre} - \text{bagging concentration} + \text{Post bagging concentration}} \times 100\%$$

4.1.4 Bias and Accuracy of Bagging Procedure

A DQI is established in the TQAP for this verification test for the bias and accuracy of the bagging procedure. This DQI is assessed by bagging an artificial leak at a known rate in the middle of the analytical calibration curve. The procedure followed is that specified in U.S. EPA *Protocol for Equipment Leak Emission Estimates* using certified CH₄-in-air gas standards and calibrated flow meters. This DQI indicator was assessed at the beginning and end of the week of field sampling. An acceptance criterion of 80 to 120% recovery is required for the bagging equipment to pass the known leak rate test. Table 6 presents the results of the known leak rate test. As shown in Table 6, this DQI was met before and after reference sampling.

Table	6	Known	Leak	Rate	Test	R	eculte
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	Leak Rate			
Date [Time]	Level	Theoretical	Measured	% Recovery(a)
		Pre-Test		
11/28/2008 [12:45]	Low	4.31 x 10 ⁻⁴	4.23x 10 ⁻⁴	98%
11/28/2008 [12:20]	High	1.75×10^{-3}	1.60×10^{-3}	91%
		Post-Test		
12/5/2008 [14:35]	Low	1.25 x 10 ⁻³	1.32 x 10 ⁻³	106%
12/5/2008 [14:43]	High	2.43×10^{-3}	2.50×10^{-3}	103%

⁽a) Percent (%) Recovery is calculated as (measured emission rate, kg/hr CH_4) / (theoretical emission rate, kg/hr CH_4) x 100%

4.1.5 Bias and Accuracy of Gas Chromatography Analytical Method

A DQI is established in the TQAP for this verification test for the bias and accuracy of the GC analytical method used to quantify the concentration of leaks collected during reference sampling. This DQI was assessed through initial calibration, and by performing positive and negative control samples. These assessments are discussed in the following paragraphs.

Initial Calibration. Initial calibration of the GC was conducted by using various levels of certified calibration gases starting with an un-spiked gas standard and then a minimum of four additional concentrations of gas standards. The TQAP for this verification test required that the initial calibration be performed at the start and end of every analytical sequence or if overall instrument sensitivity changed by greater than 10%. To ensure accuracy of the initial calibration, the instrument must be calibrated using certified gas standards. The minimum acceptance criteria specified for this assessment is that all gas standards must be within 2% of their certified value.

The analytical laboratory that performed the GC analytical method (Enthalpy Analytical, Inc.) purchased gas standards with certification accuracies of \pm 2%, as specified by the gas supplier. In addition, the GC analytical laboratory produced diluted gas standards from these purchased standards using a gas dilution system compliant with U.S. EPA Method $205^{(7)}$ which specifies gas dilution systems must produce calibration gases whose measured values are within \pm 2% of the predicted levels from a certified gas standard.

Positive Control Checks. The TQAP for this verification test required that positive control checks be performed at a minimum frequency of 10% of all samples tested using one concentration of calibration gas standard. The minimum acceptance criteria for positive control checks is that the positive control check response is less than or equal to a 10% change in response from the initial calibration after adjustment of the overall instrument sensitivity. Forty sample measurements were conducted by the GC analytical laboratory using triplicate injections and 19 positive control checks were performed exceeding the minimum frequency of 10% of samples tested. The results of the positive control checks are provided in Table 7. As demonstrated by Table 7, all positive control checks met this acceptance criterion.

Negative Control Checks. The TQAP for this verification test required that negative control checks be performed at a minimum frequency of one out of every 10 samples tested. The minimum acceptance criterion for this assessment is that all negative control responses must remain lower than the lowest calibration standard for the chemical analyzed. Forty sample measurements were conducted by the GC analytical laboratory using triplicate injections and four negative control checks were performed meeting the minimum frequency of one negative control check per 10 samples analyzed. All negative control checks performed were non-detect for the compounds analyzed indicating an analytical result below the method detection limit for the compound. The method detection limit for methane, ethylene, styrene, benzene, 1,3-butadiene, methylene chloride, and propylene dichloride was 1.00 ppmv for each compound.

4.2 Audits

Two types of audits were performed during the verification test, a technical systems audit (TSA) of the verification test procedures, and a data quality audit. Because of the nature of bagging reference method, a performance evaluation audit, as is usually performed to confirm the accuracy of the reference method, was not applicable for this verification test. Audit procedures for the TSA and the data quality audit are described further below.

4.2.1 Technical Systems Audit

The Battelle AMS Center Quality Manager performed a TSA during both the laboratory and field testing portions of this verification test to ensure that the verification test was performed in accordance with the QMP for the AMS Center and the test/QA plan.

The TSA of the laboratory portion of the verification test was performed on October 22, 2008. During this TSA, the Battelle AMS Center Quality Manager observed the test procedures used to determine method detection limits and the response of the Industrial Scientific IBRID MX6 with PID sensor and SP6 motorized sampling pump at the each method detection limit. These procedures were observed during some of the testing conducted with acrylic acid, benzene, dichloromethane (methylene chloride), and styrene. The TSA of the field testing portion of the verification test was performed on December 3, 2008. During this TSA, the Battelle AMS Center Quality Manager observed the procedures of the bagging reference method, including the confirmation of the detected leaks by means of pre- and post-bagging screening of the leaking component with the Thermo-Environmental TVA, construction of the bagging enclosure, and duplicate reference sample collection, as well as audited the observations of the leak component with camera. In addition, the Battelle AMS Center Quality Manager observed both the performance of a calibration drift check and recalibration as well as an end-of-day calibration response check of the Thermo-Environmental TVA.

Table 7. Summary of Positive Control Check Responses

Positive Control Check Sample ID	Compounds Measured by GC Method	Expected Response (Picoampere Second)	Actual Response (Picoampere Second)	Percent Error ^(a)
			39.3	-1.1%
GC100pg167 #2	Benzene	39.8	39.3 39.0	
GC100pg167 #2	Benzene	39.8 13.7	13.8	-1.9%
GC100pf169F #4	Ethylene			+0.39%
CC100mf160E #4	1,3-butadiene	27.3	26.9	-1.6%
GC100pf169F #4	Ethylene	13.7	13.7	-0.61%
CC100, CLCOE !//	1,3-butadiene	27.3	26.7	-2.4%
GC100pf169F #4	Ethylene	13.7	13.5	-1.6%
CC100, CLCOE !//	1,3-butadiene	27.3	26.3	-3.9%
GC100pf169F #4	Ethylene	13.7	13.4	-2.4%
CC100 CLCOF IIA	1,3-butadiene	27.3	25.7	-5.8%
GC100pf169F #4	Ethylene	13.7	13.7	-0.44%
CC100 CLCOF IIA	1,3-butadiene	27.3	26.9	-1.5%
GC100pf169F #4	Ethylene	13.7	13.8	+0.39%
0.0102 44.112	1,3-butadiene	27.3	27.2	-0.43%
GC102pg44 #3	Methane	22.4	22.8	+1.6%
GC102pg44 #3	Methane	22.4	22.7	+1.3%
GC100pg169 #2	Methane	7.10	6.95	-2.1%
GC100pg169 #2	Methane	7.10	6.73	-5.3%
GC100pg169 #3	Methane	15.9	15.3	-3.4%
GC100pg169 #4R	Methane	15.9	15.5	-2.5%
GC100pg169 #4R	Methane	15.9	15.8	-0.39%
GC102pg52 #4	Pentane	122	127	+4.2%
	Methylene chloride	17.6	17.7	+0.60%
	Benzene	148	150	+1.1%
	Propylene dichloride	36.1	35.4	-2.1%
	Styrene	31.9	34.0	+6.7%
GC102pg52 #4	Pentane	122	125	+2.7%
	Methylene chloride	17.6	17.3	-1.9%
	Benzene	148	147	-0.75%
	Propylene dichloride	36.1	34.4	-4.6%
	Styrene	31.9	32.7	+2.4%
GC102pg52 #4	Pentane	67.7	67.5	-0.35%
	Methylene chloride	10.2	9.86	-3.4%
	Benzene	82.0	79.5	-3.1%
	Propylene dichloride	21.0	20.5	-2.9%
	Styrene	17.8	18.4	+3.8%
GC102pg52 #4	Pentane	67.7	70.3	+3.7%
	Methylene chloride	10.2	10.2	+0.16%
	Benzene	82.0	82.3	+0.35%
	propylene dichloride	21.1	21.2	+0.49%
	Styrene	17.8	18.6	+4.5%

⁽a) Percent error is calculated as [(Actual Peak Response, peak area – Expected Response, peak area)/ Expected Response, peak area] x 100%.

The TSA of both the laboratory and field testing portions resulted in one finding and one observation. The finding identified that only one field test (at a chemical plant) has been conducted as part of this verification test as opposed to the two field sites (one a chemical plant and the other a petrochemical plant) identified in the TQAP for this verification test. The observation noted documentation errors and improvements to the manner in which data were recorded were discussed on-site with the Verification Test Coordinator; immediate changes based on the discussed improvements were implemented.

A TSA report was prepared, and a copy was distributed to the EPA AMS Center Quality Manager.

4.2.2 Data Quality Audit

Records generated in the verification test received a one-over-one review before these records were used to calculate, evaluate, or report verification results. Data were reviewed by a Battelle technical staff member involved in the verification test. The person performing the review added his/her initials and the date to a hard copy of the record being reviewed.

100% of the verification test data were reviewed for quality by the Verification Test Coordinator, and at least 10% of the data acquired during the verification test were audited. The data were traced from the initial acquisition, through reduction and statistical analysis, to final reporting to ensure the integrity of the reported results. All calculations performed on the data undergoing the audit were checked.

The data quality audit resulted in four findings (on three separate topics) that were addressed related to the documentation of the number of confirming individuals at the method detection limits in the laboratory phase raw data, exclusion from the verification report of concentration measurements made by the PID sensor for dichloromethane (methylene chloride), methanol, and propane during the laboratory phase of this verification test, and data transcription errors.

A data audit report was prepared, and a copy was distributed to the EPA AMS Center Quality Manager.

Chapter 5 Statistical Methods

The statistical methods used to evaluate the quantitative performance factors listed in Section 3.2 are presented in this chapter. Qualitative observations were also used to evaluate verification test data.

5.1 Method Detection Limit

The method detection limit was assessed using the procedures described in Section 3.2.2 and the TQAP for this verification test. The overall detection limit variation was calculated as the standard deviation of the method detection limits determined under all the conditions tested for each chemical of interest. The equation for standard deviation is as follows:

$$S_x = \left[\frac{1}{n-1} \sum_{k=1}^{n} (C_k - \bar{C})^2\right]^{0.5}$$
 (1)

where S_x is the standard deviation of all method detection limits determined for chemical x, n is the number of replicate samples, C_k is the leak rate measured for the kth sample, and is the average leak rate of the replicate samples. If the sample sizes were small (n < 10), standard deviations provide a biased estimate of variability. Therefore the range is provided when there were fewer than 10 samples collected.

5.2 Percent Agreement

Percent agreement was used to assess the agreement between the FLIR GasFindIRTM cameras and the monitoring device acceptable under U.S. EPA Method 21 in the laboratory for each compound tested. The inverse of the percent agreement is the percentage of the results that the technology would detect a leak when U.S. EPA Method 21 would not. The equation for percent agreement is as follows:

$$\textit{Percent Agreement} = \frac{\textit{A}}{\textit{T}} \times 100\%$$

where A the number of tests that both units agree and T is the total number of tests. To determine if both the monitoring device acceptable under U.S. EPA Method 21 and the FLIR GasFindIRTM camera agreed, the method detection limits at each test condition were first reviewed. If the method detection limit of the FLIR GasFindIRTM camera was below the highest reliable flow rate of the chemical delivery system (reported as \leq), then the FLIR GasFindIRTM camera was noted

as being able to detect the chemical gas leak under those specified test conditions. Similarly, if the method detection limit of the FLIR GasFindIR TM camera was equal to or above the highest reliable flow rate of the chemical delivery system (reported as \geq), then the FLIR GasFindIR TM camera was noted as not being able to detect the chemical gas leak under those specified test conditions.

Next, the response of the monitoring device acceptable under U.S. EPA Method 21 was reviewed for the same test conditions. If the monitoring device acceptable under U.S. EPA Method 21 produced a response greater than zero, the monitoring device was considered capable of detecting the chemical gas leak. Similarly, if the monitoring device acceptable under U.S. EPA Method 21 produced a response equal to zero, the monitoring device was considered incapable of detecting the chemical gas leak.

The responses of the FLIR GasFindIRTM MW camera and the monitoring device acceptable under U.S. EPA Method 21 under the same test conditions were compared. If both the FLIR GasFindIRTM MW camera and the monitoring device acceptable under U.S. EPA Method 21 proved capable of detecting the chemical gas leak, then both units were considered to have agreed under the specific test condition. Likewise, if either the FLIR GasFindIRTM MW camera or the monitoring device acceptable under U.S. EPA Method 21 proved incapable of detecting the chemical gas leak under the specified test conditions, then the units were considered to have disagreed. Test conditions, under which a response from the either the FLIR GasFindIRTM MW camera or the monitoring device acceptable under U.S. EPA Method 21 were not obtained, were excluded from the comparison.

Chapter 6 Test Results

As mentioned previously, this verification test included both quantitative and qualitative evaluations. The quantitative evaluation was conducted to assess the method detection limits of the FLIR GasFindIRTM MW camera, the detection of chemical gas species relative to a portable monitoring device acceptable under U.S. EPA Method 21, as well as, by testing the influence of confounding factors. The qualitative evaluation was performed to document the operational aspects of FLIR GasFindIRTM MW camera used during verification testing. The following sections provide the results of the quantitative and qualitative evaluations.

6.1 Method Detection Limit

The method detection limit of each chemical compound was determined according to the procedures discussed in Section 3.2.2. Table 8 through Table 11 present the method detection limits of each chemical compound determined during laboratory testing. Table 8 through Table 11 identify each test condition evaluated (i.e., stand-off distance, background material, and wind speed), the temperatures of the laboratory and of the chemical leak, the response of the portable monitoring device acceptable under U.S. EPA Method 21, and the method detection limits for each test condition. Table 12 summarizes the range of method detection limits in units of grams per hour (g/hr) found during the laboratory testing as well as presents the overall detection limit variation for each compound. The overall detection limit variation presented in Table 12 was calculated using Equation 1 in Chapter 5.

Table 8. FLIR GasFindIR $^{\rm TM}$ MW Method Detection Limits at 10 Feet Stand-off Distance with a Cement Board Background

Compound	Wind Speed (mph) ^(a)	Ambient Temp. (°F)	Leak Temp. (°F)	M21 Device Conc. (ppmv)	Method Detection Limit (g/hr)
1,3-butadiene	0	70.3	70.9	843	1.3
Acetic acid	0	72.7	82.1	4.0	$\leq 0.02^{(b)}$
	2.5	75.1	85.5	526	\leq 4.6 ^(b)
	5	75.0	80.4	32	\leq 4.6 ^(b)
Acrylic acid	0	71.2	84.8	4.9	0.92
Benzene	0	72.7	89.3	220	0.70
	2.5	74.3	81.7	737	11
	5	74.4	77.5	684	28
Methylene chloride	0	70.9	79.2	N.A. ^(g)	18
	2.5	72.3	78.4	N.A. ^(g)	> 70 ^(c)
Ethylene	0	71.4	71.9	No data ^(d)	1.4
	$0^{(e)}$	70.9	71.2	No data ^(d)	0.70
	$0^{(f)}$	71.1	71.5	No data ^(d)	0.35
	2.5	71.4	72.2	253	68
	5.0	71.3	72.1	554	83
Methanol	0	71.3	77.0	N.A. ^(g)	0.35
	2.5	70.1	88.8	N.A. ^(g)	2.8
	5.0	70.1	82.0	N.A. ^(g)	14
Pentane	0	72.1	79.0	1.7	$\leq 0.28^{(b)}$
	$0^{(e)}$	71.7	77.6	No data ^(d)	$\leq 0.28^{(b)}$
	$0^{(f)}$	71.9	80.1	No data ^(d)	\leq 0.28 $^{(b)}$
	2.5	71.3	83.4	45	8.3
	$2.5^{(e)}$	71.3	82.2	18	2.2
	$2.5^{(f)}$	71.4	81.9	0.20	0.28
	5.0	71.1	78.6	77	28
	$5.0^{(e)}$	71.0	77.3	26	9.4
	5.0 ^(f)	70.8	76.8	12	4.1
Propane	0	71.0	70.6	N.A. ^(g)	≤ 0.44 ^(b)
	2.5	71.8	71.8	N.A. ^(g)	4.4
	5.0	71.3	71.6	N.A. ^(g)	8.2
Styrene	0	71.8	82.4	212	0.70

⁽a) The leak was viewed using the camera's standard lens (25-mm) at these conditions unless otherwise noted.

⁽b) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

⁽c) The leak could not be detected below the highest reliable flow rate supplied by the delivery system.

⁽d) No data – the leak concentration was inadvertently not collected by laboratory personnel using the M21 device.

⁽e) The leak was viewed using the optional 50-mm lens at these conditions.

⁽f) The leak was viewed using the optional 100-mm lens at these conditions.

⁽g) N.A. – not applicable. The ionization potential of this compound is higher than is capable of detection by the device used. Therefore, any raw data measured with this device is not reported in this table.

Table 9. FLIR GasFindIRTM MW Method Detection Limits at 30 Feet Stand-off Distance with a Cement Board Background

Compound	Wind Speed (mph) ^(a)	Ambient Temp. (°F)	Leak Temp. (°F)	M21 Device Conc. (ppmv)	Method Detection Limit (g/hr)
1,3-butadiene	0	71.0	71.8	876	1.6
Acetic acid	0	70.8	88.7	1.8	$\leq 0.02^{(b)}$
	2.5	74.8	85.5	7.8	$\leq 4.6^{(b)}$
	5	74.8	79.9	7.8	\leq 4.6 ^(b)
Acrylic acid	$0^{(c)}$	71.7	92.0	0.80	0.92
Benzene	$0^{(c)}$	71.4	76.2	203	0.35
	$2.5^{(c)}$	74.5	82.8	323	15
	5 ^(c)	74.8	78.7	1042	31
Methylene chloride	$0^{(c)}$	69.9	87.7	$N.A.^{(d)}$	4.9
Ethylene	0	71.3	71.8	No data ^(e)	3.8
•	$0^{(\mathrm{f})}$	70.5	71.1	No data ^(e)	2.1
	$0^{(c)}$	70.1	70.4	No data ^(e)	1.1
	2.5	71.3	72.2	287	83
	5.0	71.2	72.0	241	243
Methanol	$0^{(c)}$	71.8	77.9	N.A. ^(d)	0.28
	$2.5^{(c)}$	72.4	90.4	N.A. ^(d)	2.1
	5 ^(c)	70.2	81.4	$N.A.^{(d)}$	19
Pentane	$0^{(c)}$	72.0	77.1	17	\leq 0.28 $^{(b)}$
	$2.5^{(c)}$	71.3	85.6	84	8.3
	5 ^(c)	69.9	80.0	46	17
Propane	$0^{(c)}$	70.5	70.6	N.A. ^(d)	$\leq 0.44^{(b)}$
•	$2.5^{(c)}$	71.8	71.7	$N.A.^{(d)}$	3.3
	5 ^(c)	71.9	71.7	N.A. ^(d)	6.3
Styrene	$0^{(c)}$	71.4	77.1	85	0.35

⁽a) The leak was viewed using the camera's standard lens (25-mm) at these conditions unless otherwise noted.

⁽b) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

⁽c) The leak was viewed using the optional 100-mm lens at these conditions.

⁽d) N.A. – not applicable. The ionization potential of this compound is higher than is capable of detection by the device used. Therefore, any raw data measured with this device is not reported in this table.

⁽e) No data – the leak concentration was inadvertently not collected by laboratory personnel using the M21 device.

⁽f) The leak was viewed using the optional 50-mm lens at these conditions.

Table 10. FLIR GasFindIRTM MW Method Detection Limits at 10 Feet Stand-off with a Curved Metal Gas Cylinder Background

Compound	Wind Speed (mph) ^(a)	Ambient Temp. (°F)	Leak Temp. (°F)	M21 Device Conc. (ppmv)	Method Detection Limit (g/hr)
1,3-butadiene	0	70.0	70.8	\geq 2,000	2.7
Acetic acid	0	72.8	80.6	2.9	$\leq 0.02^{(b)}$
	2.5 ^(c)	74.8	85.7	1.3	\leq 4.6 $^{(b)}$
	5 ^(c)	74.8	78.7	29	\leq 4.6 ^(b)
Acrylic acid	0	71.7	93.9	20	1.2
	0	72.6	86.2	364	0.70
Benzene	2.5	74.4	82.0	33	11
	5	74.2	77.9	227	35
Mathylana ahlarida	0	70.7	81.0	N.A.	18
Methylene chloride	2.5	74.2	82.1	N.A.	$> 70^{(d)}$
Ethylene	0	71.4	71.4	No data ^(e)	1.7
	2.5	71.1	72.1	225	68
	5	71.4	72.1	600	122
Methanol	0	71.3	95.0	N.A. ^(f)	0.35
	2.5	70.5	91.8	N.A. ^(f)	3.1
	5	70.4	81.6	N.A. ^(f)	17
Pentane	0	71.6	87.1	8.0	0.44
	2.5	71.9	85.8	58	8.3
	5	72.1	80.5	142	19
Propane	0	70.7	71.4	N.A.	$\leq 0.44^{(g)}$
	2.5	71.9	71.9	N.A.	7.1
	5	70.9	71.5	N.A.	13
Styrene	0	72.1	82.8	104	0.70

⁽a) The leak was viewed using the camera's standard lens (25-mm) at these conditions unless otherwise noted.

⁽b) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

⁽c) The leak was viewed using the optional 100-mm lens at these conditions.

⁽d) The leak could not be detected below the highest reliable flow rate supplied by the delivery system.

⁽e) No data – the leak concentration was inadvertently not collected by laboratory personnel using the M21 device.

⁽f) N.A. – not applicable. The ionization potential of this compound is higher than is capable of detection by the device used. Therefore, any raw data measured with this device is not reported in this table.

⁽g) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

Table 11. FLIR GasFindIRTM MW Method Detection Limits at 30 Feet Stand-off Distance with a Curved Metal Gas Cylinder Background

Compound	Wind Speed (mph) ^(a)	Ambient Temp. (°F)	Leak Temp. (°F)	M21 Device Conc. (ppmv)	Method Detection Limit (g/hr)
1,3-butadiene	0	71.1	71.9	468	1.6
Acetic acid	0	71.0	83.6	2.2	$\leq 0.02^{(b)}$
	2.5 ^(c)	74.7	88.0	161	\leq 4.6 $^{(b)}$
	5 ^(c)	74.7	78.3	No data ^(d)	\leq 4.6 ^(b)
Acrylic acid	$0^{(c)}$	70.7	80.2	1.2	0.92
Benzene	0 ^(c)	71.9	86.1	337	0.77
	$2.5^{(c)}$	74.9	82.0	526	16
	5 ^(c)	75.0	80.6	521	35
Methylene chloride	$0^{(c)}$	69.6	80.8	N.A. ^(e)	11
Ethylene	0	71.3	72.1	No data ^(d)	7.0
	$0^{(f)}$	71.4	72.0	No data ^(d)	5.2
	2.5	71.3	72.2	571	156
	5	71.3	72.1	473	278
Methanol	0	71.7	81.4	N.A. ^(e)	0.35
	2.5	71.2	88.7	N.A. ^(e)	2.8
	5	70.3	82.6	N.A. ^(e)	22
Pentane	0 ^(c)	71.9	78.2	18	$\leq 0.28^{(b)}$
	$2.5^{(c)}$	74.0	85.3	19	2.8
	5 ^(c)	71.6	81.3	61	17
Propane	$0^{(c)}$	70.3	69.9	N.A. ^(e)	$\leq 0.44^{(b)}$
_	2.5 ^(c)	70.9	71.4	N.A. ^(e)	3.3
	5 ^(c)	70.7	71.7	N.A. ^(e)	6.6
Styrene	0 ^(c)	72.8	88.3	No data ^(d)	0.70

⁽a) The leak was viewed using the camera's standard lens (25-mm) at these conditions unless otherwise noted.

⁽b) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

⁽c) The leak was viewed using the optional 100-mm lens at these conditions.

⁽d) No data – the leak concentration was inadvertently not collected by laboratory personnel using the M21 device.

⁽e) N.A. – not applicable. The ionization potential of this compound is higher than is capable of detection by the device used. Therefore, any raw data measured with this device is not reported in this table.

⁽f) The leak was viewed using the optional 50-mm lens at these conditions.

Table 12. FLIR GasFindIRTM MW Range of Method Detection Limits and Overall Method Detection Limit Variation (g/hr)^(a)

Compound	Minimum	Maximum	Overall Variation ^(b)
1,3-butadiene	1.3	2.7	
Acetic acid	≤ 0.02	$\leq 4.6^{(c), (d)}$	2.3
Acrylic acid	0.92	1.2	
Benzene	0.35	35 ^(d)	14
Dichloromethane	4.9	$> 70^{(c)}$	
(methylene chloride)			
Ethylene	0.35	$278^{(d)}$	88
Methanol	0.28	22 ^(d)	8.5
Pentane	≤ 0.28	28 ^(d)	8.2
Propane	≤ 0.44	13 ^(d)	3.8
Styrene	0.35	0.70	

- (a) Minimum and maximum values shown were measured at a 0-mph wind speed unless otherwise noted.
- (b) When sample sizes are small (N < 10), standard deviations provide a biased estimate of the variability, therefore only the range is provided when there were fewer than 10 method detection limits determined.
- (c) Measured at a 2.5-mph wind speed condition.
- (d) Measured at a 5-mph wind speed condition.

6.2 Detection Agreement to a Portable Monitoring Device

The detection of a single chemical gas leak in either the laboratory or field environments was determined by the operator as well as two confirming individuals as discussed in Section 3.2.1. The leak rate was know from certified gas cylinders and calibrated flow meters in the laboratory, or was determined through the bagging method during field testing. During both the laboratory and field tests, a portable monitoring device acceptable under U.S. EPA Method 21 was used to sample the leaks. The following sections present results on the ability of the FLIR GasFindIR TM MW camera to detect a chemical gas species relative to a portable monitoring device acceptable under U.S. EPA Method 21.

6.2.1 Laboratory Testing

Table 13 presents the percent agreement between the ability of the FLIR GasFindIRTM MW camera and of a portable monitoring device acceptable under U.S. EPA Method 21 to detect a chemical gas leak under the conditions tested. Percent agreement was calculated according to Equation 2 in Chapter 5. The calculation of percent agreement excludes those laboratory test conditions for which a response was not collected using a portable monitoring device acceptable under U.S. EPA Method 21. In addition, percent agreement was not evaluated for methylene chloride, methane, methanol, and propane because these compounds have an ionization potential greater than that which could be supplied by the Industrial Scientific IBRID MX6 with PID sensor.

Table 13. Summary of Detection Agreement Between FLIR GasFindIRTM MW Camera and a Method 21 Portable Monitoring Device

Compound	No. of Tests in which Agreed	Total No. of Tests Completed	Percent Agreement
1,3-butadiene	4	4	100%
Acetic acid	11	11	100%
Acrylic acid	4	4	100%
Benzene	12	12	100%
Ethylene	8	8	100%
Pentane	16	16	100%
Styrene	3	3	100%

6.2.2 Field Testing

During field testing, nine leaking components were viewed using the FLIR GasFindIRTM MW camera using the procedures described in Section 3.2.1. Table 14 identifies whether each chemical species gas leak was observed by the FLIR GasFindIRTM MW camera and the concentration of the leak as determined by a portable monitoring device acceptable under U.S. EPA Method 21. In addition, these tables identify the type of component that was leaking, the average chemical-specific mass leak rate from the component as determined by reference sampling, the distance the leak was observed, and the wind speed. Daily meteorological conditions were obtained from Dow Chemical's on-site weather station. Although the wind speed and daily maximum and minimum temperatures were obtained from this weather station, the actual wind speed and ambient and background temperatures at each leak location at the time of observation are unknown. Additional discussions describing each leak location are provided in the following sections.

Leak Location 1. A leak was identified originating from a 3-inch plug in service with a process stream containing ethane, ethylene, methane, and propane. Screening of the component with the TVA caused an over range reading (estimated as > 100,000 ppmv). The leak was viewed and detected with the FLIR GasFindIRTM MW camera at stand-off distance of 12 ft with the sun at the observers back. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for ethylene and methane concentrations. Daily weather conditions, as reported by the on-site weather station, were clear conditions, a daily minimum and maximum temperature of 41 and 61 degrees Fahrenheit (°F), respectively, with wind out of the east at up to 8 mph.

Table 14. Summary of Field Testing Results Using the FLIR GasFindIRTM MW Camera

Leak Location	Leaking Component Type	Wind Speed (mph)	Stand- off Distance (ft)	M21 Device Screening Conc. (ppmv)	Leak Detected by Camera?	Bagging Results: Average Leak Rate (g/hr)
1	3-inch Plug	8	12	>100,000	Yes	8.79 (methane) 4.31 (ethylene)
2	¹ / ₄ -inch Tube	21	10 30	20,500	No No	0.951 (ethylene)
3	½-inch Connector	21	10 30 45	>100,000	Yes Yes Yes	2.32 x 10 ⁻³ (ethylene) 7.78 (methane)
5	6-inch Block Valve	21	10	>100,000	No	5.24 x 10 ⁻² (ethylene) 8.68 x 10 ⁻³ (styrene) 0.077 (benzene)
6	8-inch Block Valve	21	10	20,500	No	3.44 ^(a) (benzene)
7	Control Valve Flange	18	10	17,500	No	1.95 x 10 ⁻³ (ethylene) 0.282 (benzene)
8	2-inch Block Valve	18	10	8,000 ^(b)	No	1.92 ^(b) (1,3-butadiene)
9	1-inch Valve Plug	18	10	835	No	0.350 (methylene chloride)
10	6-inch Pressure Relief Valve	5	10	>100,000	No	6.78 (propylene dichloride)

⁽a) As reported in Table 5, the pre- and post-bagging leak concentrations, as measured by the TVA, differed by 24.4%. This exceeds the minimum acceptance criterion of 20% for the DQI for the confirmation of detected leaks. Thus, this data is considered suspect and reported with this data qualifier.

Leak Location 2. A leak was identified originating from a ¼-inch tube in service with a process stream containing ethane and ethylene. Screening of the component with the TVA resulted in a concentration reading of 20,500 ppmv. The leak was viewed with the FLIR GasFindIRTM MW camera at stand-off distances of 10 and 30 ft with the sun to the left of the observer. The camera did not detect the leak at either stand-off distance. Wind direction at the location was noted as originating from behind the observer and the site was shaded by piping and other equipment. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for ethylene concentration. Daily weather conditions, as reported by the on-site weather station, were clear conditions, a daily minimum and maximum temperature of 42 and 70 °F with wind out of the south southeast at 21 mph.

⁽b) As reported in Table 4, the calibration check response for the TVA, conducted after screening this component, resulted in a 24% difference. This exceeded the minimum acceptance criterion of 10% for the DQI for the bias and accuracy of sample screening measurements using a portable monitoring device. After recalibration of the TVA, the leak concentration from this component was not reconfirmed with the TVA. Thus, this data is considered suspect and reported with this data qualifier.

Leak Location 3. A leak was identified originating from a ½-inch connector in service with a process stream containing acetylene, ethane, ethylene, methane, propane, and propylene. Screening of the component with the TVA caused an over range reading (estimated as > 100,000 ppmv). The leak was viewed with the FLIR GasFindIRTM MW camera at stand-off distances of 10, 30, and 45 ft, with the sun to the right of the observer. The FLIR GasFindIRTM MW camera detected the leak at each of the three stand-off distances. Wind direction at the location was noted as originating from the right of the observer and the site was shaded by piping and other equipment. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for ethylene and methane concentrations. Daily weather conditions, as reported by the on-site weather station, were clear conditions, a daily minimum and maximum temperature of 42 and 70 °F with wind out of the south southeast at 21 mph.

The average mass leak rate of ethylene measured at this leak location was 2.23 x 10⁻³ g/hr. This value is below the lowest ethylene method detection limit measured with the FLIR GasFindIR TM MW camera during the laboratory phase of this verification test.

Leak Location 4. Leak location 4 contained a leaking component that was misidentified as being in service with styrene. This sample location was confirmed to be in ethylbenzene service and thus no analytical results are reported for this leak location. The FLIR GasFindIRTM MW camera was able to detect this leak.

Leak Location 5. A leak was identified originating from a 6-inch block valve in service with a process stream containing benzene, ethane, ethylene, ethylbenzene, styrene, and toluene. Screening of the component with the TVA caused an over range reading (estimated as > 100,000 ppmv). The leak was viewed with the FLIR GasFindIRTM MW camera at a stand-off distance of 10 ft; the leak could not be detected at this distance. The site was shaded and the viewing background was concrete. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for benzene, ethylene, and styrene concentrations. Daily weather conditions, as reported by the on-site weather station were clear conditions, a daily minimum and maximum temperature of 48 and 79 °F with wind out of the north at 21 mph.

The average mass leak rates of ethylene, styrene, and benzene measured at this leak location were 5.24 x 10⁻², 8.68 x 10⁻³, and 0.077 g/hr, respectively. These values are all below the lowest method detection limits measured with the FLIR GasFindIRTM MW cameras for these compounds during the laboratory phase of this verification test.

Leak Location 6. A leak was identified originating from an 8-inch block valve in service with a process stream containing benzene, toluene, hexane, and other aromatic hydrocarbons. Screening of the component with the TVA resulted in a concentration reading of 20,500 ppmv. The leak was viewed with the FLIR GasFindIR MW camera at a stand-off distance of 10 ft with the sun to the right of the camera observer; the leak could not be detected at this distance. The site was an exterior location and weather conditions were noted as slightly overcast with moderate wind originating from the right of the observer. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for benzene concentration. Daily weather conditions, as reported by the on-site weather station were clear conditions, a daily minimum and maximum temperature of 48 and 79 °F with wind out of the north at 21 mph.

Leak Location 7. A leak was identified originating from a control valve flange in service with a process stream containing benzene, butane, butylbenzene, all isomers of diethylbenzene, ethane, ethylbenzene, ethylene, hexane, toluene, and other aromatic hydrocarbons. Screening of the component with the TVA resulted in a concentration reading of 17,500 ppmv. The leak was viewed with the FLIR GasFindIRTM MW camera at a stand-off distance of 10 ft with the sun behind the camera observer; the leak could not be detected at this distance. The site was located on the second deck of the chemical plant and weather conditions were qualitatively noted as very windy. The viewing background was other plant piping and equipment. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for benzene and ethylene concentrations. Daily weather conditions, as reported by the on-site weather station, were partly cloudy conditions, a daily minimum and maximum temperature of 43 and 65 °F with wind out of the north at 18 mph.

The average mass leak rates of ethylene and benzene measured at this leak location were 1.95×10^{-3} and 0.282 g/hr, respectively. These values are all below the lowest method detection limits measured with the FLIR GasFindIR TM MW camera for these compounds during the laboratory phase of this verification test.

Leak Location 8. A leak was identified originating from a 2-inch block valve in service with a process stream containing 1,3-butadiene. Screening of the component with the TVA resulted in a concentration reading of 8,000 ppmv. The leak was viewed with the FLIR GasFindIR TM MW camera at a stand-off distance of 10 ft; the leak could not be detected at this distance. The site was an exterior location on a marine vapor recovery line at a marine vapor recovery system and weather conditions were qualitatively noted to be very windy and overcast. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for 1,3-butadiene concentration. Daily weather conditions, as reported by the on-site weather station, were partly cloudy conditions, a daily minimum and maximum temperature of 43 and 65 °F with wind out of the north at 18 mph.

Leak Location 9. A leak was identified originating from a 1-inch valve plug in service with a process stream containing methylene chloride. Screening of the component with the TVA resulted in a concentration reading of 835 ppmv. The leak was viewed with the FLIR GasFindIR MW camera at a stand-off distance of 10 ft; the leak could not be detected at this distance. The site was an exterior location and weather conditions were qualitatively noted as overcast with calm winds. The viewing background was concrete ground and a few metal pipe supports. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for methylene chloride concentration. Daily weather conditions, as reported by the on-site weather station, were partly cloudy conditions, a daily minimum and maximum temperature of 43 and 65 °F with wind out of the north at 18 mph.

The average mass leak rate of methylene chloride measured at this leak location was 0.350 g/hr. This value is below the lowest ethylene method detection limit measured with the FLIR GasFindIRTM MW camera during the laboratory phase of this verification test.

Leak Location 10. A leak was identified originating from a 6-inch pressure relief valve in service with a process stream containing 1,2,3-trichloropropane, 2,3-dichloropropanol, 2-methyl-2-pentenal, 1-chloro-2,3-epoxypropane, and propylene dichloride. Screening of the component

with the TVA caused an over range reading (estimated as > 100,000 ppmv). The leak was viewed with the FLIR GasFindIR TM MW camera at a stand-off distance of 10 ft; the leak could not be detected at this distance. The site was an exterior location (on top of a storage tank platform) and weather conditions were qualitatively noted as overcast, breezy, and cold. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for propylene dichloride concentration. Daily weather conditions, as reported by the on-site weather station, were partly cloudy conditions, a daily minimum and maximum temperature of 41 and 50 °F with wind out of the north at 5 mph.

6.3 Confounding Factors

The method detection limits generated during laboratory testing presented in Table 8 through Table 11 were inspected to identify general trends that the confounding factors of stand-off distance, wind speed, and background materials impart on the method detection limits for the gaseous chemical species leaks observed using the FLIR GasFindIRTM MW camera. In addition, the effect of lens size was also inspected. The following general trends were noted when using the FLIR GasFindIRTM MW camera.

- Stand-off Distance Method detection limits generally increased as the viewing distance increased
- Wind Speed Method detection limits generally increased with increased wind speed
- Background Materials—Method detection limits were generally lower when viewed against the cement board background. Two exceptions to this observation were noted when viewing ethylene. The first occurred when viewing the leak at a 10 ft distance at a 5-mph wind speed with the standard 25-mm lens. The second occurred when viewing the leak at a 30 ft distance at a 2.5-mph wind speed with the optional 100-mm lens.
- Camera Lens Method detection limits generally decreased with an increase in camera lens size

During field testing, confounding factors were recorded either quantitatively or qualitatively and are reported in Table 14 and Table 15. A rigid analysis of the influence of confounding factors was not undertaken using field testing data, however, it is generally noted that because the cameras detected only a few of the chemical leaks in the field, the confounding factors of wind speed, stand-off distance, and background materials affected the detection capability of the cameras.

6.4 Operational Factors

The FLIR GasFindIRTM MW camera was found to be easily set up in a small, two ft by two ft area and deployed within approximately 10 minutes for portable gas leak observations. In terms of field portability, the camera was light in weight (approximately 4.6 pounds with battery and camera), easily carried by one person and was provided with a rugged shipping case for transportation.

The FLIR GasFindIRTM MW camera may be powered with either an AC adaptor for stationary applications or with a six volt, 4200 milliampere-hour nickel-metal hydride battery for mobile field observations. The battery for the camera was used and held its charge when performing

visual screening of leaking components. The FLIR GasFindIRTM MW camera comes equipped with a standard 25-mm camera lens; optional 50-mm and 100-mm lenses may be purchased separately for use with the camera. The camera observer sees the infrared image through a standard eyepiece when using both the FLIR GasFindIRTM MW camera; these images are also recordable to any off-the-shelf video recorder for image storage.

Ease of use was not investigated with a newly trained operator, as the vendor operated the FLIR GasFindIRTM MW camera during both laboratory and field testing. Verification test team members, however, did observe that both cameras were operated by the camera operator with relative ease. The FLIR GasFindIRTM MW camera is not intrinsically safe, and cannot be used in explosive atmospheres or environments.

During this verification test, all chemical leaks were required to be observed by the camera operator and two additional confirming individuals to be considered as "detected" by the camera. During verification testing, there were instances where either one or two of the three observers (not the required three) were able to observe the chemical leak. This indicates that the ability of the operator using the camera to positively identify the chemical leak may have an influence on the operation of the camera.

The cost of the FLIR GasFindIRTM MW camera is \$64,950. The base price of the camera includes an intelligent battery charger and three lithium ion batteries, an alternating current power supply, a video cable, a personal video recorder and battery, audio/video cable for the personal video recorder, camera neck strap, shipping/carrying case, and operating manual.

The cost of optional 50 and 100-millimeter lenses for the FLIR GasFindIRTM MW camera are \$7,500 and \$9,950, respectively.

Chapter 7 Performance Summary

Method Detection Limits. Method detection limits were determined during the laboratory testing. Table 15 summarizes the minimum and maximum method detection limit obtained during laboratory testing using the FLIR GasFindIRTM MW camera. Specific details, including the test conditions at which these method detection limits were obtained and the lens size used, are provided in Table 8 through Table 11 in Chapter 6. The overall detection limit variations for each chemical obtained using each camera are presented in Table 12 in Chapter 6.

Detection of Chemical Gas Species Relative to a Portable Monitoring Device. The ability of the FLIR GasFindIRTM MW camera to detect a gaseous leak of a chemical relative to a portable monitoring device acceptable under U.S. EPA Method 21 was assessed during both laboratory and field testing. During laboratory testing, after the method detection limit had been reached for a particular chemical under the specified test conditions, the leak was sampled by the portable monitoring device. Table 15 presents the percent agreement between the ability of the FLIR GasFindIRTM MW camera and of a portable monitoring device acceptable under U.S. EPA Method 21 to detect a chemical gas leak under the conditions tested in the laboratory.

During field testing a portable monitoring device acceptable under U.S. EPA Method 21 was used to screen each leaking component as part of the bagging reference method used. Table 16 reports the responses of the portable screening device when screening leaking components, identifies whether the FLIR GasFindIRTM MW camera was able to detect the chemical leak from the leaking component, and reports the chemical-specific mass rate of emissions from the leaking component as obtained through the bagging method.

Confounding Factors. Stand-off distance, wind speed, and background materials generally impacted the performance of the FLIR GasFindIRTM MW camera (e.g., increasing the stand-off distance from the leak increased the method detection limits). Changing to an optional magnifying camera lens that can be purchased separately lowered the method detection limit. Details of the effects of confounding factors may be found in Section 6.3.

Table 15. Summary of FLIR GasFindIRTM MW Camera Method Detection Limits^(a) and Percent Agreement with a Method 21 Monitoring Device During Laboratory Testing

	Method Detection Limit (g/hr)		Agreement with Method 21 Monitoring Device		
	3.61			D	
Compound	Minimum	Maximum	Performed	Percent Agreement	
1,3-butadiene	1.3	2.7	4	100%	
Acetic acid	≤ 0.02	$\leq 4.6^{(b), (c)}$	11	100%	
Acrylic acid	0.92	1.2	4	100%	
Benzene	0.35	35 ^(c)	12	100%	
Methylene chloride	4.9	> 70 ^(c)	No data ^(d)		
Ethylene	0.35	278 ^(c)	8	100%	
Methanol	0.28	22 ^(c)	No data ^(d)		
Pentane	≤ 0.28	28 ^(c)	16	100%	
Propane	≤ 0.44	13 ^(c)	No	o data ^(d)	
Styrene	0.35	0.70	3	100%	

- (a) Minimum and maximum method detection limits shown were measured at a 0-mph wind speed unless otherwise noted.
- (b) Measured at a 2.5-mph wind speed.
- (c) Measured at a 5-mph wind speed.
- (d) Percent agreement was not evaluated for methylene chloride, methanol, and propane because these compounds have an ionization potential greater than the energy which could be supplied by the Industrial Scientific IBRID MX6 with PID sensor.

Operational Factors. The FLIR GasFindIRTM MW camera was found to be easily setup and ready to deploy in 10 minutes. The camera is light (4.6 pounds or less) and operated on batteries when performing visual screening of leaking components. The camera may also utilize optional lenses that can be used to further magnify the images. Because the camera was operated by FLIR and there were some disagreements on detections with the two other confirming individuals, the ability of the operator may influence the operation of the camera. The FLIR GasFindIRTM MW camera is not intrinsically safe, and cannot be used in explosive atmospheres or environments.

The cost of the FLIR GasFindIRTM MW camera is \$64,950 and includes an intelligent battery charger and three lithium ion batteries, an alternating current power supply, a video cable, a personal video recorder and battery, audio/video cable for the personal video recorder, camera neck strap, shipping/carrying case, and operating manual.

The cost of optional 50 and 100-millimeter lenses for the FLIR GasFindIRTM MW camera are \$7,500 and \$9,950, respectively.

Table 16. Summary of Field Testing Results Using the FLIR GasFindIR $^{\mathrm{TM}}$ MW Camera

Leak Location	Leaking Component Type	Wind Speed (mph)	Stand-off Distance (ft)	M21 Device Screening Conc. (ppmv)	Leak Detected by Camera?	Bagging Results: Average Leak Rate (g/hr)
1	3-inch Plug	8	12	>100,000	Yes	8.79 (methane) 4.31 (ethylene)
2	1/4-inch Tube	21	10 30	20,500	No No	0.951 (ethylene)
3	½-inch Connector	21	10 30 45	>100,000	Yes Yes Yes	2.32 x 10 ⁻³ (ethylene) 7.78 (methane)
5	6-inch Block Valve	21	10	>100,000	No	5.24 x 10 ⁻² (ethylene) 8.68 x 10 ⁻³ (styrene) 0.077 (benzene)
6	8-inch Block Valve	21	10	20,500	No	3.44 ^(a) (benzene)
7	Control Valve Flange	18	10	17,500	No	1.95 x 10 ⁻³ (ethylene) 0.282 (benzene)
8	2-inch Block Valve	18	10	8,000 ^(b)	No	1.92 ^(b) (1,3-butadiene)
9	1-inch Valve Plug	18	10	835	No	0.350 (methylene chloride)
10	6-inch Pressure Relief Valve	5	10	>100,000	No	6.78 (propylene dichloride)

⁽a) As reported in Table 5, the pre- and post-bagging leak concentrations, as measured by the TVA, differed by 24.4%. This exceeds the minimum acceptance criterion of 20% for the DQI for the confirmation of detected leaks. Thus, this data is considered suspect and reported with this data qualifier.

⁽b) As reported in Table 4, the calibration check response for the TVA, conducted after screening this component, resulted in a 24% difference. This exceeded the minimum acceptance criterion of 10% for the DQI for the bias and accuracy of sample screening measurements using a portable monitoring device. After recalibration of the TVA, the leak concentration from this component was not reconfirmed with the TVA. Thus, this data is considered suspect and reported with this data qualifier.

Chapter 8 References

- 1. *Test/QA Plan for Verification of Leak Detection and Repair Technologies*, Battelle, Columbus, Ohio, September 18, 2008.
- Quality Management Plan for the ETV Advanced Monitoring Systems Center, Version 7.0, U.S. EPA Environmental Technology Verification Program, Battelle, Columbus, Ohio, November, 2008
- 3. *EPA Method 21- Detection of Volatile Organic Compound Leaks*, EPA-600/2-18-110; U.S. EPA, September 1981.
- 4. Panek, J., P. Drayton, and D. Fashimpaur. Controlled Laboratory Sensitivity and Performance Evaluation of Optical Leak Imaging Infrared Cameras for Identifying Alkane, Alkene, and Aromatic Compounds, Proceedings of the 99th Annual Conference and Exposition of the Air and Waste Management Association, New Orleans, June 20 – 23, 2006, Manuscript number 06-A-159-AWMA, Curran Associates, Inc., Red Hook, New York, March 2007.
- 5. *EPA Protocol for Equipment Leak Emissions Estimates*, EPA-453/R-95-017; U.S. EPA: Research Triangle Park, NC, November 1995.
- 6. EPA Method 18 Measurement of Gaseous Organic Compound Emissions by Gas Chromatography, 40 CFR, Part 60, Appendix A; April, 1994.
- 7. EPA Method 205 Verification of Gas Dilution Systems for Field Instrument Calibrations, 40 CFR, Part 51, Appendix M, September, 1996.

Appendix A FLIR GasFindIR TM LW Camera Results

A FLIR GasFindIRTM LW camera underwent a limited amount of testing during both the laboratory and field testing phases of this verification test. The FLIR GasFindIRTM LW camera was not evaluated against the entire suite of chemicals used in the laboratory portion of this verification testing; rather the vendor used the FLIR GasFindIRTM LW camera for 1,3-butadiene, acetic acid, and acrylic acid because these compounds have an absorption peak within the 10 – 11 micrometer operating wavelength of the FLIR GasFindIRTM LW camera. The camera was evaluated in the field for all chemical gas leaks identified, regardless of whether the gas leak contained compounds with an absorption peak within the 10 – 11 micrometer operating wavelength of the FLIR GasFindIRTM LW camera, on only those days that the camera was available to the verification test team during field testing.

A.1 Method Detection Limit

The method detection limit for 1,3-butadiene, acetic acid, and acrylic acid was determined according to the procedures discussed in Section 3.2.2. Tables A1 through A4 present the method detection limits of each these compounds determined during laboratory testing. Tables A1 through A4 identify each test condition evaluated (i.e., stand-off distance, background material, and wind speed), the temperatures of the laboratory and of the chemical leak, the response of the portable monitoring device acceptable under U.S. EPA Method 21, and the method detection limits for each test condition. Table A5 summarizes the range of method detection limits in units of gram per hour (g/hr) found during the laboratory testing as well as presents the overall detection limit variation for each compound. The overall detection limit variation presented in Table A5 was calculated using Equation 1 in Chapter 5.

Table A1. FLIR GasFindIR $^{\rm TM}$ LW Method Detection Limits at 10 Feet Stand-off Distance with a Cement Board Background

Compound	Wind Speed (mph) ^(a)	Ambient Temp. (°F)	Leak Temp. (°F)	M21 Device Conc. (ppmv)	Method Detection Limit (g/hr)
1,3-butadiene	0	70.1	71.2	≥ 2,000	2.7
	0	72.7	82.1	4.0	0.02
Acetic acid	2.5	75.1	85.5	526	$ \leq 4.6^{\text{(b)}} $ $ \leq 4.6^{\text{(b)}} $
	5	75.0	80.4	32	\leq 4.6 ^(b)
Acrylic acid	0	71.2	84.8	4.9	0.92

- (a) The leak was viewed using the camera's standard lens (50-mm) at these conditions unless otherwise noted.
- (b) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

Table A2. FLIR GasFindIRTM LW Method Detection Limits at 30 Feet Stand-off Distance with a Cement Board Background

Compound	Wind Speed (mph) ^(a)	Ambient Temp. (°F)	Leak Temp. (°F)	M21 Device Conc. (ppmv)	Method Detection Limit (g/hr)
1,3-butadiene	0	71.7	72.1	≥ 2,000	13
	0	70.8	88.7	1.8	0.02
Acetic acid	2.5	74.8	85.5	7.8	\leq 4.6 ^(b)
	5	74.9	80.5	17	14
Acrylic acid	0	71.7	92.0	0.8	0.92

⁽a) The leak was viewed using the camera's standard lens (50-mm) at these conditions unless otherwise noted.

Table A3. FLIR GasFindIR $^{\rm TM}$ LW Method Detection Limits at 10 Feet Stand-off with a Curved Metal Gas Cylinder Background

Compound	Wind Speed (mph) ^(a)	Ambient Temp. (°F)	Leak Temp. (°F)	M21 Device Conc. (ppmv)	Method Detection Limit (g/hr)
1,3-butadiene	0	70.2	71.0	≥ 2,000	3.4
	0	72.8	80.6	2.9	0.02
Acetic acid	2.5	74.8	85.7	1.3	$\leq 4.6^{(b)}$
	5	74.8	78.7	29	$\leq 4.6^{(b)}$
Acrylic acid	0	71.4	97.7	1.2	$\leq 0.46^{(b)}$

⁽a) The leak was viewed using the camera's standard lens (50-mm) at these conditions unless otherwise noted.

 $\begin{tabular}{ll} Table A4. & FLIR GasFindIR$^{TM} LW Method Detection Limits at 30 Feet Stand-off Distance with a Curved Metal Gas Cylinder Background \\ \end{tabular}$

Compound	Wind Speed (mph) ^(a)	Ambient Temp. (°F)	Leak Temp. (°F)	M21 Device Conc. (ppmv)	Method Detection Limit (g/hr)
1,3-butadiene	0	71.0	71.9	≥ 2,000	13
	0	71.0	83.6	2.2	0.02
Acetic acid	2.5	74.7	88.0	161	\leq 4.6 ^(b)
	5	74.7	77.9	28	18
Acrylic acid	0	70.7	80.2	1.2	0.92

⁽a) The leak was viewed using the camera's standard lens (50-mm) at these conditions unless otherwise noted.

Table A5. FLIR GasFindIRTM LW Range of Method Detection Limits and Overall Method Detection Limit Variation (g/hr)^(a)

Compound	Minimum	Maximum	Overall Variation ^(b)
1,3-butadiene	2.7	13	
Acetic acid	0.02	18 ^(D)	5.7
Acrylic acid	≤ 0.46	0.92	

⁽a) Minimum and maximum values shown were measured at a 0-mph wind speed unless otherwise noted.

⁽b) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

⁽b) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

⁽b) Leak observable at the lowest reliable flow rate capable of being supplied by the chemical delivery system.

⁽b) When sample sizes are small (N < 10), standard deviations provide a biased estimate of the variability, therefore only the range is provided when there were fewer than 10 method detection limits were determined.

A.2 Detection Agreement to a Portable Monitoring Device

The detection of a single chemical gas leak in either the laboratory or field environments was determined by the operator as well as two confirming individuals as discussed in Section 3.2.1. The leak rate was known from certified gas cylinders and calibrated flow meters in the laboratory, or was determined through the bagging method during field testing. During both the laboratory and field tests, a portable monitoring device acceptable under U.S. EPA Method 21 was used to sample the leaks. The following sections present results on the ability of the FLIR GasFindIRTM LW camera to detect a chemical gas species relative to a portable monitoring device acceptable under U.S. EPA Method 21.

A.2.1 Laboratory Testing

Table A6 presents the percent agreement between the ability of the FLIR GasFindIRTM LW camera and of a portable monitoring device acceptable under U.S. EPA Method 21 to detect a chemical gas leak under the conditions tested. Percent agreement was calculated according to Equation 2 in Chapter 5. The calculation of percent agreement excludes those laboratory test conditions for which a response was not collected using a portable monitoring device acceptable under U.S. EPA Method 21.

Table A6. Summary of Detection Agreement Between FLIR GasFindIRTM LW Camera and a Method 21 Portable Monitoring Device

Compound	No. of Tests in which Agreed	Total No. of Tests Completed	Percent Agreement
1,3-Butadiene	4	4	100%
Acetic acid	12	12	100%
Acrylic acid	4	4	100%

A.2.2 Field Testing

During field testing, three leaking components were viewed using the FLIR GasFindIRTM LW camera using the procedures described in Section 3.2.1. Table A7 identifies whether each chemical species gas leak was observed by the FLIR GasFindIRTM LW camera and the concentration of the leak as determined by a portable monitoring device acceptable under U.S. EPA Method 21. In addition, these tables identify the type of component that was leaking, the average chemical-specific mass leak rate from the component as determined by reference sampling, the distance the leak was observed and the wind speed. Daily meteorological conditions were obtained from Dow's on-site weather station. Although the wind speed and daily maximum and minimum temperatures were obtained from this meteorological tower, the actual wind speed and ambient and background temperatures at each leak location at the time of observation are unknown. Additional discussions describing each leak location are provided in the following sections.

Leak Location 2. A leak was identified originating from a ¹/₄-inch tube in service with a process stream containing ethane and ethylene. Screening of the component with the TVA resulted in a concentration reading of 20,500 ppmv. The leak was viewed with the FLIR GasFindIRTM LW camera at stand-off distances of 10 and 30 ft with the sun to the left of the observer. The camera did not detect the leak at either stand-off distance. Wind direction at the location was noted as originating from behind the observer and the site was shaded by piping and other equipment. The leak was bagged and a duplicate reference sample was collected into two

Leak Location	Leaking Component Type	Wind Speed (mph)	Stand-off Distance (ft)	M21 Device Screening Conc. (ppmv)	Leak Detected by Camera?	Bagging Results: Average Leak Rate (g/hr)
2	¹ / ₄ -inch Tube	21	10 30	20,500	No No	0.951 (ethylene)
3	½-inch Connector	21	10 30 45	>100,000	Yes Yes Yes	2.32 x 10 ⁻³ (ethylene) 7.78 (methane)
5	6-inch Block Valve	21	10	>100,000	No	5.24 x 10 ⁻² (ethylene) 8.68 x 10 ⁻³ (styrene)

Table A7. Summary of Field Testing Results Using the FLIR GasFindIRTM LW Camera

evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for ethylene concentration. Daily weather conditions, as reported by the on-site weather station, were clear conditions, a daily minimum and maximum temperature of 42 and 70 °F with wind out of the south southeast at 21 mph.

Leak Location 3. A leak was identified originating from a ½-inch connector in service with a process stream containing acetylene, ethane, ethylene, methane, propane, and propylene. Screening of the component with the TVA caused an over range reading (estimated as > 100,000 ppmv). The leak was viewed with the FLIR GasFindIRTM LW camera at stand-off distances of 10, 30, and 45 ft with the sun to the right of the observer. The FLIR GasFindIRTM LW camera detected the leak at each of the three stand-off distances. Wind direction at the location was noted as originating from the right of the observer and the site was shaded by piping and other equipment. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for ethylene and methane concentrations. Daily weather conditions, as reported by the on-site weather station, were clear conditions, a daily minimum and maximum temperature of 42 and 70 °F with wind out of the south southeast at 21 mph.

Leak Location 5. A leak was identified originating from a 6-inch block valve in service with a process stream containing benzene, ethane, ethylene, ethylbenzene, styrene, and toluene. Screening of the component with the TVA caused an over range reading (estimated as > 100,000 ppmv). The leak was viewed with the FLIR GasFindIRTM LW camera at a stand-off distance of 10 ft; the leak could not be detected at this distance. The site was shaded and the viewing background was concrete. The leak was bagged and a duplicate reference sample was collected into two evacuated SUMMA canisters. The SUMMA canisters were shipped to the off-site GC laboratory and analyzed for benzene, ethylene, and styrene concentrations. Daily weather conditions, as reported by the on-site weather station, were clear conditions, a daily minimum and maximum temperature of 48 and 79 °F with wind out of the north at 21 mph.

A.3 Confounding Factors

The method detection limits generated during laboratory testing presented in Table A1 through Table A4 were inspected to identify general trends that the confounding factors of stand-off distance, wind speed, and background materials impart on the method detection limits for the

gaseous chemical species leaks observed using the FLIR GasFindIRTM LW camera. The following general trends were noted when using the FLIR GasFindIRTM LW camera.

- Stand-off Distance Method detection limits generally increased as the viewing distance increased;
- Wind Speed Method detection limits generally increased with increased wind speed;
- Background Materials Method detection limits were generally lower when viewed against the cement board background. An exception to this observation was noted when viewing acrylic acid at a 10 ft distance at a 0-mph wind speed with the standard 50-mm lens.

A.4 Operational Factors

The FLIR GasFindIRTM LW camera was found to be easily setup in a small, two ft by two ft area and deployed within approximately 10 minutes for portable gas leak observations. In terms of field portability, the camera was light in weight (approximately six pounds with battery and camera), easily carried by one person and was provided with a rugged shipping case for transportation.

The FLIR GasFindIRTM LW cameras may be powered with either an AC adaptor for stationary applications or with a six volt, 4200 milliampere-hour nickel-metal hydride battery for mobile field observations. The battery for each camera was used and held its charge through the whole of each testing day. The FLIR GasFindIRTM LW camera comes equipped with a standard 50-mm camera lens. The camera observer sees the infrared image through a standard eyepiece when using both the FLIR GasFindIRTM LW cameras; these images are also recordable to any off-the-shelf video recorder for image storage.

Ease of use was not investigated with a newly trained operator, as the vendor operated both the FLIR GasFindIRTM LW cameras during the both laboratory and field testing. Verification test team members, however, did observe that the camera was operated by the camera operator with relative ease. The FLIR GasFindIRTM LW camera is not intrinsically safe, and cannot be used in explosive atmospheres or environments.

During this verification test, all chemical leaks were required to be observed by the camera operator and two additional confirming individuals to be considered as "detected" by the camera. During verification testing, there were instances where either one or two of the three observers (not the required three) were able to observe the chemical leak. This indicates that the ability of the operator using the camera to positively identify the chemical leak may have an influence on the operation of the camera.

The cost of the FLIR GasFindIRTM LW camera is \$80,000. The base price of the camera includes an intelligent battery charger and three lithium ion batteries, an alternating current power supply, a video cable, a personal video recorder and battery, audio/video cable for the personal video recorder, camera neck strap, shipping/carrying case, and operating manual.



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June 15, 2020

Illinois EPA Attn: Jeff Guy, Hearing Officer P.O. Box 19276 1021 North Grand Avenue Springfield, IL 627-94-9276

Submitted Via Email To: epa.publichearingcom@illinois.gov

jeff.guy@illinois.gov

Re: Public Comments on the Draft Permit for General III, LLC, 11600 S. Burley, Chicago, IL 60617, Application No. 19090021, I.D. No. 031600SFX

To The Hearing Officer:

Please be advised that I represent the Southeast Environmental Task Force ("SETF"). SETF is an environmental education and advocacy organization based on Chicago's southeast side. SETF's members include individuals who live, work and recreate on the southeast side. SETF's mission is to ensure a healthy and safe environment for its residents, to preserve regional ecological resources and to achieve a sustainable economy that enhances local communities.

SETF's comments are supported by the Natural Resources Defense Council ("NRDC") and its thousands of members and activists in the City of Chicago, including those who reside on Chicago's southeast side.² These comments are also supported by the Chicago South East Side Coalition to Ban Petcoke³, a community-based organization that is dedicated to the health, safety and welfare of the people who live, work and recreate in the Calumet region. Because of the scope of their public comments, it wasn't possible for these aligned organizations to coordinate fully on a single set of comments. Consequently, additional comments that are also supported by SETF will also be submitted by these organizations focusing on other aspects of the proposed rules.

SETF's comments are divided into two sections. In its first set of comments, SETF asserts the draft permit fails to meet critical legal requirements that are designed to protect public health, safety and welfare. Neither the permit process nor the draft permit achieves environmental justice mandates imposed by federal and state law and Illinois EPA's own environmental justice

¹ <u>http://setaskforce.org/</u>

² https://www.nrdc.org/

³https://www.facebook.com/SSCBP60617/

commitments. SETF's second set of comments assert additional permit measures are needed to address the air pollution impacts of fugitive releases of auto shredder residue, volatile organic emissions and odors.

For purposes of the record, I'm attaching and incorporating by reference several correspondences with Illinois EPA that SETF submitted regarding this permitting transaction:

- 1. An October 30, 2019 request for IL EPA to conduct its permitting activities in a manner consistent with its environmental justice commitments, including a request for a full opportunity for public participation and for an environmental justice analysis to ensure the permitting of this facility will not create a significant adverse and disproportionate impact on the adjacent environmental justice community.
- 2. Correspondences regarding the operating history of the existing General Iron facility, from which General III's business, operations and several pieces of equipment will be transferred. Page 50 is the City of Chicago's May 18, 2020 Emergency Closure Order following two separate explosions at the General Iron facility that also mandates:
 - "A review of the entire operations has to be conducted by the City of Chicago to ensure the appropriate safety measures are in place to prevent this from happening in the future."
- 3. A request for the public process regarding this permit be delayed until the Governor's and Mayor's Covid-19 restrictions on public gatherings are lifted.
- 4. A request for all adjacent and integrated business operations located at or near 11600 S. Burley, Chicago, IL to be regarded as a single source for purposes of permitting.

All of these correspondences are compiled and attached to these comments and labelled as SETF General III Draft Permit Comments Exhibit One.

<u>Comment</u> - Illinois EPA failed to conduct an environmental justice analysis as part of its permit review.

SETF made the following request at the opening bell of this permit transaction:

"Moreover, considering the characteristics of the immediately surrounding area, the NGO coalition is formally requesting IL EPA to conduct an environmental justice analysis as part of its permitting process.

There is a strong justification for an environmental justice analysis and for a full and complete opportunity for public participation. According to information derived from the demographic feature of U.S. EPA's ECHO database, there are 68,947 people living within a three-mile radius of General III's proposed facility. 49% of the people who live in that three-mile radius are Hispanic, and 30% are African American. The ECHO database also indicates that there are 26,624 households in this area as well as 19,051 minors younger than 18. Nearby residential communities include the East Side, South Deering and Hegewisch. The facility would operate immediately adjacent to the Calumet

River. In addition, the facility is less than one mile from Washington High School. This area scores above 90% in eleven categories assessed by U.S. EPA's EJ screening tool, including PM 2.5, diesel PM, NATA air toxics cancer risk, NATA respiratory hazard index, traffic proximity, lead paint indicator, superfund proximity, risk management plan proximity, hazardous waste proximity and wastewater discharge proximity."

The complete October 30, 2019 correspondence that includes this request is in SETF Exhibit One.

Notably, Illinois EPA characterized this permit transaction as triggering its environmental justice obligations when it distributed a public notice announcing the submission of a permit application by General III. In its public notice about the draft permit, Illinois EPA provided a link to its general environmental justice policies, but offers no description about how these environmental justice commitments affected its review of the permit application, its interactions with the permit applicant or its Draft Permit.

Neither the Notice of Comment Period, the Project Summary nor the Draft Permit make any reference to an environmental justice analysis. The Illinois EPA's Environmental Justice Officer did not testify at the virtual public hearing. Consequently, it's entirely unclear if and how Illinois EPA incorporated environmental justice into its permit review process. By contrast, like SETF, most public participants in the hearing specifically invoked environmental justice issues, including Mark Valez, Gina Ramirez, Meleah Geertsma, Andy Douglas, Olga Bautista, Charles Stark, Kijana Courtney, Juan Rojas, Alfredo Romo, Peggy Salazar, Jocelyn Rangel, James Kinney, Corrina Mendoza and Damon Watson. Consistent with the metrics presented in U.S. EPA's EJ screening tool, all of these individuals expressed concern about the significant, adverse and disproportionate harm that will result by permitting General III in an already overburdened, primarily minority community.

For example, East Side resident Mark Valez questioned the impacts of General III's operations and emissions on a nearby neighborhood park, Rowan Park, that includes outdoor baseball diamonds, playgrounds and a football field. Charles Stark is a teacher at nearby Washington High School who pointed out that the prevailing wind direction will transport General III's emissions to this nearby High School as well as Washington Elementary School and Rowan Park, where already overburdened populations of susceptible children will experience the cumulative impacts of this new source in combination with many other nearby polluting facilities. Jocelyn Rangel, a lifelong southeast side resident and locally employed registered nurse questioned the potential impacts of this facility on a local population that already experiences high asthma rates and prevalent co-morbidities.

IL EPA is prohibited from engaging in actions that have the effect of discriminating on the basis of race, color and national origin. Pursuant to Title VI of the Civil Rights Act of 1964, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity which, like Illinois EPA, receives federal financial assistance. The Illinois Civil Rights Act of 2003 (740 ILCS 23/5) similarly prohibits discrimination on the basis of "[R]ace, color, national origin, or gender". Section (a)(2) also prohibits using methods and policies that have disparate, discriminatory impacts on any of these protected classes.

At the opening bell of this permit transaction, SETF alerted Illinois EPA that its responsibilities in this case included conducting an environmental justice analysis to ensure that its permitting actions do not result in a significant, adverse and disproportionate harm on a predominantly Lantinx and African American community. In response, Illinois EPA's Public Notice, Project Summary, Draft Permit and public hearing comments are devoid of any evidence of any effort to address these issues. This months-long omission – which continued at the public hearing in the face of public testimony about the environmental injustices being perpetrated by Illinois EPA – fails to meet the requirements of federal and state law and Illinois EPA's own environmental justice policies. Moreover, this months-long omission cannot be remedied post-hoc; the public will not have the opportunity to review and comment on any analysis the Illinois EPA jerry rigs once the public comment period concludes.

In fact, Illinois EPA repeatedly exercised its discretion in ways that will result in a significant, adverse and disproportionate harm on the surrounding environmental justice community. At multiple decision points in this permitting process, IL EPA made discretionary choices that have a discriminatory effect on the environmental justice community near this facility. In the following comments, SETF identifies multiple discretionary choices made by Illinois EPA that are discriminatory and also fail to comply with clear legal mandates designed to protect the health, safety and welfare of Illinois residents.

Comment – Contrary to its own well-established permitting standards, Illinois EPA fails to incorporate several related, co-located facilities in its Draft Permit. Consequently, the Draft Permit is based on an incorrect source determination that does not include all of the pollutant-emitting activities that are part of a single source. General III and the other facilities co-located at 11600 S. Burley are a single source, but are being segmented into constituent operations for purposes of permitting. Illinois EPA's decision to allow this single source to be segmented for purposes of permitting is to the advantage of the permit applicant, but is contrary to the health, safety and welfare of the nearby environmental justice community. This is especially problematic because other related, co-located facilities that will operate with General III as a single source are being registered and/or permitted by Illinois EPA in contemporaneous but completely separate processes. Even more egregious, for these other facilities, these activities are necessary because Illinois EPA apparently completely neglected to require proper registration and/or permitting over many years.

IL EPA's standard permit language states that separate facilities can be considered a single stationary source if they:

- "a. belong to the same industrial grouping or operate as a support facility,
- b. are located on contiguous or adjacent properties, and,
- c. are under common ownership or common control.

Common control differs from common ownership in that there is an inherent limitation on a facility's ability to operate "but for" another facility providing its services."⁴

In the present case, the 11600 S. Burley facilities include Napuck Salvage, Reserve Marine Terminals, South Chicago Recycling, RSR Partners/Regency Technologies, General III LLC and, perhaps, Calumet Transload. Based on a review of Illinois EPA documents acquired using FOIA, it appears that Illinois EPA concludes that these facilities constitute a single source. Despite this, the agency appears to be conducting separate permitting activities which inappropriately segment a single source into its constituent operations.

Illinois EPA has not received a permit application or issued a Draft Permit that properly characterizes this entire source, its complete operations, its aggregate emissions, the full range of its emission controls, its source-wide protocols for testing and monitoring emissions, and its comprehensive recordkeeping and reporting protocols to verify compliance. In keeping with its history of neglect in ensuring compliance for the operations located at 11600 S. Burley, Illinois EPA only has a partial and incomplete picture of this single source, and consequently has an inadequate, incomplete basis to grant or deny any request for any constituent operation including General III. For this reason, Illinois EPA must deny any request by any current or proposed segmented facility that will, in fact, operate as part of a single source at 11600 S. Burley.

Illinois EPA's claim that the facilities can be integrated as part of a subsequently issued operating permit must be viewed of its failure to complete an operating permit for the predecessor General Iron facility – and indeed for many Illinois facilities – for years and decades. General Iron's operating permit application hasn't been acted on by Illinois EPA since it was submitted in 2005. Deferring the single source determination to an operating permit is an inadequate response to this comment.

<u>Comment</u> – Contrary to the Illinois Environmental Protection Act, Illinois EPA fails to take account of the compliance history of General Iron, which is transferring its business, operations and equipment to the 11600 S. Burley facility. Illinois EPA's decision is to the advantage of the permit applicant, but contrary to the health, safety and welfare of the nearby environmental justice community.

Illinois EPA's first authority pursuant to 415 ILCS 5/39(a) is this:

"In making its determinations on permit applications under this Section the Agency may consider prior adjudications of noncompliance with this Act by the applicant that involved a release of a contaminant into the environment."

Illinois EPA's second authority pursuant to 415 ILCS 5/39(a) is this:

⁴ On November 26, 2019, U.S. EPA issued a new guidance document regarding single source determination that clarified that adjacency, not functional relatedness, is the decisive factor is establishing a single source. While this doesn't change the analysis for the co-related, adjacent operations at 11600 S. Burley, this may necessitate a change in Illinois EPA's standard permit language.

"In granting permits, the Agency may impose reasonable conditions specifically related to the applicant's past compliance history with this Act as necessary to correct, detect, or prevent noncompliance."

Illinois EPA's third authority pursuant to 415 ILCS 5/39(a) is this:

"The Agency may impose such other conditions as may be necessary to accomplish the purposes of this Act, and as are not inconsistent with the regulations promulgated by the Board hereunder."

As an initial matter, SETF believes that Illinois EPA's lawyer fundamentally mischaracterized the law on this matter during the public hearing, misleading public participants and unfairly discouraging them from testifying on compliance matters relevant to the permit application. Illinois EPA's lawyer did not refer to the three constituent parts of 415 ILCS 5/39(a), but rather conflated them in a completely confusing and misleading fashion. The lawyer justified Illinois EPA's position by alluding to court decisions, but provided no reference to any specific case. The lawyer did not distinguish between cases that preceded the legislation described above by contrast to cases that interpret these specific provisions. In response to testimony that was clearly relevant under the second and third parts cited above, the lawyer incorrectly stated that Illinois EPA was precluded from considering this testimony. This is part of an overall pattern of Illinois EPA's misleading and unfair conduct in the public process that will be discussed later in these comments. Illinois EPA's interpretation of its authority of 415 ILCS 5/39(a) is problematic and its public statements are confusing and misleading; in the present case, this created an unfair public process.

The three authorities granted to Illinois EPA in 415 ILCS 5/39(a) are all at issue in the present matter. In terms of specifically adjudicated matters, neither the Draft Permit nor the Project Summary reference In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-19-113(a)-IL-08. In this case, U.S. EPA asserts that General III significantly underestimated its metal shredder's VOM emissions when the shredder, in fact, had a potential to emit more than 100 tons of VOM per year. Despite this, General Iron did not have any emission capture or control equipment to achieve an overall reduction of uncontrolled VOM emissions of at least 81 percent, nor did it have the appropriate operating permit that corresponded with its VOM emissions. U.S. EPA identified the magnitude of the VOM emissions through inspections using its FLIR camera and a Section 114 Information Request.

⁵ <u>In the Matter of General Iron Industries, Inc. Chicago, Illinois,</u> Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 4. Attached and also available at: https://www.epa.gov/sites/production/files/2018-07/documents/general-iron-industries-inc.nov-fov.pdf

⁶ <u>In the Matter of General Iron Industries, Inc. Chicago, Illinois,</u> Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 5. Attached and also available at: https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc._nov-fov.pdf

⁷ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 4. ("35. During the May 24 & 25, 2018 inspection, EPA observed and recorded hydrocarbons exiting the hammermill shredder with a FLIR infrared camera."). Attached and also available at: https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc._nov-fov.pdf

As part of an August 22, 2019 Administrative Consent Order, General Iron agreed to complete the installation of a regenerative thermal oxidizer (RTO) with a minimum VOM destruction efficiency of 98%. This is legally relevant to the present case because the RTO mandated by U.S. EPA's Administrative Consent Order is to be transferred to the proposed General III facility. This U.S. EPA-mandated RTO is the very piece of pollution control equipment that exploded at the General Iron facility a few days after the public hearing. By not incorporating U.S. EPA's August 22, 2019 Administrative Consent Order, Illinois EPA is improperly ignoring an adjudication and creating perilous conditions for an environmental justice community.

Illinois EPA's second authority pursuant to 415 ILCS 5/39(a) - "In granting permits, the Agency may impose reasonable conditions specifically related to the applicant's past compliance history with this Act as necessary to correct, detect, or prevent noncompliance" – is also directly relevant to the present case. An adjudication is only one way that relevant information related to compliance can be presented to Illinois EPA. Another way is information derived by partner agencies, for example, the City of Chicago. NRDC will be submitting extensive information about multiple enforcement initiatives currently underway on the city level. NRDC's analysis doesn't need to be repeated in SETF's comments apart from a specific example that was presented to the Illinois EPA during its permit deliberations. In this example, a city inspector completed a written report based on a firsthand inspection of the General Iron facility (something Illinois EPA rarely if ever did). In presenting this December, 2019 inspection report, I will highlight all of the inspector's observations that are directly relevant to the subject of compliance with the Illinois Environmental Protection Act, <u>especially because General Iron's pollution control equipment will be transferred to the proposed General III facility</u>:

"CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL RESPONDED TO A CITIZEN'S COMPLAINT REGARDING ODORS AND AN EXPLOSION HEARD IN THE MORNING COMING FROM THE FACILITY AT 1909 N CLIFTON AVE, GENERAL IRON INDUSTRIES (GII, LLC). GII LLC OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC1063430) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING GII, LLC ON FEBRUARY 10, 2020, ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: HOME DEPOT (1232 W NORTH AVE) PARKING LOT, INTERSECTION OF THROOP ST WABANSIA AVE, AND INTERSECTION OF THROOP ST WABANSIA AVE. IT IS A PUNGENT ODOR OF SWEET METAL THAT BURNS MY NOSTRILS. I ALSO OBSERVED AN ODOR OF BURNING MATERIAL. THE SAME ODORS OF SWEET METAL WERE ALSO OBSERVED ONSITE.UNTREATED EMISSIONS WERE OBSERVED ESCAPING THE TOP AND THE SIDES OF THE SHREDDER, I ALSO OBSERVED SMOKE LEAVING THE SHREDDER AND TRAVELING THROUGH THE PROPERTY ACROSS FROM THE NORTH BRANCH CHICAGO RIVER. THE SHREDDER IS NOT AN ENCLOSED PIECE OF EQUIPMENT. IT DOES CONTAIN A HOOD TO CAPTURE THE EMISSIONS AND PROCESS THEM THROUGH A REGENERATIVE THERMAL OXIDIZER (RTO) AND A WET SCRUBBER TO REMOVE VOLATILE ORGANIC COMPOUNDS (VOCS), HAZARDOUS AIR POLLUTANTS (HAPS), AND OTHER AIRBORNE SOLVENTS. BEING ABLE TO OBSERVE EMISSIONS ESCAPING THE SHREDDER LEADS ME TO BELIEVE THAT THE EQUIPMENT CAPTURING THE EMISSIONS IS INSUFFICIENT. CONSEQUENTLY, THIS DOES NOT ALLOW THE RECENTLY

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⁸ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-19-133(a)-IL-08, U.S. EPA Region 5, August 22, 2019 at 7. Attached and also available at: https://www.epa.gov/sites/production/files/2019-08/documents/general iron industries inc aco.pdf

INSTALLED AIR POLLUTION CONTROL EQUIPMENT TO PROCESS THE EMISSIONS SINCE THEY ARE ESCAPING AT THE SHREDDER BEFORE THE TREATMENT PROCESS.AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED ON THE PROPERTY DIRECTLY SOUTHWEST AND ACROSS THE NORTH BRANCH CHICAGO RIVER. AUTO FLUFF IS A PRODUCT OF SHREDDING OPERATIONS AND IT CONSIST OF FINE PARTICLES OF GLASS, FIBERS, RUBBER, METAL, PLASTIC, DIRT, AND AUTOMOTIVE FLUIDS. FUGITIVE DUST WAS ALSO OBSERVED ONSITE WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS TO AND FROM TRUCK TRAILERS. MISTING CANNONS WERE OBSERVED TO NOT BE IN OPERATION TO CONTROL AIRBORNE PARTICLES AT THE TIME OF THE INSPECTION. OBSERVING AUTO FLUFF IN THE OUTSIDE OF GII, LLC?S PROPERTY AND FUGITIVE DUST WITHOUT OPERATING MISTING CANNONS LEADS ME TO BELIEVE THAT REASONABLE MEASUREMENTS WERE NOT AND ARE NOT BEING TAKEN TO ENSURE DUST, DEBRIS, AND DIRT WON?T MIGRATE OFF SITE AND INTO THE PUBLIC WAY,I SPOKE TO JIM AND HE INFORMED ME THAT THERE WAS AN EXPLOSION IN THE SHREDDER DURING THE MORNING HOURS BETWEEN 7:30AM ? 7:40AM. HE SAID THIS IS A COMMON OCCURRENCE.A NOV CITATION #E0000***** WAS ISSUED FOR AIR POLLUTION PROHIBITED (11-4-730) AND HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]). A NOV CITATION #E0000**** WAS ISSUED FOR VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 46 WHICH REQUIRES THE PERMITTEE TO CONTROL AND SUPPRESS DUST AND OTHER MATERIALS TO PREVENT OFF-SITE MIGRATION AND NUISANCE IN CONNECTION WITH BUSINESS (7-28-080). THE HEARING DATE FOR THE CITATIONS WILL BE ON APRIL 30, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO GENERAL IRON INDUSTRIES (GII, LLC) AGENT LISTED ON THE ILLINOIS SECRETARY OF STATE CORPORATION FILE DETAIL REPORT. THE AGENTS NAME AND ADDRESS ILLINOIS CORPORATION SERVICE C AT 801 ADLAI STEVENSON DRIVE, SPRINGFIELD, IL 62703."

This information is directly relevant to the applicant's past compliance history with this Act as necessary to correct, detect, or prevent noncompliance, particularly since the pollution control equipment from this facility will be transferred to the General III facility. Illinois EPA's categorical refusal to consider this evidence is contrary to its authority pursuant to 415 ILCS 5/39(a) and will create perilous conditions for the nearby environmental justice community.

Illinois EPA's third authority pursuant to 415 ILCS 5/39(a) - "[T]he Agency may impose such other conditions as may be necessary to accomplish the purposes of this Act, and as are not inconsistent with the regulations promulgated by the Board hereunder" – is also directly relevant to the present case. The plain language of this provision stands in stark contrast to another fundamentally misleading statement made by an Illinois EPA representative at the public hearing, whose testimony was subsequently introduced into the permit repository in written form. By contrast to the cited authority granted in 415 ILCS 5/39(a), he stated:

"In its review of an application, the Illinois EPA has no choice legally but to issue a construction permit to a source if the source will be in compliance with all state and federal air pollution control regulations."

Illinois EPA is not at liberty to ignore the authorities and responsibilities provided by the legislature, and it is not at liberty to misstate the plain language of the Illinois Environmental Protection Act. In permitting, Illinois EPA is expressly authorized to impose conditions that 1.

are necessary to accomplish the purposes of the Act, and, 2. are not inconsistent with the regulations. Illinois EPA can impose conditions that go beyond the regulations if they are "not inconsistent" with the regulations and accomplish the purposes of the Act. Again, Illinois EPA's interpretation of its authority of 415 ILCS 5/39(a) is problematic and its public statements are confusing and misleading; in the present case, this created an unfair public process.

As a practical matter, critical measures beyond technical regulatory compliance are authorized by law and are essential to health, safety and welfare of the environmental justice community. For example, 415 ILCS §5/9(a) states:

No person shall: (a) Cause of threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, so as to violate regulations or standards adopted by the Board under this Act.

This same provision is repeated in 35 Illinois Administrative Code 201.102, approved as part of the federally enforceable SIP for the State of Illinois on May 31, 1972. 37 Fed. Reg. 10842. This SIP approval also included 35 Illinois Administrative Code 201.101, which defines air pollution as "...the presence in the atmosphere of one or more air contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant or animal life, to health, or to property, or to unreasonable interfere with the enjoyment of life or property."

Public testimony and written comments that address air pollution that is injurious to human, plant or animal life, to health, or to property, or which unreasonably interferes with life or property is legally relevant to this permitting. This is especially true because the same pollution control equipment used by General Iron will be transferred to the proposed facility. If these issues are raised – as they have been repeatedly in the present case - mere assurances of technical compliance are not adequate. To this point, Laura Compton, a resident who lives near the current General Iron facility testified about years of poor performance, serial violations and specific health impacts (burning eyes) she experienced as a result of that facility's operations. Jordan Diaz, another resident living near General Iron, testified about negative health consequences and a history of violations, prompting the Illinois EPA attorney to immediately intervene to discount this testimony. Another General Iron neighbor, Brian Kavanaugh, testified that there were severe impacts from its current operations that have no place in the city or anywhere else because of negative effects on its neighbors.

Illinois EPA will be tempted to respond to this comment by asserting these are enforcement not permitting matters. If so, SETF requests Illinois EPA to include the record of its enforcement activities at the General Iron facility, the record of its enforcement referrals to the Attorney General for this facility as well as any operating permit it issued anytime over the past 15 years. It is hypocritical for Illinois EPA to fail to fulfill fundamental enforcement and permitting responsibilities and then rely on these failures to justify agency inaction in the present case. Using Illinois EPA's past omissions to justify present inaction is a vicious cycle and evidence of a failed Agency, unfortunately at the expense of the health, safety and welfare of Illinois residents.

<u>Comment</u> – Illinois EPA is ignoring the catastrophic failure of the pollution control equipment that will be transferred from General Iron to General III. Illinois EPA's decision is to the advantage of the permit applicant, but contrary to the health, safety and welfare of the nearby environmental justice community.

During the recent General III public hearing, IL EPA indicated that the equipment employed by General Iron would be moved to the proposed General III facility, including the RTO and other pollution control equipment. Consistent with this, the pending application and the draft permit are based on the operating characteristics of existing equipment employed by General Iron. In this way, General III's permit application is not typical because it proposes to move existing pollution control equipment from General Iron to a new location. This may be a new facility, but it's utilizing used parts, specifically the emissions capture hood, cyclone, filter and RTO and associated pollution control equipment. Provisions relating to the air pollution control equipment that will be transferred from General Iron include Paragraphs 9a and 11a – 11h. Equally important, the emission limits in the Draft Permit are based on the effective operation of this transferred pollution control equipment. If this transferred pollution control equipment does not operate effectively, it is also uncertain if the facility can maintain a potential to emit for air pollutants consistent with a minor source designation.

Much of the Draft Permit is based on the performance of this transferred equipment. In turn, the performance of this equipment is legally relevant because of the mandate imposed by 35 IAC 201.160 "Standards for Issuance":

- a) No construction permit shall be granted unless the applicant submits proof to the Agency that:
 - 1) The emission unit or air pollution equipment will be constructed or modified to operate so as not to cause a violation of the Act or of this Chapter

Pursuant to 35 IAC 212.324(f), the owner or operator shall maintain and repair all pollution control equipment in a manner that assures that emission limits and standards in 35 IAC 212.324 shall be met at all times.

Consequently, it's essential for Illinois EPA to ask this simple question – has the pollution control equipment that is being transferred to the General III worked effectively at General Iron? Especially in light of the explosion, the answer is unmistakably no.

Because of this, SETF now asserts that the pending permit application and the resulting Draft Permit do not accurately represent the operation of the equipment that will be employed at the proposed new General III facility. The permit application is an inadequate basis for permit review and is incomplete. SETF's assertion is based on the explosion that occurred at General Iron shortly after the public hearing, coupled with the long history of compliance issues related to this equipment that are detailed in NRDC's comments. Initial reports suggest the explosion originated in the RTO, one of the pieces of pollution control equipment that is to be transferred to the proposed General III facility. Moreover, even if the operation of the RTO is not the only cause of the explosion, the transfer of any equipment that can cause this kind of catastrophic

failure suggests the applicant's representations must be revisited as part of any credible permit review.

The pending application is incomplete because the applicant's representations about the proposed use of any equipment, its control efficiency, and the applicant's ability to operate the equipment safely and effectively can no longer be accepted without a complete investigation of the explosion incident. In light of the explosion, the applicant cannot prove this transferred air pollution equipment will be constructed so as to not cause the violations of the Act that result from catastrophic failure, fires, explosions and the uncontrolled release of pollutants. Moreover, existing emission estimates and air quality models that do not account for emissions during periods of catastrophic failure also must be reassessed. Additional permit terms and conditions may be necessary to prevent future accidents and to ensure the integrity of the equipment and the applicant's operating systems, all of which are relevant permitting considerations. This analysis is also consistent with the health, safety and welfare of nearby schools, parks, river users and residential neighborhoods.

For this reason, SETF asserts the pending permit application is incomplete and does not provide a basis for Illinois EPA to make permitting decisions about the General III facility. Illinois EPA must not proceed to final permit decisions until it acquires information about the equipment that the applicant is proposing to transfer and its ability to operate this equipment in a safe and effective manner, as required by 35 IAC 201.160. In the meantime, we urge IL EPA issue a Notice of Incompleteness regarding the pending permit application or an outright permit denial.

<u>Comment</u> - Despite the pleas of local residents, Illinois EPA conducted a virtual public hearing during the pandemic and the written comment period during a period of civil unrest. This is contrary to Illinois EPA's own environmental justice guidelines and unfairly impedes public participation. Illinois EPA's decision is to the advantage of the permit applicant, but contrary to the health, safety and welfare of the nearby environmental justice community.

On April 22, 2020, SETF sent the following communication to Illinois EPA via Brad Frost and the Agency's Environmental Justice Coordinator:

Please be advised that I represent the Southeast Environmental Task Force. As you know, SETF and its community partners have placed the highest priority on public participation in IL EPA permitting transactions related to the General III facility, which would be co-located with several existing, related facilities at 11600 S. Burley in southeast Chicago.

SETF prides itself on being a responsible community partner with IL EPA when, as in the present case, it requests public participation. Specifically, SETF has played a central role in publicizing and facilitating public hearings with IL EPA over a 25+ year period. Even when it disagrees with IL EPA, SETF has been a good faith partner with IL EPA because its interests in public participation align with the Agency.

Unfortunately, SETF believes IL EPA's proposed virtual hearing for the General III air construction permit will not be successful. SETF cannot remedy the problems it

foresees. It's concerned that large segments of the public will not be heard as part of this important permitting process.

Neither SETF's members nor other local residents have participated in this type of hearing. Many do not have the technology and/or technical capability to participate. SETF cannot provide training to remedy this problem because its office is closed and its leadership, members and local residents are required to be distant from one another. As a small non-profit, SETF is experiencing almost insurmountable complications to continue functioning, let alone to mount a major campaign to facilitate public participation in an unfamiliar venue.

Under these circumstances, SETF is concerned that a public hearing will suppress public participation, effectively exclude many potentially affected residents and skew the public record in favor of more sophisticated participants who may not represent community members and their interests. Even though I will prepare written comments on behalf of SETF, this is not a surrogate for the testimony of the full range of local residents who would participate in a traditional public hearing.

SETF acknowledges that you and other IL EPA personnel are working under very difficult circumstances due to the pandemic. Having said this, the legislators who mandated intractable permit decision deadlines were not contemplating a pandemic. Surely, the permit applicant wouldn't want to foreclose public participation or gain any advantage by virtue of a pandemic that no one could foresee. SETF believes there should be a moratorium on further permit proceedings in this case until the Governor concludes Illinois can return to in-person social interactions.

Illinois EPA never responded to this message and proceeded to its virtual public hearing. Predictably, most of the participants who testified asserted that Illinois EPA's decision was fundamentally unfair and defeated the purpose for a public hearing. From my notes, the testimony of participants included the following:

Mark Valez – His family has lived on the East Side for 70 years, and he has a petition with 2,000 signatures of local residents opposing General III. Despite this, because there was no information in Spanish, very few local residents knew about the hearing or how to participate, including people who use nearby Rowan Park and families whose children attend nearby Washington High School.

Gina Ramirez – It's unfair to have a hearing during the pandemic. This reflects the racism that causes southeast Chicago to be a sacrifice zone.

Olga Bautista – Many members of the public are unable to login because they are required to download an app on their phones but either don't have the storage for the app or can't afford to purchase additional storage. The hearing is inaccessible for them. Spanish speaking and hearing-impaired individuals face obstacles preventing their participation. Is this ADA compliant? It's unfair to hold a public hearing in such desperate times when people are facing so many other challenges.

Meleah Geertsma – In light of the emergency conditions, this is an unfair process that excludes many community members.

Kiana Courtney – The compressed timeline for the public process unfairly inhibits public participation. There was a lack of outreach for Spanish speakers. Was the public notice available in Spanish?

Peggy Salazar – Holding a meeting during the pandemic is unjust and an insult to the community, and disregards local residents.

Carolyn Pedroza – East Side resident who strongly objects to the "pandemic hearing". The hearing excludes poor people who lack the technology and technical skills to participate. The Spanish-speaking residents who are the most directly affected are the most excluded. Many of her own family members are unable to participate.

Damon Watson (NAACP) – The disproportionate impact of the pandemic on southeast and southwest side communities is compounded by the environmental injustice being perpetrated by IL EPA.

Illinois EPA's conduct is contrary to its own environmental justice commitments, developed in large part to resolve earlier civil rights complaints against the Agency for this type of unfair conduct. Illinois EPA's Environmental Justice Public Participation Policy identifies a series of public participation initiatives that apply "to all permitting transactions." These commitments include:

- 1. providing early and meaningful public involvement throughout the permitting process;
- 2. making a determination of the appropriate outreach based on factors like the type of permit, potential impact of the project, type of source or level of interest.

Illinois EPA's failure to provide early and meaningful public involvement, appropriate outreach, a meaningful public hearing and an adequate written comment period works to the advantage of the permit applicant, but is contrary to Illinois EPA's own environmental justice commitments.

Comment – Illinois EPA has not assessed the air quality impacts of emissions from new truck traffic that will move through local communities to access the General III facility. On a weekly basis, General III's operations will attract hundreds of trucks carrying junk automobiles, appliances and other scrap metal; this is an essential part of General III's business. Even if Illinois EPA cannot regulate tailpipe emissions from these mobile sources, it is Illinois EPA's responsibility to assess these emissions to determine if they will cause or contribute to unhealthy air quality for nearby residents. This omission is compounded by the Illinois EPA's failure to include well-established standards in Illinois law to reduce the release of materials from the kinds of vehicles that will be aggregating on local roadways. This omission is also compounded by the lack of anti-idling provisions is the draft permit for trucks on the proposed General III property and waiting to enter this property. Illinois EPA's omissions are to the advantage of the permit applicant, but contrary to the health, safety and welfare of the nearby environmental justice community.

The General III facility cannot operate unless it receives deliveries of scrap metal by truck. This essential aspect of General III's operations will bring hundreds of trucks – and their associated tailpipe emissions – to its location every week. These trucks and their cumulative emissions will be a new, permanent source of air pollution in nearby residential neighborhoods, both when they come to and go from the General III facility using local roadways. These impacts will be compounded if trucks are allowed to idle at or near the facility.

Pursuant to 40 CFR 51.160 - "Legally enforceable procedures" – Illinois EPA has both the authority to include an assessment of the air quality impacts from mobile sources in its permitting decisions. Illinois EPA must assure that the construction or modification of a facility will not result in interference with attainment or maintenance of a national standard in the State in which the proposed source (or modification) is located. 40 CFR 51.160 (a)(2). Such procedures must include means by which the State or local agency responsible for final decisionmaking on an application for approval to construct or modify will prevent such construction or modification if it will interfere with the attainment or maintenance of a national standard. 40 CFR 51.160 (b)(2). The nature and amount of emissions to be emitted by mobile sources associated with a facility is expressly referenced as a relevant inquiry. 40 CFR 51.160 (c)(1). Illinois EPA must assess its activities in the context of a broader control strategy that includes consideration of "changes in relocation of residential, commercial, or industrial facilities or transportation systems." 40 CFR 51.100.

The relocation of the business and operations of General Iron to the proposed General III facility will result in the introduction of hundreds of trucks every week of every year into southeast Chicago, including many diesel vehicles. Despite this, Illinois EPA has taken no steps to assess if this result, directly associated with the proposed General III facility, will interfere with attaining and maintaining healthy air standards in the environmental justice community on Chicago's southeast side.

In fact, at the opening bell of this permitting, SETF provided information about the potential impacts of truck traffic and tailpipe emissions on the southeast side. It appears this information was ignored. Even absent General III, the area surrounding the proposed General III facility scores above the 90% percentile in several risk-based, transportation related categories assessed as part of U.S. EPA's EJ screening tool, including PM 2.5, diesel PM, NATA air toxics cancer risk, NATA respiratory hazard index and traffic proximity. The tailpipe emissions that will result from the trucks needed to service the proposed General III facility will only exacerbate these risks, but remain unassessed by Illinois EPA. This omission is to the advantage of the permit applicant, but places the environmental justice community in peril.

In addition, Illinois EPA's draft permit fails to incorporate the existing mandates of Illinois law designed to prevent the release of pollution from truck loads, specifically, the requirements contained in 35 IAC 212.315 "Covering for Vehicles":

No person shall cause the operation of a vehicle of the second division as defined by 625 ILCS 5/11-127 or a semi-trailer as defined by 625 ILCS 5/1-187 without a covering sufficient to prevent the release of particulate matter into the atmosphere, provided that this rule shall not pertain to automotive exhaust emissions.

Finally, as to trucks, Illinois EPA could have but did not incorporate provisions to prevent idling by vehicles on the General III property or waiting to enter the General III facility in a manner consistent with state statute and Chicago Municipal Code. In order to protect human health and the environment, 625 ILCS 5/11-1429 prohibits diesel vehicles in Cook County from idling for more than a total 10 minutes within any 60 minute period, with only specifically delineated exceptions. The Chicago Municipal Code Section 9-80-095 limits idling of on-road diesel powered vehicles within City borders to a total of three minutes within a sixty-minute period, also for air quality and public health purposes. For air quality and public health purposes, Illinois EPA should impose a three minute standard to limit truck idling on the General III facility and for trucks waiting to enter the facility.

<u>Comment</u> – Illinois EPA should require a FLIR monitoring system to detect releases of volatile organic materials, coupled with permit obligations to engage in corrective action when these releases are detected.

Metal shredders – whether classified as large recycling facilities or consequential facilities - are significant sources of volatile organic materials (VOMs). VOMs are photochemical oxidants associated with a number or detrimental health effects, which include birth defects and cancer, as well as environmental and ecological effects. In the presence of sunlight, VOMs are influenced by a variety of meteorological conditions that have the ability to create photochemical smog, reacting with oxygen in the air to produce ground-level ozone.

As noted, in the case In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-19-113(a)-IL-08, U.S. EPA concluded that General Iron significantly underestimated its metal shredders' VOM emissions when it, in fact, had a potential to emit more than 100 tons of VOM per year. Despite this, General Iron did not have any emission capture or control equipment to achieve an overall reduction of uncontrolled VOM emissions of at least 81 percent, nor did it have the appropriate operating permit that corresponded with its VOM emissions. U.S. EPA identified the magnitude of the VOM emissions through inspections using its FLIR camera and a Section 114 Information Request. As part of an August 22, 2019 Administrative

⁹ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 6. Attached and vailable at: https://www.epa.gov/sites/production/files/2018-07/documents/general iron industries inc. nov-fov.pdf

¹⁰ <u>Id</u>.

¹¹ <u>Id</u>.

¹² In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 4. Attached and vailable at: https://www.epa.gov/sites/production/files/2018-07/documents/general iron industries inc. nov-fov.pdf

¹³ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 5. Attached and available at: https://www.epa.gov/sites/production/files/2018-07/documents/general_iron_industries_inc._nov-fov.pdf

¹⁴ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-18-IL-14, U.S. EPA Region 5, July 18, 2018, at 4. ("35. During the May 24 & 25, 2018 inspection, EPA observed and recorded hydrocarbons

Consent Order, General Iron agreed to complete the installation of a regenerative thermal oxidizer with a minimum VOM destruction efficiency of 98%. ¹⁵

The General III permit should include mandatory FLIR monitoring requirements for processing equipment and storage piles. The permit should include monitoring using an infrared camera that is capable of detecting fugitive VOM releases. This protocol should be implemented and/or verified by qualified, independent third party vendors. This monitoring protocol should be incorporated into permit provisions that include appropriate recordkeeping, reporting and corrective action requirements. Mere projections regarding VOM emissions are inadequate given the history of the equipment that will be transferred to General III, and also fail to meet the requirements imposed as part of every State Implementation Plan.

"Projections of the effect of planned air pollution control measures contained in the SIPs are not merely assumed but are enforced by regulations adopted as part of the SIP. Therefore, if the control measures are not implemented sufficiently to result in required reductions, the State or local agency, or EPA, can take action to enforce implementation of the regulations. 57 F.R. 13498, 13567 (April 16, 1992). The fundamental principles for SIPs/Control Strategy include: (1) baseline emissions from the source and the control measures must be quantified (specific amount of reductions can be ascribed to measures) (2) measures must be enforceable (specify clear, unambiguous, and measurable requirements) (3) source-specific limits must be permanent and reflect assumptions used in SIP demonstrations and contain means to track emission changes at sources and provide for corrective action. Id. at 13567-13568.

Absent a real-time VOM monitoring system like FLIR, fugitive VOM releases will be undetected and unaddressed.

In order to demonstrate the technical credibility of this technology – commonly referred to as FLIR (Forward Looking Infrared Radiation) monitoring – SETF is attaching an Environmental Technology Verification Report prepared by Batelle under a cooperative agreement with U.S. EPA. Generally speaking, FLIR cameras are a technology that uses infrared detectors to take pictures or videos. It works by having sensors take in infrared radiation (IR) and using differences in the wavelengths of radiation to create images. Variations in temperature cause the variations in IR wavelength that the detectors can register. This allows the detector to pick up objects or trends that are not necessarily visible to the naked eye, such as colorless gases, if they have a different temperature than their surrounding environment. IR also passes through some solid objects that visible light is not able to, allowing FLIR systems to effectively see through walls in some contexts.

exiting the hammermill shredder with a FLIR infrared camera."). Attached and available at: https://www.epa.gov/sites/production/files/2018-07/documents/general iron industries inc. nov-fov.pdf

¹⁵ In the Matter of General Iron Industries, Inc. Chicago, Illinois, Docket No. EPA-5-19-133(a)-IL-08, U.S. EPA Region 5, August 22, 2019 at 7. Attached and available at: https://www.epa.gov/sites/production/files/2019-08/documents/general iron industries inc aco.pdf

The technology was originally developed in the late 50's to early 60's. It has historically been used mostly for police and military reconnaissance and surveillance due to its portability (such as being attached to aircraft and drones), its ability to see through walls, and it being harder to detect than other systems like radar. FLIR systems have only begun being used in a larger variety of uses in the past few decades due to decreasing production costs and improved software that increases resolution and sensitivity. More recently, the technology has seen wider applications in security, public safety, and manufacturing. In particular, FLIR technology has proven useful for detecting and monitoring gas leaks in industrial settings.

For gas leaks, the cameras rely on detecting minute differences in temperature between the gas and the surrounding environment. The software on the cameras can be calibrated to look for very specific, pre-defined temperature differences that are known to be associated with very specific gases. Studies have shown these cameras are very accurate and precise for the compounds they are programed to detect. There are multiple companies that produce FLIR cameras. However, the largest one is a company called FLIR Systems. FLIR Systems produces a camera that is specifically designed to detect VOMs and Methane, called the FLIR GF320. The camera was first released in 2005, and it is still available through the company directly as well as specialized dealers.

For these reasons, IL EPA should mandate FLIR monitoring for processing equipment along with corresponding recordkeeping, reporting and corrective action requirements. This is the only credible way for facilities to detect and, in turn, respond to VOM releases that otherwise would pose an undetected, unaddressed danger to the local community.

<u>Comment</u> – All auto shredder residue processing equipment and storage areas must be enclosed to prevent this material from becoming airborne and being deposited on nearby residential areas and the Calumet River. The permit should include requirements to (a) conduct all auto shredder residue ("ASR") processing in fully enclosed buildings outfitted with robust air pollution controls, (b) move all ASR between the shredder and any subsequent enclosed residue processing buildings via fully enclosed conveyors, and (c) store any ASR in fully enclosed structures with appropriate air pollution controls.¹⁶

¹⁶ According to court documents in the case regarding Northern Metals, the former Minneapolis shredder created significant amounts of dust from processing of ASR subsequent to the auto shredder but before any treatment or storage of residue. See: In the Matter of Revocation of Air Emission Permit 05300480-003, OAH Docket No. 60-2200-33647, Memorandum in Support of MPCA's Motion for Summary Judgment, at paragraphs 22, 26 and 57-67 (describing processing of shredder residue to recover additional metals, including (a) at a Metals Recovery Plant in which "particulate matter coated the equipment in the building, as well as the floors and fixtures" and which had garage doors that remained open during processing and openings for conveyors, as well as (b) outdoors next to the Metals Recovery Plan without any controls). The proposed replacement shredding operation in Becker, Minnesota, appears to better control this processing step, with materials conveyed between the new shredder and the new Metals Recovery Plant via a covered conveyor, and the Metals Recovery Plant itself controlled by a baghouse. See: In the Matter of the Decision on the Need for an Environmental Impact Statement for the Proposed Northern Metals, LLC Becker Sherburne County City of Becker, Minnesota, Findings of Fact, Conclusions of Law and Order, June 13, 2018, available at https://www.pca.state.mn.us/sites/default/files/p-ear2-134b.pdf, at paragraphs 12 and 13. (Note that our citation of this decision is not an endorsement of its findings or conclusions, but is included solely to show that measures can and should be taken to control fugitive dust from the shredder residue processing step. We also note our concerns with allowing the Becker facility to store auto fluff in a covered three-walled bin instead of a full enclosure.)

Automotive shredder residue ("ASR" or "auto-fluff") is a byproduct of scrap metal recycling facilities. ASR is usually generated by hammermill industrial shredders when vehicles, household appliances, and other manufactured metal products are collected and reprocessed for commercial value. ¹⁷ Chemically, ASR is primarily composed of aluminum, carbon, and zinc. ¹⁸ However, ASR may also contain polymers and/or hazardous contaminants, including heavy metals, PCB's, and petroleum hydrocarbons. ASR can vary in chemical and physical composition depending on the treatment process. Untreated ASR may contain a heterogeneous mixture of materials, including plastics, rubber, foam, fabric, carpet, glass, wood, road dirt, debris, and other residual metals. Physically, ASR can range from small granular particles to identifiable pieces of material (i.e. small pieces of glass, wood, etc.).

Table 1
WET Metal Values in Untreated ASR (mg/L)

Sample Date	Cd	Pb	Zn	Cu
6/18/2009	0.086	58.7	925	1.25
7/28/2009	1.29	41.8	1320	2.66
8/21/2009	0.657	88.3	1423	0.426
11/12/2009	1.25	49.6	1456	5.98
5/19/2010	2.57	155	864	6.83
10/26/2010	2.09	109	2603	9.1
1/5/2011	1.62	86.7	1685	3.97
1/25/2011	0.64	74.4	1025	3.35
4/28/2011	1.26	68.9	1110	4.51
10/31/2011	1.86	29.4	1970	4.60
11/7/2011	1.79	51.0	1525	2.03
Regulatory Values (CCR, Title 22 Ch. 11, § 66261.24)	1	50*	250	25

Bold numbers indicate values at or above the STLC value.

ASR can be a characteristic hazardous waste under RCRA because of the toxicity of entrained metals and other components of the waste. As described in its Material Data Safety Sheet, ASR contains multiple toxic substances in addition to cadmium, lead and zinc. In Illinois, ASR is characterized as a special waste (specifically, "a waste material generated by shredding recyclable metals"). According to 35 IAC § 808, special wastes are given a "toxic score." The generator of a special waste has the burden of characterizing their waste according to ASTM test methods to determine the toxic score of the waste. Because of the hazardous constituents of ASR, Illinois EPA should mandate specific measures to control every aspect of ASR management. These measures include screening scrap materials, rejecting components in these

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Each of the reclassification letters issued to the shredders allows a soluble lead concentration of 50 mg/L.
 The requirements of the reclassification letters vary with respect to other Title 22 metals.

¹⁷ Institute of Scrap Recycling Facilities (California Chapter): *Treatment of Auto Shredder Residue*, available at https://www.dtsc.ca.gov/HazardousWaste/upload/ISRI ASR Study JPM 8 2 13.pdf

¹⁸ Gerdau: Material Data Safety Sheet for ASR, available

athttps://www2.gerdau.com/sites/default/files/downloadable_files/Automobile%20Shredder%20Residue%20_ASR_%20MSDS%20_NA_%202-15-12.pdf

¹⁹ Illinois EPA, "Do I Have a Special Waste?" available at https://www2.illinois.gov/epa/topics/waste-management/waste-disposal/special-waste/Pages/do-i-have.aspx

²⁰ See 35 Ill. Admin. Code 808.121(a)

wastes that commonly include hazardous substances and managing and storing ASR in full enclosures.

Illinois EPA should mandate strict controls to screen for and exclude hazardous materials to minimize the quantity of hazardous substances that will be entrained in ASR, to prevent these hazardous constituents from becoming airborne. This should include should prohibitions on components that can accompany scrap metal wastes, including switches, batteries, gas and propane tanks and any components that contain traces of transmission fluid, gasoline, diesel fuel, lubricating oils and antifreeze. These prohibitions require stringent enforcement practices by the facilities. Visual gate inspections of incoming loads of scrap materials for prohibited components are essential but not adequate. Facilities should be required to employ photoionization detectors to screen for volatile organic compounds and other gases, as well as radiation detectors. Based on screening, facilities should be required to categorically reject "materials requiring special handing", and maintain documentation detailing the supplier, the screening technique that was utilized and the basis for rejecting the materials.

Illinois EPA should mandate that all ASR-related operations (storage, management, processing and transportation) should take place in fully enclosed and controlled structures. This is necessary to prevent the release of hazardous substances into two environmental media. First, as discussed elsewhere in these comments, material, including entrained hazardous substances, can be released from outdoor ASR piles into the air. Second, rainfall and snowmelt can penetrate outdoor ASR piles, causing contaminated leachate (containing suspended solids and hazardous constituents) that can be resuspended as airborne particles. Enclosure prevents the uncontrolled release of airborne particulate matter. Enclosure also prevents rainfall and snowmelt from penetrating ASR piles, minimizing the release of contaminated leachate and the resuspension of airborne particles.

<u>Comment</u> - Provisions of Illinois law that are part of the approved Illinois SIP characterize odors as contaminants that should not be released in a manner that injures nearby residents. Under 415 ILCS §5/9(a):

No person shall: (a) Cause of threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, so as to violate regulations or standards adopted by the Board under this Act.

This same provision is repeated in 35 Illinois Administrative Code 201.102, approved as part of the federally enforceable SIP for the State of Illinois on May 31, 1972. 37 Fed. Reg. 10842. This SIP approval also included 35 Illinois Administrative Code 201.101, which defines air pollution as "...the presence in the atmosphere of one or more air contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant or animal life, to health, or to property, or to unreasonable interfere with the enjoyment of life or property." The definition of contaminant explicitly includes odors:

Sec. 3.165. Contaminant. "Contaminant" is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source. (Source: P.A. 92-574, eff. 6-26-02.)

The concerns of the local environmental justice community about releases of odors from the proposed General III facility are legally relevant to the proposed permit. As revealed by the analysis prepared by NRDC, odor concerns are not mere speculation, but rather are identified as a recurrent problem at the existing General Iron facility despite the use of the same pollution control equipment that will be transferred to General III. These odors are not merely unpleasant, they evidence fugitive releases of categories of regulated pollutants including metals, volatile organic materials and particles. Even in the single Inspection Report included in these comments, the city inspector experienced from an off-site location "a pungent odor of sweet metal that burns my nostrils," an "odor of burning material" and fugitive dust. She was able to attribute these releases to General Iron because she observed the same effects on-site as well.

Because General Iron's existing pollution control equipment – which will be transferred to General III – is inadequate to control these releases, Illinois EPA's approach in Paragraph 11a of the Draft Permit is uninformed and inadequate. General III should be required to develop an odor management plan proactively that will address the severe, recurrent releases that are constantly reported at the General Iron facility, and which are clearly injurious to human health and the use and enjoyment of property. As a precondition for commencing construction, the permittee must be required to develop and implement a comprehensive odor management plan that identifies changes in material, installation of controls and other measures to control odors, and that mandates a corrective action plan if odors are observed or odor complaints are received by facility operators or regulators. The odor management plan should require General III to identify and implement odor monitoring equipment to detect the characteristic odors that are related to its characteristic metallic, volatile and particulate emissions. Illinois EPA's deferral of this issue in the Draft Permit is to the advantage of the permit applicant, but damaging to the nearby environmental justice community.

Please contact me if you have any questions or comments or if I can provide additional information.

Sincerely,

Keete Harley

Keith Harley, Attorney for the Southeast Environmental Task Force Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
(312) 726-2938
kharley@kentlaw.iit.edu

Enc

Exhibit 209

From: Guy, Jeff on behalf of EPA.PublicHearingCom

To: CommitteeonEnvironmentalProtectionandEnergy

Subject: RE: General III, LLC 031600SFX 19090021

Date: Monday, June 15, 2020 10:41:13 AM

Attachments: <u>image001.png</u>

Hello,

Thank you for your comments, which will be included as an exhibit with the hearing record. The Agency will prepare a responsiveness summary that will include a summary of all the views, significant comments, criticisms, and suggestions - in addition to the Agency's specific response and final action. You will be notified of the final decision in this matter and of the availability of the responsiveness summary.

Thanks.

Jeffrey J. Guy

Hearing Officer, Illinois Environmental Protection Agency Office of Community Relations (217) 785-8724

Jeff.Guy@illinois.gov



From: CommitteeonEnvironmentalProtectionandEnergy

Sent: Sunday, June 14, 2020 9:33 PM

To: Guy, Jeff <Jeff.Guy@Illinois.gov>; EPA.PublicHearingCom <EPA.PublicHearingCom@Illinois.gov>

Subject: [External] General III, LLC 031600SFX 19090021

Hello,

On behalf of Chairman George Cardenas, please find comments regarding the General III, LLC Construction Permit attached.

Best,

Samira Hanessian Research and Policy Analyst

City of Chicago Committee on Environmental Protection and Energy

This e-mail, and any attachments thereto, is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended

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COMMITTEE ON ENVIRONMENTAL PROTECTION AND ENERGY
CITY COUNCIL
CITY HALL - ROOM 300
121 NORTH LASALLE STREET
CHICAGO, ILLINOIS 60602

ALDERMAN GEORGE A. CARDENAS CHAIRMAN

PHONE: 312-744-3040

Jeff Guy Hearing Officer Illinois Environmental Protection Agency Bureau of Air 1021 North Grand Avenue Springfield, IL 62794

Re: General III, LLC Illinois EPA BOA ID No. 031600SFX and Application No. 19090021)

Dear Mr. Guy,

I appreciate the opportunity to comment on the proposed Construction Permit for General III, LLC, to be located at 11600 South Burley Avenue in Chicago.

As the Chairman of the City of Chicago Committee on Environmental Protection and Energy, I am committed to strengthening environmental considerations in the planning, development, and permitting processes. Many of my current initiatives focus on creating meaningful public engagement opportunities, and policies that maximize a community's desired use of land and property, while maintaining environmental sustainability.

The applicant, General III, LLC is a serial violator of the Illinois Environmental Protection Act. As Chairman, I request that IEPA consider every significant aspect of the environmental impact, evaluate all potential and likely effects—direct, indirect and cumulative—of the proposed action and take public comment on the proposed issuance of the permit into consideration.

The applicant has established a precedent for its operations regardless of location. It is incumbent on the IEPA to evaluate all aspects of the construction and operation of the facility for which the permit is required.

Best regards,

George A. Cardenas

C) aug Cana

Chairman, Committee on Environmental Protection and Energy

From: Guy, Jeff on behalf of EPA.PublicHearingCom

To: Mark Velez

Subject: RE: [External] General Iron vs. East Side Chicago

Date: Monday, June 15, 2020 11:30:03 AM

Attachments: <u>image001.png</u>

Mr. Velez,

Thank you for your comments, which will be included as an exhibit with the hearing record. The Agency will prepare a responsiveness summary that will include a summary of all the views, significant comments, criticisms, and suggestions - in addition to the Agency's specific response and final action. You will be notified of the final decision in this matter and of the availability of the responsiveness summary.

Thanks.

Jeffrey J. Guy

Hearing Officer, Illinois Environmental Protection Agency Office of Community Relations (217) 785-8724

Jeff.Guy@illinois.gov



From: Mark Velez <mvelez1287@gmail.com>

Sent: Sunday, June 14, 2020 10:33 PM

To: EPA.PublicHearingCom <EPA.PublicHearingCom@Illinois.gov>

Subject: [External] General Iron vs. East Side Chicago

To Whom It May Concern:

Please see the attached updated copy of 5,574 signatures from residents opposed to General Iron being granted the permit in the East Side neighborhood of Chicago, IL and 14 pages of comments.

I've lived on the East Side for my entire life (33 years). Horrible smells from nearby industrial businesses have become an everyday part of life. I've felt the embarrassment of rationalizing them to friends who come to visit. I've had 3 relatives die from cancer within the past few years alone. I attribute the cause of their deaths to petcoke, manganese and the other unknown pollutants that kill us slowly every day. The government has no issue with this because we are not rich... and not white.... like Lincoln Park.

Allowing another company to add to the poison we breathe every day is a sin and hate crime and everyone who contributes to this or looks the other way will have to answer for their actions one

day.	We've seen the civil unrest over the past few weeks with the killing of G	eorge Floyd.	COVID 19I
hope	the EPA can see the many issues surrounding this permit being granted	. Please stop	this from
happ	ening.		

Sincerely,

Mark Velez 773-550-3873 mvelez1287@gmail.com

change.org

Chicago's East Side Community

Recipient: J.B. Pritzker, Lori Lightfoot, Environmental Protection Agency

Letter: Keep General Iron Out of the East Side of Chicago!

Comments

Name	Location	Date	Comment
Ismael Ramirez	Chicago, IL	2020-04-21	"I'm signing because I care about current and future generations. Please keep these harmful polluters out of our neighborhood."
Christopher Wantuch	Chicago, IL	2020-04-21	"If it's not good enough for Lincoln Park, it should not be good enough for the East Side! We are all the same people and should be treated as such!!"
Lora Cairo	whiting, IN	2020-04-21	"I grew up in that's neighborhood and its has always been given the shaft by the city of Chicago and the state of Illinois. no new housing development and true economic growth has happened in that neighborhood for years. This just adds to the pledge of pollution and misuse of of land that your citizens have had to endure for years. please stop this continued abuse of the eastside and help truly develop it as a gateway into not only the city of Chicago but also into Illinois."
Carol Granados	Chicago, IL	2020-04-21	"I do not this in my community"
Christopher Guerrero	Chicago, US	2020-04-21	"This area is subject to enough respiratory irritants and foul smells already"
Michelle Reynolds	Chicago, IL	2020-04-21	"Enough with toxic polluters on the East Side!"
Edward Martinez	Chicago, IL	2020-04-21	"Edward Martinez"
Adan Rodriguez	US	2020-04-21	"I grew up & have lived in this neighborhood all my life and the East Side has always been a forgotten part of Chicago. The only time it's mentioned is because we have one of the highest pollution areas in the city. Places like ours that are most burdened are the last places where more factories should be put"
Mary Esquivel	Chicago, IL	2020-04-21	"I'm signing because I'm sick and tired of our neighborhood being used as a dumping ground. Find some place else on the north side. Enough is enough!"
Giuliana Molinaro	Chicago, IL	2020-04-21	"It astonishes me to learn about this in light of the HILCO fiasco. City officials cannot continue allowing big contracts with dangerous industries to compromise the health and future of Chicago. We're amidst a global pandemic, think bigger and cleaner!! Protect the beautiful East Side!"
peter zamudio	Chicago, IL	2020-04-21	"My neighborhood already has enough pollution problems as it is"
Alejandra Muñiz	Chicago, US	2020-04-21	"I am a res Resident worried for my and my family health. Please stop this !!"
Kevin Morrin	Chicago, IL	2020-04-21	"The Southeast community has had to deal with pollutants years back from Wisconsin Steel, US Steel, Republic / LTV Steel. Lost my dad on Sept 22, 2019 and he had COPD due to growing up near one of these. This community does not need this as we know the track record of General Iron."

Name	Location	Date	Comment
Luis Quintero	Chicago, IL	2020-04-21	"I am a resident of the east side community. I care for my neighbors well being along with my families."
Wendy Avalos	Chicago, IL	2020-04-21	"Wendy Avalos"
Israel Carabez	Point Pleasant Beach, NJ	2020-04-21	"The idea of polluting the air of hundreds of teenagers at a division 1 high school and an elderly community is inhumane. This is a disgrace."
Brianne Miskie	Chicago, IL	2020-04-21	"There is already too much pollution on the east side. I'm tired of seeing the neighborhood (my students and their families) poisoned."
Ivan Morales Sierra	US	2020-04-21	"I live in the East side"
Benito Herrera	Chicago, IL	2020-04-21	"I worked on the Northside, near 1600 N. Throop and general iron was right across the river from where I worked, and between 2015 and 2016 they constantly polluted the air. And the only reason they were kicked out of that location is because the rich people that live in that area made a deal with the mayor, and I'm not sure if it was mayor lightfoot or emmanuel, but apparently they'll listen to the rich people and now they want to move it to the Eastside which is a working class area, and all they care about is that it's no longer in the rich neighborhood. In other words, they don't care about the Eastside, and its residents. We have to protest this because why should we put up with general iron polluting the Eastside? We don't, so let's do whatever is necessary to get them to move away from here, because just because we're not rich, doesn't mean that we don't have rights to clean air. All general iron cares about is making money, and they don't have to live here like we do. They're a bunch of greedy people o"
Brian Rosinski	Saint Louis, MO	2020-04-21	"I love the East Side."
Edith Tovar	Chicago, IL	2020-04-21	"We need industrial corridors and zoning reform. Enough with the loopholes! Our communities deserve to breathe clean air!"
Edith Tovar	Chicago, IL	2020-04-21	"Clean air is a human right! Enough with polluters over public health."
JOSEPHINE HERRERA	Chicago, US	2020-04-21	"We have enough pollution around this area."
Sharon Paterson	Chapel Hill, NC	2020-04-21	"I grew up on the East Side and spent decades being swamped by noxious odors and bad air of industry. Social justice means giving ALL people equal access to clean air and water. Keep heavy industry far away from residential areas."
Laura Vaineo	chicago, IL	2020-04-21	"Im signing the petition because I care about the people in our community not just my family. Please stop the pollution many people can not afford to just move out of the neighborhood."
J.A. McMahon	Chicago, IL	2020-04-21	"Sooner the better"
Javier Pacheco	Chicago, IL	2020-04-21	"I'm signing this because as a resident of the EastSide, we deserve clean air! We already have to struggle with the pollution currently in

Name	Location	Date	Comment
			the area, and many members of the community will develop health issues in the future due to high exposure. EastSide is NOT the city's dumping ground!"
Marisa Arevalo	Chicago, IL	2020-04-22	"Yo no quiero mas poluciòn en mi vecindad! Quiero un lugar libre de chimicas e polvo de metal. E vivido aqui desde 1985, y el East Side es mi hogar donde mis padres laboraron, donde fui a la primaria, secundaria. Aqui es donde me case y compre casa. No quiero que mis familiares batallen el pandemico e esta compania que no pone las personas primero. No to this and any company that pollutes The East Side!"
Cathy Shortino	Chicago, IL	2020-04-22	"Everyone everywhere deserves clean fresh air that won't give them cancer."
Enrique Morales	Chicago, IL	2020-04-22	"Hegewisch resident"
Daniel Nunez	Chicago, IL	2020-04-22	"We are not the city's dumping ground."
Elizabeth Hostert	Shorewood, IL	2020-04-22	"The East Side matters!"
Lilly Ellis	Chicago, IL	2020-04-22	"Lillian Ellis"
Nayely Cruz	Chicago, US	2020-04-23	"It's dangerous"
Sergio Cano	Chicago, IL	2020-04-23	"Keep the East side safe and clean."
Kathleen Ayres	Longmont, CO	2020-04-23	"It sounds like the city needs some planning."
Corina Pedraza	Chicago, IL	2020-04-23	"I'm signing because I live five blocks from the proposed site and I live with two kids and two elders. We ALL deserve to live in a neighborhood free of contamination, just like the residents in Lincoln Park!!"
Jose Guerra	Chicago, IL	2020-04-23	"Jose luis Guerra Jr."
olga bautista	chicago, IL	2020-04-23	"It's unconscionable that the elected officials would accept this company into an already over burden community with poor air quality, highest rates of asthma and next door to George Washington High School."
Pablo Pérez	Yorkville, IL	2020-04-23	"Pablo H Perez"
Sylvia Laski	Chicago, IL	2020-04-23	"We have enough pollution affecting our children."
Anthony Caldwell	Chicago, IL	2020-04-23	"Dam right"
Stephanie Barlog	Chicago, IL	2020-04-23	"I do not want any more pollution in our area of residence. We deal with enough of that on a daily basis."
Veronica Salas	Chicago, IL	2020-04-23	"I was proudly born and raised in the South East Side of Chicago; and currently raising a family here. Let's keep our community safe and clean. Let's stop the Environmental Racism!"
Angelica Rosales	Chicago, IL	2020-04-24	"My family deserves clean air."

Name	Location	Date	Comment
Virginia Martinez	Oak Park, IL	2020-04-24	"The East Side has suffered enough already. Years of pollution, bio-hazards and environmental racism have left their mark. Enough."
Paul Molina	Chicago, IL	2020-04-24	"Because we all deserve clean air in our city"
Sophia Kortchmar	Chicago, IL	2020-04-24	"I work at a school in this neighborhood. Don't poison my students and me."
Maria Lomeli	Chicago, IL	2020-04-24	"It impacts my neighborhood directly."
María Santos	Chicago, IL	2020-04-24	"I live in the South Chicago Area, stop permitting businesses that polute our neighborhood"
Teresa Groat	Chicago, IL	2020-04-24	"The southeast side of Chicago is home to families, schools and parks. It's also been the dumping ground for industry and development that pollute the air and soil and contaminate the surface water. Let's stop saddling these residents with industry that does not belong in their neighborhood."
Rafael Razo	Chicago, IL	2020-04-24	"I have lived in this community for all my life and Chicago seems to put their trash in our neighborhood and I don't appreciate it because there's a lot of hard-working families who take care of their homes and personal belongings."
Lacinda Hummel	Chicago, IL	2020-04-24	"If it's too dangerous for Lincoln Park, it's too dangerous for the East Side."
Yesenia Chavez	Burnham, IL	2020-04-24	"I'm signing because residents of the south and east side of Chicago are some of the most precious and vital individuals to our culture. They deserve to have clean air LIKE THE RESIDENTS OF LP"
Isabel Hernandez	Madison, WI	2020-04-24	"I grew up on East side and still have 6 nephews that live there. They deserve better."
Anna Garza	Chicago, IL	2020-04-24	"I'm signing this petition because I'm tired of dirty industry on the Southeast side of Chicago. I'm against any industry that is harmful to people's health and contaminates our environment. Go away!"
Melisa Lopez	Chicago, IL	2020-04-25	"We don't need any other dump sites in our area!!"
jorge Garcia	Chicago, IL	2020-04-25	"I'ma resident and I'm tired of having dirty air."
Irma Cerda	Chicago, IL	2020-04-25	"There are already several of these metal recycling companies on the Southeast side, we do not need another one especially near a school."
Adriana Rizo	Whiting, IN	2020-04-25	"We need clean air!!"
Esther Briseno	Chicago, IL	2020-04-25	"We want clean air stop polluting our neighborhood!"
Carmela Vargas	Calumet City, IL	2020-04-25	"The southeast side is a dumping ground. If it's not safe for Lincoln Park why is it okay to bring to the East Side!"

Name	Location	Date	Comment
zenida castillo	chicago, IL	2020-04-25	"My family and I deserve to breathe clean air"
Steve Manojlovich	Chicago, IL	2020-04-25	"It's time to beautify the EASTSIDE NOT PALUTE IT AGAIN. SUE GARZA WHY ARE YOU ALLOWING AND NOT STANDING UP FOR YOU CONSTITUENTS."
Janet Quaglia	Elk Grove Village, IL	2020-04-25	"It wrong"
gordana buis	Chicago, IL	2020-04-25	"I grew up in this neighborhood and I am also raising my kids here. We deserve to have clean air like Lincoln Park! No more garbage"
Phillip Austin	Chicago, IL	2020-04-25	"As a Lincoln Park resident this business has caused enough local air and water pollution, heavy traffic, and noise to know it does not fit anywhere near a residential zone. This should be in a heavy industrial zone."
Irena Petrik	Chicago, IL	2020-04-25	"I dont want more pollution in my living area!"
Cecilia Garcia	Chicago, IL	2020-04-25	"��"
clara campos	Chicago, IL	2020-04-25	"A clean environment is essential for healthy leaving. We should keep the environment clean and healthy."
Gloria Torres	Chicago, IL	2020-04-25	"We All deserve Clean Air"
RUDOLPH ECHEVERRIA	Bellwood, IL	2020-04-26	"Duh SMH郎郎"
Noe Azpeitia	Chicago, IL	2020-04-26	"I am a member of the community"
Kate Goetz	Chicago, IL	2020-04-27	"The East Side doesn't deserve General Iron's pollution any more than Lincoln Park did!"
Raquel Macias	Calumet City, IL	2020-04-27	"This a terrible situation for people to live in"
Cheryl Johnson	Chicago, IL	2020-04-27	"This is an environmental insults to the community and we will fight!"
Norma Perez	Chicago, IL	2020-04-28	"This is discrimnation. People in the east side are humans too and we deserve the same civil rights are the rich!"
Mily Anzo	Chicago, US	2020-04-28	"It's a hazard to the health and well being of the community. The company does not comply with safety standards."
jessica serrano	Merrillville, IN	2020-04-29	"Yvette Serrano"
Jose Zavala	Plainfield, IL	2020-04-29	"We care about clean air and want a healthy environment for our familia"
Mautice Elion	Chicago, IL	2020-04-29	"We need to clean up the East Side and not allow companies that pollute to come in and kill us slowly!"
Santiago Contreras	Chicago, IL	2020-04-30	"Clean air is the most important thing right now"

Name	Location	Date	Comment
tim engberts	Leusden, US	2020-04-30	"Seventh Angel Care in the days of the voice of the Seventh Angel, when he shall begin to sound, the mystery of God should be finished, as he hath declared to his servants the prophets. Revelation 10:7, the Seventh Angel sounded; and there were great voices in heaven, saying, The kingdoms of this world are become the kingdoms of our Lord, and of his Christ; and he shall reign for ever and ever, Revelation 11:15."
Jose Lopez	Chicago, IL	2020-04-30	"The pollution it will cause in the community."
Lara Compton	Chicago, IL	2020-05-02	"General Iron has been polluting our neighborhoods for years. It's owners, new and old, continue to think it is above the law. General Iron and RMG do not deserve to receive permits from the city of Chicago or the state of Illinois."
Maria Ortiz	Chicago, IL	2020-05-04	"This neighborhood deserves a fair chance at a safe and clean future."
Debra Salinas	Whiting, IN	2020-05-04	"We are tired of being treated like second class citizens living in an already toxic environment. We have too much industry in the area and do not need any more poisons brought to our community. Keep your can of RAID to yourself. We don't want it."
Mario Lucero	Oak Park, IL	2020-05-04	"The Chicago East Side matters, too!"
Gregoria Vega Byrnes	Chicago, IL	2020-05-05	"Everyone deserves clean air."
miles vance	Chicago, IL	2020-05-05	"I am tired of this shit, you need to respect us as human beings. The alderwoman should be ashamed saying this will be safe. A few jobs aren't worth all the pollution, pain, and disease that places like this cause. If anyone thinks this is safe you are a lying piece of shit that needs to jump into the cal river. This is about money and profiting off the misery of others. Democrats should be ashamed that this is even an option."
olga bautista	chicago, IL	2020-05-08	"The whites on the north side fought off this polluter and the city held their hand till they found a nice neighborhood to relocate toThat's Environmental Racismmy right time breathe clean air ends when polluters like General Iron's right to operate in my backyard begins."
Edwin Gonzalez	Chicago, IL	2020-05-08	"The South East Side's residents deserve the same clean air, environment and considerations as the residents of Lincoln Park."
Lynn Smith	Chicago, IL	2020-05-08	"The South side absolutely deserves clean air and green spaces ! We need our beautiful green spaces respected and applauded as well."
Vanessa Saucedo	Chicago, IL	2020-05-08	"I'm signing because residents of the East Side deserve to have clean air. If it's not ok to have in Lincoln Park, then we can't have it over here."
Corey rodriguez	Chicago, IL	2020-05-08	"No more dirty industries"
Guadaupe Enriquez	Chicago, IL	2020-05-08	"No bueno."

Name	Location	Date	Comment
Gaudhy Campuzano	Chicago, IL	2020-05-08	"We are tired. Our neighborhood is not a dumpster. Our children deserve clean air as well. We have enough of this garbage our here. Look at the statistics of cancer in our are. We don't want you here."
edwin Perez	Chicago, IL	2020-05-08	"I need clean air"
karen reyes	Chicago, IL	2020-05-08	"We need to stop polluting all neighborhoods, especially black and Latino! And my family is from the east side and they've already suffered so much from pollution."
Maria Vargas	Chicago, IL	2020-05-08	"I'm signing because I'm concerned about the health of my children, my family, my community and myself. I'm also signing because I'm concerned for the health of our Earth which doesn't just belong to me in this moment but my children and my grandchildren and future generations. I'm also signing because the south side has been neglected for resources but is always remembered as a dumping ground or an area to use when other areas say no. Enough is enough!"
Elena Kantzioris	Chicago, IL	2020-05-08	"We deserve better! Stop polluting our Lives!"
Pedro Abrego	Chicago, IL	2020-05-08	"Pedro Abrego"
Ana Mejia	Chicago, IL	2020-05-08	"Because we don't live in a dump."
catherine carillo	Chicago, IL	2020-05-08	"I live on the south side where we have the highest rate of cancer in the city. we deserve clean air also"
Maria Jimenez	Schaumburg, IL	2020-05-08	"People deserve clean air especially now with this pandemic"
Damien Hernandez	Chicago, IL	2020-05-08	"Why is my neighborhood less important than the north side!"
nancy garcia	Elizabeth, LA	2020-05-08	"I want a better country for our kids."
Robbie Rob	US	2020-05-08	"I'm a lifelong resident of the Southeast Side of Chicago and I'm deeply concerned about the health effects this will have on our community."
Bailey Carlisle	Brooklyn, NY	2020-05-08	"I'm signing because this is fucked up and shouldn't even be considered."
Maria Heredia	Chicago, IL	2020-05-08	"We are tired of being the dumping ground! Show us the report, that states it will not produce pollution!"
Martin Herrera	Chicago, IL	2020-05-08	"Martin Herrera"
Claudia Sandoval	Chicago, IL	2020-05-08	"We have the right to live in a clear and healthy environment. We were born and raised in this area and our children deserve to be safe."
Brandon Herrera	Chicago, IL	2020-05-09	"My family and friends live in the Southeast Side of Chicago, and the terrible air quality this will bring into their neighborhoods will only make matters worse with the current global pandemic happening!"

Name	Location	Date	Comment
Vanessa Reyna	Chicago, IL	2020-05-09	"My family's health is important! We care for our loved ones as well!"
EILEEN KLEES	Chicago, IL	2020-05-09	"I have a client in Hegewich and that area has suffered enough from blight & pollution."
Nancy Salas-Herrera	Chicago, IL	2020-05-09	"The residents of Chicago East Side deserve a better and safer environment."
Tyrone Wilkins	Atwood, IL	2020-05-09	"I'm signing because my family and friends are hard working tax payers who deserve a cleaner East Side. And not some nasty recycler that can potentially cause their property value to drop."
Vanessa Kovacevic	Chicago, IL	2020-05-09	"I live in this neighborhood and I'm worried about the health impact on residents"
Richard Drew	Chicago, IL	2020-05-09	"Working people deserve clean air too"
Tiffany Poole	Chicago, US	2020-05-09	"We all deserve clean air, zip code should not dictate who's health is valued."
A Anne Holcomb	Chicago, IL	2020-05-09	"I live not far from this planned development. I want to breathe clean air!"
Cristal perez	Chicago, IL	2020-05-09	"I live on the East side and my family deserves clean air."
Amanda Montes	Chicago, IL	2020-05-09	"We don't want you here. Why our lives are less important than the north siders."
Jorge Orozco	Chicago, IL	2020-05-09	"I live in the area and will remember everyone involved come election time"
Alex Lopez	Calumet City, IL	2020-05-10	"We all deserve clean air dawg"
Scott Houldieson	Highland, IN	2020-05-10	"The East Side of Chicago has been decimated by more than a century of industrial malfeasance. Stop making it worse!"
Monserrat Marquez	Chicago, IL	2020-05-10	"We already have enough factories, we deserve clean air too."
David Nino	Chicago, IL	2020-05-10	"My nephew is 2 years old and i dont want to see him in a body bag from cancer"
Andrew Goodwin	Whiting, IN	2020-05-10	"My grandmother lives in the East Side. She's lived their most of her adult life. Please don't value the lives of those living in Lincoln Park more than those in the East Side."
Thomas Kirby	Muncie, IN	2020-05-10	"I spend a lot of time for work in Chicago's East Side Community and I have friends that live there who deserve to be able to breathe clean air!"
Bill McCormick	Chicago, IL	2020-05-10	"They have got to be shitting us. There's no way this is good for anyone who likes breathing."
Bradley Richie-Sutton	Chicago, IL	2020-05-10	"I live in this neighborhood with my grandmother who has health issues and this could kill her"

Name	Location	Date	Comment
Truine	Location	Dutt	
Sharon Mcclain	Chicago, IL	2020-05-10	"Don't need to have any pollution in our neighborhood. Go some where else."
Dagene Brown	Chicago, IL	2020-05-10	"I live in this community."
Joe Esquivel	Chicago, IL	2020-05-10	"Because my entire family lives there. My grandparents have been living there for 70 years. They raised their family there. Their kids (my aunts and uncles) have their families there. The amount you pay in taxes should not make your life worth less."
Robert Kelly	Chicago, US	2020-05-11	"We dont need more pollutants in our neighborhood."
Steven Schwartzberg	Chicago, IL	2020-05-11	"Everyone is entitled to clean air"
Joan Walker	Chicago, IL	2020-05-11	"The South side is not a dump. We matter!!!"
Renata Garcia	Chicago, IL	2020-05-12	"We can't keep allowing marginalized to be exactly that, forgotten and marginalized"
Michael & Tiffany Norwood	Chicago, IL	2020-05-12	"I am a teacher and don't want this mess in my air!!!"
Heriberto Guzman	US	2020-05-12	"I live in the south and this is bullshit"
jill murtagh	chicago, IL	2020-05-14	"The south side is NOT the dumping grounds of the city!"
Alejandra Aguilar	Chicago, IL	2020-05-15	"Because I want a better environment for the kids in this community."
Mari Rocha	Chicago, IL	2020-05-15	"This is environmental racism and not right! I sign because I care and you should too!"
Maria Gonzalez	Chicago, IL	2020-05-16	"We need clean air!!"
Phoebe Murtagh	Chicago, IL	2020-05-16	"I did a paper about this topic, and am deeply concerned that the city is following a pattern of saddling underprivileged communities with toxic industry. One need only look at the dramatically different demographics of the two neighborhoods, including the strikingly disparate land values, to see why Lincoln Park gets relieved of General Iron and the East Side gets stuck with it."
Andres Villegas	Chicago, IL	2020-05-17	"Im not impressed by the performance of local elected officials. They are obviously not representing the local community nor are they thinking virtuously!"
Blanca Herrera	Chicago, IL	2020-05-19	"I'm signing this because the East side needs clean air! Enough with all the pollution making us sick!"
Nora Cabrales	Chicago, IL	2020-05-19	"the Southside deserve the same quality of air as the Northside Don't bring your crap to our side of town!!!"
Robert Alcala	US	2020-05-19	"I agree with your reasoning!! I got your BACK!!"
Amanda Hernandez	Chicago, IL	2020-05-20	"We do not need anymore pollution in our area."

Name	Location	Date	Comment
Maureen Kattah	Chicago, IL	2020-05-21	"Communities should have a voice in their own development!"
Jhoanna Maldonado	Chicago, IL	2020-05-22	"It is WRONG to move from one side of town to another, to pollute an area that is vulnerable and doesn't want it in their neighborhood!!"
Cassie Creswell	Chicago, IL	2020-05-24	"If it's not safe enough to be located Lincoln Park, it's not safe enough to be located on the SE Side either."
Taryn Kurth	Chicago, IL	2020-05-24	"This is dangerous and to expose residents to the pollution is unacceptable, anywhere in Chicago. This poses a public health hazard and has to stop."
Wendy Douglas	Chicago, IL	2020-05-28	"We don't want you here!!"
Mary Goering	Evanston, IL	2020-05-28	"Stop dumping on poor neighborhoods!"
Levi Todd	Chicago, IL	2020-05-28	"If pollution isn't healthy or safe for Lincoln Park, it's not healthy or safe for the East Side."
Elise Padilla	Chicago, IL	2020-05-28	"My family and I matter just as much as the residents of Lincoln Park."
Celia colon	Chicago, IL	2020-05-28	"We have a right to live in a place that is not full of toxins that going to harm and kill us!"
Anthony Rubio	Chicago, IL	2020-05-28	"The East Side is family and who wouldn't want a safe environment for their family?People should have a say so over their communities!"
linda villa	Chicago, IL	2020-05-28	"I care for my community"
Erica Baeza	Chicago, US	2020-05-28	"No to general iron"
James Green	US	2020-05-28	"I oppose the development if the General Iron scrap metal business on the East Side. It is established as a residential neighborhood, by City of Chicago ordinances. Thereby it should be forbidden to establish an industry in a residential area by reason of zoning restrictions."
Josephine Del Rio	Warrenville, IL	2020-05-29	"I believe in this cause."
Ramon Cardenas	Chicago, IL	2020-05-29	"I believe the East side deserves a healthy way of life"
Midori Himiko	Chicago, IL	2020-05-29	"We don't need anymore pollution in this area get out"
melissa serrano	Chicago, IL	2020-05-29	"Our side of town is not a dump! There are parks, schools playgrounds near. Please respect our neighborhood."
Sarah Coulter	Chicago, IL	2020-05-29	"The East Side doesn't need another polluting industry and all businesses/industries need to be held accountable for their impacts on the community residents and wildlife."
Terri Santo	Orland Park, IL	2020-05-29	"Governor Pritzker, you're better than this!"

Name	Location	Date	Comment
Steven McCarter	Chicago, IL	2020-05-29	"This is my community and we've had enough."
Nancy Kusler	Chicago Heights, IL	2020-05-29	"This area is home to friends and former students. Preserve the East Side of Chicago."
Wilburn Hester	South Holland, IL	2020-05-29	"I am an Environmental Engineer by degree and it is an Environmental Injustice to move this plant to the East side"
Charlotte Taylor	Chicago, IL	2020-05-30	"My classroom is across the street from this site and I believe we should have clean air when we open the window."
Donna James	Chicago, IL	2020-05-30	"I'm a concerned ES resident"
Enrique Santana	Chicago, IL	2020-05-30	"Environmental mishap Hazard to the local air and water waysSafety issues like EXPLOSIONS TRAFFIC Our roads will be destroyed!!! Exciting traffic is bad ENOUGH!Valve of our homes/properties will diminish!!!"
morganna Lockett	Chicago, IL	2020-05-31	"Because I live on the south side and I care about what happens to it hold and bad"
Cristina Hernandez	Chicago, IL	2020-05-31	"I live in the community!"
Michele Hays	Evanston, IL	2020-06-07	"We shouldn't allow our most vulnerable to be the ones to pay for our lifestyles."
Toni Oplt	Edwardsville, IL	2020-06-08	"Living in the Metro East area of Illinois, I know only too well how powerful corporate polluters can take advantage of poor communities and push themselves into neighborhoods with little care what they will do to the quality of life for residents. We need to value all peope above corporate polluter profit. Chicago's East Side is not the place for General Iron."
Cynthia Linton	Chicago, IL	2020-06-08	"That area already has too much pollution. It's the definition of environmental injustice."
Barbara Njus	Elgin, IL	2020-06-09	"We need real Green Energy solutions, not moving a polluter from one community to continue polluting in another."
Edwin Gutierrez	Addison, IL	2020-06-09	"It's not fair to residents of the south side."
Steph Billeck	Fox Lake, IL	2020-06-09	"Black Communities are NOT a hazmat area!"
Josue Navarro	Chicago, IL	2020-06-09	"Because it's my community"
Pascual Ramirez	Springfield, IL	2020-06-09	"It's bad for the environment around me."
Jens Ericson	Sherman Oaks, CA	2020-06-09	"I'm a past Chicago resident. The south side doesn't need more pollution"
Vanessa Hernandez	Chicago, IL	2020-06-09	"I don't want to be exposed to pollutants for the benefit of large corporations"
Amira Williams	Chicago, US	2020-06-09	"This is environmental racism"

Name	Location	Date	Comment
Joshua Bobbitt	Chicago, IL	2020-06-09	"I ain't w that environmental racism bs"
yolanda portillo	Chicago, IL	2020-06-09	"Yolanda portillo"
Nadia Portillo	Chicago, IL	2020-06-09	"The air on the East Side of Chicago is already very polluted. They deserve cleaner air just like other areas in & around Chicago."
Asha Edwards	Chicago, IL	2020-06-10	"This is environmental racism and residents don't want this"
Marley Mattheo	Chicago, US	2020-06-10	"i'm signing because, as one of the residents of lincoln park who complained of the pollution, i feel like shit knowing that it's only going to be affecting other people who are more at risk. this isn't fair or right!"
Evan McMahon	Chicago, IL	2020-06-10	"This is environmental racism"
Rosa Hernandez	Lakeview, Chicago, IL	2020-06-10	"The south side is already over polluted. Lincoln Park residents can just deal with it."
Claudia Soto	Chicagi, IL	2020-06-10	"If they don't want it out there why should we have it near us? We are worth as much as the people on the north side"
Taylor Carrion	Capitol Heights, MD	2020-06-10	"General Iron is doing good in the community and yall are trying to ruin it"
Brianna Alba	Saint John, IN	2020-06-10	"There's already so much pollution on the southeast side of Chicago. We don't need more."
Maria cervantes	Chicago, IL	2020-06-10	"I am signing this because as a resident of the South side of Chicago not only are we all being negatively affected by this implantation but because there are many residents and in particular Hispanics that do not qualify for health insurance, they will not be able to receive the adequate treatment caused by the chemicals exposed from the scrape metal. I am concern for the lives of those who are currently facing health challenges along with those who are at high risk of getting sick."
Natalie Pietrzak	Chicago, IL	2020-06-10	"My daughter and I live on the East Side and expect to live in a healthy environment."
Taylor Knight	Chicago, IL	2020-06-10	"Fuck Pollution"
Daniel Gomez	Chicago, IL	2020-06-11	"I feel it is vital towards our safety and health that we have access to the cleanest air as possible. Everyone deserves the basic human right of being able to live and breathe, don't take that away from us and don't jeopardize our health!"
Demarcus Brown	Garden Grove, CA	2020-06-11	"I don't really care some white nigga told me 2 so"
Nikola Filipovic	Chicago, IL	2020-06-11	"I have signed this petition because I want a Better Future for the current and next generations and for them to be able to live a healthy life by being able to breathe clean air."
Karina Nieves	Chicago, IL	2020-06-11	"I live on the east side and I already have horrible asthma"

Name	Location	Date	Comment
Jacob Fuentes	Chicago, IL	2020-06-12	"I live here I go to school here and I don't want to have to breath in toxins from a shit storm company"
Miguel Perea	Chicago, IL	2020-06-12	"I don't want this business in our neighborhood. Keep that business where they are"
Luis Jimenez	Chicago, IL	2020-06-13	"If it's not being allowed to be in Lincoln Park due to the pollution it brings, why is it ok to move it and pollute a predominantly black and brown community?"

change.org

Chicago's East Side Community

Recipient: J.B. Pritzker, Lori Lightfoot, Environmental Protection Agency

Letter: Keep General Iron Out of the East Side of Chicago!

Signatures

Name	Location	Date
Mark Velez	Chicago, IL	2020-04-21
Sabrina Silva	Chicago, IL	2020-04-21
Jess Garay	Chicago, IL	2020-04-21
Ismael Ramirez	Chicago, IL	2020-04-21
Gina Ramirez	Chicago, IL	2020-04-21
Allyson Bielat	Algonquin, IL	2020-04-21
Rodrigo Arceo	Lansing, IL	2020-04-21
Christopher Wantuch	Chicago, IL	2020-04-21
Lora Cairo	whiting, IN	2020-04-21
Emily Nicole	Homewood, IL	2020-04-21
rene diaz	Chicago, IL	2020-04-21
Vanessa Perez	Chicago, IL	2020-04-21
Gail Molinaro	Chicago, IL	2020-04-21
Carol Granados	Chicago, IL	2020-04-21
Tido Hoff	Chicago, IL	2020-04-21
Juan Flores	Chicago, IL	2020-04-21
Silvia Perez	Chicago, IL	2020-04-21
Rosalina Alejo	Chicago, IL	2020-04-21
Sandra Nuno	Chicago, IL	2020-04-21
Karina Casanova	Chicago, IL	2020-04-21

Name	Location	Date Date
Thomas Frank	Indiana	2020-04-21
Christina Colon	Chicago, IL	2020-04-21
Priscilla Garcia	Chicago, IL	2020-04-21
Diana Campos	Oak Lawn, IL	2020-04-21
Janet Lofranco	Chicago, IL	2020-04-21
Christopher Guerrero	Chicago, US	2020-04-21
Jena Ruzich	Chicago, IL	2020-04-21
Jessica Gutter	Chicago, IL	2020-04-21
Margarita Zuniga	Chicago, IL	2020-04-21
Antonio Rebeles	Chicago, IL	2020-04-21
Maria Ortiz	Chicago, IL	2020-04-21
Samantha Colunga	Chicago, IL	2020-04-21
Sandra Cerda	Chicago, IL	2020-04-21
Virginia Torres	Chicago, US	2020-04-21
Anna Cuevas	Chicago, IL	2020-04-21
clayton reeb	Belleville, IL	2020-04-21
Maria Hernandez	Chicago, IL	2020-04-21
V Alvarez	Chicago, IL	2020-04-21
Ellen Marshall	Battle Ground, IN	2020-04-21
Maureen Hughes	Oak Lawn, IL	2020-04-21
Dorothy ROLAND	Chicago, IL	2020-04-21
ROSALBA MADRIGAL	CHICAGO, IL	2020-04-21

Name	Location	Date
Michelle Reynolds	Chicago, IL	2020-04-21
Phyllis Wubben	Homer Glen, IL	2020-04-21
Ventura contreras	Chicago, IL	2020-04-21
Alex Watkins	East Chicago, US	2020-04-21
Shannon Schlie	Chicago, IL	2020-04-21
Jorge Sanchez	Chicago, IL	2020-04-21
Carlos Casimiro	Chicago, IL	2020-04-21
Nancy Meza	Chicago, IL	2020-04-21
Andrea Chu	哥倫布, OH	2020-04-21
Steven Smith	Chicago, IL	2020-04-21
Edward Martinez	Chicago, IL	2020-04-21
Elizabeth Barrera	Chicago, IL	2020-04-21
Charles Espedido	Chicago, IL	2020-04-21
Adan Rodriguez	US	2020-04-21
Jenny Velez	Chicago, IL	2020-04-21
Marisa Gonzalez	Chicago, IL	2020-04-21
Mary Esquivel	Chicago, IL	2020-04-21
Giuliana Molinaro	Chicago, IL	2020-04-21
Priscilla San Miguel	Chicago, IL	2020-04-21
Donna Hernandez	Chicago, IL	2020-04-21
Diana Rodriguez	Chicago, IL	2020-04-21
Crystal Vance	Chicago, IL	2020-04-21

Name	Location	Date
Guadalupe Diaz	Chicago, IL	2020-04-21
Hazel Robateau	Chicago, IL	2020-04-21
Ed Lihota	Chicago, IL	2020-04-21
Connie Perez	Chicago, IL	2020-04-21
Daniela Portales	Cicero, IL	2020-04-21
Donna Pejic	Chicago, IL	2020-04-21
Ceasar Rodriguez	Chicago, IL	2020-04-21
Louis Velez	Chicago, IL	2020-04-21
Joan D'Adam	Orland Park, IL	2020-04-21
Tiffany Alvarez	Schererville, IN	2020-04-21
Antonio Lopez	Chicago, IL	2020-04-21
Laura Aharrah	St John, IN	2020-04-21
Ayanna Woods	Chicago, IL	2020-04-21
Rebekkah Espinosa	Chicago, IL	2020-04-21
mary brower	Chicago, IL	2020-04-21
al celestin	East Chicago, IN	2020-04-21
Carina Martinez	Chicago, IL	2020-04-21
Abbie Burgos	Lees Summit, MO	2020-04-21
Christopher Sandoval	Chicago, IL	2020-04-21
Roxan Gonzalez	Kansas City, MO	2020-04-21
Cyatharine Alias	Skokie, IL	2020-04-21
Darek Lau	US	2020-04-21

Name	Location	Date
Yesenia Hamdan	Chicago, IL	2020-04-21
Lusero Plasencia	Chicago, IL	2020-04-21
Elizabeth Ortiz	Chicago, IL	2020-04-21
Jessica Mora	Chicago, IL	2020-04-21
Judith gonzalez	Chicago, IL	2020-04-21
Lenny Alarcon	Chicago, IL	2020-04-21
Jack Downs	Chicago, IL	2020-04-21
Patricia Montijo	Chicago, IL	2020-04-21
Peter Rangel	Chicago, IL	2020-04-21
Cynthia Herrera	Chicago, IL	2020-04-21
Ellen Yu	Peoria, AZ	2020-04-21
peter zamudio	Chicago, IL	2020-04-21
Lisa Castaneda	Homer Glen, IL	2020-04-21
Rob Lyons	Chicago, IL	2020-04-21
Joseph Starcevich	Chicago, IL	2020-04-21
Anna Tsamis	Mokena, IL	2020-04-21
Jorge L Vargas	Chicago, IL	2020-04-21
Pauline Zavala	Lansing, IL	2020-04-21
Barbara Godinez	Chicago, IL	2020-04-21
adela arceo	Tucson, AZ	2020-04-21
Alejandra Muñiz	Chicago, US	2020-04-21
Melissa perez	White Plains, NY	2020-04-21

Name	Location	Date
Rebecca Gaeta	Chicago, IL	2020-04-21
Kevin Morrin	Chicago, IL	2020-04-21
Luis Quintero	Chicago, IL	2020-04-21
Sanchez D	Chicago, IL	2020-04-21
Wendy Avalos	Chicago, IL	2020-04-21
Israel Carabez	Point Pleasant Beach, NJ	2020-04-21
Brianne Miskie	Chicago, IL	2020-04-21
Ivan Morales Sierra	US	2020-04-21
Benito Herrera	Chicago, IL	2020-04-21
Brian Rosinski	Saint Louis, MO	2020-04-21
Ursula Lopez	US	2020-04-21
Paula Peltier	Steger, IL	2020-04-21
Alan Ward	Monee, IL	2020-04-21
Maria Briseno	Chicago, IL	2020-04-21
Edith Tovar	Chicago, IL	2020-04-21
Ryan Guertin	New Milford, CT	2020-04-21
Ellen Marshall	West Lafayette, IN	2020-04-21
julio ibarra	Chicago, IL	2020-04-21
edward mcparland	Kansas City, MO	2020-04-21
Sue Buehn	Woodstock, IL	2020-04-21
Samantha Munoz	Chicago, IL	2020-04-21
daniel gomez	chicago, IL	2020-04-21

Name	Location	Date
Carlos Rosas	Chicago, IL	2020-04-21
Diana Morales	Chicago, IL	2020-04-21
Yvette Montes	Chicago, IL	2020-04-21
Catherine Cotter Brady	Chicago, IL	2020-04-21
Edith Tovar	Chicago, IL	2020-04-21
Traia Thiel	Minneapolis, MN	2020-04-21
JOSEPHINE HERRERA	Chicago, US	2020-04-21
Maira Cervantes	Chicago, IL	2020-04-21
Devin DeLaney	Fountain Hill, PA	2020-04-21
Eugenio Jimenez	Chicago, US	2020-04-21
Ramon Juarez	Chicago, IL	2020-04-21
Efrain Campos	Chicago, IL	2020-04-21
Alma Armas	Chicago, IL	2020-04-21
Jackeline Perea	Chicago, IL	2020-04-21
Andrea Salas	Calumet City, IL	2020-04-21
Brenda Choi	Las Vegas, NV	2020-04-21
Raquel Guerrero	Chicago, IL	2020-04-21
Sandra Franco	Chicago, IL	2020-04-21
David Munoz	Minooka, IL	2020-04-21
Jaime Alvarez	Chicago, IL	2020-04-21
Israel Brito	Chicago, IL	2020-04-21
luis alvarez	Chicago, IL	2020-04-21

Name	Location	Date
Isella Perea	Chicago, IL	2020-04-21
Leslie Ortiz	Chicago, IL	2020-04-21
Mary Palmer	Chicago, IL	2020-04-21
Marcos Sandoval	Chicago, IL	2020-04-21
Brenda Muniz	Chicago, IL	2020-04-21
Ariadna Escamilla	Chicago, IL	2020-04-21
Sharon Paterson	Chapel Hill, NC	2020-04-21
Laura Vaineo	chicago, IL	2020-04-21
Trevor Shaw	Chicago, IL	2020-04-21
Loruhama Fuentes	Chicago, IL	2020-04-21
Melanie Sieng-sao	Manteca, US	2020-04-21
YING SUN	Flushing, US	2020-04-21
nicole estrada	Hialeah, US	2020-04-21
Leonard Dersa	Sterling Heights, US	2020-04-21
Terry Bennett	Port Orchard, US	2020-04-21
Tobie Kvale	Denison, US	2020-04-21
Misty Samson	Bentonville, US	2020-04-21
Dillie Harrison	Berclair, US	2020-04-21
Donna Schwartz	Encinitas, US	2020-04-21
Julia Roberts	Orlando, US	2020-04-21
Christina Jeannotte	Queensbury, US	2020-04-21
Tina BROWN	Long Beach, US	2020-04-21

Name	Location	Date
Kelly Nichols	Highland Park, IL	2020-04-21
Patrick Marshall	Pleasant Hill, CA	2020-04-21
Renee Mendoza-Shorter	Chicago, IL	2020-04-21
Ana Lopez	Bensenville, IL	2020-04-21
Marcel Hernandez	Oak Forest, US	2020-04-21
Maris Guerrero	Chicago, IL	2020-04-21
Mariana Bernal	Chicago, IL	2020-04-21
Angelica Valerio	Chicago, IL	2020-04-21
Miguel Ayala	Chicago, IL	2020-04-21
Jesse Espinosa	Chicago, IL	2020-04-21
Claudia ROBLES	Chesterton, IN	2020-04-21
Melina Valerio	Chicago, IL	2020-04-21
Juan Gonzalez	US	2020-04-21
Marisela Muniz	Chicago, IL	2020-04-21
Judy Motkowicz	Tampa, FL	2020-04-21
Randall Jamrok	Chicago, IL	2020-04-21
Damian Cervantes	Chicago, IL	2020-04-21
Jesse Torres	Chicago, IL	2020-04-21
Mari Rodriguez	Chicago, IL	2020-04-21
Adriana Espinoza	Chicago, IL	2020-04-21
Melinda Maciel	Chicago, IL	2020-04-21
erika castellano	Galesburg, IL	2020-04-21

Name	Location	Date
Timothy Gizynski	Chicago, IL	2020-04-21
Margaret Green	Seattle, WA	2020-04-21
Stephanie Fitzpatrick	Chicago, IL	2020-04-21
Lori Thompson	Chicago, IL	2020-04-21
Stacey OBlanis	Chicago, IL	2020-04-21
Veronica Ramirez	Chicago, IL	2020-04-21
Elizabeth Lancaster	US	2020-04-21
Mitzi Carter	Chicago, IL	2020-04-21
Steve Lona	Bolingbrook, IL	2020-04-21
Ezra Landman-Feigelson	Chicago, IL	2020-04-21
Rachel Pruiett	Evansville, IN	2020-04-21
J.A. McMahon	Chicago, IL	2020-04-21
Alex Hannau	Chicago, IL	2020-04-21
Larry Baer	Chicago, IL	2020-04-21
Melissa Griffith	Chicago, IL	2020-04-21
Olivia S.	Chicago, IL	2020-04-21
Bette Reskey	Chicago, IL	2020-04-21
James Earnshaw	Chicago, IL	2020-04-21
Whitney Martinez	Chicago, IL	2020-04-21
Shawne Duck	Chicago, IL	2020-04-21
Esmeralda Velasco	Chicago, IL	2020-04-21
Daniel Kleszynski	Chicago, IL	2020-04-21

Name	Location	Date
Lexi Carrick	Chicago, IL	2020-04-21
Maureen Finlon	Montgomery, TX	2020-04-21
jay staudohar	Chicago, IL	2020-04-21
Coral Manor	Chicago, IL	2020-04-21
Carrie Gleason	Sedalia, US	2020-04-21
Colleen Day	Chicago, IL	2020-04-21
Corinne Tomczak	Orland Park, IL	2020-04-21
Javier Pacheco	Chicago, IL	2020-04-21
Danielle Berasi	Chicago, IL	2020-04-21
Kenneth Pearson	Saint Augustine, FL	2020-04-21
Sonia Shah	Chicago, IL	2020-04-21
Purab Parikh	Chicago, IL	2020-04-21
Denise Bertagna	Bartlett, IL	2020-04-21
Henry Mazanett	Chicago, IL	2020-04-21
STEVEN Rusin	Chicago, IL	2020-04-22
Christine Herrera	Chicago, IL	2020-04-22
Jose Armas	Chicago, IL	2020-04-22
Ramon Gomez	East Chicago, IN	2020-04-22
Deanna Botma	US	2020-04-22
Marisa Arevalo	Chicago, IL	2020-04-22
Anthony Ramos	Chicago, IL	2020-04-22
Miriam Schmid	Chicago, IL	2020-04-22

Name	Location	Date
Isaiah Colón	Chicago, IL	2020-04-22
Catherine Keneipp	Glenview, IL	2020-04-22
Enrique Morales	Chicago, IL	2020-04-22
Isabel Tamas	Hinsdale, IL	2020-04-22
Michael Crotty	Chicago, IL	2020-04-22
rita crotty	chicago, IL	2020-04-22
Sherri DiMarco	Valparaiso, IN	2020-04-22
Eric Milich	Chicago, IL	2020-04-22
Daniel Nunez	Chicago, IL	2020-04-22
Delorys Benitez	Chicago, IL	2020-04-22
Anthony Pasaye	Chicago, IL	2020-04-22
Patty Ramos	Berwyn, IL	2020-04-22
Rosa Mendez	Chicago, IL	2020-04-22
Gabriel Martinez	Chicago, IL	2020-04-22
Jason Hetzel	Hammond, IN	2020-04-22
Lydia Villa	Chicago, IL	2020-04-22
Kouqin Yang	Oakland, US	2020-04-22
Gourgen Grigoryan	North Hollywood, US	2020-04-22
Grace Deng	旧金山, US	2020-04-22
Ryan Garcia	San Gabriel, US	2020-04-22
Karen Mariell	Brooklyn, US	2020-04-22
William Gedeon	Fort Lauderdale, US	2020-04-22

Name	Location	Date
Erin Funke	Stillwater, US	2020-04-22
Valerie Thompson	Austin, US	2020-04-22
Marcus Herbert	Hayward, US	2020-04-22
Belen Martinez	Chicago, IL	2020-04-22
Jose Rodriguez	Chicago, IL	2020-04-22
Crystal Pacheco	Chicago, IL	2020-04-22
Rachel DeYoung	Chicago, IL	2020-04-22
Christine Zagami	Westfield, NJ	2020-04-22
Silvia Rubalcaba	Chicago, IL	2020-04-22
Molly Maas	Pewaukee, WI	2020-04-22
Jennifer Dietrich	Chesterton, IN	2020-04-22
Karli Zuker	Chicago, IL	2020-04-22
Elizabeth Hostert	Shorewood, IL	2020-04-22
Lilly Ellis	Chicago, IL	2020-04-22
Latisha Buchanan	Chicago, IL	2020-04-22
Aracely Galvan	Chicago, IL	2020-04-22
Khrysta Hendricks	Chicago, US	2020-04-22
Chuck Stark	Chicago, IL	2020-04-22
D Lopez	Chicago, IL	2020-04-22
Wendy Perez	Chicago, US	2020-04-22
Barbara Mota	Chicago, IL	2020-04-22
Martin Jaramillo	Chicago, IL	2020-04-22

Name	Location	Date
Jose Gudino	Chicago, IL	2020-04-22
Emilio Gutierrez	Chicago, IL	2020-04-22
Natasha Arnold	Chicago, IL	2020-04-22
Darshon Gibbs	Chicago, IL	2020-04-22
Angel Plascencia	Chicago, US	2020-04-22
Jimena Alvarez	Urbana, IL	2020-04-22
Brandon Alcala	Chicago, IL	2020-04-22
Jessie Ramos	Chicago, IL	2020-04-22
Daniel Wills	Schererville, IN	2020-04-22
Annabelle Garcia	Chicago, IL	2020-04-22
Nadia Vargas	Chicago, IL	2020-04-22
BERIL BASMAN	CHICAGO, IL	2020-04-22
Rachel Yzaguirre	Chicago, IL	2020-04-22
Riley Fink	Orange, US	2020-04-22
Ruben Cortez	Chicago, IL	2020-04-22
Adam Kaluba	Burleson, US	2020-04-22
Rongsheng Chen	Mansfield, US	2020-04-22
mariela Gonzalez	Aurora, US	2020-04-22
Keiran Garrett	Matthews, US	2020-04-22
Alexis Barrios	Mission, US	2020-04-22
Crystal Rodriguez	Chicago, IL	2020-04-22
Joann Podkul	Chicago, IL	2020-04-22

Name	Location	Date
Quetzalli Rodriguez	Chicago, IL	2020-04-22
John & Barbara Tekiela	Chicago, IL	2020-04-22
Michelle Vega	Chicago, IL	2020-04-22
Peggy Gonzales	Chicago, IL	2020-04-22
Brianna Lopez	Marion, US	2020-04-22
Decheng Chin	chicago, US	2020-04-22
Torsten Olsen	Oakland, US	2020-04-22
Tarik Fisher	Minneapolis, US	2020-04-22
Qin Chen	Newton, US	2020-04-22
Malachi Montalvo	Mission, US	2020-04-22
Md Ahmed	Hamtramck, US	2020-04-22
Bria Hill	Mcdonough, US	2020-04-22
Jovany Carvajal	Chula Vista, US	2020-04-22
William Rolfes	Tacoma, US	2020-04-22
Lamonique Allen	Harker Heights, US	2020-04-22
Lindsey Montero	Zolfo Springs, US	2020-04-22
Ulisses Meza Stewart	Scottsbluff, US	2020-04-22
Jerry Mayberry 2	Jackson, US	2020-04-22
Naijee Patterson	Detroit, US	2020-04-22
Ashley Coll	Phoenix, US	2020-04-22
Veronica Velazco	Dolton, IL	2020-04-22
Danielle Roche	Chicago, IL	2020-04-22

Name	Location	Date
Steve Safstrom	Chicago, US	2020-04-22
Gina Roxas	Skokie, IL	2020-04-22
Vickie Echols	Chicago, IL	2020-04-22
Nancy Alvarez	Chicago, IL	2020-04-22
Emily Thai	Chicago, IL	2020-04-23
Helen Castro	Chicago, IL	2020-04-23
Phillip Mariner	San Francisco, CA	2020-04-23
Alfredo Calvillo	Chicago, IL	2020-04-23
Nayely Cruz	Chicago, US	2020-04-23
Tim GOULD	Crown point, IN	2020-04-23
Jessica Gonzales	Chicago, IL	2020-04-23
Ethan McIntosh	Des Plaines, IL	2020-04-23
Sophie Gee	Chicago, IL	2020-04-23
Dina Celestin	East Chicago, IN	2020-04-23
Juliana Hernandez	Chicago, IL	2020-04-23
Rosabella Hernandez	Chicago, IL	2020-04-23
Margarita Larios	Hood River, OR	2020-04-23
Isabela Berlanga	Chicago, IL	2020-04-23
Jean Madigan	Chicago, IL	2020-04-23
Josefina Rojo	Chicago, IL	2020-04-23
Carmen Cervantes	Chicago, IL	2020-04-23
Maria Garcia	Chicago, IL	2020-04-23

Name	Location	Date
Sergio Cano	Chicago, IL	2020-04-23
Kathleen Ayres	Longmont, CO	2020-04-23
LYNETTE ARCEO	Chicago, IL	2020-04-23
Bertha Aguilar	Chicago, IL	2020-04-23
Silvia Vaca	Chicago, IL	2020-04-23
Leticia Padilla	Chicago, IL	2020-04-23
Kimiko Hollins	Chicago, IL	2020-04-23
Araceli Nunez Orozco	Chicago, IL	2020-04-23
Daniel Hernandez	Countryside, IL	2020-04-23
Lizbeth Sanchez	Chicago, IL	2020-04-23
Lorena Ornelas	Chicago, IL	2020-04-23
Corina Pedraza	Chicago, IL	2020-04-23
Claudia Delgado	Chicago, IL	2020-04-23
Jose Guerra	Chicago, IL	2020-04-23
Linda Gonzalez	Chicago, IL	2020-04-23
Matthew Andrade	Chicago, IL	2020-04-23
Sofia Recio	Chicago, IL	2020-04-23
olga bautista	chicago, IL	2020-04-23
Milosava Bulajic	Chicago, IL	2020-04-23
Cristina Camargo	Chicago, IL	2020-04-23
Lisset Gonzalez	Chicago, IL	2020-04-23
Nidia Cardenas	Chicago, IL	2020-04-23

Name	Location	Date
Fanny Diego	Chicago, IL	2020-04-23
Sheron Fata	Chicago, IL	2020-04-23
Pablo Pérez	Yorkville, IL	2020-04-23
Claudia Brand	Chicago, IL	2020-04-23
Barbara Langley	Schererville, IN	2020-04-23
Valerie Cales	Beverly Hills, CA	2020-04-23
Diana Alnemri	Chicago, IL	2020-04-23
Areen Nemri	Chicago, IL	2020-04-23
Cinthya Rodriguez	CHICAGO, IL	2020-04-23
Jamil Nemri	Chicago, IL	2020-04-23
Hortencia Rodriguez	Chicago, IL	2020-04-23
Sylvia Laski	Chicago, IL	2020-04-23
Anthony Caldwell	Chicago, IL	2020-04-23
R. Bloom	Chicago, IL	2020-04-23
LANA ZUMOT	Tinley Park, IL	2020-04-23
Esmerelda Gutierrez	Highland, IN	2020-04-23
Mario Garza	Chicago, IL	2020-04-23
Jasmine Neri	Chicago, IL	2020-04-23
Emily Moreno	Whiting, IN	2020-04-23
Eric Aviles	New York, NY	2020-04-23
Joseph Elbaor	Chicago, IL	2020-04-23
Monika Gawlak	Chicago, IL	2020-04-23

Name	Location	Date
Irma Salazar	Chicago, IL	2020-04-23
Stephanie Barlog	Chicago, IL	2020-04-23
Veronica Salas	Chicago, IL	2020-04-23
Tammy Kennedy	Chicago, IL	2020-04-23
Yanina Nevarez	Chicago, IL	2020-04-23
Mary Gen Davies	Chicago, IL	2020-04-24
Esperanza Salazar	Chicago, IL	2020-04-24
Jasmin Ramirez	Chicago, IL	2020-04-24
Jose Gonzalez	Chicago, IL	2020-04-24
Guadalupe Guzman	Calumet City, IL	2020-04-24
Jessica Castro	Chicago, IL	2020-04-24
Annalisa Hernandez	Chicago, IL	2020-04-24
Abraham Espinosa	Chicago, IL	2020-04-24
Jacquelyn Castro	Highland, IN	2020-04-24
Marlene Brown	Dolton, IL	2020-04-24
Julio Medina	Chicago, IL	2020-04-24
Cesar Montemayor	East Chicago, IN	2020-04-24
Ruben Calvo	Dyer, IN	2020-04-24
Marisela Briseno	Chicago, IL	2020-04-24
Alejandra Hernandez	Chicago, IL	2020-04-24
Teresa Plascencia	Chicago, IL	2020-04-24
Eliz Gonzalez	Chicago, IL	2020-04-24

Name	Location	Date
Kassandra Cortez	Chicago, IL	2020-04-24
Jackie C	US	2020-04-24
Natali Gonzalez	Chicago, IL	2020-04-24
Lilian Jimenez	Chicago, IL	2020-04-24
Sofia Moreno	Chicago, IL	2020-04-24
Raquel Rodriguez	Chicago, IL	2020-04-24
Araceli Beas	Chicago, IL	2020-04-24
Christina Chavez	Chicago, IL	2020-04-24
Rudy Rodriguez	Chicago, IL	2020-04-24
RICHARD Rodriguez	Chicago, IL	2020-04-24
Rosa Jimenez-Hernandez	Chicago, IL	2020-04-24
Angelica Rosales	Chicago, IL	2020-04-24
Christi Gonzalez	Oak Lawn, IL	2020-04-24
Catalina sada	Lyons, IL	2020-04-24
LR Lr	Chicago, IL	2020-04-24
Vanessa Alvelo	Schererville, IN	2020-04-24
Jennifer Williams	Chicago, IL	2020-04-24
Erica Solis	Chicago, IL	2020-04-24
Cesar Bustos	Chicago, IL	2020-04-24
Loyda Quintero	Chicago, IL	2020-04-24
Nidia Davila	Chicago, IL	2020-04-24
Javier Soler	Chicago, IL	2020-04-24

Name	Location	Date
Yolanda Leon	Chicago, IL	2020-04-24
Yulisa Baeza	Chicago, IL	2020-04-24
Virginia Martinez	Oak Park, IL	2020-04-24
Nestor Gomez	Chicago, IL	2020-04-24
Maria Moreno	Chicago, IL	2020-04-24
Roger Garcia	Chicago, IL	2020-04-24
David Marquez	DG, IL	2020-04-24
Salvador Avalos	Chicago Heights, IL	2020-04-24
Sandra Castillo	Chicago, IL	2020-04-24
Marla Bramble	Chicago, IL	2020-04-24
Erik Castelan	Berwyn, IL	2020-04-24
Donna Pinta	Chicago, IL	2020-04-24
Esperanza Baeza	Chicago, IL	2020-04-24
Emily Baeza	Chicago, IL	2020-04-24
Paul Molina	Chicago, IL	2020-04-24
Brunilda Nuñez	St. Louis, MO	2020-04-24
Felipe Tendick-Matesanz	Chicago, IL	2020-04-24
Horacio Gonzalez	East Chicago, IN	2020-04-24
Alejandra Garcia	Chicago, IL	2020-04-24
Mike Pietrusinski	Chicago, IL	2020-04-24
Elizabeth mora	US	2020-04-24
Louise Galvan	Chicago, US	2020-04-24

Name	Location	Date
Liz Natale	arlington heights, IL	2020-04-24
Donna Tiberi Blaszczyk	Chicago, IL	2020-04-24
Ricardo Alvarez	Crown Point, IN	2020-04-24
Gabriel Martinez	Chicago, IL	2020-04-24
ALBERTO A ROSALES	Calumet City, IL	2020-04-24
Lucia Cortez	Akron, OH	2020-04-24
Giovanni Castaneda	Chicago, IL	2020-04-24
Aaron Cortez	Chicago, IL	2020-04-24
Yemaya Alvarez	Chicago, IL	2020-04-24
Derrick Lesain	Chicago, IL	2020-04-24
Alexis Gonzalez	Lansing, IL	2020-04-24
Anahi Farfan	Chicago, IL	2020-04-24
Maria Ramirez	Chicago, IL	2020-04-24
Grayce Gonzalez	Bloomington, IN	2020-04-24
Ivan Padron	Chicago, IL	2020-04-24
Jesus Dorantes	Chicago Heights, IL	2020-04-24
Alexes Castaneda	Aurora, IL	2020-04-24
Daniel Feeley	Las Vegas, US	2020-04-24
Ashley Orozco	Chicago, IL	2020-04-24
Paul Gallardo	Chicago, IL	2020-04-24
Norma Rodriguez de Yagcier	Burbank, IL	2020-04-24
Alejandra Hermosillo	Chicago, IL	2020-04-24

Name	Location	Date
Maria Mariscal	Chicago, IL	2020-04-24
Santiago Espinosa	Chicago, IL	2020-04-24
Angela Ruiz	Oak Lawn, IL	2020-04-24
Vanessa Gonzalez	Chicago, IL	2020-04-24
Bryan Marban	Wheeling, US	2020-04-24
Michelle Morales	Chicago, IL	2020-04-24
Eivan Herrera-Valdez	Chicago, IL	2020-04-24
Ivan Mendoza	Chicago, IL	2020-04-24
Skyla Menke	ohio city, US	2020-04-24
Jayla Hopkins	Thiensville, US	2020-04-24
Bryanna Patrick	Woodstock, US	2020-04-24
Esmy Trujillo	Shafter, US	2020-04-24
Jewel Flores	Houston, US	2020-04-24
Mazy Meyer	Sun Prairie, US	2020-04-24
Sophia Kortchmar	Chicago, IL	2020-04-24
Laura Bulosan	Chicago, IL	2020-04-24
Cathy Chiu	Chicago, IL	2020-04-24
PedoBear 69696969	Asheville, NC	2020-04-24
Genesis Del Real	Chicago, IL	2020-04-24
Denisse Romero	Chicago, IL	2020-04-24
Jessica Soto	Chicago, IL	2020-04-24
Andrea Perez	Chicago, IL	2020-04-24

Name	Location	Date
Pablo Palafox	Chicago, IL	2020-04-24
Adela Mota	Chicago, IL	2020-04-24
Anna Nedoss	Chicago, IL	2020-04-24
Cathy Mroczkowski	Chicago, US	2020-04-24
Maria Lomeli	Chicago, IL	2020-04-24
Priscilla Pacheco	Chicago, IL	2020-04-24
Steven Alnemri	Chicago, US	2020-04-24
Kathleen Pidrak	Chicago Heights, IL	2020-04-24
Liz Del Toro	Chicago, IL	2020-04-24
Adriana Munoz	Chicago, IL	2020-04-24
Viviana Martinez	Chicago, IL	2020-04-24
Jori Kubek	Chicago, IL	2020-04-24
Alexis Jimenez	Chicago, IL	2020-04-24
Alex Ramos	Chicago, IL	2020-04-24
María Santos	Chicago, IL	2020-04-24
Elda A. Rubio	Chicago, IL	2020-04-24
Yvonne Alvarez	Urbana, IL	2020-04-24
Adam Milich	Chicago, IL	2020-04-24
Jacquelynn Romero	Chicago, IL	2020-04-24
Fatima Mendez	Chicago, IL	2020-04-24
Diana Martinez	Chicago, IL	2020-04-24
Erick Beltran	Chicago, IL	2020-04-24

Name	Location	Date
Edward Garcia	Chicago, IL	2020-04-24
Esperanza Cherry	Chicago Heights, IL	2020-04-24
elise garcia	Hammond, IN	2020-04-24
Juan Mirelez	Chicago, IL	2020-04-24
Carla Luna	Chicago, IL	2020-04-24
Teresa Groat	Chicago, IL	2020-04-24
Joe Smith	Chicago, IL	2020-04-24
Thomas Bulmer	Chicago, IL	2020-04-24
Fadia Nemri	Lansing, IL	2020-04-24
Amber Moore	Wilkesboro, US	2020-04-24
Carlos Garcia	Chicago, IL	2020-04-24
Victor Rodriguez	Granite City, US	2020-04-24
Madison Orman	Soddy Daisy, US	2020-04-24
Veronica Reyes	Chicago, IL	2020-04-24
Savva Nosov	Charlotte, US	2020-04-24
Ryder Fern	Huntley, US	2020-04-24
Jack Simons	Waukesha, US	2020-04-24
Paul Schwebach	Durand, US	2020-04-24
Luis Maradiaga	Chicago, IL	2020-04-24
Andres Reyes	Chicago, IL	2020-04-24
Khiya Murray	San Francisco, US	2020-04-24
Monica Torres-Linares	Chicago, IL	2020-04-24

Name	Location	Date
Sandra Ortiz	Chicago, IL	2020-04-24
Arturo Marin	Chicago, IL	2020-04-24
Vanessa Garciapavon	Chicago, IL	2020-04-24
Pamela DeLaGarza	Chicago, IL	2020-04-24
Jose Mendoza	Chicago, IL	2020-04-24
Jesse Mumm	Chicago, IL	2020-04-24
Nicole Nir	LaGrange, IL	2020-04-24
yesenia torres	Chicago, IL	2020-04-24
Lucia Gonzalez	Chicago, IL	2020-04-24
Laura Rodriguez	Chicago, IL	2020-04-24
Esgar Estrada	Garden Grove, CA	2020-04-24
Harry Seth	Chicago, IL	2020-04-24
Mark Galvan	Chicago, US	2020-04-24
Michelle Hernandez	Chicago, IL	2020-04-24
Maria Balcazar	Chicago, IL	2020-04-24
Maribel Arceo	Chicago, IL	2020-04-24
Adrian Solis	Detroit, MI	2020-04-24
Maggie Sullivan	Lorain, OH	2020-04-24
Mary Fuentes	Chicago, IL	2020-04-24
Adenike Adeniji	Chicago, IL	2020-04-24
Melisa Campos	Chicago, IL	2020-04-24
Faviola Camarena	Chicago, IL	2020-04-24

Name	Location	Date
Jorge Robledo	Chicago, IL	2020-04-24
Rafael Razo	Chicago, IL	2020-04-24
Jessica Thomas	Chicago, IL	2020-04-24
Jeremy Barr	Chicago, IL	2020-04-24
Lacinda Hummel	Chicago, IL	2020-04-24
Eva ASeves	Chicago, IL	2020-04-24
Jesus Romero	Chicago, IL	2020-04-24
Yesenia Chavez	Burnham, IL	2020-04-24
Leticia Martinez	Chicago, IL	2020-04-24
Silvia Saucedo	Chicago, IL	2020-04-24
Aryanna Pacheco	Chicago, IL	2020-04-24
Rafael Gonzalez	Lehi, UT	2020-04-24
Isabel Hernandez	Madison, WI	2020-04-24
Cynthia Herrera	Chicago, IL	2020-04-24
Salvador Salazar	Chicago, IL	2020-04-24
Israel Alberto	Macomb, IL	2020-04-24
Leonardo Mosqueda	Chicago, IL	2020-04-24
Deisy Vizcarra	Kewanee, IL	2020-04-24
Alexia Mosqueda	Chicago, IL	2020-04-24
Richard Colunga jr	Chicago, IL	2020-04-24
Angelica Barajas	Chicago, IL	2020-04-24
Cesar Miranda	Chicago, IL	2020-04-24

Name	Location	Date
Noe Jurado	Macomb, IL	2020-04-24
Maritza Darling-Ramos	Chicago, IL	2020-04-24
Marco Espinosa	Chicago, IL	2020-04-24
Manazuri Romero	Chicago, IL	2020-04-24
Juanita Barajas	Chicago, IL	2020-04-24
Alexis Juarez	Chicago, IL	2020-04-24
Freddy Fuentes	Chicago, IL	2020-04-24
Angie Perez	Waukegan, IL	2020-04-24
Max Beltran	Chicago, IL	2020-04-24
Anakaren Salazar	Macomb, IL	2020-04-24
Victor Ramirez	Chicago, IL	2020-04-24
Isaac Marquez	Macomb, IL	2020-04-24
Gloria Diaz	Chicago, IL	2020-04-24
Marcus Anguiano	Chicago, IL	2020-04-24
Kenneth Howard	Chicago, IL	2020-04-24
Lilia Colunga	Chicago, IL	2020-04-24
Michaelangelo Mosqueda	Chicago, IL	2020-04-24
Mario Salazar	Chicago, IL	2020-04-24
Rosa Cruz	Chicago, IL	2020-04-24
selena contreras	Chicago, IL	2020-04-24
Manuel Hernandez	Chicago, IL	2020-04-24
Cynthia Cerritos	Cicero, IL	2020-04-24

Name	Location	Date Date
Emily Rzasa	Chicago, IL	2020-04-24
Ian Jarvis	Pataskala, US	2020-04-24
Ally Hall	Anderson, US	2020-04-24
alexa francesco	Haddonfield, US	2020-04-24
Levering Rector	Warrenton, US	2020-04-24
Mario Guzman	Cicero, IL	2020-04-24
Justin Cornejo	Chicago, IL	2020-04-24
Suzette Munoz	Chicago, IL	2020-04-24
Noah Velez	Tempe, AZ	2020-04-24
Garcia Adrian	Chicago, IL	2020-04-24
Carolina Lopez	Cicero, IL	2020-04-24
Adrian Pena	Plainfield, IL	2020-04-24
Anthony Gomez	Chicago, IL	2020-04-24
Gustavo Elvir	Chicago, IL	2020-04-24
Raphael Alarcon	Chicago, IL	2020-04-24
Marissa Flores	Chicago, IL	2020-04-24
Raidel Orozco	San Francisco, CA	2020-04-24
Niko Noriega	Berwyn, IL	2020-04-24
Mayra Morales	Rockford, IL	2020-04-24
Yaxeni Aranda	Chicago, IL	2020-04-24
Norma Rebeles	Chicago, IL	2020-04-24
Miguel Gutierrez	Chicago, IL	2020-04-24

Name	Location	Date
Carlos Rodriguez	Chicago, IL	2020-04-24
Vivian Villarreal	Chicago, IL	2020-04-24
Louis Navas	Chicago, IL	2020-04-24
Cassandra Zambrano	Blue island, IL	2020-04-24
Anna Garza	Chicago, IL	2020-04-24
Bianca Reyes	Addison, IL	2020-04-24
Elizabeth Gomez	Cicero, IL	2020-04-24
Esteban Campos	Chicago, IL	2020-04-24
Andrew Decker	Palatine, IL	2020-04-24
Diane Bolanos	Chicago, IL	2020-04-24
Amber Griffiths	Arlington, TX	2020-04-24
John McGill	Chicago, IL	2020-04-25
Melisa Lopez	Chicago, IL	2020-04-25
Merrick O'Connell	Chicago, IL	2020-04-25
allalinys almanzar	Providence, US	2020-04-25
Daniel Regan	Silver Spring, US	2020-04-25
Lee Iv	Glen Mills, US	2020-04-25
Kerry Forbes	Waltham, US	2020-04-25
jorge Garcia	Chicago, IL	2020-04-25
Angie Angie	Augusta, US	2020-04-25
Jeylee Lopez	New York, US	2020-04-25
Wesley Bielinski	Chicago, US	2020-04-25

Name	Location	Date
Abeni Browner	Austin, US	2020-04-25
Elisabella Forest	Chino Hills, US	2020-04-25
Martin Muñoz	Minneapolis, MN	2020-04-25
Irma Cerda	Chicago, IL	2020-04-25
Lucy Stanfield	Chicago, IL	2020-04-25
Ashley Tirado	Chicago, IL	2020-04-25
Gabriela Pantoja	Chicago, IL	2020-04-25
Donnetta Shanklin	Elgin, IL	2020-04-25
Adriana Rizo	Whiting, IN	2020-04-25
Marcelina Pedraza	Chicago, IL	2020-04-25
Miguel Martínez	Chicago, IL	2020-04-25
Esther Briseno	Chicago, IL	2020-04-25
Jairo Ruiz	Chicago, IL	2020-04-25
Daniel O'Connor	Chicago, IL	2020-04-25
Lydia Gomez	Chicago, IL	2020-04-25
Alondra Lavariega	Rockford, IL	2020-04-25
Lucy Veloz	Tinley Park, IL	2020-04-25
Laura Martin	Milwaukee, US	2020-04-25
Izzie Lutz	Mauston, US	2020-04-25
Cat Scales	Atlanta, US	2020-04-25
Cecilia Marroquin	Waukegan, US	2020-04-25
Angelicka Sprinkle	Little Rock, US	2020-04-25

Name	Location	Date
Joesph Clarke	Canton, US	2020-04-25
charlotte s	Towson, US	2020-04-25
Anthony Padilla	South Gate, US	2020-04-25
margarita Villasenor	Chicago, IL	2020-04-25
Avrie Antrobius	novi, US	2020-04-25
Dylan Carothers	Tucson, US	2020-04-25
David Sidd	Murrieta, US	2020-04-25
Gage Zackman	Mastic, US	2020-04-25
Justin Savoy	Iowa, US	2020-04-25
Arianna Fisher	US	2020-04-25
Dianna Peters	Canton, US	2020-04-25
Molly Waterstreet	Waukesha, US	2020-04-25
Kaedin Alvarez	Alpharetta, US	2020-04-25
Maya Granados	Buda, TX	2020-04-25
Blake Cordell	Chicago, IL	2020-04-25
Samira Mohammed	Dallas, US	2020-04-25
Addison Chastain	Lyman, US	2020-04-25
Emma Penev	Calabasas, US	2020-04-25
Nikki Raup	Millmont, US	2020-04-25
Alex Christiansen	Minneapolis, US	2020-04-25
Karen Cooley	Detroit, US	2020-04-25
Dulal Ali	Detroit, US	2020-04-25

Name	Location	Date
Jane Jay	Buffalo, US	2020-04-25
Ottie Jenkins	York, US	2020-04-25
Lucia Ihlen del Prado	Atlanta, US	2020-04-25
Jose Prieto	Bridgeton, US	2020-04-25
Felicia Loving	Little Rock, US	2020-04-25
Alanna Arnold	Roscoe, US	2020-04-25
Charlotte Wang	Bellevue, US	2020-04-25
RAMY KALABCHY	Orange, US	2020-04-25
Zoey Socha	Milwaukee, US	2020-04-25
Toni Hamilton	Clawson, US	2020-04-25
Synethia Rankins	New Orleans, US	2020-04-25
Abraham zafrani	brooklyn, US	2020-04-25
Hasan Awad	Rialto, US	2020-04-25
Sheldon Kessler	US	2020-04-25
Samantha Malin	Chesapeake, US	2020-04-25
Elisha Song	Forest Hills, US	2020-04-25
Carmela Vargas	Calumet City, IL	2020-04-25
Jerry Mulanax	Richland, US	2020-04-25
Deborah Nelson	Ruckersville, US	2020-04-25
Joseph Gomez	Chicago, IL	2020-04-25
Maria Mijares	Chicago, IL	2020-04-25
Virginia Resa	Chicago, IL	2020-04-25

Name	Location	Date
Raul Gomez	Chicago, IL	2020-04-25
Melisa Deanda	Chicago, IL	2020-04-25
Jasmine Diaz	Blue island, IL	2020-04-25
zenida castillo	chicago, IL	2020-04-25
Olga I Gonzales	Chicago, IL	2020-04-25
Gianna Dallman	Rockford, US	2020-04-25
Khambia Clarkson	Marshalltown, US	2020-04-25
James Enlwo	Washington, US	2020-04-25
Himawari Uzumaki	Perris, US	2020-04-25
Sara Hailemichael	US	2020-04-25
Ismelda Corniel	Waltham, US	2020-04-25
gracie wilson	Leechburg, US	2020-04-25
Carolina Rodriguez	Laredo, US	2020-04-25
Alisha Smith	Cape Coral, US	2020-04-25
maira vasquez	Frederick, US	2020-04-25
Nora Law	heber, US	2020-04-25
Maddie Davidson	Stamford, US	2020-04-25
Carrie Man	Honolulu, US	2020-04-25
Fanny Chan	Brooklyn, NY	2020-04-25
Santiago Pena	Livingston, US	2020-04-25
Edwin Napoleoni	Brooklyn, US	2020-04-25
Taylah Hudson	New York, US	2020-04-25

Name	Location	Date
Taylor Donen	Signal Mountain, US	2020-04-25
Jatinder Singh	Elk Grove, US	2020-04-25
Jennifer Chavez	Racine, US	2020-04-25
Kalese Stepto	Wake Forest, US	2020-04-25
Tina God love	Meridian, US	2020-04-25
Felipe Solorio	Chicago, IL	2020-04-25
Marie Martinez	San Angelo, US	2020-04-25
Justin Kaufman	Fort Wayne, US	2020-04-25
Jacqueline clark	Folsom, US	2020-04-25
Anastasija Kilina	Brooklyn, US	2020-04-25
Violet Johnson	Frankfort, US	2020-04-25
Nola Arp	Atlanta, US	2020-04-25
Isaac Hernandez	Cicero, US	2020-04-25
kk h	Toms River, US	2020-04-25
Mau Moco	New Orleans, US	2020-04-25
Iyana1 Kinlaw	Conway, US	2020-04-25
Tristan Wong	Westminster, US	2020-04-25
Cristina Hoffman	US	2020-04-25
Justin Truong	San Francisco, US	2020-04-25
Louis Ramsey	Miami, US	2020-04-25
Oliver Marino	Winchester, US	2020-04-25
Sara Assefa	Los Angeles, US	2020-04-25

Name	Location	Date
Kill kb	Oklahoma CITY, US	2020-04-25
Lisa Stewart	Belton, US	2020-04-25
Helen M. O'Connor	oak Lawn, IL	2020-04-25
Nina Mani	Chicago, IL	2020-04-25
Veronica Blaylock	Chicago, US	2020-04-25
Mary Koroma	Reading, US	2020-04-25
Sienna Mayo	Maryville, US	2020-04-25
ABRAHAM MEKONEN	Oxon Hill, US	2020-04-25
Juliana Pino	Chicago, IL	2020-04-25
Kaleah Leeder	Cypress, US	2020-04-25
Roblox Girl	Bloomington, US	2020-04-25
Almaz Mehari	Boston, US	2020-04-25
David Dowling	Blackstone, US	2020-04-25
Max Warman	Augusta, US	2020-04-25
Na'Tyah McDowell	Scottdale, US	2020-04-25
Heaven Brown	Danbury, US	2020-04-25
Deirdre O'Neill	Valley Stream, US	2020-04-25
Jeral Gripper	Brooklyn, US	2020-04-25
Kathy Hedden	Keansburg, US	2020-04-25
Deblil Tsigabu	Washington, US	2020-04-25
Stephen Aitken	Cranbury, US	2020-04-25
Lorna Jakubowski	Chicago, US	2020-04-25

Name	Location	Date
Marc Jordan	Barrington, NH	2020-04-25
Bernice Jackson	Columbus, US	2020-04-25
Matthew Wartman	Jenkintown, US	2020-04-25
Levicy Zeier	Coosada, US	2020-04-25
Danielle Lovell	Virginia Beach, US	2020-04-25
Patricia Smith	Rochester, US	2020-04-25
Veronica Thomas	Fort Wayne, US	2020-04-25
Tyler Ylinen	Lakeville, US	2020-04-25
Katherine Cannon	Nashville, US	2020-04-25
Kim Fulmore	Fresh Meadows, US	2020-04-25
Cecilia Snow	Matamoras, US	2020-04-25
lydia mata	Crystal city, US	2020-04-25
Grecia Luna	Houston, US	2020-04-25
Shawnta C	Westchester, US	2020-04-25
Gary Rowland	Zanesville, US	2020-04-25
Anastasia Rangel	West Jordan, US	2020-04-25
Khlood Hegazin	Frankfort, IL	2020-04-25
Nancy Zgaljardic	Ridgewood, US	2020-04-25
Carlos Castillo	Chicago, IL	2020-04-25
Maria Padila	Providence, UT	2020-04-25
Elvira Gascon	Chicago, IL	2020-04-25
JJ Ueunten	Chicago, IL	2020-04-25

Name	Location	Date
Sean O'Connor	Chicago, US	2020-04-25
laura Macias	Chicago, IL	2020-04-25
Tony Aguilera	Chicago, IL	2020-04-25
Marc Rebeles	Chicago, IL	2020-04-25
Camille Cimprich	Chicago, IL	2020-04-25
Steve Manojlovich	Chicago, IL	2020-04-25
Kathryn Zamarron	chicago, IL	2020-04-25
Janet Quaglia	Elk Grove Village, IL	2020-04-25
gordana buis	Chicago, IL	2020-04-25
Jake Lutak	Chicago, US	2020-04-25
Toanna Barker	Brooklyn, US	2020-04-25
Yajhayra Bierd	Bronx, US	2020-04-25
Dionicia Fernandez	Brooklyn, US	2020-04-25
Linda Govea	Highland, IN	2020-04-25
Cheyenne Rabb	skokie, US	2020-04-25
Letty Rebeles	Chicago, IL	2020-04-25
Dania McDonald	Elmont, US	2020-04-25
Rosario Lopez	Chicago, IL	2020-04-25
Denny Fones	Westmont, US	2020-04-25
Antonieta Ruiz-Mendez	Columbus, US	2020-04-25
Mary Lamagna	Alpharetta, US	2020-04-25
Joel Almodovar	Miami, US	2020-04-25

Name	Location	Date
Teagan Plylar	Tampa, US	2020-04-25
Faith Osborne	Lemont, US	2020-04-25
Jerry Miller	Hyde, US	2020-04-25
Rosina Ness	White Plains, US	2020-04-25
Jenny Noboa Tabales	New York, US	2020-04-25
Teresa Morning	Fort Myers, US	2020-04-25
Graciela Ledesma	Bronx, US	2020-04-25
Virginia Jackson	Georgetown, US	2020-04-25
Pallavi Shah	Deerfield, IL	2020-04-25
Luziana Garcia	Kewaunee, US	2020-04-25
Yvonne Fletcher	Brooklyn, US	2020-04-25
Carolyn Young	Wytheville, US	2020-04-25
Ann Aubrey	Brooklyn, US	2020-04-25
HUGE YT FAN I WATCH IT 24/7	New Iberia, US	2020-04-25
Olivia Voegtle	Chicago, US	2020-04-25
Savanna Waddle	Gans, US	2020-04-25
Dahlia Herrera	Lodi, US	2020-04-25
Ralphy Ramirez	Columbus, US	2020-04-25
ТТ	West Chester, US	2020-04-25
Manelyk González	San Diego, US	2020-04-25
Nikole Cabello	Chicago, IL	2020-04-25
Karamat Ali	Brooklyn, US	2020-04-25

Name	Location	Date
Dylan Hornos	Elizabeth, US	2020-04-25
Evan Southerland	Orlando, US	2020-04-25
Holly Neidhammer	York, US	2020-04-25
Cole Vevang	River falls, US	2020-04-25
Kyle Cook	Chicago, IL	2020-04-25
Orlando Nino	US	2020-04-25
Yachi Muñiz	Rochester, US	2020-04-25
Marie Louise Morandi Long Zwicker	Sullivan, US	2020-04-25
Lillianna T	Pembroke Pines, US	2020-04-25
Cyrene Tuazon	Orlando, US	2020-04-25
lance dupuy	Plaquemine, US	2020-04-25
Joe Mama	New York City, US	2020-04-25
Emma Wilson	Milan, US	2020-04-25
Kathryn Bohn	Stoughton, US	2020-04-25
Clarity Wilson	Princeton Junction, US	2020-04-25
Kristina Coveny	Denver, US	2020-04-25
Carmeline Michel-Saintvil	New York, US	2020-04-25
Hailey Carter	Saint Johns, US	2020-04-25
Sarah Barnett	Sunbury, US	2020-04-25
Judy Santana	Medina, US	2020-04-25
Kristin Connolly	Rockville Centre, US	2020-04-25

Name	Location	Date
Nimah Ahmad	Rochester, US	2020-04-25
Robyn Ruehlen	Magnolia, US	2020-04-25
penta emily	Miami, US	2020-04-25
laura burks	Apple Valley, US	2020-04-25
Glenesia Roberts	Peekskill, US	2020-04-25
Daniel Roberts	Charles City, US	2020-04-25
Erika Olarte-Polo	Newark, US	2020-04-25
Georgette Clarke	New York, US	2020-04-25
Natalie Ross	Springfield, US	2020-04-25
eugene adams	jacksonville, US	2020-04-25
Laura Breckenridge	Bow, WA	2020-04-25
pam weir	Lancaster, US	2020-04-25
Corey Uchiha	US	2020-04-25
Savannah O'Neal	Carrollton, US	2020-04-25
Olivia Gould	Sandy, US	2020-04-25
Corey Lewis	Spokane, US	2020-04-25
Mahir Parlas	Hayward, US	2020-04-25
Himani Patel	East Hanover, US	2020-04-25
Serenity Lewis	Bristol, US	2020-04-25
Devin Q	Buffalo, US	2020-04-25
Karen Charlot	Brooklyn, US	2020-04-25
Hannah Millheim	Cumming, US	2020-04-25

Name	Location	Date
Christina Gonzalez	Cedar Hill, US	2020-04-25
Jade Fuller	Langhorne, US	2020-04-25
Yasmine Gonzalez	Chicago, IL	2020-04-25
Virginia Specht	Mount Prospect, IL	2020-04-25
Rebeca Ornelas	Chicago, IL	2020-04-25
Jackie Gonzalez	Chicago, IL	2020-04-25
Gustavo Lopez	Dyer, IN	2020-04-25
Phillip Austin	Ridgefield, CT	2020-04-25
Risanne Lara	Chicago, IL	2020-04-25
Maryellen Connolly	Rockaway Park, NY	2020-04-25
Tomislav Lazic	Chicago, IL	2020-04-25
Veronica Magana	Chicago, IL	2020-04-25
Vanesa campos	Chicago, IL	2020-04-25
Patricia Lebeter	Chicago, IL	2020-04-25
Trudie Magallon	Mount Prospect, IL	2020-04-25
Laura Martin	Johannesburg, US	2020-04-25
Denise Furlan	Monee, IL	2020-04-25
Jennifer Smith	Chicago, IL	2020-04-25
Irena Petrik	Chicago, IL	2020-04-25
Elisa Calderon	Chicago, IL	2020-04-25
Graciela Cruz	Burnham, IL	2020-04-25
Janely Correa	Cicero, IL	2020-04-25

Name	Location	Date
Elsa trejo	Chicago, IL	2020-04-25
Cecilia Garcia	Chicago, IL	2020-04-25
Miguel Serna	Chicago, IL	2020-04-25
clara campos	Chicago, IL	2020-04-25
Maria Pedroza	chicago, IL	2020-04-25
Gloria Torres	Chicago, IL	2020-04-25
Stephanie Valentin	Round Lake, IL	2020-04-25
Joseph Martinez	Chicago, IL	2020-04-25
Yolanda Rangel	Chicago, IL	2020-04-25
Melissa Zavala	Claremont, CA	2020-04-25
SHARON NASELLA	Glendale, CA	2020-04-25
Iliana Villarruel	Chicago, IL	2020-04-25
Leilani Gonzalez	Chicago, IL	2020-04-25
Manny Munoz	Chicago, IL	2020-04-25
Lewis Dickey	Chicago, IL	2020-04-25
Julianna Rodriguez	Chicago, IL	2020-04-25
Consuelo Vargas	Hammond, IN	2020-04-25
Erica Delgado	Chicago, IL	2020-04-25
Maricela Pedroza	Chicago, IL	2020-04-25
Lleni Diaz	Chicago, IL	2020-04-25
Izzy Hannigan	Chicago, IL	2020-04-26
Alix Strunk	Oak Park, IL	2020-04-26

Name	Location	Date
Angélica Sierra	Chicago, IL	2020-04-26
Christina Lee	St. Louis, MO	2020-04-26
RUDOLPH ECHEVERRIA	Bellwood, IL	2020-04-26
Ana Del Real	Chicago, IL	2020-04-26
artemio pena	Chicago, IL	2020-04-26
Charlene Gottardo	Chicago, IL	2020-04-26
Marissa Coronel	Chicago, IL	2020-04-26
Gladys Orozco	chicago, IL	2020-04-26
nicolette gascon	chicago, IL	2020-04-26
Oscar Echeverria	Chicago, IL	2020-04-26
Lina Thorne	Chicago, IL	2020-04-26
Raymond Arguello	Chicago, IL	2020-04-26
Nickolas Delagarza	Chicago, IL	2020-04-26
Barb Funt	Cicero, IL	2020-04-26
Francisco Vaca	Chicago, IL	2020-04-26
Alex Reyes	US	2020-04-26
Genaro Cruz	Lansing, IL	2020-04-26
Alejandro Diaz	Chicago, IL	2020-04-26
joseph salazar	chicago, IL	2020-04-26
Francisco Olivares	Chicago, IL	2020-04-26
Noe Azpeitia	Chicago, IL	2020-04-26
Vera Sevic	Linköping, Sweden	2020-04-26

Name	Location	Date
Fernando Vaca	Chicago, US	2020-04-26
Rocio Perez	Chicago, IL	2020-04-26
Nora Mota	Chicago, IL	2020-04-26
Griselda Aguilar	Chicago, IL	2020-04-26
Kate Goetz	Chicago, IL	2020-04-27
Rivka Goetz	Chicago, IL	2020-04-27
Andy Daglas	Chicago, IL	2020-04-27
Nicolas Marquez	New York, NY	2020-04-27
Karen Goetz	Indianapolis, IN	2020-04-27
Emily Woodman	Chicago, IL	2020-04-27
Lilliana Jimenez	Chicago, IL	2020-04-27
Raquel Macias	Calumet City, IL	2020-04-27
Carina Perea	Chicago, IL	2020-04-27
Jessica Martinez	Lockhart, US	2020-04-27
Flight In June	Palatine, US	2020-04-27
LENNY MEXIA	San Marcos, US	2020-04-27
Madina Bahretdinova	Hollywood, US	2020-04-27
bryce newand	mexico, US	2020-04-27
JN	midwest city, US	2020-04-27
María Perez	Chicago, IL	2020-04-27
Robert Griffin	Saint Johns, US	2020-04-27
Emma Tanner	Wichita, US	2020-04-27

Name	Location	Date Date
Dan Junttonen	King Of Prussia, US	2020-04-27
Marsha Fatino	Austin, US	2020-04-27
Isabel Raya	Clewiston, US	2020-04-27
Benjamin Williams	Barrington, US	2020-04-27
Marshaya Carroll	Tacoma, US	2020-04-27
Ryan Everett	Upland, US	2020-04-27
nora baker	Chicago, US	2020-04-27
Tabatha Stowers	Birmingham, US	2020-04-27
Jen Bliss	Hudson, US	2020-04-27
Chloe Seufer	Denver, US	2020-04-27
Sherina Clark	Eastpointe, US	2020-04-27
GraceAnn Keller	Salem, US	2020-04-27
Andi Anderson	Detroit, US	2020-04-27
Kayla Conrad	Clearwater, US	2020-04-27
Nat L.	Sanford, US	2020-04-27
Cassidy Kennemer	Wenatchee, US	2020-04-27
Charlotte Arnold	Independence, US	2020-04-27
Roshunda Pea	Balch Springs, US	2020-04-27
Vincent Shenko	Brielle, NJ	2020-04-27
هاشم موسوی	US	2020-04-27
Vedha Venkatesh	Aldie, US	2020-04-27
Carol Shalaew	Simpsonville, US	2020-04-27

Name	Location	Date
Shu Dong	Daytona Beach, US	2020-04-27
Alecia Harrison	Richmond, US	2020-04-27
Cheryl Johnson	Chicago, IL	2020-04-27
Lorine Dingue	Chatsworth, US	2020-04-27
Morgan Galloway	Muscatine, US	2020-04-27
Madison McCoy	Saginaw, US	2020-04-27
Mary Losack	Irving, US	2020-04-27
Ramon Echavarria	Orlando, US	2020-04-27
Gaudalupe Perez	Indianapolis, IN	2020-04-27
Javier Fregoso	Santa Paula, US	2020-04-27
Laura Echeverria	Chicago, IL	2020-04-27
Gloria Hargett	Chicago, IL	2020-04-27
Marisn Staats	Schaumburg, IL	2020-04-27
Benito Cabrales	Chicago, IL	2020-04-27
Rosa Espinoza	chicago, IL	2020-04-27
Melinda Estrada	Chicago, IL	2020-04-28
Obdulia Aranda	Tinley Park, IL	2020-04-28
Rigo Moreno	Chicago, IL	2020-04-28
Martine Wodka	Sleepy Hollow, IL	2020-04-28
Socorro Castro	Chicago, IL	2020-04-28
Victor Banda	Indianapolis, IN	2020-04-28
Antanesha Lane	Chicago, IL	2020-04-28

Name	Location	Date
Helen Carson	Chicago, IL	2020-04-28
Esmeralda Cardenas	Chicago, IL	2020-04-28
Maritza Larios	Chicago, IL	2020-04-28
Fanny Salazar	Chicago, IL	2020-04-28
Sandrs Campos	Chicago, IL	2020-04-28
Stephanie Tavarez	Chicago, IL	2020-04-28
Maribel Castro	Chicago, IL	2020-04-28
Mayra Martinez	Cicero, IL	2020-04-28
Estefania Cardenas	Chicago, IL	2020-04-28
Daniel Rodriguez	Cicero, US	2020-04-28
Lionila Gonzalez	Zapopan, Mexico	2020-04-28
Irma Herrera	Chicago, IL	2020-04-28
Nancy Rodriguez	Chicago, IL	2020-04-28
Marcela Diaz	Chicago, IL	2020-04-28
Adriana Lopez	Chicago, IL	2020-04-28
Jermaine Young	Chicago, US	2020-04-28
Dondrey Johnson	Seattle, US	2020-04-28
Amandeep Kaur	Yuba City, US	2020-04-28
Cihat Akviranli	Houston, US	2020-04-28
Allen Rains	Columbus, US	2020-04-28
Alice Palanzo	Danbury, US	2020-04-28
Itchy Pussy	Libertyville, US	2020-04-28

Name	Location	Date
Marcine McBride	West Babylon, NY	2020-04-28
Nefertiti Jones	Charlotte, US	2020-04-28
Francesca Arquiza	Aurora, US	2020-04-28
Mangela Gonzalez	Homestead, US	2020-04-28
Ray Drake	Chandler, US	2020-04-28
rheifb ehdifb	akron, US	2020-04-28
Lisa Slayton	Huntington, US	2020-04-28
Ocean Pogorel	US	2020-04-28
Eden Evans	Riverside, US	2020-04-28
Karah Lynn	Elon, US	2020-04-28
Bobbie Jo Brewer	Oregonia, US	2020-04-28
Shawn Lunsford	Milledgeville, US	2020-04-28
Judi Ernst	Naperville, US	2020-04-28
Keni White	Blue Springs, US	2020-04-28
Mav Thompson	Miami, US	2020-04-28
Barbod Solgi	New York, US	2020-04-28
Hillah Amozeg	Miami, US	2020-04-28
Jafari Amirhossein	US	2020-04-28
Yami Martinez	Lompoc, US	2020-04-28
Emad Moradi	Crossville, US	2020-04-28
Jean bertagnini	Weston, US	2020-04-28
Katherine Tokarzewski	Ambridge, US	2020-04-28

Name	Location	Date
Thiago De macedo	Columbia, US	2020-04-28
Lizbeth Lopez	Moreno Valley, US	2020-04-28
violet mayes	Bloomington, US	2020-04-28
رامتين قنبريان	Fremont, US	2020-04-28
Victoria Soo	Garden Grove, US	2020-04-28
Fahad Khan	Buffalo, US	2020-04-28
Barbara Lett	Peterman, US	2020-04-28
America Avila	Stafford, VA	2020-04-28
Sandra Sandoval	Cicero, IL	2020-04-28
Armando Guzman	Las Vegas, NV	2020-04-28
Rocio flores Flores	Chicago, IL	2020-04-28
Viviana Munoz	Chicago, IL	2020-04-28
Jocelyn Rubio	Chicago, IL	2020-04-28
Ariana Pwralta	Chicago, IL	2020-04-28
Mariela tavarez	Chicago Heights, IL	2020-04-28
Norma Perez	Chicago, IL	2020-04-28
Mily Anzo	Chicago, US	2020-04-28
viviana Moreno	Chicago, US	2020-04-28
Elizabeth Moreno	US	2020-04-28
Teresa Castro	Green Bay, WI	2020-04-28
Patricia Romero	Chicago, IL	2020-04-28
Ernest Brooks III	Indianapolis, IN	2020-04-28

Name	Location	Date
Valerie Brown	Chicago, IL	2020-04-28
Valerie Leatherberry	Chicago, IL	2020-04-28
Yolanda Flores	Chicago, IL	2020-04-28
Antonio Acosta	Illinois	2020-04-29
Lois Heaston	Chicago, IL	2020-04-29
bob rayburn	chicago, IL	2020-04-29
Sandra Valtierra	Orland Park, IL	2020-04-29
Irene Schuster	New Lenox, IL	2020-04-29
jessica serrano	Merrillville, IN	2020-04-29
Ramiro Baca	Chicago, IL	2020-04-29
Christine Gomez	Chicago, IL	2020-04-29
Sara Bessett	Chicago, IL	2020-04-29
paula martinez	chicago, IL	2020-04-29
Leo Pacheco	Chicago, IN	2020-04-29
Noe Tovar	Chicago, IL	2020-04-29
gloria Rodriguez	Chicago, IL	2020-04-29
Didi Pacheco	Arlington Heights, IL	2020-04-29
Elena Camacho	Chicago, IL	2020-04-29
Maricruz Lamas	Chicago, IL	2020-04-29
Jaime Gonzalez	Chicago, IL	2020-04-29
Jorden B.	North Carolina	2020-04-29
Rena Adams	Chicago, IL	2020-04-29

Name	Location	Date
Pastor Doris Thompson	Chicago, IL	2020-04-29
Elizabeth Velazquez	Chicago, IL	2020-04-29
Wayne Garritano	Chicago, IL	2020-04-29
Lily Guzman	Crest Hill, IL	2020-04-29
Ashley Magana	Chicago, IL	2020-04-29
Sandra Sosa	Chicago, IL	2020-04-29
Jose Zavala	Plainfield, IL	2020-04-29
Riccardo Ramos	Chicago, IL	2020-04-29
Beatriz Medina	US	2020-04-29
serena Ramos	Chicago, IL	2020-04-29
Brenda Defourneau	Chicago, IL	2020-04-29
Kim Miller	Chicago, IL	2020-04-29
Mia Capers	Chicago, IL	2020-04-29
Tisha Dillard	Chicago, IL	2020-04-29
Lolita Cusic	Chicago, IL	2020-04-29
Mautice Elion	Chicago, IL	2020-04-29
Mitzi Gvojic	Chicago, IL	2020-04-29
Gail Elion	Chicago, IL	2020-04-29
Isabella Estrada	Chicago, IL	2020-04-29
Destiny Williams	Des Moines, IA	2020-04-29
Maryellen Drake	Chicago, IL	2020-04-29
Aaron Arroyo	Chicago, IL	2020-04-29

Name	Location	Date
Robert Martinez	Chicago, IL	2020-04-29
Crystal Mosley	Chicago, US	2020-04-29
Vivian Orozco	Chicago, IL	2020-04-29
Leanne Kennedy	Newport, US	2020-04-29
Ryan Tanner	Knoxville, US	2020-04-29
david tripp	Buzzards Bay, US	2020-04-29
Aishah OConnell	Winston Salem, US	2020-04-29
Tyron Moore	Bryant, US	2020-04-29
raphael rodriguez	chicago, IL	2020-04-29
Michelle Lewis-Bennett	South Holland, IL	2020-04-29
FELIPE TORRES	CHICAGO, IL	2020-04-29
Vincent Hines	US	2020-04-29
jennifer Castaneda	Chicago, IL	2020-04-29
Josue Sandoval	Chicago, IL	2020-04-29
Tom Shepherd	chicago, IL	2020-04-29
Keywann Goldsmith	Springfield, IL	2020-04-29
Jalen Edwards	Zachary, US	2020-04-29
Francisca Campos Gutierrez	Chicago, IL	2020-04-29
Elonda Johnson	Chicago, IL	2020-04-29
Charles Grantham	Chicago, IL	2020-04-29
Maria Rivera	Chicago, IL	2020-04-29
Juan Flores	Chicago, IL	2020-04-29

Name	Location	Date Date
Ivan Ramirez	Chicago, IL	2020-04-29
Calenita Laguerre	Chicago, IL	2020-04-29
David Kenady	Chicago, IL	2020-04-29
Francisco Lopez	Chicago, IL	2020-04-30
Carol Medina	Orland Park, IL	2020-04-30
Leticia McKinney	Chicago, US	2020-04-30
Santiago Contreras	Chicago, IL	2020-04-30
tim engberts	Leusden, US	2020-04-30
Mirella Camarena	Chicago, IL	2020-04-30
Marlee Silberman	Chicago, IL	2020-04-30
Jose Campos	Chicago, IL	2020-04-30
Samantha Rojas	Lowell, IN	2020-04-30
Guadalupe Ochoa	Chicago, IL	2020-04-30
John Tabares	Chicago, IL	2020-04-30
Rudy Mendoza	Dolton, IL	2020-04-30
Jose Lopez	Chicago, IL	2020-04-30
Tina Perez	Chicago, IL	2020-04-30
Abraham Sepulveda	Chicago, IL	2020-04-30
Martina Arellano	Chicago, IL	2020-04-30
Guillermo Rodriguez	Chicago, IL	2020-04-30
Ramana Guntamukkala	Monroe Township, US	2020-04-30
Mari Monroe	Denver, US	2020-04-30

Name	Location	Date
Cooper Lyon	Anchorage, US	2020-04-30
Tami Gregory	Missouri City, US	2020-04-30
Radha Nagini	Plains boro, US	2020-04-30
Tisha Hyde	Brooklyn, US	2020-04-30
Gaelle Athouriste	Hollywood, US	2020-04-30
Sandy Reid	Fort Walton Beach, US	2020-04-30
Vincent Jurek	New Braunfels, US	2020-04-30
Maria Edwards	Dorchester, US	2020-04-30
dorothy arnwine	New York, US	2020-04-30
Suzana Stjepanović	Keller, US	2020-04-30
Xavier Hernandez	Chicago, IL	2020-05-01
Roberto Romero Salas	Chicago, US	2020-05-01
Martin Gallegos	Chicago, IL	2020-05-01
Juan Ramírez	Zapopan, Mexico	2020-05-01
Gustavo Campos	Chicago, IL	2020-05-01
Lara Compton	Chicago, IL	2020-05-02
Imelda J Munoz-Perez	Hammond, IN	2020-05-02
Lizeth Ortiz-alvarez	Chicago, IL	2020-05-02
Beaatrice Lumpkin	Chicago, IL	2020-05-03
Rolando Rodriguez	Chicago, IL	2020-05-04
Peg Salazar	Chicago, IL	2020-05-04
Zachary Nichols	Evanston, IL	2020-05-04

Name	Location	Date
Joann Ell	Chicago, IL	2020-05-04
Claudia Lucero	Chicago, IL	2020-05-04
Justis Olivarez	Chicago, IL	2020-05-04
Anita Granado-Rosso	US	2020-05-04
Araceli Pantoja	Chicago, IL	2020-05-04
Nereida Velez	Chicago, IL	2020-05-04
Debra Salinas	Whiting, IN	2020-05-04
Vicky Sanchez	Whiting, IN	2020-05-04
ROSALVA RUIZ	Chicago, IL	2020-05-04
Mario Lucero	Oak Park, IL	2020-05-04
Beateiz Cervantes	Chicago, IL	2020-05-04
Rita Jirasek	Chicago, IL	2020-05-04
Matthew Rutter	Chandler, US	2020-05-04
Scott Turner	Pittsburgh, US	2020-05-04
Mason Wobschall	East Amherst, US	2020-05-04
Owen Honour	Wayzata, US	2020-05-04
Gunnar Dearth	Jackson, US	2020-05-04
Brett Megan	Londonderry, US	2020-05-04
Korine Michel	Hialeah, US	2020-05-04
mosafer mosafer	Caldwell, US	2020-05-04
Joey Marocco	Logansport, US	2020-05-04
СН	New Lenox, US	2020-05-04

Name	Location	Date
camryn mccutchen	Moncks Corner, US	2020-05-04
Joemy Medina	Englewood, US	2020-05-04
Carnelius Denson Sr	Andalusia, US	2020-05-05
Dylan Thompson	Harrisonburg, US	2020-05-05
Skyler Vant	North Salt Lake, US	2020-05-05
Leann Taylor	Vincentown, US	2020-05-05
Jane Madrid	Hobbs, US	2020-05-05
KATHLEEN Hoban	Clarks Summit, US	2020-05-05
Melissa Dodson	Whitwell, US	2020-05-05
ramyar mafakheri	tehran, US	2020-05-05
David White	Missouri City, US	2020-05-05
Regina Williams	Miami, US	2020-05-05
Camila Toba	Houston, US	2020-05-05
ashley ramirez	Wilmington, US	2020-05-05
Rene Benavidez	Chicago, IL	2020-05-05
Guadalupe Urdiales	Lansing, IL	2020-05-05
Mieke Harbin	Highland, IN	2020-05-05
Susan Lempke	Chicago, IL	2020-05-05
Celia Benavidez	Chicago, IL	2020-05-05
Rachel Vance	Chicago, IL	2020-05-05
Linnea Ogrentz	Chicago, IL	2020-05-05
Steve Starr	Chicago, IL	2020-05-05

Name	Location	Date
Robert Green	Calumet City, IL	2020-05-05
Karen Morin	Chicago, IL	2020-05-05
Laura Radelia	Orland Park, IL	2020-05-05
Mary Jo Shaver	Chicago, IL	2020-05-05
Gregoria Vega Byrnes	Chicago, IL	2020-05-05
miles vance	Chicago, IL	2020-05-05
Demetrios Papaioannou	Chicago, IL	2020-05-05
Brenna Brady	Oak Lawn, IL	2020-05-05
Erin raether	Chciago, IL	2020-05-06
Anahi Carrera	Chicago, IL	2020-05-07
Shari Polovina Elbaor	Chicago, IL	2020-05-08
Laura Salazar	Chicago, IL	2020-05-08
Kelly Gagen	Lockport, IL	2020-05-08
Andrew Breen	Chicago, IL	2020-05-08
roemary glavin	chicago, IL	2020-05-08
Nelly Martínez	Chicago, IL	2020-05-08
Michelle Dolac	Chicago, IL	2020-05-08
Alyssa Carrizales	Chicago, IL	2020-05-08
Brooke Rodriguez	Chicago, IL	2020-05-08
David Cedano	Valparaiso, US	2020-05-08
Rosemary Delgado	chicago, IL	2020-05-08
Alexandra Galvan	Chicago, IL	2020-05-08

Name	Location	Date
Courtney Garrity	Canyon Country, CA	2020-05-08
Oscar Sanchez	Chicago, IL	2020-05-08
Jessica Vargas	Chicago, IL	2020-05-08
Elizabeth Fraser	Chicago, IL	2020-05-08
Daisy Magana	Chicago, IL	2020-05-08
Mikel Villalobos	Chicago, IL	2020-05-08
Dolores Olmedo	Chicago, IL	2020-05-08
Jesse Chavez	Chicago, IL	2020-05-08
Cathaline Carter	CHICAGO, IL	2020-05-08
Samuel Solis Jr.	Chicago, IL	2020-05-08
Betty Landis	Evanston, IL	2020-05-08
Bricia Arambula	Chicago, IL	2020-05-08
Antonio Chico	Leander, TX	2020-05-08
robert castillo	Chicago, IL	2020-05-08
Edwin Gonzalez	Chicago, IL	2020-05-08
Carina Ruiz	Chicago, IL	2020-05-08
Carlos Castillo	Chicago, IL	2020-05-08
David Senteno	Chicago, IL	2020-05-08
Adela Chavarria	North Chicago, IL	2020-05-08
Rodolfo ortiz	Chicago, IL	2020-05-08
Lynn Smith	Chicago, IL	2020-05-08
ISIDRO Avila	Chicago, IL	2020-05-08

Name	Location	Date
Crystal Leon	Chicago, IL	2020-05-08
Christopher Rodriguez	Chicago, IL	2020-05-08
Nicholas Gaik	Chicago, IL	2020-05-08
Esteban Perez	Riverside, IL	2020-05-08
Ron Rodriguez	Oak Lawn, IL	2020-05-08
Carl Zavala	Chicago, IL	2020-05-08
Carlos Carrillo	Chicago, IL	2020-05-08
Adrian Cerda	Chicago, IL	2020-05-08
Lauren Gonzalez	Chicago, IL	2020-05-08
Roger Castro	Chicago, US	2020-05-08
Vanessa Saucedo	Chicago, IL	2020-05-08
Sanjuana Cardenas	Chicago, IL	2020-05-08
Thomas Bulmer	Chicago, IL	2020-05-08
Corey rodriguez	Chicago, IL	2020-05-08
Benacio Esquivel	Chicago, IL	2020-05-08
Guadaupe Enriquez	Chicago, IL	2020-05-08
Norma Gonzalez	Chicago, IL	2020-05-08
Juan Serrano	Griffith, IN	2020-05-08
Minerva Dominguez	Chicago, IL	2020-05-08
Jesse Meza	Berwyn, IL	2020-05-08
Rosalie Luera	Tinley Park, IL	2020-05-08
Rishi Awatramani	Chicago, IL	2020-05-08

Name	Location	Date
Erin Franzinger	Chicago, IL	2020-05-08
Lisa Sowa-Downs	Chicago, IL	2020-05-08
Jamie Garrity	Homewwod, IL	2020-05-08
Melissa Villalobos	Chicago, IL	2020-05-08
Marta Hernandez	Chicago, IL	2020-05-08
julie armijos	Chicago, IL	2020-05-08
Vanessa Soto	Whiting, IN	2020-05-08
Rose Salazar	Chicago, IL	2020-05-08
Daniel Avila	Evergreen park, IL	2020-05-08
Carlos Cerda	Chicago, IL	2020-05-08
Forrest Cortes	Chicago, IL	2020-05-08
Laura Cuevas	Chicago, IL	2020-05-08
Joel Cortes	Chicago, IL	2020-05-08
Eric Gomez	Chicago, IL	2020-05-08
Gaudhy Campuzano	Chicago, IL	2020-05-08
Carla Rosado	Chicago, IL	2020-05-08
edwin Perez	Chicago, IL	2020-05-08
karen reyes	Chicago, IL	2020-05-08
Erica Cerda-Ticknor	La grange, IL	2020-05-08
Maria Vargas	Chicago, IL	2020-05-08
Paul Roggenkamp	Tampa, FL	2020-05-08
Alexandra Cuadra	Crown Point, IN	2020-05-08

Name	Location	Date
Jane Nystrom	Chicago, IL	2020-05-08
Jamie Puente	Chicago, IL	2020-05-08
pedro Gonzalez	Chicago, IL	2020-05-08
Ashley Carrasco	Chicago, IL	2020-05-08
Elena Kantzioris	Chicago, IL	2020-05-08
Susan Camacho	Chicago, IL	2020-05-08
Yvette Ruvalcaba	Chicago, IL	2020-05-08
Doris Mendoza	Chicago, IL	2020-05-08
Carolyn Reyes	Chicago, IL	2020-05-08
Pedro Abrego	Chicago, IL	2020-05-08
Courtney Young	Urbana, IL	2020-05-08
Jacquelyn Cuadra	Chicago, IL	2020-05-08
Bianca Montoya	Chicago, IL	2020-05-08
Brian Zuchowski	Chicago, IL	2020-05-08
Dekonti Davies	Chicago, IL	2020-05-08
Christopher Biegel	Chicago, IL	2020-05-08
Frank Lopez	Hayward, WI	2020-05-08
Joe Paniagua	Lansing, IL	2020-05-08
Jesus Alvarado	Chicago, IL	2020-05-08
Rebecca Perez	Chicago, IL	2020-05-08
Carlisa Bly	Chicago, IL	2020-05-08
Kathleen Ulm	Hammond, IN	2020-05-08

Name	Location	Date
Betty Gonzalez	Chicago, IL	2020-05-08
Jennifer Beirne	Chicago, IL	2020-05-08
Javier Duarte	Chicago, IL	2020-05-08
Sue Elliott	Chicago, IL	2020-05-08
Donovan Rush	Chicago, IL	2020-05-08
Linda Bullen	Chicago, IL	2020-05-08
Iyana Simba	Fairfax, VA	2020-05-08
Tamara Smith	Chicago, IL	2020-05-08
Ana Mejia	Chicago, IL	2020-05-08
Melissa Rodriguez	Chicago, IL	2020-05-08
Patricia CALVILLO RIVERA	Chicago, IL	2020-05-08
Shalonda Henry	Oklahoma City, US	2020-05-08
Jordan Harris	Duluth, US	2020-05-08
Biljana Filipovic	US	2020-05-08
Sarah Lewis	Orlando, US	2020-05-08
Matthew Rodman	Westmont, US	2020-05-08
Robert Garrity	Calumet city, IL	2020-05-08
Ramya Vallabhaneni	Reidsville, US	2020-05-08
퓓퓪퓶퓲퓪퓷 퓐퓿퓲퓵퓪	Topeka, US	2020-05-08
Marisol Escobar	Chicago, IL	2020-05-08
Sheila Johnson	US	2020-05-08
David Martinez	Chicago, IL	2020-05-08

Name	Location	Date
Deeana Mendoza	Chicago, IL	2020-05-08
Richard McConnell	Crown Point, US	2020-05-08
Max Schuette	Lemont, US	2020-05-08
Keira Craddock	Levittown, US	2020-05-08
carolina castaneda	Chicago, IL	2020-05-08
Keily Garcia	Las Vegas, US	2020-05-08
Leslie Tighe	Chicago, IL	2020-05-08
Margaret Reid	Greenville, US	2020-05-08
Mahonry Estrada	Chicago, IL	2020-05-08
maryanne calvillo	chicago, IL	2020-05-08
Elizabeth Hallmark	Charlotte, US	2020-05-08
Cheryl Briscoe	Chicago, IL	2020-05-08
Lorraine DeVito	Freehold, US	2020-05-08
MONICA NEVAREZ	Chicago, IL	2020-05-08
Francisco Rosriguez	Chicago, IL	2020-05-08
Smita Mahajan	Chicago, IL	2020-05-08
Kayla Anderson	Atlanta, US	2020-05-08
Mylie Ochoa	Odenton, US	2020-05-08
Victoria Flores	Chicago, IL	2020-05-08
Froilán Guzmán	San Diego, CA	2020-05-08
Madison Tyler	US	2020-05-08
Dorothea bates	Superior, US	2020-05-08

Name	Location	Date
Wolf Cool	US	2020-05-08
Leland Smith	Sedalia, US	2020-05-08
Jerna Noël	Maplewood, US	2020-05-08
calvin Chilton	Long Beach, US	2020-05-08
Angelica Alvarez	Chicago, IL	2020-05-08
Loreinny Jimenez	Irvington, US	2020-05-08
Tamara Cruz	Elizabeth, US	2020-05-08
amanda goluszka	college station, US	2020-05-08
Casey Roberts	Marshfield, US	2020-05-08
meijing Huang	Flushing, US	2020-05-08
Rubi Delvalle	Galveston, US	2020-05-08
Desmond Nylander	Deptford, US	2020-05-08
Christina Córdova-Herrera	Berwyn, IL	2020-05-08
Valerie Laris	Gloversville, US	2020-05-08
Demetriis Brunskill	Riverhead, US	2020-05-08
Rosa Paniagua	Chicago, IL	2020-05-08
Felicia Harvey	Chicago, US	2020-05-08
Justin Atnes	US	2020-05-08
Fardowsa Elmi	San Diego, US	2020-05-08
Ciara Rodriguez	VINELAND, US	2020-05-08
Zac Staser	Bolingbrook, US	2020-05-08
Umayr Khan	Chicago, US	2020-05-08

Name	Location	Date
Joanna Yepez	Sacramento, US	2020-05-08
Ella Bizzozero	hackettstown, US	2020-05-08
Ellie Chramosta	Stilwell, US	2020-05-08
Sasa Sterling	Chicago, IL	2020-05-08
Faith Otobo	Bronx, US	2020-05-08
Natalia Hill	US	2020-05-08
Linda Almaguer	Chicago, IL	2020-05-08
Javier Ventura	Chicago, IL	2020-05-08
Ismael Castaneda	Blue Island, IL	2020-05-08
Robert Eynatten	La Grange, IL	2020-05-08
Alexandria Bonilla	Chicago, IL	2020-05-08
Saul Marin	Park Forest, IL	2020-05-08
Emily Christopherson	Saint Paul, MN	2020-05-08
CYNTHIA ESCOBEDO	Chicago, IL	2020-05-08
catherine carillo	Chicago, IL	2020-05-08
Jose Duran	Mokena, IL	2020-05-08
Audelia Soto	Chicago, IL	2020-05-08
Roberto Defreitas	Chicago, IL	2020-05-08
Gabriela Popoca	Chicago, IL	2020-05-08
Adan Contreras	Chicago, IL	2020-05-08
Giselle Ruvalcaba	Chicago, IL	2020-05-08
Juan Rodríguez	Chicago, US	2020-05-08

Name	Location	Date
Cristina Gomez	Chicago, IL	2020-05-08
Javier Casillas	Schaumburg, IL	2020-05-08
Donald Roberts	Chicago, IL	2020-05-08
Chuck Richardson	Chicago, IL	2020-05-08
Lynn Santoyo	Chicago, IL	2020-05-08
Arturo anaya	Chicago, IL	2020-05-08
Jose Garcia	Chicago, IL	2020-05-08
James Carrillo	Chula Vista, CA	2020-05-08
Terry Evans	Chicago, IL	2020-05-08
Thomas Russell	Evanston, IL	2020-05-08
Tina Mayes	Chicago, IL	2020-05-08
Tristian Villalobos	FPO 96373, AP	2020-05-08
angelina perz	Chicago, IL	2020-05-08
Maureen Sullivan	Chicago, IL	2020-05-08
Sharon Alvarado	Chicago, IL	2020-05-08
Tony Burmistrz	Chicago, IL	2020-05-08
Cindy Espinosa	Chicago, IL	2020-05-08
Maria Jimenez	Schaumburg, IL	2020-05-08
Cecilia Llamas	Chicago, IL	2020-05-08
Steven Sucilla	Chicago, IL	2020-05-08
Damien Hernandez	Chicago, IL	2020-05-08
AURORA INSURRIAGA	CHICAGO, IL	2020-05-08

Name	Location	Date
Luz Garcia	Chicago, IL	2020-05-08
Julia Hundley	Park Forest, IL	2020-05-08
Kelly Hughes	Chicago, IL	2020-05-08
Julian Cruz	Chicago, IL	2020-05-08
Yenytzel Maldonado	Chicago, IL	2020-05-08
Elena Martinez	Chicago, IL	2020-05-08
Valeria Duron	Chicago, IL	2020-05-08
Mary N. Hernandez	Chicago, IL	2020-05-08
Jessica Andrade	Chicago, IL	2020-05-08
Samona Ruiz	Chicago, IL	2020-05-08
Carmen Cuadra	Chicago, IL	2020-05-08
Amaris Alanis Ribeiro	Chicago, IL	2020-05-08
Violeta Lukac	Chicago, IL	2020-05-08
Paula Andrade	Chicago, IL	2020-05-08
Teresa Sobieski	Lewiston, ID	2020-05-08
Danielle Andrade	Chicago, IL	2020-05-08
Walter Stager	Plano, US	2020-05-08
Yumemi_ Emi	US	2020-05-08
Carl Celestin	Union, US	2020-05-08
Ryan Duncan	Detroit, US	2020-05-08
LUZ Sepulveda	Chicago, IL	2020-05-08
Joel Vasquez	Chicago, IL	2020-05-08

Name	Location	Date
Patricia Evans	Marengo, US	2020-05-08
sherri hodges	Phoenix, US	2020-05-08
Taylor Wiseman	Brownsburg, US	2020-05-08
Carla Sanchez	Chicago, IL	2020-05-08
María Pedraza	Salinas, US	2020-05-08
Preston Boespflug	Battle Ground, US	2020-05-08
Ray Wiesen	US	2020-05-08
Ken Wong	Chicago, IL	2020-05-08
Jordon Angstadt	Mertztown, US	2020-05-08
Brandon Faglier	Asheboro, US	2020-05-08
Levi Payne	Monroe, US	2020-05-08
reese correa	Tulare, US	2020-05-08
Lana Jackson	Brooklyn, US	2020-05-08
Robert Lowry	Rochester, US	2020-05-08
Heleana OBrien	Lithonia, US	2020-05-08
Samantha Strong	Jacksonville, US	2020-05-08
Valery Shuman	Chicago, IL	2020-05-08
Luis Rivera	Chicago, IL	2020-05-08
Christopher Sopchak	Denville, US	2020-05-08
Donna McKee	Lederach, US	2020-05-08
Danielle Martinez	chicago, IL	2020-05-08
Pablo Perez	Charleston, SC	2020-05-08

Name	Location	Date
Maya Rodriguez	Chicago, IL	2020-05-08
Bonnie May Hickmon	Chicago, IL	2020-05-08
nancy garcia	Elizabeth, LA	2020-05-08
Robbie Rob	US	2020-05-08
Sal Garcia	Chicago, IL	2020-05-08
John Benedict	Clemons, IA	2020-05-08
Jazlyn Cano	Chicago, IL	2020-05-08
Jason Palagi	Chicago, IL	2020-05-08
Tony L.	Chicago, IL	2020-05-08
JOHN BATTISTA	Chicago, IL	2020-05-08
Feli Maritza	Indianapolis, IN	2020-05-08
Henry Robateau	Rolling Meadows, IL	2020-05-08
Stacey Bergland	Evanston, IL	2020-05-08
PAMELA BATTISTA	Chicago, IL	2020-05-08
Arlene McFadden	Chicago, IL	2020-05-08
Samantha Estrada	Brooklyn, NY	2020-05-08
Andrea Munoz	Calumet City, IL	2020-05-08
Mayra Godoy	Lyons, IL	2020-05-08
Meli Jimenez	Chicago, IL	2020-05-08
Jacob Taus	Chicago, IL	2020-05-08
Debby Martinez	Chicago, IL	2020-05-08
Assel Moldak	Chicago, IL	2020-05-08

Name	Location	Date
Rita Rangel	Chicago, IL	2020-05-08
Anely Lopez	Chicago, IL	2020-05-08
Bojan Celenkovic	Belgrade, Serbia	2020-05-08
Jaime Cuadra	Chicago, IL	2020-05-08
Carl Dela Criz	Chicago, IL	2020-05-08
barbara mota	Chicago, IL	2020-05-08
Brian Covarrubias Sanchez	Indianapolis, IN	2020-05-08
Jaime Valentin	Chicago, IL	2020-05-08
Jos Aguilar	Chicago, IL	2020-05-08
Jimena Barajas	Chicago, IL	2020-05-08
Elena Farfan	US	2020-05-08
Adrian Corral	Chicago, IL	2020-05-08
Virginia Wier	Illinois	2020-05-08
Jessica Zavala	East Chicago, IN	2020-05-08
Lily Perez	Prospect Heights, US	2020-05-08
John Partner	Hammond, IN	2020-05-08
José Venegas	Chicago, IL	2020-05-08
Flores Monica	Chicago, IL	2020-05-08
Bailey Carlisle	Brooklyn, NY	2020-05-08
Isabel Salazar	Chicago, IL	2020-05-08
Marta Perea	Chicago, IL	2020-05-08
Susan Hardison	Dolton, IL	2020-05-08

Name	Location	Date
Laura Magallanes	Chicago, IL	2020-05-08
Valeria LAUREANO	Indianapolis, IN	2020-05-08
Carlos Nunez	Chicago, IL	2020-05-08
Maddy Vincent	Chicago, US	2020-05-08
Megan Brizuela	Chicago, IL	2020-05-08
Luis Paz	Chicago, IL	2020-05-08
Maria Heredia	Chicago, IL	2020-05-08
Mario Gonzalez	Hammond, IN	2020-05-08
Martin Herrera	Chicago, IL	2020-05-08
Isabella Martin	Sylmar, US	2020-05-08
Emily Aguilar	Chicago, IL	2020-05-08
Destini Colley	Houston, US	2020-05-08
Christopher Estrada	Chicago, IL	2020-05-08
Shook Madison	New York, US	2020-05-08
Phenix Brown	Huntersville, US	2020-05-08
Kyle David	Cambridge, US	2020-05-08
Sydney Cooley	Richland Center, US	2020-05-08
Microwave Sci-ManSF	Novato, US	2020-05-08
Brandy Graves	Copperas cove, US	2020-05-08
Peter Njau	Seattle, US	2020-05-08
Alexander Gray	Central point, US	2020-05-08
Elias Quintero	Chicago, IL	2020-05-08

Name	Location	Date
Joe Jackmeoffplease	Wenonah, US	2020-05-08
Robert Juner	Naperville, US	2020-05-08
julia bastante	Haskell, US	2020-05-08
Denny Garibay	Holland, US	2020-05-08
Marra Pryal	Bethesda, US	2020-05-08
Elizabeth Nunez	Chicago, IL	2020-05-08
Laura Goldberg	Chicago, IL	2020-05-08
Christian Solis	Chicago, IL	2020-05-08
Rachel Vargas	Chicago, IL	2020-05-08
Guadalupe Alvarez	Chicago, IL	2020-05-08
Naomi Gonzalez	Calumet city, IL	2020-05-08
Melissa Harvey	Chicago, IL	2020-05-08
Maria Ramirez	Chicago, IL	2020-05-08
Patricia Serckie	Chicago, IL	2020-05-08
Melina Rivas	Chicago, IL	2020-05-08
eustolia sandoval	chicago, IL	2020-05-08
Alex Evans	La Porte, IN	2020-05-08
Hugo Venegas	East Chicago, IN	2020-05-08
Chuck Kass	Chicago, IL	2020-05-08
Katherine Mcgue	Chicago, IL	2020-05-08
Greg Romero	Chicago, IL	2020-05-08
Larissa Campana	Emeryville, CA	2020-05-08

Name	Location	Date
Leticia Reyna	Chicago, IL	2020-05-08
Claudia Sandoval	Chicago, IL	2020-05-08
Simone Alexander	Chicago, IL	2020-05-08
Kristen Schillaci	Hammond, IN	2020-05-08
Alexis Cuadrado	Chicago, IL	2020-05-08
MARIA REYNA	Chicago, IL	2020-05-08
Brandon Herrera	Chicago, IL	2020-05-08
Richelle Carlisle	BROOKLYN, NY	2020-05-09
Vanessa Reyna	Chicago, IL	2020-05-09
Christine Biron	Chicago, IL	2020-05-09
Ariana Rodriguez	Chicago, IL	2020-05-09
EILEEN KLEES	Chicago, IL	2020-05-09
Alejandra Ibarra	Chicago, IL	2020-05-09
Kumar Jensen	Chicago, IL	2020-05-09
Finn Person	US	2020-05-09
Crystal Contreras	US	2020-05-09
Adam Ruvalcaba	Chicago, IL	2020-05-09
charlotte jackson	Silver Spring, US	2020-05-09
Jill Blanchard	Minneapolis, US	2020-05-09
Sugey Calderon	Worthington, US	2020-05-09
Salvador Reyes	Lansing, IL	2020-05-09
Aliyah Pope	Rockville, US	2020-05-09

Name	Location	Date
Teresa Navarro	Chicago, IL	2020-05-09
Alex Cuevas	Garland, US	2020-05-09
Jordyn Taylor	Schaumburg, US	2020-05-09
Jamon Aviles	US	2020-05-09
Yolian cintron	Chicago, IL	2020-05-09
Justin Villasenor	Chicago, IL	2020-05-09
Cherokee Gutierrez	Houston, TX	2020-05-09
Alondra Martinez	Chicago, IL	2020-05-09
Marcos Coronado	Chicago, IL	2020-05-09
Baby Mexico	Lake Jackson, US	2020-05-09
Allie Vuona	Woonsocket, US	2020-05-09
Jessica Cantrell	Dodgeville, US	2020-05-09
jennie chang	manhattan, US	2020-05-09
Juan Castaneda	Chicago, IL	2020-05-09
Melissa Mangieri	Sarver, US	2020-05-09
Kira Chow	Goose Creek, US	2020-05-09
Miguel Gonzalez	Bronx, US	2020-05-09
Sunshine Fegett	Decatur, US	2020-05-09
JON INWOOD	Brooklyn, NY	2020-05-09
Adali Ramirez	Chicago, IL	2020-05-09
Maritza Juarez	Whiting, IN	2020-05-09
Azucena Padilla	Chicago, IL	2020-05-09

Name	Location	Date
Hoton Cortes	Chicago, IL	2020-05-09
Sandra Aguilera	Chicago, IL	2020-05-09
Gilberto Cruz	O'Fallon, IL	2020-05-09
Jahari Webb	Chicago, IL	2020-05-09
Rick Deleon	Chicago, IL	2020-05-09
Kimberly Zamudio	Joliet, IL	2020-05-09
Celia Rojas	Chicago, IL	2020-05-09
Carolyn Marsh	Munster, IN	2020-05-09
Sasa Filipovic	Chicago, IL	2020-05-09
Aileen Salgado	Chicago, IL	2020-05-09
Nancy Salas-Herrera	Chicago, IL	2020-05-09
veronica moran	Chicago, IL	2020-05-09
Juan Correa	Chicago, IL	2020-05-09
David Piazza	Chicago, IL	2020-05-09
Tyrone Wilkins	Atwood, IL	2020-05-09
Marta Florez	Chicago, IL	2020-05-09
Ulises Macias	Chicago, IL	2020-05-09
Oralia Correa	Chicago, IL	2020-05-09
Jennifer Medrano	Chicago, IL	2020-05-09
Gabriela Sierra	Chicago, IL	2020-05-09
Sandra Aguirre	Chicago, IL	2020-05-09
monserrat zamudio	Philadelphia, PA	2020-05-09

Name	Location	Date
Eric Rangel	Chicago, IL	2020-05-09
melissa carrillo	Chicago, IL	2020-05-09
Theresa Daniel	Chicago, IL	2020-05-09
Mark Tesoro	Redwood City, CA	2020-05-09
ivonne chavez	Chicago, IL	2020-05-09
Myriam Perez	Chicago, IL	2020-05-09
Eva Jimenez	Chicago, IL	2020-05-09
Margarita Villasenor	Chicago, IL	2020-05-09
Kimberly Goldbaum	Chicago, IL	2020-05-09
Vanessa Kovacevic	Chicago, IL	2020-05-09
Shaila Vera	Waverly, IA	2020-05-09
Jakelin Cervantes	Chicago, IL	2020-05-09
Jennifer Silva	Chicago, IL	2020-05-09
Dariela Zarate	Dallas, TX	2020-05-09
Milagros Ramos	Chicago, IL	2020-05-09
Shanon Numo	Chicago, IL	2020-05-09
Deyanira Moreno	San Juan, TX	2020-05-09
ozzy Bugarin	Midlothian, IL	2020-05-09
Fabian Valdivia	Chicago, IL	2020-05-09
Mariana Jimenez	Chicago, IL	2020-05-09
Jose Menchaca	Chicago, IL	2020-05-09
Vilma Arguelles	Chicago, IL	2020-05-09

Name	Location	Date
Olga Salazar	Chicago, IL	2020-05-09
Xochitl Lopez	Chicago, IL	2020-05-09
Jose Guzman	Saint Paul, MN	2020-05-09
Martika Lopez	Chicago, IL	2020-05-09
Carolyn Martinez	Chicago, IL	2020-05-09
August Abitang	Chicago, IL	2020-05-09
Gaby Reyes	Chicago, IL	2020-05-09
Yessenia Balcazar	Chicago, IL	2020-05-09
Jocelyn Molina	Chicago, IL	2020-05-09
Shermeka Marie	Chicago, IL	2020-05-09
Roman Lapinski	Chicago, IL	2020-05-09
Breyanna Primous	Kansas City, MO	2020-05-09
Stella Arroyo	Chicago, IL	2020-05-09
Marta Reyes	Chicago, IL	2020-05-09
Rebecca Moran	Chicago, IL	2020-05-09
Michael Hamilton	Plainfield, IL	2020-05-09
Jacquelyn Garza	Grayslake, IL	2020-05-09
Vivian Gonzales	Henderson, NV	2020-05-09
Margaret cortes	Chicago, IL	2020-05-09
Richard Drew	Chicago, IL	2020-05-09
Alejandra Aguilar	Chicago, IL	2020-05-09
Jose Barraza	Chicago, IL	2020-05-09

Name	Location	Date
Nicole Sipic	Chicago, IL	2020-05-09
Rodrigo Cortes Espinoza	Chicago, IL	2020-05-09
Julissa Ocampo	Chicago, IL	2020-05-09
Jesse Hernandez	Chicago, IL	2020-05-09
Marlene Espinoza	Chicago, IL	2020-05-09
Mayra Gonzalez	Chicago, IL	2020-05-09
Tiffany Poole	Chicago, US	2020-05-09
colette tasker steele	Chicago, IL	2020-05-09
Armando Del Real	Chicago, IL	2020-05-09
melvin roland	Chicago, IL	2020-05-09
Aaron Glinsey	Chicago, IL	2020-05-09
Brandi Harris	Aurora, IL	2020-05-09
Blanca Pacheco	Chicago, IL	2020-05-09
Steven Gassen	Oak Park, IL	2020-05-09
Rocio Andrade	Chicago, IL	2020-05-09
A Anne Holcomb	Chicago, IL	2020-05-09
Isabel Chavez	Beloit, WI	2020-05-09
John Nemri	Chicago, IL	2020-05-09
Elia Murillo	Chicago, IL	2020-05-09
Terecita Gomez	Chicago, IL	2020-05-09
veda childress	Chicago, IL	2020-05-09
Maria Munoz	Chicago, IL	2020-05-09

Name	Location	Date
Marvin Schwartz	Chicago, IL	2020-05-09
kai louden	Chicago, IL	2020-05-09
Jennifer Bogardus	Chicago, IL	2020-05-09
Linda Young	Chicago, IL	2020-05-09
Jesse Godina	Villa Park, US	2020-05-09
Katie Walker	Chicago, IL	2020-05-09
Sugey Barba	Chicago, IL	2020-05-09
Brandon Moody	Chicago, IL	2020-05-09
Leida Sylvester	Chicago, IL	2020-05-09
Goya Saavedra	Chicago, IL	2020-05-09
Tyler F	Charlotte, NC	2020-05-09
Imelda Lagunas-Gonzalez	US	2020-05-09
Blair Michele Meehan	Plainfield, US	2020-05-09
Francois Chris	Japan	2020-05-09
Jesse Bergstrom	Chicago, US	2020-05-09
Hannah Gruber	Providence, US	2020-05-09
Brianna von Collenberg	Las Vegas, US	2020-05-09
Amanda erwin	Santa Cruz, US	2020-05-09
yousef darras	US	2020-05-09
mada briseno	chicago, IL	2020-05-09
sophie horn	Mason, US	2020-05-09
Quan Sun	Brentwood, US	2020-05-09

Name	Location	Date
Yadira Ramírez	Chicago, IL	2020-05-09
jessica pinto	brooklyn, US	2020-05-09
Crystal Flores	Mcallen, US	2020-05-09
Keonte Peterson	Chicago, IL	2020-05-09
Jaqueline Paz	Chicago, IL	2020-05-09
Karen T	Chicago, IL	2020-05-09
Bianca Caillouet	Chicago, IL	2020-05-09
Andrew Moreno	Chicago, IL	2020-05-09
Mayra Patino	Chicago, IL	2020-05-09
Isa cardenas	Granger, IN	2020-05-09
Melissa Torres	Chicago, IL	2020-05-09
Alyssa Montiel	Chicago, IL	2020-05-09
Irene Torrez	Chicago, IL	2020-05-09
Aurelia Alvarez	Chicago, IL	2020-05-09
Ana Sanchez	Chicago, IL	2020-05-09
Jessica Padilla	Chicago, IL	2020-05-09
Melony Escorza	Chicago, IL	2020-05-09
Rosa Padilla	Chicago, IL	2020-05-09
Catherine Montiel	Chicago, IL	2020-05-09
Adrian Oliveros	Chicago, IL	2020-05-09
Alfredo Sierra	Chicago, IL	2020-05-09
Jose Flores	Chicago, IL	2020-05-09

Name	Location	Date
Jennifer Ortega	Chicago, IL	2020-05-09
C Mcclain	Chicago, IL	2020-05-09
Cristal perez	Chicago, IL	2020-05-09
Rosalba Briseno	Romeoville, IL	2020-05-09
Humberto Perez	Chicago, IL	2020-05-09
S V	tsv, Australia	2020-05-09
ricardo villarreal	Chicago, IL	2020-05-09
Qiana Monroe	Antioch, IL	2020-05-09
Phyllis Kotlarz	Orland Park, IL	2020-05-09
Fatima Cortes	Chicago, IL	2020-05-09
jane nye	chgo, il, AL	2020-05-09
Leslie Servin	Chicago, IL	2020-05-09
Gerardo Castillo	Chicago, IL	2020-05-09
Natalie Castillo	Chicago, IL	2020-05-09
Araceli Aponte	Chicago, IL	2020-05-09
Megan Hougarf	Chicago, IL	2020-05-09
Jeremy Whisenton	Chicago, IL	2020-05-09
Mary Anderson	Morongo valley, US	2020-05-09
Sebastian Holtzman	Albuquerque, US	2020-05-09
David Mcdowell	Chicago, US	2020-05-09
Liz Rodrigues	Aurora, US	2020-05-09
Dylan Fitzhugh	Murfreesboro, US	2020-05-09

Name	Location	Date
Nunzia Martino	Bloomington, IL	2020-05-09
Herlinda Castro	Chicago, IL	2020-05-09
Claudia Soto	Chicago, IL	2020-05-09
Raul Ramirez	Chicago, IL	2020-05-09
Divinity Lane	Chicago, IL	2020-05-09
Jessica Gonzalez	Chicago, IL	2020-05-09
Amy Lindner	Chicago, IL	2020-05-09
Elisa Lopez	Chicago, IL	2020-05-09
Juliet Allison	Chicago, IL	2020-05-09
Salome Bruce	Kansas City, MO	2020-05-09
Jailyn Joseph	Chicago, IL	2020-05-09
Jennifer Serrano	Chicago, IL	2020-05-09
Mariyah Allen	Chicago, IL	2020-05-09
Amanda Montes	Chicago, IL	2020-05-09
wendy paez	Chicago, IL	2020-05-09
Viviana Mota	Chicago, IL	2020-05-09
Carilina GARCIA	Chicago, IL	2020-05-09
Erik Infante	Chicago, IL	2020-05-09
Jennifer Mendez	Chicago, IL	2020-05-09
Jayden Tarr	Chicago, IL	2020-05-09
Olga Gamboa	Chicago, IL	2020-05-09
Jorge Orozco	Chicago, IL	2020-05-09

Name	Location	Date
Alejandra Alvarez	Chicago, IL	2020-05-09
Elizabeth Figueroa	Chicago, IL	2020-05-09
Shannon Walker	Chicago, IL	2020-05-09
Rosa Mendoza	Chicago, IL	2020-05-09
Selena Cabrera	Chicago, IL	2020-05-09
Faby Jimenez	Chicago, IL	2020-05-09
Tiffany N.	Chicago, IL	2020-05-09
Anthony Salinas	Chicago, IL	2020-05-09
Adam Young	Hobart, IN	2020-05-09
Natalia N	Chicago, IL	2020-05-09
Brenda Oceguera	Chicago, IL	2020-05-09
Patricia Alsup	Chicago, IL	2020-05-09
Diana Alvarez	Hammond, IN	2020-05-09
Vianey Valentin	Chicago, IL	2020-05-09
Jonathan Ortiz	Chicago, IL	2020-05-09
Crystal Soto	Chicago, IL	2020-05-09
Danielle Romero	Chicago, IL	2020-05-09
Adriel Marquez	Chicago, IL	2020-05-09
Khari Averett	Midlothian, IL	2020-05-09
Richard Medina	Chicago, IL	2020-05-09
Erika Meza	Chicago, IL	2020-05-09
Fernando Barrera	Chicago, IL	2020-05-10

Name	Location	Date
brenda padilla	Chicago, US	2020-05-10
Samantha Madlom	Whiting, IN	2020-05-10
Alexis Huizar	Chicago, IL	2020-05-10
Lillian Lawrence	Chicago, IL	2020-05-10
Jeremiah Reed	Chicago, IL	2020-05-10
Louis Guadarrama	Chicago, IL	2020-05-10
Karina Ayala-Bermejo	Chicago, IL	2020-05-10
Jose Rivera	Chicago, IL	2020-05-10
Maja Bulka	Skokie, IL	2020-05-10
DESHON BOYNES	Chicago, IL	2020-05-10
Beatriz Ibarra	Chicago, IL	2020-05-10
Sara Famularo	Chicago, IL	2020-05-10
Gabrielle Razo	Chicago, IL	2020-05-10
Fatima Arias	Chicago, IL	2020-05-10
Daniel Villarreal	Chicago, IL	2020-05-10
Alex Lopez	Calumet City, IL	2020-05-10
Scott Houldieson	Highland, IN	2020-05-10
Millie Carreon	Chicago, IL	2020-05-10
Michelle Jacinto	Chicago, IL	2020-05-10
Jerrilyn Pearson	Chicago, IL	2020-05-10
James Wilburn	US	2020-05-10
Mary C Thomas	Chicago, IL	2020-05-10

Name	Location	Date
Grethel Huerta	Chicago, IL	2020-05-10
Marino N Cassandra Gaeta	US	2020-05-10
Jackson Bruce	Palmyra, US	2020-05-10
savannah sahm	Painesville, OH	2020-05-10
lillie karam	Orange, US	2020-05-10
Raul Soto	Oak Park, IL	2020-05-10
kat finke	chicago, IL	2020-05-10
Yvette NewberryWhite	Chicago, IL	2020-05-10
Monserrat Marquez	Chicago, IL	2020-05-10
Leslie Marquez	Chicago, IL	2020-05-10
David Nino	Chicago, IL	2020-05-10
Viktor Di Lucian Marquez	Chicago, IL	2020-05-10
dalia guizar	Chicago, IL	2020-05-10
Miguel orozco	Chicago, IN	2020-05-10
Leonel Granados	Chicago, IL	2020-05-10
Andrew Goodwin	Whiting, IN	2020-05-10
Grace Theodosis	Chicago, IL	2020-05-10
Cesar Villalobos	Des Plaines, US	2020-05-10
Mayra Marquez	Chicago, IL	2020-05-10
Julie Riffle	Chicago, IL	2020-05-10
Chris Theodosis	Chicago, IL	2020-05-10
lucila saldaña	chicago, IL	2020-05-10

Name	Location	Date
Sylvia Rogers	Chicago, IL	2020-05-10
Janine Hart	Chicago, IL	2020-05-10
Thomas Kirby	Muncie, IN	2020-05-10
Lauren Taylor	Chicago, IL	2020-05-10
Natalia Arreguin	Chicago, IL	2020-05-10
Tania Orozco	Chicago, IL	2020-05-10
Michael Soto	Chicago, IL	2020-05-10
Francisco Medina	Chicago, IL	2020-05-10
Autumn Blackburn	Chicago, IL	2020-05-10
Priscilla San Miguel	Chicago, IL	2020-05-10
Jaime Venegas	Chicago, IL	2020-05-10
Sonia López	Chicago, IL	2020-05-10
Mamayan Jabateh	Chicago, IL	2020-05-10
GUSTAVO Gasca	Chicago, IL	2020-05-10
Petra Alebic	Chicago, IL	2020-05-10
Abigail Garcia	Chicago, IL	2020-05-10
The Clown Chuckles	Chicago, IL	2020-05-10
John Taus	Chicago, IL	2020-05-10
Karina Sevilla	Chicago, IL	2020-05-10
Madelon Smith	Chicago, IL	2020-05-10
destinee perez	chicago, IL	2020-05-10
Dee Downey	Chicago, IL	2020-05-10

Name	Location	Date
Kimberly Bell	Chicago, IL	2020-05-10
sandi leef	Chicago, IL	2020-05-10
Yolanda Munoz	Chicago, IL	2020-05-10
Maria Munoz Guevara	Chicago, IL	2020-05-10
Julian Pacheco	Chicago, IL	2020-05-10
Oscar Salas	Chicago, IL	2020-05-10
Bill McCormick	Chicago, IL	2020-05-10
Djuana Cobb	Chicago, IL	2020-05-10
Michelle Barginear	Chicago, IL	2020-05-10
Oscar Gutierrez	Chicago, IL	2020-05-10
Maria Torres	Gary, IN	2020-05-10
Megan Kelley	Chicago, IL	2020-05-10
Bradley Richie-Sutton	Chicago, IL	2020-05-10
Alice Brandon	Chicago, IL	2020-05-10
Ascencion Andrade	Chicago, IL	2020-05-10
Anel Olivares	Chicago, IL	2020-05-10
Larry Wilkes	Chicago, IL	2020-05-10
Monica Alvarez	Chicago, IL	2020-05-10
Sharon Mcclain	Chicago, IL	2020-05-10
Richard Wachenheim	Romeoville, IL	2020-05-10
Tanya Ordas	Chicago, IL	2020-05-10
Maribel Ornelas	Chicago, IL	2020-05-10

Name	Location	Date
Dagene Brown	Chicago, IL	2020-05-10
Jacqueline Akines	Chicago, IL	2020-05-10
Kate Burns	Munster, IN	2020-05-10
Karina Alvarez	Chicago, IL	2020-05-10
miguel Alvarado	Chicago, IL	2020-05-10
Jaime Godina	Chicago, IL	2020-05-10
David Perez	Chicago, IL	2020-05-10
Jose Chavez	Chicago, IL	2020-05-10
Lori A. Lennix	Chicago, IL	2020-05-10
Aliya Bender	Hammond, IN	2020-05-10
Jorge Urbano	Chicago, IL	2020-05-10
Kimberly Boreczky	Chicago, IL	2020-05-10
Jiovanny Hernandez	Noblesville, IN	2020-05-10
Joe Esquivel	Chicago, IL	2020-05-10
Robert Pyrkowski	Chicago, IL	2020-05-10
Val Stewart	Shorewood, US	2020-05-10
diane ramos	Chicago, IL	2020-05-10
George Cosey	Hammond, IN	2020-05-10
Cassandra Nolen	Chicago, IL	2020-05-11
Kenneth O'Drobinak	Munster, IN	2020-05-11
Frank Dalio	Chicago, IL	2020-05-11
Sandra Klancar	Chicago, IL	2020-05-11

Name	Location	Date
Nadia Johnson	Chicago, IL	2020-05-11
Victor Cortez	Chicago, IL	2020-05-11
Lauren Bianchi	Chicago, IL	2020-05-11
Laura Milkert	Chicago, IL	2020-05-11
Jason Doss	Mount Prospect, IL	2020-05-11
Juan Madrigal	Chicago, IL	2020-05-11
Robert Kelly	Chicago, US	2020-05-11
Christine Marquez	Chicago, IL	2020-05-11
ELLEN MAYER	Chicago, IL	2020-05-11
Patricai Ramos	Chicago, IL	2020-05-11
Steven Schwartzberg	Chicago, IL	2020-05-11
Lynne Jordan	Chicago, IL	2020-05-11
Julia Hunter	Chicago, IL	2020-05-11
Jade Mazon	Chicago, IL	2020-05-11
Joan Walker	Chicago, IL	2020-05-11
Terry Collins	Chicago Heights, IL	2020-05-11
Loreen Targos	Chicago, IL	2020-05-11
Mariana Cruz	Hammond, IN	2020-05-11
celeste martinez	Fremont, US	2020-05-11
Perry Gx	Tustin, US	2020-05-11
Guadalupe Castaneda	Chicago, IL	2020-05-11
Autumn Wadhwa	Pleasanton, US	2020-05-11

Name	Location	Date
Josie Murphy	Chicago, US	2020-05-11
Michael Mccarter	Chicago, IL	2020-05-11
Gabriella Baca	Chicago, IL	2020-05-11
Socorro Parra	Oak Park, IL	2020-05-11
Marie Fabelina	US	2020-05-11
nicole padilla	merrillville, IN	2020-05-11
Deveda Francois	Chicago, IL	2020-05-12
Renata Garcia	Chicago, IL	2020-05-12
Ken Gregory	Powell, TN	2020-05-12
Aurelio Huerta	Chicago, IL	2020-05-12
Imelda Munoz	Chicago, IL	2020-05-12
Nicholas Buckley	Parsippany, US	2020-05-12
Sophia Howard	Hammond, US	2020-05-12
Kyla Claire Colot	Tucson, US	2020-05-12
Elsy Vanna	Chicago, IL	2020-05-12
Michael Garcia	Chicago, IL	2020-05-12
Arnold Bradford	Chicago, IL	2020-05-12
Xavier Cuadra	Chicago, IL	2020-05-12
Michael & Tiffany Norwood	Chicago, IL	2020-05-12
Brenda Becerra	Chicago, IL	2020-05-12
Esther Briseno	Chicago, IL	2020-05-12
Esau Chavez	Chicago, IL	2020-05-12

Name	Location	Date
Daniel Mezydlo	Mokena, IL	2020-05-12
Fern Taylor	Chicago, IL	2020-05-12
jose lemus	chicago, IL	2020-05-12
Valerie Hopkins	Chicago, US	2020-05-12
Jessica Cole	Decatur, US	2020-05-12
Don Williams	Raleigh, US	2020-05-12
J. Haley	Springfield, US	2020-05-12
Lina Diez	Winter Garden, US	2020-05-12
Callum Velat	Middleboro, US	2020-05-12
Giovanni Jimenez	Plantation, US	2020-05-12
Hugo Garcia	Silver Spring, US	2020-05-12
Oliver Levinson	New York, US	2020-05-12
alli h	New Albany, US	2020-05-12
Heriberto Guzman	US	2020-05-12
Alexandra Saucedo	Chicago, IL	2020-05-12
Caroline Wooten	Chicago, IL	2020-05-12
Terry Smith	Chicago, IL	2020-05-13
Gloria Orozco	Chicago, IL	2020-05-13
Hector Calderon	Merrillville, IN	2020-05-13
Sara Wylie	Melrose, MA	2020-05-13
hailey coleman	Westland, US	2020-05-13
Rachel Dunn	Tulsa, US	2020-05-13

Name	Location	Date
Kacey Ware	Moultrie, GA	2020-05-13
Mike Tinney	Fort Worth, US	2020-05-13
Leaf 607	Carmel, US	2020-05-13
Kendrick Roche Lanzot	San Juan, US	2020-05-13
Thomas Lowe	Kula, US	2020-05-13
Maria Sanchez	Chicago, IL	2020-05-13
Tate Anderson	Orem, US	2020-05-13
Kimberly Cowling	US	2020-05-13
Alondra Figueroa	Austin, US	2020-05-13
Jennifer swanson	Paducah, US	2020-05-13
Tim Maurer	Anaheim, US	2020-05-13
dawn smity	Tampa, US	2020-05-13
Joel Ramirez	San Jose, US	2020-05-13
Kelly Emery	Los Angeles, US	2020-05-13
Grace Mika	Jamaica Plain, US	2020-05-13
David W. Gates	Birmingham, US	2020-05-13
Toni Salas	Chicago, IL	2020-05-13
Maya E	Upper Darby, US	2020-05-13
Tameka Hill	Aurora, US	2020-05-13
Cloris Ma	Washington, US	2020-05-13
Eden Whited	Seattle, US	2020-05-13
Richard Beiler	Decatur, US	2020-05-13

Name	Location	Date
Layal Khalil	Houston, US	2020-05-13
Imelda Rivera	Coachella, US	2020-05-13
Angela Hubbs	Hemet, US	2020-05-13
Rashad Robinson	Waco, US	2020-05-13
Fadiylah Esannson	Newark, US	2020-05-13
Dalilah Villarreal	Penitas, US	2020-05-13
Ray Davis	Cabot, US	2020-05-13
Fishy Stanky	Oak Lawn, US	2020-05-13
Noureen Asif	Newburgh, US	2020-05-13
Briona Hamilton	Chicago, US	2020-05-13
Earle Esdelle	Port-of-spain, Trinidad & Tobago	2020-05-13
Enllely Cruz	Miami, US	2020-05-13
Kassie Beyer	Chicago, IL	2020-05-13
Robert Vanecko	Chicago, US	2020-05-13
Eugene Buanteo	Chicago, IL	2020-05-13
Erica Taylor	Chicago, US	2020-05-13
Thaddeus Outlaw	Secaucus, US	2020-05-13
Elizabella Ortiz	Hamburg, US	2020-05-13
Courtney Hanson	Chicago, IL	2020-05-13
Alistair Wiley	US	2020-05-13
Carrie Goode	Gastonia, US	2020-05-13
Florence Evans	New York, US	2020-05-13

Name	Location	Date
Joel Limbrick	Dallas, US	2020-05-13
Marielle Keaggy	Roscoe, US	2020-05-13
Emma Ceja	Chicago, US	2020-05-13
Lakresha Wallace	Louisville, US	2020-05-13
Jason Patfield	Highland Park, US	2020-05-13
harper sarabia	Las Vegas, US	2020-05-13
C'Airea McCluron	Chicago, US	2020-05-13
Cameron Johnson	St. Louis, US	2020-05-13
Robert Bearden	Chicago, IL	2020-05-13
Hannah Heckman	Palm Harbor, US	2020-05-13
Michelle Stremmel	Roscoe, US	2020-05-13
Caden Sutherland	Washington, US	2020-05-13
Victoria Lamptey	Hockessin, US	2020-05-13
Sela Weaver	Winnetka, US	2020-05-13
Alana Webster	Bethesda, US	2020-05-13
Jackson Seyl	Joliet, US	2020-05-13
Ashlyn Frey	Foley, US	2020-05-13
haylee tripi	Buffalo, US	2020-05-13
Carmel DeRogatis	Chicago, IL	2020-05-13
Silvia Santos	Chicago, IL	2020-05-13
Sandy Carter	Chicago, IL	2020-05-13
Cristina Rodriguez	Chicago, IL	2020-05-14

Name	Location	Date
Trace Murdock	Versailles, US	2020-05-14
X w	Harrison, US	2020-05-14
Lisa Good	Houston, US	2020-05-14
Maureen Curiel	San Rafael, US	2020-05-14
Joelle Clark	San Jose, US	2020-05-14
Noel Ramsaur	Yuba City, US	2020-05-14
Jova O	Caguas, US	2020-05-14
Dustin Ngo	Buffalo, US	2020-05-14
Lazerick Grant	Omaha, US	2020-05-14
Lucas Polovina	Chicago, IL	2020-05-14
Emily Gasca	Chicago, IL	2020-05-14
Toriano Ford	Palos hills, IL	2020-05-14
jill murtagh	chicago, IL	2020-05-14
Kathy Fox	Chicago, IL	2020-05-14
Luis Cabrales	Chicago, IL	2020-05-14
Karina Martinez	North Chicago, IL	2020-05-14
Sara Galvàn Orozco	Chicago, IL	2020-05-14
Elizabeth Santana	Knoxville, TN	2020-05-14
Andres Aguilar	Chicago, IL	2020-05-14
Rebecca Bowman	Nile, MI	2020-05-14
Dorina Lopez	Chicago, IL	2020-05-14
Alex Robledo	Chicago, IL	2020-05-14

Name	Location	Date
Jennifer Vazquez	Chicago, IL	2020-05-14
Brenda Cruz	Des Plaines, IL	2020-05-14
Alejandra Ingles	Tulsa, US	2020-05-14
Oscar Tapia	Chicago, IL	2020-05-14
Selena Rodriguez	Chicago, US	2020-05-14
sydney cason	Chicago, US	2020-05-14
Aaliyah Hightower	Renton, US	2020-05-14
Superior Clark	Chicago, IL	2020-05-14
Martina Lentino	Chicago, IL	2020-05-14
Maya Hansen	Chicago, IL	2020-05-14
Cathy Hu	Manhasset, NY	2020-05-14
Demetrio Alicea	Chicago, IL	2020-05-14
Adrian Mandeville	New York, NY	2020-05-14
Mark Hassenfratz	Long Island City, NY	2020-05-14
Brooke Sawyer	Lubbock, TX	2020-05-14
Alyssa Bell-Padgett	Chicago, IL	2020-05-14
Valen Tomaszewski	Chicago, IL	2020-05-14
Sabrina Lefkowitz	New York, NY	2020-05-14
Thomas Coates	Wellington, US	2020-05-14
Laura Turner	Chicago, IL	2020-05-14
Roslyn Rios	Temecula, CA	2020-05-14
Mia Fierberg	Brooklyn, NY	2020-05-14

Name	Location	Date
Morgan Finlayson	Belmont, CA	2020-05-14
Christina Cano	Chicago, IL	2020-05-14
Kelsey Sotello	Piqua, US	2020-05-14
EDWARD MIKAN	Demotte, US	2020-05-14
Sophia Davis	US	2020-05-14
selina yi	US	2020-05-14
Maya Scheidl	Chicago, IL	2020-05-14
Spencer Scott	Lehi, US	2020-05-14
Soraya de Leon	Las Vegas, US	2020-05-14
Cristina Scardine	Evans, US	2020-05-14
Mario Martinez	Antioch, US	2020-05-14
Beatriz Schaver	Chicago, IL	2020-05-14
Alyssa Stolmack	Chicago, IL	2020-05-14
Anne Zhao	Chicago, IL	2020-05-14
Brooke White	Antioch, IL	2020-05-14
Gabrielle Sanford	Shreveport, US	2020-05-14
Nazaria Wilder	Apple Valley, US	2020-05-14
Julianna Clinton	Winter Park, US	2020-05-14
Pamela Watkins	Cleveland, US	2020-05-14
Barbara Cook	Scranton, US	2020-05-14
Alaina Packer	Salem, US	2020-05-14
Linda Gonzalez	Chicago, IL	2020-05-14

Name	Location	Date
Sergio Gonzalez	Chicago, IL	2020-05-14
Jillian Bowman	Chicago, IL	2020-05-15
Amani McCalleb	Chicago, IL	2020-05-15
Gabriel Barron	Chicago, IL	2020-05-15
Andrew Santorella-Doyle	Chicago, IL	2020-05-15
Sara Kruszynski	Whiting, IN	2020-05-15
Alyssa Estrada	Chicago, IL	2020-05-15
Geri Palmer	Evanston, IN	2020-05-15
Jamie Rios	Chicago, IL	2020-05-15
Victoria Pascual	Chicago, IL	2020-05-15
Ashley Castaneda	Chicago, IL	2020-05-15
Daley Polner	New York, NY	2020-05-15
Alexis Kampe	Muncie, IN	2020-05-15
elena barrera-waters	Austin, TX	2020-05-15
Kristine Torres	Milwaukee, US	2020-05-15
Nicole Lopez	Chicago, IL	2020-05-15
Joann Novakovich	Chicago, IL	2020-05-15
Frimpong Baidoo	Austin, TX	2020-05-15
Linda Mobley	Atlanta, GA	2020-05-15
Charlo Lewis	Pleasant Hill, CA	2020-05-15
Kealoha Ogunseitan	Chicago, IL	2020-05-15
Austin Flinn	Puyallup, US	2020-05-15

Name	Location	Date
Aaliyah Smith	US	2020-05-15
Anne Wang	Chicago, IL	2020-05-15
Myles Wesley Kent	Vista, US	2020-05-15
JESSICA MARTINEZ	Chicago, IL	2020-05-15
Grisel Díaz	Chicago, IL	2020-05-15
Elisa D	Chicago, IL	2020-05-15
Elizabeth Redfern	Lawrence, US	2020-05-15
Lindsay Opie	Chicago, IL	2020-05-15
Paula Carcamo	Chicago, IL	2020-05-15
Rene Reyes	Chicago, IL	2020-05-15
Megan Kerber	Chicago, IL	2020-05-15
Aya Perry	Chicago, IL	2020-05-15
Emily Rodriguez	Tampa, FL	2020-05-15
Janina Goncalves	Chicago, IL	2020-05-15
Carla Abreu	Paris, France	2020-05-15
Gabriela Reyna	Chicago, IL	2020-05-15
Mari Rocha	Chicago, IL	2020-05-15
Virginia Martinez	Chicago, IL	2020-05-15
Tawana Hairston	Fishers, US	2020-05-15
gia perez	Chesapeake, US	2020-05-15
Anna Prisco	Ramsey, NJ	2020-05-15
Michelle Lee	New York, NY	2020-05-15

Name	Location	Date
Claudia Del	Chicago, IL	2020-05-15
Frank X Blazquez	Albuquerque, NM	2020-05-15
Justine Kubica	Hoffman Estates, IL	2020-05-15
Julianna Gecsey	Elmhurst, IL	2020-05-15
Amber Klut	Dyer, IN	2020-05-15
Ellie Cockrell	Villa Park, IL	2020-05-15
Romy Portieles Pena	Chicago, IL	2020-05-15
Gema Gaete	Chicago, IL	2020-05-15
Hector Diaz	Chicago, IL	2020-05-15
Gabriela De la rosa	Chicago, IL	2020-05-15
Cynthia Chavez	Chicago, IL	2020-05-15
Jerica Jurado	Chicago, IL	2020-05-15
Rebecka Huerta	Chicago, IL	2020-05-15
Anna Miller	Chicago, IL	2020-05-15
Zoë Landless	Chicago, IL	2020-05-15
Kelsey Brown	Chicago, IL	2020-05-15
Jockabeth Ponce	Mexico, Mexico	2020-05-15
Victoria Rodriguez	Chicago, IL	2020-05-15
Violet Abreu	Elmhurst, IL	2020-05-15
Elizabeth Brown	Chicago, IL	2020-05-15
Elizabeth Molinar	Melrose Park, IL	2020-05-15
Raymond Zibits	Chicago, IL	2020-05-15

Name	Location	Date
Louis Padilla	Chicago, IL	2020-05-15
Jose Franco	Chicago, IL	2020-05-15
Mariana Sanchez	Lafayette, IN	2020-05-15
Karina Palomo	Chicago, IL	2020-05-15
Esteban Gonzalez	Chicago, IL	2020-05-15
Isidro Herrera	Dekalb, IL	2020-05-15
Sam Liu	Evanston, IL	2020-05-15
Lizette Ledezma	Chicago, IL	2020-05-15
Mayra Patino	Chicago, IL	2020-05-15
Lizete Patino	Chicago, IL	2020-05-15
Chantel Raygoza	Chicago, IL	2020-05-15
Renata Veljacic	Chicago, IL	2020-05-15
Sarina Xin	Chicago, NY	2020-05-16
Sharana Baker	Chicago, IL	2020-05-16
Lucya Mendoza	Chicago, IL	2020-05-16
Tere Raygoza	Guadalara, Mexico	2020-05-16
Yolanda Del Real	Chicago, IL	2020-05-16
Ariana Raygoza	Chicago, IL	2020-05-16
Celina Raygoza	Chicago, IL	2020-05-16
Estela Del Real	Chicago, IL	2020-05-16
nadia sol ireri Unzueta carrasco	Chicago, IL	2020-05-16

Name	Location	Date
Samantha Moran	Chicago, IL	2020-05-16
Michelle Silva	Chicago, IL	2020-05-16
Alexander Flores	Chicago, IL	2020-05-16
Samantha Sosa	Detroit, MI	2020-05-16
Gabriela Sanchez	Chicago, IL	2020-05-16
Mari Alvarez	Chicago, IL	2020-05-16
Dalia Vazquez	Calumet City, IL	2020-05-16
Gema Soto	Chicago, US	2020-05-16
Andrea Corona	Chicago, IL	2020-05-16
Adira Dangoy	Channahon, IL	2020-05-16
Rebecca Moran	Chicago, IL	2020-05-16
MacGeoffrey Kutor	Chicago, IL	2020-05-16
Sivann Onstad	Burbank, US	2020-05-16
Sanjuana Rodriguez	Greenville, WI	2020-05-16
Leslie Lopez	Chicago, IL	2020-05-16
Nanette Tucker	Chicago, IL	2020-05-16
Hector Almanza	Chicago, IL	2020-05-16
Katie Thompson	Eugene, US	2020-05-16
Sara Kalemba	Chicago, IL	2020-05-16
Monica Cervantes	Chicago, IL	2020-05-16
Michelle Kalemba	Chicago, IL	2020-05-16
Steven Rico	Chicago, IL	2020-05-16

Name	Location	Date
Verda Wilkerson	Chicago, IL	2020-05-16
John Maclean	Chicago, US	2020-05-16
Laquitta Armstrong	Lincolnville, US	2020-05-16
Guadalupe Partida	Chicago, IL	2020-05-16
Genesis Garcia Fisher	Bloomington, MN	2020-05-16
Maria Gonzalez	Chicago, IL	2020-05-16
Kevin Gallick	Chicago, IL	2020-05-16
Phoebe Murtagh	Chicago, IL	2020-05-16
Juan Lopez	Chicago, IL	2020-05-17
Dona Robertson	Henderson, US	2020-05-17
Juniper Glass-Klaiber	Athens, OH	2020-05-17
Elizabeth Anson	Chicago, IL	2020-05-17
Andres Villegas	Chicago, IL	2020-05-17
Emilia Garcia	Chicago, IL	2020-05-18
Jessica Chavarria	Chicago, IL	2020-05-18
Monica Magallanes	Dyer, IN	2020-05-18
Anaya West	Seattle, US	2020-05-18
Gallardo Christine	Chicago, IL	2020-05-18
Martin Flores	Chicago, IL	2020-05-18
Adrián Ornelas	Schererville, IN	2020-05-18
Irene Diaz	Chicago, IL	2020-05-19
Michelle Medrano-Reyes	Homewood, IL	2020-05-19

Name	Location	Date
Blanca Herrera	Chicago, IL	2020-05-19
Aglaet De Santiago	Chicago, IL	2020-05-19
Rafael De Santiago	Chicago, IL	2020-05-19
Estefania Gamino	Chicago, IL	2020-05-19
Fabian Bedoy	Chicago, IL	2020-05-19
Emily Campos	Chicago, IL	2020-05-19
Laura Morales	US	2020-05-19
Jennifer Moore	Chicago, US	2020-05-19
Lisbet Avila	Chicago, IL	2020-05-19
Nora Cabrales	Chicago, IL	2020-05-19
Jaime Soler	US	2020-05-19
Ariana Trinidad	Chicago, US	2020-05-19
Patrick Dattulo	Chicago, IL	2020-05-19
MARIA ESTRADA	Chicago, IL	2020-05-19
roman delion	Chicago, IL	2020-05-19
JEANNETTE MEDRANO	LANSING, IL	2020-05-19
Beatriz Cervantes	Chicago, IL	2020-05-19
Robert Alcala	US	2020-05-19
Cristina Herrera	Chicago, IL	2020-05-19
Iris Rodriguez	Orlando, FL	2020-05-20
Valerie Castillo	Chicago, IL	2020-05-20
Alice Alcala	Elk Grove Village, IL	2020-05-20

Name	Location	Date
Juanita Cardoso	Chicago, IL	2020-05-20
Jorge Aguilar	Chicago, IL	2020-05-20
Amanda Hernandez	Chicago, IL	2020-05-20
Mirelle Rivera	Chicago, IL	2020-05-21
Grace Luk	Morton Grove, IL	2020-05-21
Rafael De Santiago	Chicago, US	2020-05-21
Ashley Fleming	Chicago, IL	2020-05-21
Malinda Hinton	Dyer, IN	2020-05-21
Maureen Kattah	Chicago, IL	2020-05-21
LESLIE UMBLES	Chicago, IL	2020-05-21
Gage Lata	Millburn, US	2020-05-21
Karen Lacey	CHICAGO, IL	2020-05-21
Donna Arisoa	Rockville, US	2020-05-21
knife paxton	Decatur, US	2020-05-21
Garlington Tifaine	Hillside, US	2020-05-21
Michael Hardin	Dixon, US	2020-05-21
Angelica Pena	Chicago, IL	2020-05-21
Sabrina Hogan	Chicago, US	2020-05-21
Anthony Wojno	Chicago, IL	2020-05-21
Lisa Williams	Ivins, US	2020-05-21
Michelle Bradmore	Fountain, CO	2020-05-21
Betty Rodriguez	Chicago, IL	2020-05-21

Name	Location	Date
Kell Meyer	St Charles, US	2020-05-21
Alisa Battle	Brooklyn, US	2020-05-21
David Nyarko	Gurnee, US	2020-05-21
Daniel Guape	Fontana, US	2020-05-21
Stephanie Ramos	Elmont, US	2020-05-21
Maria Garcia	Chicago, IL	2020-05-21
Carol Kaim	Chicago, IL	2020-05-21
ROSALIO ALVAREZ	Chicago, IL	2020-05-21
Alex Wu	Barrington, US	2020-05-21
Chikiah Mona	US	2020-05-21
Sherri Brunk	Kahoka, US	2020-05-21
amanda dixon	Plainfield, US	2020-05-21
Steve Cembala	Chicago, IL	2020-05-22
sierra yaskin	Durango, US	2020-05-22
Sheila Deri	Rochester, US	2020-05-22
Dave Dyer	Elmont, US	2020-05-22
Susan M Sebesta	Chicago, IL	2020-05-22
Jhoanna Maldonado	Chicago, IL	2020-05-22
Mueze Bawany	Chicago, IL	2020-05-22
Daya Stanley	Colorado Springs, CO	2020-05-22
Serai Robinson	Cleveland, US	2020-05-22
Lori Klein	Overland Park, US	2020-05-23

Name	Location	Date
Monique Green	Rockford, US	2020-05-23
Aly Silva	Chicago, US	2020-05-23
Amaya Perez	Fresno, US	2020-05-23
Te'a Ross	Placentia, US	2020-05-23
Alex Forgue	Chicago, IL	2020-05-23
Christine Dussault	Chicago, IL	2020-05-23
Karina alvarez	Chicago, IL	2020-05-23
Jayden Vasquez	Manassas, US	2020-05-23
Mark Huerta	Los Angeles, US	2020-05-23
THERESA SPIKES	Cincinnati, US	2020-05-23
Teddy Anaya	Las Vegas, US	2020-05-23
Adan Martínez	Chicago, US	2020-05-23
Tiawanna Simmons	Washington, US	2020-05-23
Debbie Earley	Felton, US	2020-05-23
Steven Morris	Sharps Chapel, US	2020-05-23
Shayla Reuben	Newark, US	2020-05-23
Princess Shelly	Carbondale, US	2020-05-23
Marco Gandara	Mesa, US	2020-05-23
Michael Cirocco	Riverside, US	2020-05-23
Selena Sarmiento	Long Branch, US	2020-05-23
Toni Portlock	Houston, US	2020-05-23
Olivia Kenn	Tampa, US	2020-05-23

Name	Location	Date
Eldar Zhanybekov	Chicago, US	2020-05-23
Rey Ibarra	Bellflower, US	2020-05-23
Nadine Lalanne	Miami Gardens, US	2020-05-23
Lesia Douthard	Chicago, US	2020-05-23
Daryl W. De Boer	Manchester Township, US	2020-05-23
Melissa Ramkarran	Boston, US	2020-05-24
Nathean Anielewski	Donora, US	2020-05-24
Bertha Williams	Los Angeles, US	2020-05-24
Kim Smolen	Chicago, IL	2020-05-24
Eydan Linares	Wayne, US	2020-05-24
Liz Brown	Chicago, IL	2020-05-24
briana morales	Van Nuys, US	2020-05-24
Cassie Creswell	Chicago, IL	2020-05-24
Taryn Kurth	Chicago, IL	2020-05-24
Edna Sylvince	Moorestown, US	2020-05-24
Debby Willette	Greencastle, US	2020-05-24
Joyce Brody	Chicago, IL	2020-05-24
David OConnor	Chicago, IL	2020-05-25
Annie Watson	Chicago, IL	2020-05-25
Dean Pinos	US	2020-05-26
Gray Hampton	North Hollywood, US	2020-05-26
Thomas Foster	Fairhaven, US	2020-05-26

Name	Location	Date
Dawn McCollom	Summerfield, US	2020-05-26
Skylar McGinity	Lebanon, US	2020-05-26
Aidan Foust	US	2020-05-26
Nicolas McAfee	Portland, US	2020-05-26
Jaidah Mccants	Matthews, US	2020-05-26
Joseph Rienzi	Clermont, US	2020-05-26
Rita Malfeo-Klein	Chicago, IL	2020-05-26
Grant Toepfer	Pekin, US	2020-05-26
David McPeake	Lexington, US	2020-05-26
Gannon Michna	Chesterton, US	2020-05-26
Sophia LaRose	Brookfield, US	2020-05-26
Oriele Benavides	Princeton, US	2020-05-26
Yueh Ting Chiang	Durham, US	2020-05-26
Evelyn Farmer	Gladewater, US	2020-05-26
Royelle Riddick	North Canton, US	2020-05-26
Dale Downs	Chicago, IL	2020-05-26
Phoenix Sheerin	New York, US	2020-05-26
Francisco Garcia	Lynwood, US	2020-05-26
Dalton Elrod	Fort Worth, US	2020-05-26
Raymond Gordon	Chicago, US	2020-05-26
Daniel Asarch	Las Vegas, US	2020-05-26
Jonathan Ortega-Mercado	Pomona, US	2020-05-26

Name	Location	Date
Samy Baghdan	Loxahatchee, US	2020-05-26
Dawayaziah Wilcher	Bakersfield, US	2020-05-26
Anne Wallace	Chicago, IL	2020-05-26
Alex Franco	Canyon Country, US	2020-05-26
Collin Bread	Hancock, US	2020-05-26
Alex DeMarco	Malvern, US	2020-05-26
Claire Enger	Castle Rock, US	2020-05-26
Andrea Dunn	Chicago, IL	2020-05-26
Aurelio Aseves	Chicago, IL	2020-05-26
Francisco Mendez	Crete, IL	2020-05-27
Erik Ruiz	Chicago, IL	2020-05-27
Yolanda Roque	Aurora, IL	2020-05-27
Susan Avila	Chicago, IL	2020-05-27
Alexa Chavez	Indianapolis, IN	2020-05-27
Jeri Jacob	Chicago, IL	2020-05-27
Rachel Roti	Des Plaines, IL	2020-05-27
Eric May	Chicago, IL	2020-05-27
David Lamore	Indianapolis, US	2020-05-27
Caleb gutschke	Middleville, US	2020-05-27
Ryan Benson	Columbia, US	2020-05-27
Cathy Turner	Seattle, US	2020-05-27
Josh Mitchell	Minneapolis, US	2020-05-27

Name	Location	Date
Trisha Weldon	Mtclemens, US	2020-05-27
Ali Lee	Saint Paul, US	2020-05-27
Damon Henry	US	2020-05-27
Tova Jaffe	Greenbrae, US	2020-05-27
Brianna Aparicio	Indianapolis, US	2020-05-27
Leslie Arriaga	Selma, US	2020-05-27
Francine Banks	Berwyn, US	2020-05-27
Brandon Blunt	Indianapolis, US	2020-05-27
desirae mcguire	Miamisburg, US	2020-05-27
Brandi P	Chicago, US	2020-05-27
Joshua Nyangau	Albertville, US	2020-05-27
Chris Kelliher	Boston, US	2020-05-27
Alaina Sauro	Saint Paul, US	2020-05-27
annemarie gribanow	Thomson, US	2020-05-27
Kevin Henry	Arden hills, US	2020-05-27
Darwil Mejia	South Hackensack, US	2020-05-27
Sarah Mwaura	Spokane, US	2020-05-27
Lisie Ake	Federal Way, US	2020-05-27
Dominique Odom	Canton, US	2020-05-27
Nathan Prah	Minneapolis, US	2020-05-27
Carlos Castillo	Palatine, US	2020-05-27
Allison Graham	Portland, US	2020-05-27

Name	Location	Date
danette woods	Minneapolis, US	2020-05-27
sophie mord boyd	Saint Paul, US	2020-05-27
Shadow Loomis	Elkhorn, US	2020-05-27
Lizzie Firefist	Bloomington, US	2020-05-27
David Huggins	Stone Mountain, US	2020-05-27
alexis goss	Kansas City, US	2020-05-27
Ann Meier	US	2020-05-27
Ching Chuong	Fontana, US	2020-05-27
Moua Vang	Saint Paul, US	2020-05-27
Ryan Driskell	Joliet, US	2020-05-27
Cheyenne Fish	Colorado Springs, US	2020-05-27
Bobbi Anderson	Rickman, US	2020-05-27
Alex Ten	New City, US	2020-05-27
Grace Helmke	Saint Paul, US	2020-05-27
kara p	Bellevue, US	2020-05-27
Sierra Leahy	Escondido, US	2020-05-27
Kema Haye	Houston, US	2020-05-27
Olivia Jones	Omaha, US	2020-05-27
Mary dzengolewski	lebanon, US	2020-05-27
Haniya Sharif	Columbus, US	2020-05-27
Gabrielle Gutierrez	Houston, US	2020-05-27
Luke Johnson	Wolfpoint, US	2020-05-27

Name	Location	Date
Nolan VanHorn	Otsego, US	2020-05-27
Lenimar Sabate	Rowland Heights, US	2020-05-27
Wayne Tubbs	Centerville, US	2020-05-27
Randi Justin	Fort Lauderdale, US	2020-05-27
Heather Nooks	Dallas, US	2020-05-27
Angie Eglian	Lucasville, US	2020-05-27
sonia flores	Merritt, US	2020-05-27
Merlin Reyes	Saint Cloud, US	2020-05-27
Lois Hodges	Milwaukee, US	2020-05-27
Susan Rodriguez	Chicago, IL	2020-05-27
Gary Walley	Chicago, IL	2020-05-27
Samia Washington	Chicago, IL	2020-05-27
Soto Maria	Gary, IN	2020-05-27
Amanda Aguilera	Hammond, IN	2020-05-27
steven bugarin	Hammond, IN	2020-05-27
Luis Padilla	Chicago, IL	2020-05-27
Ruben Moreno	Chicago, IL	2020-05-28
Tara P	Marlborough, US	2020-05-28
ashley grospe	torrance, US	2020-05-28
Mada Anjolia	Skokie, US	2020-05-28
Brianna Messina	Atlanta, US	2020-05-28
Noah Ratliff	Upper Sandusky, US	2020-05-28

Name	Location	Date
Lacrecia Alamu	Chandler, US	2020-05-28
Alecia Ayers	Las Vegas, US	2020-05-28
Grady Tierney	Houston, US	2020-05-28
Tya Zeper	Celebration, US	2020-05-28
Brittany Leary	Wisconsin Rapids, US	2020-05-28
Skylar Nichole	Indianapolis, US	2020-05-28
Elise Payne	Fort Collins, US	2020-05-28
jenna guarrera	Parkton, US	2020-05-28
Devyn Clay	Woodstock, US	2020-05-28
Diego Orellana	Everett, US	2020-05-28
Ashley Shaw	Beverly Hills, US	2020-05-28
Rebecca Wiltshire	Clifton, US	2020-05-28
Karie Jackson	Silver Spring, US	2020-05-28
Mia Martin	South Fulton, US	2020-05-28
amira maute	Jefferson City, US	2020-05-28
Aubrie Benson	Wonder lake, US	2020-05-28
Valentina Valencia	Bronx, US	2020-05-28
kendra chandon	Fort Lauderdale, US	2020-05-28
Lizette Rodriguez	Reading, US	2020-05-28
Emily Terrero	Yonkers, US	2020-05-28
Fadhel Alyunis	Ormond Beach, US	2020-05-28
emily marciniak	Buffalo, US	2020-05-28

Name	Location	Date
Sharaya Dunwell	New Haven, US	2020-05-28
Ariane urayeneza	South Bend, US	2020-05-28
David Young	Chicago, US	2020-05-28
Anthony Scrimenti	Guilderland, US	2020-05-28
Ailyn Garcia	Anaheim, US	2020-05-28
Rache Ocampo	Belleville, US	2020-05-28
lyn parker	US	2020-05-28
FREDERICK JONES	Queens, US	2020-05-28
Maya Heron	Germantown, US	2020-05-28
cody carlson	Phoenix, US	2020-05-28
Laura Venneri	Elburn, US	2020-05-28
makayla d	Brooklyn, US	2020-05-28
كاظم .Afaf عفاف	Chicago, US	2020-05-28
Jake Ortega	US	2020-05-28
Madison Lira	San Antonio, US	2020-05-28
@okapi7 Kauffman	Birdsboro, US	2020-05-28
Balvino Mota	Daphne, US	2020-05-28
Daniela Sepulveda	Washington, US	2020-05-28
abigail areche	Pawtucket, US	2020-05-28
Estephani lemus	Forest Park, US	2020-05-28
adella singleton	central point, US	2020-05-28

Name	Location	Date
Valerie Silva	San Luis, US	2020-05-28
Matthew Phillips	North Highlands, US	2020-05-28
Xzavier Jones	Calumet City, US	2020-05-28
Alivia Page	Antelope, US	2020-05-28
Itohan Obahiagbon	Staten Island, US	2020-05-28
tati brown	Bronxville, US	2020-05-28
Alana Thompson	Woodbridge, US	2020-05-28
Lynn Maeyaert	Minneapolis, US	2020-05-28
Mark Diaz	Killeen, US	2020-05-28
Krissy Kennedy	Braintree, US	2020-05-28
Josiah Villanueva	Mesa, US	2020-05-28
daniela gramajo	Chicago, US	2020-05-28
Taylor Pancake	Ironton, US	2020-05-28
Nichole Palfi	Fort Mohave, US	2020-05-28
nuri ulloa	Jacumba, US	2020-05-28
alex daniel	Palos Hills, US	2020-05-28
Amerina Baca	Albuquerque, US	2020-05-28
Anthony K	Philadelphia, US	2020-05-28
Some Random 5th Grader From Fisk	Salem, US	2020-05-28
Antoinette Senese	Aurora, US	2020-05-28
Marchaela troupe	US	2020-05-28

Name	Location	Date
Jamena Shields	Virginia Beach, US	2020-05-28
Makayla Malmberg	Cheyenne, US	2020-05-28
Kafia Jama	US	2020-05-28
Maria Patterson	New York, US	2020-05-28
Azaria Masso	Lakeland, US	2020-05-28
Saikou Jallow	Bloomington, US	2020-05-28
Marie Salukombo	Austin, US	2020-05-28
Carlie Servais	Madison, US	2020-05-28
Ben Renert	New York, US	2020-05-28
Charles Harley	Florence, US	2020-05-28
Anna Jenkins	Chicago, US	2020-05-28
Tia Thomas	Hinesville, US	2020-05-28
Cheyanne Ingram	Hyattsville, US	2020-05-28
mallory m	Fayetteville, US	2020-05-28
Tais Perez	Lakeland, US	2020-05-28
Oby Okeke	Edmond, US	2020-05-28
Zach Ramarui	Denver, US	2020-05-28
Cindy Chen	Brooklyn, US	2020-05-28
Keniah Johnson	Danville, US	2020-05-28
Kallie Waldron	Sand diego, US	2020-05-28
Michael Gill	Seattle, US	2020-05-28
Rogelio Martinez	Cedar Rapids, US	2020-05-28

Name	Location	Date
mariam mariam	Dearborn Heights, US	2020-05-28
Gaspar Ramirez	Chicago, US	2020-05-28
Anjali Verma	North Tonawanda, US	2020-05-28
destiny vandusen	Coolidge, US	2020-05-28
Tierra Gainey	Garner, US	2020-05-28
Muna Ali	Falls Church, US	2020-05-28
Brandi Hill	Anniston, US	2020-05-28
Nevaya Brewster	Riverdale, US	2020-05-28
Misty Smith	Springfield, US	2020-05-28
Terry Lee	Crystal Lake, US	2020-05-28
Naya Martinez	Minneapolis, US	2020-05-28
Nkayla Washington	Queens, US	2020-05-28
Luma Morningstarr	Padre Island Ntl Seashor, US	2020-05-28
Evelina Delboccio	Hilliard, US	2020-05-28
Charles Mihalich	Indio, US	2020-05-28
Keke Francis	Center Moriches, US	2020-05-28
Arlette Camacho	Denver, US	2020-05-28
ximena arreola	lexington, US	2020-05-28
Cody Cargle	Panama City, US	2020-05-28
Catie Mahoneu	Hopkinton, US	2020-05-28
Hope Mann	Westfield, US	2020-05-28
ryu ranzur	Marysville, US	2020-05-28

Name	Location	Date
Nora White	Sioux Falls, US	2020-05-28
Madeline Ocasio	Woodbridge, US	2020-05-28
Sarah Epstein	Brockton, US	2020-05-28
Aleigha Huston	Powder Springs, US	2020-05-28
Assia Mine	Boufarik, US	2020-05-28
Fabienne Castin	Miami, US	2020-05-28
kati logan	Bakersfield, US	2020-05-28
anna carter	Boardman, US	2020-05-28
Emily Trezil	Westland, US	2020-05-28
Shanez Jernigan	Eastpointe, US	2020-05-28
LP	Attleboro, US	2020-05-28
trent grande	Byron Center, US	2020-05-28
Claudia Marquez	Fort Myers, US	2020-05-28
Madison Williams	Simpsonville, US	2020-05-28
Elizabeth Meadows	Chicago, IL	2020-05-28
Liezl Gamboa	Brooklyn, US	2020-05-28
rhiana briney	Cedar Rapids, US	2020-05-28
idequi hernandez	Arlington, US	2020-05-28
Qurban Ali	Austin, US	2020-05-28
Curtis Harris	Chicago, IL	2020-05-28
tania escobedo	knightdale, US	2020-05-28
Jacqueline Herrera	Stickney, US	2020-05-28

Name	Location	Date
Julissa Arredono	Houston, US	2020-05-28
iyauna Dearing	Denver, US	2020-05-28
Andrea Cerda-Duran	Greenwood, US	2020-05-28
Marvin Wickware	Chicago, IL	2020-05-28
Aubrey Smith	Kenosha, US	2020-05-28
Salma Alwine	Chicago, US	2020-05-28
Olivia Scott	Mustang, US	2020-05-28
Haena Keawekane	Kailua Kona, US	2020-05-28
Jacqueline Rodriguez	Alexandria, VA	2020-05-28
Amarah Magana	Riverside, US	2020-05-28
mya morgan	Galveston, US	2020-05-28
Adrian Coleman	Lake City, US	2020-05-28
Kayla Ayala	Norwalk, US	2020-05-28
Jessica Martinez	Las Vegas, US	2020-05-28
Gay Johnson	Galesburg, IL	2020-05-28
Raul Trejo	Fontana, US	2020-05-28
cat bowman	Oakley, US	2020-05-28
Raven Slater	San Diego, US	2020-05-28
Shay Meg	Cordova, US	2020-05-28
Fran Tobin	Chicago, IL	2020-05-28
Leo Rodriguez	Houston, US	2020-05-28
Kristin voelker	Clifton Park, US	2020-05-28

Name	Location	Date
Melody Gonzalez	Los Angeles, US	2020-05-28
Gianna Sinclair	Covington, US	2020-05-28
Jessica Mueller	Pittsburgh, US	2020-05-28
Peg Maldonado	US	2020-05-28
Jasmine M	Oxnard, US	2020-05-28
Kaya Krawiec	Danbury, US	2020-05-28
Andrea Mejia	East Weymouth, US	2020-05-28
Traci Holman	Longview, US	2020-05-28
Lauren Youngblood	Grand Prairie, US	2020-05-28
Mumina Mohamed	Boston, US	2020-05-28
Ella Sada	US	2020-05-28
Diana Calderon	Sterling, US	2020-05-28
I F.	US	2020-05-28
Sandra Manning	Airville, US	2020-05-28
Aaliyah Ramirez	Hemet, US	2020-05-28
Serena Lindsey	Chicago, IL	2020-05-28
Cathy Talbott	Herrin, IL	2020-05-28
Rick Reicks	Council Bluffs, IA	2020-05-28
Erik Christensen	Chicago, IL	2020-05-28
Craig Gonder	Chicago, IL	2020-05-28
Nicholas Williams	Chicago, IL	2020-05-28
lain yonn	Bensalem, US	2020-05-28

Name	Location	Date
Nisa Neely	Chicago, IL	2020-05-28
Christian Miller	Clovis, US	2020-05-28
Rosalind Hayslett	Suffolk, US	2020-05-28
ruby trejo	highland, US	2020-05-28
SwaY FIREFANG	US	2020-05-28
Charise Thayer	Bellbrook, US	2020-05-28
Kyleigh Huse	Atlanta, US	2020-05-28
Angel rhone	Chicago, US	2020-05-28
ari v	Colorado Springs, US	2020-05-28
Apollo Davis	Columbia, US	2020-05-28
Rachel Butt	Waban, US	2020-05-28
Luciano Jimenez	Salt Lake City, US	2020-05-28
Jasmine Anaya	Montgomery, US	2020-05-28
Carina L	Orlando, US	2020-05-28
Kris Nguyen	Florence, US	2020-05-28
Eworitseju Anosike	Chicago, US	2020-05-28
Aliah Walker	Duluth, US	2020-05-28
Abigahil Lopez	Chicago, US	2020-05-28
Jason Mendez	Azusa, US	2020-05-28
Mae Green	Saint Helen, US	2020-05-28
gracie el	Bronx, US	2020-05-28
Jason Ponterotto	Bronx, US	2020-05-28

Name	Location	Date
Jackson Shilobrit	Brookfield, US	2020-05-28
Khushi Bhondwe	Chicago, IL	2020-05-28
Nasrine Ningbinnin	Thibodaux, US	2020-05-28
Alexa Gonzalez	Houston, US	2020-05-28
sindy pierre	Indianapolis, US	2020-05-28
joe mama	Riverside, US	2020-05-28
Elicia Blair	New York, US	2020-05-28
Samantha Rosales	Las Vegas, US	2020-05-28
Becca Church	Ada, US	2020-05-28
Conor Rezabek	Spencer, US	2020-05-28
tori smith	Cape May, US	2020-05-28
Norma J F Harrison	Berkeley, US	2020-05-28
Alexandra Zuniga	Chicago, IL	2020-05-28
Raphael Portillo	Chicago, IL	2020-05-28
Kevin Berlanga	Chicago, US	2020-05-28
Sophie Circenis	Chicago, IL	2020-05-28
Alma Zepeda	Chicago, IL	2020-05-28
andrea salamanca	Chicago, IL	2020-05-28
Wendy Douglas	Chicago, IL	2020-05-28
Mary Goering	Evanston, IL	2020-05-28
Yvette Wilson	Chicago, IL	2020-05-28
Noelani Ross	Chicago, IL	2020-05-28

Name	Location	Date
Bianca Freyre	Chicago, IL	2020-05-28
Keren Vincenty	Chicago, IL	2020-05-28
Katie S	Chicago, IL	2020-05-28
Maya Clatanoff	Chicago, IL	2020-05-28
Ana Luna	Chicago, IL	2020-05-28
Vivien Colunga	Chicago, IL	2020-05-28
Alex Jimenez	Chicago, IL	2020-05-28
Alan Gomez	Addison, US	2020-05-28
Dana Ghiassi	Älvsjö, US	2020-05-28
Javier Torres	Fort Worth, US	2020-05-28
Христина Сарджвеладзе	Los Angeles, US	2020-05-28
Sam Key	Louisville, US	2020-05-28
Jonah Clark	Dover, US	2020-05-28
Brooke Conneally	Cranston, US	2020-05-28
Shaylah King	Providence, US	2020-05-28
layla aguilar	Corpus Christi, US	2020-05-28
Tamika Alves	Queens Village, US	2020-05-28
Samea Santos	Orlando, US	2020-05-28
Kirah Hopson	Philadelphia, US	2020-05-28
Deior Toney	Washington, US	2020-05-28
jisel ortiz	Palatine, US	2020-05-28
America Fraire	San Antonio, US	2020-05-28

Name	Location	Date
Aleeya R.	SOUTH RICHMOND, US	2020-05-28
Mercedes Porchea	Sherburne, US	2020-05-28
Logan Carter	North Liberty, US	2020-05-28
vanessa pelaez	Chicago, IL	2020-05-28
Aimee Senda	Chicago, IL	2020-05-28
Sandra Ramirez	Chicago, IL	2020-05-28
Levi Todd	Chicago, IL	2020-05-28
olivia wroblewski	Chicago, IL	2020-05-28
Esmeralda Rios	Chicago, IL	2020-05-28
Joel Ramirez	Chicago, IL	2020-05-28
Kyra Woods	Chicago, IL	2020-05-28
Julie Rodriguez	Burlington, WI	2020-05-28
Kyle Duff	Chicago, IL	2020-05-28
Christine Oldenberg	Chicago, IL	2020-05-28
George Chiropolos	Chicago, IL	2020-05-28
James Herrigel	Chicago, IL	2020-05-28
Alecx Hernandez	Cicero, IL	2020-05-28
Amelia O'Brien-Combs	Chicago, IL	2020-05-28
Colleen Chierici	Brookfield, IL	2020-05-28
Anna Mattson	Berwyn, IL	2020-05-28
Sandra Leon	Chicago, IL	2020-05-28
Mark Mitrovich	Chicago, IL	2020-05-28

Name	Location	Date
Veronica Gutierrez	Chicago, IL	2020-05-28
James Kinney	Chicago, IL	2020-05-28
Elise Padilla	Chicago, IL	2020-05-28
Juliste Gogolinski	Chicago, IL	2020-05-28
Rosita Alicea-Zink	Chicago, IL	2020-05-28
Veronica Peña	Chicago, IL	2020-05-28
Celia colon	Chicago, IL	2020-05-28
Viridiana Rodriguez	Chicago, IL	2020-05-28
Monica Chico	Chicago, IL	2020-05-28
Guillermo Gonzalez	Chicago, IL	2020-05-28
Anthony Rubio	Chicago, IL	2020-05-28
Elisa Escamilla	Chicago, IL	2020-05-28
Thomas Hoffman	Chicago, IL	2020-05-28
ralph mendoza	Chicago, IL	2020-05-28
linda villa	Chicago, IL	2020-05-28
Katie Rivas	Chicago, IL	2020-05-28
Vameika Collins	Dolton, IL	2020-05-28
Stephanie Felleti	Des Plaines, US	2020-05-28
haylee provost	Agawam, US	2020-05-28
roxanna luna	crown point, IL	2020-05-28
BV Tran	Richardson, US	2020-05-28
Maddie Penney	Fort Wayne, US	2020-05-28

Name	Location	Date
sofia troncone	Buffalo, US	2020-05-28
Tracy Nunamaker	Columbus, US	2020-05-28
doris cheung	San Francisco, US	2020-05-28
Sappy Sableye	Houston, US	2020-05-28
Miranda Linthicum	US	2020-05-28
kuenbay ajang	Denison, US	2020-05-28
Madalyn Woods	Martinsville, US	2020-05-28
Gabiriela Kancheava	Elk Grove, US	2020-05-28
sylvia terrell	cherokee, US	2020-05-28
India Banks	Blue island, US	2020-05-28
Jesse Florell	Chicago, US	2020-05-28
Erica Baeza	Chicago, US	2020-05-28
Yazmin Delgado	Austin, US	2020-05-28
Nathalia Osuna	Phoenix, US	2020-05-28
Alicia Salgado	Chicago, IL	2020-05-28
Anya Craig	US	2020-05-28
Aneesa Cervantes	Irvine, US	2020-05-28
Emma Harbison	US	2020-05-28
Alexa Jimenez	Jonesboro, US	2020-05-28
Ashley Lopez	Roanoke, US	2020-05-28
Priscila Sojo	Haines City, US	2020-05-28
Kit Ying Tang	Hacienda Heights, US	2020-05-28

Name	Location	Date
Michelle Roberts	Carson, US	2020-05-28
Lilly Ortiz	Philadelphia, US	2020-05-28
Alexa Rodriguez	Arlington, US	2020-05-28
Tiffanie Howell	Scottsburg, US	2020-05-28
Anthony Gonzalez	Chandler, US	2020-05-28
Axel Barrios	Golden, US	2020-05-28
Skylar Davis	Nashville, US	2020-05-28
Andrew Lugo	Mays Landing, US	2020-05-28
Malea Johnson	Springfield, US	2020-05-28
Tania Lopez	Chicago, US	2020-05-28
Kirsi Lockhart	Euless, US	2020-05-28
Teagan Nethery	Cleveland, US	2020-05-28
Amelia King	Wixom, US	2020-05-28
lyss fuentes	Fontana, US	2020-05-28
Maddie Belcher	Brooksville, US	2020-05-28
Lauren Hornesby	Brookhaven, US	2020-05-28
Kimberly Nava	Franklin Park, US	2020-05-28
Aidian Alvarado	Hobbs, US	2020-05-28
shana machnick	Albany, US	2020-05-28
Diya Bhattachrya	Westborough, US	2020-05-28
Natalie Muir	Jamaica, US	2020-05-28
Kaitlin Rose	Los Angeles, US	2020-05-28

Name	Location	Date
Rachel Tran	Southaven, US	2020-05-28
Alexa Calderon	Itasca, US	2020-05-28
Ashley Cordero	Brooklyn, US	2020-05-28
Karen Roothaan	Chicago, IL	2020-05-28
Isabela Sant'Anna-Skites	Evanston, US	2020-05-28
Rebecca Johnson	Athens, US	2020-05-28
Emily Breen	fords, US	2020-05-28
Savannah Matteson	Antelope, US	2020-05-28
emily kempton	niceville, US	2020-05-28
Micahya Thomas	Louisville, US	2020-05-28
Ayana Moody	Honolulu, US	2020-05-28
Maricela Ordaz	Millsboro, US	2020-05-28
Josh Jones	O Fallon, US	2020-05-28
nur saeed	Columbus, US	2020-05-28
Valeria Rameno Canada	Anaheim, US	2020-05-28
Daniel Ogbeiwi	Springfield, US	2020-05-28
Caroline Mosca	Augusta, US	2020-05-28
Dannielle Gibbons	Camden, US	2020-05-28
Tricia Pierce	Newport News, US	2020-05-28
Adriana Lacroix	Benton Harbor, US	2020-05-28
abigail N	Mission Viejo, US	2020-05-28
Eunice Kefehyen	Dekalb, US	2020-05-28

Name	Location	Date
Lynn Phung	Rosemead, US	2020-05-28
Ryo Matsuzawa	Gardena, US	2020-05-28
Hilario Pulgarin	Dallas, US	2020-05-28
Lizbeth Urquizo	Berwyn, US	2020-05-28
Molly Wilson	Sunnyvale, US	2020-05-28
Abner Tenorio	Miami, US	2020-05-28
Angelica ramos	waynesville, US	2020-05-28
crysta kee	Crosby, US	2020-05-28
Kody Dixon	Broken Arrow, US	2020-05-28
Danny Hagle	Memphis, US	2020-05-28
Shiqi Chen	New York, US	2020-05-28
Jayla Murray	Federalsburg, US	2020-05-28
Valentina Brander	Cottage Grove, US	2020-05-28
Tianna Curtis-Bradley	Chicago, US	2020-05-28
norma carrion	CAROLINA, US	2020-05-28
Gavin Leyba	Round Lake, US	2020-05-28
Sorayah St Val	Bronx, US	2020-05-28
Jane Chang	Castro Valley, US	2020-05-28
Addy Mings	Bensenville, US	2020-05-28
Crystal Lesley	Arlington, US	2020-05-28
Madeline Schade	Cincinnati, US	2020-05-28
Rotem Alon	Mamaroneck, US	2020-05-28

Name	Location	Date
Alexandra Bidner	US	2020-05-28
Andria Fortune	San Antonio, US	2020-05-28
eva g	Burbank, US	2020-05-28
z s	New Orleans, US	2020-05-28
Shykarah Fareus	New London, US	2020-05-28
aubree erickson	Rockford, US	2020-05-28
Landon Ryder	Fort Polk, US	2020-05-28
Shauni bowling	Indianapolis, US	2020-05-28
Gicelle Garcia	Ontario, US	2020-05-28
Jennifer Bishop	Auburndale, US	2020-05-28
Lola Smith	Anacortes, US	2020-05-28
Sydney Valencia	Huntington Park, US	2020-05-28
Eh Ku Say	Saint Paul, US	2020-05-28
Monica Hampton	Baltimore, US	2020-05-28
Benjamin Sandoval	Reseda, US	2020-05-28
Estefany Morales	Buellton, US	2020-05-28
marina rizzi	Plainfield, US	2020-05-28
kofi agyeman the boy	Royal Oak, US	2020-05-28
Jorge Nava	Houston, US	2020-05-28
Angel Gonzalez	Dallas, US	2020-05-28
Sarayahh Rose	New York, US	2020-05-28
Parker Pryor	Denver, US	2020-05-28

Name	Location	Date
Jade Meneses	Saugerties, US	2020-05-28
Jordyn ## Guzman	San Antonio, US	2020-05-28
Yatzmin Deluna	El Paso, US	2020-05-28
Lindsey Melford	Independence, US	2020-05-28
ivan andrew	Archbald, US	2020-05-28
Kaliah Brown	Chicago, US	2020-05-28
Nicole Benavidez	Chicago, IL	2020-05-28
Felicity Evans	Houston, US	2020-05-28
Lien Phan	Tullahoma, US	2020-05-28
Brenner Philbrook	Seattle, US	2020-05-28
Vannesa Ceballos	Schaumburg, US	2020-05-28
dayanara zamudio	Chico, US	2020-05-28
Taylor Noe	North Canton, US	2020-05-28
Ghazal Saeedi	Citrus Heights, US	2020-05-28
Solitaire Miguel	San Francisco, US	2020-05-28
angie .	Union, US	2020-05-28
Sabrina Snow	Fort Hood, US	2020-05-28
Nicole Quijada	Elizabeth, US	2020-05-28
miranda rodriguez-salas	Thomasville, US	2020-05-28
Richard Utulu	Lagos, US	2020-05-28
sydnee w	Vernal, US	2020-05-28
carla stevens	Katy, US	2020-05-28

Name	Location	Date
Noah Purvin	Haymarket, US	2020-05-28
Heather Love	Colchester, US	2020-05-28
Storie Smith	Odessa, US	2020-05-28
Sophia Evans	Phoenix, US	2020-05-28
amity burock	Riverside, US	2020-05-28
Emilio Rodriguez	Chicago, IL	2020-05-28
Emily Potter	Boise, US	2020-05-28
Quentin McKinley	Delaware, US	2020-05-28
Destinie Lewis	Rocky Mount, US	2020-05-28
Caillou Ryu	Henderson, US	2020-05-28
Carter Pollard	Secret, US	2020-05-28
Morgan Keene	Apopka, US	2020-05-28
Orion Carter	Logan, US	2020-05-28
Raina Thompson	Omaha, US	2020-05-28
liz colmenares	Durham, US	2020-05-28
Samir Tatarevic	Lakeland, US	2020-05-28
Izzy Saur	Milwaukee, US	2020-05-28
Katherine Glass	Bloomington, US	2020-05-28
Isaac Harris	Huntington Beach, US	2020-05-28
Sophia Sobel	Lahaina, US	2020-05-28
Kesha Moore	chicago, US	2020-05-28
Mari Lynn	Garland, US	2020-05-28

Name	Location	Date
Audrey Jay	Chicago, US	2020-05-28
Lydia Hastings	Omaha, US	2020-05-28
AJ Jones	Paris, US	2020-05-28
Fatimah Chaudhry	Vernon Rockville, US	2020-05-28
Olivia Martinez	Mount Sterling, US	2020-05-28
Connor Cain	Hollister, US	2020-05-28
Noah Kelly	Thousand Oaks, US	2020-05-28
King Bob	Culver City, US	2020-05-28
Mark Setterberg	Houston, TX	2020-05-28
Alayah Guess	Lexington, US	2020-05-28
Kayla Peralta	Crystal Lake, US	2020-05-28
Will Paquette	Dekalb, US	2020-05-28
amanda disparano	Bronx, US	2020-05-28
odalys ocampo	Elmwood Park, US	2020-05-28
Mead Martin	Howell, US	2020-05-28
Ayarisa Ricarte	Albuquerque, US	2020-05-28
Evaleah Spotted bear	Albuquerque, US	2020-05-28
Bella Ryan	Newport News, US	2020-05-28
Micah Bradleyy Gabaldon	Fresno, US	2020-05-28
Kevin Merchant	Chicago, IL	2020-05-28
alexis ramirez	Oxnard, US	2020-05-28
Bertha Quiroga	Chicago, IL	2020-05-28

Name	Location	Date
Alberto Santana	Palmetto, US	2020-05-28
Marco Bertini	New york, US	2020-05-28
Tony Akali	Upper marlboro, US	2020-05-28
Aaliyah Griffin	Athens, US	2020-05-28
Joshua Bangs	Chicago, US	2020-05-28
Sireen Odeh	Washington, US	2020-05-28
Ashley Ceja	South Gate, US	2020-05-28
Christine LoPresti	Elmont, US	2020-05-28
Marsha Allen-Hedges	Fort Wayne, US	2020-05-28
Frank Doe	Vallejo, US	2020-05-28
Sophia Peralta	Chicago, US	2020-05-28
alex marin	Fort Lauderdale, US	2020-05-28
Whit Farlow	Decaturville, US	2020-05-28
Mariam Kassem	Boiling Springs, US	2020-05-28
Christian Rodriguez	Tampa, US	2020-05-28
Camya Dunn	Mechanicsburg, US	2020-05-28
Dillia Lane	chickasha, US	2020-05-28
Winslow Taylor	Dallas, US	2020-05-28
Sami York	Essex, US	2020-05-28
Anya Roselin	Port St. Lucie, US	2020-05-28
emma cervantes	Valencia, US	2020-05-28
Genesis Platero	Grand Prairie, US	2020-05-28

Name	Location	Date
Nikki Kaczmar	Campobello, US	2020-05-28
Alpaca Noodles	Richmond, US	2020-05-28
Paige Dilluvio	Farmington, US	2020-05-28
Kayleigh Register	Holly Springs, US	2020-05-28
Fahidat Koya-Oyefuwa	Chicago, US	2020-05-28
Grey Key-Clark	Seattle, US	2020-05-28
Cierra Franco	New York, US	2020-05-28
Cat Harris	Selma, US	2020-05-28
sophia sweet	chester, US	2020-05-28
Alyssa Clayborn	Canal Winchester, US	2020-05-28
Karter Houze	US	2020-05-28
Amrita Bala	Brooklyn, US	2020-05-28
Gwynn Lizama	Salinas, US	2020-05-28
Savannah Torres	Twentynine Palms, US	2020-05-28
Valerie Nakamura	Clarksville, US	2020-05-28
Isabella Verdon	La Habra, US	2020-05-28
Henry Johnson	Raleigh, US	2020-05-28
Ahmed Motiwala	Germantown, US	2020-05-28
Franklin Melgar	Lincolnton, US	2020-05-28
Giselle Morales	Elmhurst, US	2020-05-28
nun yabusiness	beverly hills, US	2020-05-28
Aileen Solorio	Fairfield, US	2020-05-28

Name	Location	Date
Lisbeth Olivo	Bronx, US	2020-05-28
Saviana Salazar	Odessa, US	2020-05-28
carissa h	Fort Lauderdale, US	2020-05-28
ellie feldman	Smyrna, US	2020-05-28
samantha rojas	Palos Hills, US	2020-05-28
jenna marbles	Calumet City, US	2020-05-28
kendall strupp	New Port Richey, US	2020-05-28
Hazel Avila	Santa Ana, US	2020-05-28
Julie Reed	Wentzville, US	2020-05-28
Aubrey Christensen	Mesa, US	2020-05-28
Jade Hoffmann	Sonora, US	2020-05-28
Kamora McCullough	Boiling Springs, US	2020-05-28
Olivia park	Cherry Hill, US	2020-05-28
Gavin Dorsey	Cleveland, US	2020-05-28
Erika Torres	Miami, US	2020-05-28
Ton Kay	Saint Paul, US	2020-05-28
angele moreno	Arlington, US	2020-05-28
Viviana Puga	Romulus, US	2020-05-28
taylor casey	Carpentersville, US	2020-05-28
Katt Fraser	Chicag, US	2020-05-28
Abril Melendez	New York, US	2020-05-28
solaye Moore	US	2020-05-28

Name	Location	Date
Dakota Fronk	Lewis Center, US	2020-05-28
Estevan Aguirre	La Quinta, US	2020-05-28
Raisa Asim	Delray Beach, US	2020-05-28
Courtney Warthan	Independence, US	2020-05-28
Ariana Foster	Chicago, US	2020-05-28
Anne Cade	Waldorf, US	2020-05-28
peyton hall	Cumming, US	2020-05-28
Bill Gates	Raleigh, US	2020-05-28
Mel Anne	Venice, US	2020-05-28
Katie Osorio	Gaithersburg, US	2020-05-28
Evan Adamafio	Newark, US	2020-05-28
Iyanah Dunmeyer	Hermiston, US	2020-05-28
eleni lahanas	East Lansing, US	2020-05-28
sarely coraza	Chula Vista, US	2020-05-28
Madison Mocello	Midlothian, US	2020-05-28
Courage kwaku	US	2020-05-28
Ryan Scheffler	Roseville, US	2020-05-28
Kyra Velasquez	Phoenix, US	2020-05-28
Mimi Nguyen	Fort Worth, US	2020-05-28
Abigail Shirley	Saltsburg, US	2020-05-28
Leah Lauer	Snohomish, US	2020-05-28
Shawn Lewis	Perry, US	2020-05-28

Name	Location	Date
Conner moulder	Mount Vernon, US	2020-05-28
Esther Ogunnusi	Houston, US	2020-05-28
Jenny Lobato	Kingston, US	2020-05-28
Amaya Glass	Dodgeville, US	2020-05-28
Elizabeth Daugherty	Ashtabula, US	2020-05-28
Kamryn Tingler	Kansas City, US	2020-05-28
Kino Martinez	San Antonio, US	2020-05-28
Grace LeBeau	Madison, US	2020-05-28
Leah Runau	Indianapolis, US	2020-05-28
claire pommier	Arlington Heights, US	2020-05-28
Ashlyn Freal	Baltimore, US	2020-05-28
Kaliyah Howell	Bartlett, US	2020-05-28
Brianna Cadet	Plainfield, US	2020-05-28
Catherine Leal	Salinas, US	2020-05-28
brayden pointe	New Baltimore, US	2020-05-28
Calvin Shaw	Saint Louis, US	2020-05-28
Kaylin Arana	Dallas, US	2020-05-28
Jordan Siegel	Monroe Township, US	2020-05-28
Pa Duffy	Rochester, US	2020-05-28
Lindsay Clay	Waxhaw, US	2020-05-28
Justin jubin	US	2020-05-28
peighton Kehl	Chicago, US	2020-05-28

Name	Location	Date
Mariafe Ramos	El Sobrante, US	2020-05-28
Eileen Jeffrey	Lynn, US	2020-05-28
kaitlynn uyeysyeysyeysyeys	D.C., US	2020-05-28
Angel Hernandez	Northridge, US	2020-05-28
Jessie Carreno	Dallas, US	2020-05-28
Alisa Pepic	Bronx, US	2020-05-28
Camillia Stagner	Tacoma, US	2020-05-28
Indigo Layne	Traverse City, US	2020-05-28
Janelle Coronado	Tucson, US	2020-05-28
Marilyn Draugh	Enterprise, US	2020-05-28
Tanvi Naveen	Rochester, US	2020-05-28
Manuela Jacobo	Concord, Ca, US	2020-05-28
Ariana Kimber	Chicago, IL	2020-05-28
emmery holt	Lawrenceburg, US	2020-05-28
Aaliyah White	Gurnee, US	2020-05-28
Gabriele Sartori	Fremont, US	2020-05-28
Asia Yarbrough	US	2020-05-28
Makenzie Omillian	Elizabethtown, US	2020-05-28
Mia Patenaude	Middleboro, US	2020-05-28
Lynn Anofils	Miami, US	2020-05-28
Kayla O'Connell	Yarmouth Port, US	2020-05-28

Name	Location	Date
Vivente Reyna IV	Donna, US	2020-05-28
Cole Pletcher	Round Lake, US	2020-05-28
Izzy Masias	Bremerton, US	2020-05-28
Esmeralda Huerta	Round Lake, US	2020-05-28
Kendra Wosylus	Wichita, US	2020-05-28
Tracy Torres	Olney, US	2020-05-28
Darrell Teasley	New York, US	2020-05-28
Quinn Carter	Pittsburgh, US	2020-05-28
Cindy Alvarez	Rome, US	2020-05-28
Krystal Spence	San Bernardino, US	2020-05-28
briana Diaz	San Jose, US	2020-05-28
Nicole Garcia	Calexico, US	2020-05-28
Elvin Acosta	Brooklyn, US	2020-05-28
Alec Arnold	Colorado Springs, US	2020-05-28
dorian mapp	Allen, US	2020-05-28
Trent Lastname	Toledo, US	2020-05-28
Katelyn Sadd	US	2020-05-28
Nevaeh Huff	Silver Spring, US	2020-05-28
Sylvia Chen	Chicago, US	2020-05-28
Fernando Adame	Whittier, US	2020-05-28
Emma Salazar	Temecula, US	2020-05-28
Gina Huynh	Santa Ana, US	2020-05-28

Name	Location	Date
Cruz Call	Honolulu, HI	2020-05-28
avery dean	San Antonio, US	2020-05-28
Natalie Salinas	Mansfield, US	2020-05-28
Kassie von Stein	Mount Kisco, US	2020-05-28
Dylan Mayo	Pine Bluff, US	2020-05-28
Tatyushka Cruz	East Hartford, US	2020-05-28
Angela Glover-Lamboy	Astoria, US	2020-05-28
Parth Patel	Newark, US	2020-05-28
Alexis Gilbert	Shepherd, US	2020-05-28
MICHELLE GRAMMER	Lancaster, US	2020-05-28
Abraham Diaz	Covina, US	2020-05-28
Conner Kraus	Albuquerque, US	2020-05-28
amariah love	monroe, US	2020-05-28
Zeen S	Stockton, US	2020-05-28
Dulce Villa	Salt Lake City, US	2020-05-28
Kimberly Henriquez	Manassas, US	2020-05-28
Sean Shannon	Albany, US	2020-05-28
Tara kurien	Rancho Cucamonga, US	2020-05-28
Leslie Duran	Salem, US	2020-05-28
Genesis Oritz	Spring, US	2020-05-28
Tiffany Luu	College Park, US	2020-05-28
princess puente	Houston, US	2020-05-28

Name	Location	Date
Jennifer Vo	Saint Paul, US	2020-05-28
juanita quintero	Goshen, US	2020-05-28
Estella Salazar	Chicago, IL	2020-05-28
Laine Ciaramitaro	Saint Paul, US	2020-05-28
Delani Blakely	Albany, US	2020-05-28
Priscilla Vasquez	San Diego, US	2020-05-28
James Green	US	2020-05-28
Juan Mojica	Chicago, IL	2020-05-28
Jenny Futterman	Highland Park, IL	2020-05-28
Maricela Ochoa	Chicago, IL	2020-05-28
Lulu Gutierrez	Chicago, IL	2020-05-28
Jia Situ	Chicago, IL	2020-05-28
Betty Zheng	Chicago, IL	2020-05-28
Eric Arenas	Chicago, IL	2020-05-28
Araceli Rodriguez	Elgin, US	2020-05-28
jazmin Martinez	Midlothian, US	2020-05-28
Elizabeth Hernandez	Chicago, IL	2020-05-28
Irma Mendez	Chicago, IL	2020-05-28
Andrea Skarupa	Chicago, IL	2020-05-28
Hannah Salgado	Wesley Chapel, FL	2020-05-29
Anastasia Hernandez	Chicago, IL	2020-05-29
Sara Olivarez	Chicago, IL	2020-05-29

Name	Location	Date
Vanessa Alvarez	Chicago, IL	2020-05-29
Irma L Hernandez	Mundelein, IL	2020-05-29
James Esparza	Chicago, IL	2020-05-29
Julissa Montes	Chicago, IL	2020-05-29
Josephine Del Rio	Warrenville, IL	2020-05-29
Rachel Thomas	Lansing, IL	2020-05-29
Victor Cuevas	East Chicago, IN	2020-05-29
Sophia Diaz	Chicago, IL	2020-05-29
john colon	Chicago, IL	2020-05-29
Sheila Mares	Munster, IN	2020-05-29
Michael Tafolla	Chicago, IL	2020-05-29
Norine Baltazar	Chicago, IL	2020-05-29
Caroline Gibbons	Chicago, IL	2020-05-29
Michael Gomez	Chicago, IL	2020-05-29
Joseph Strickland	Chicago, IL	2020-05-29
Marissa Montes	Chicago, IL	2020-05-29
Tanuja Jagernauth	Chicago, IL	2020-05-29
Maggie Acosta	Chicago, IL	2020-05-29
Michelle Salazar	Chicago, IL	2020-05-29
Ramon Cardenas	Chicago, IL	2020-05-29
Nzinga West	Chicago, IL	2020-05-29
Tara Adams	Hobart, IN	2020-05-29

Name	Location	Date
Gerald Linnear	Chicago, IL	2020-05-29
Nalani Manzo	Chicago, IL	2020-05-29
Cesar Rolon	Chicago, IL	2020-05-29
Gabby Nelson	Saint Paul, MN	2020-05-29
April Friendly	Homewood, IL	2020-05-29
Victoria Salazar	Chicago, IL	2020-05-29
Sasha Zuniga	Chicago, IL	2020-05-29
Steven Payne	Chicago, IL	2020-05-29
Jorge Ramirez	Chicago, IL	2020-05-29
Sylvia Zapata	Chicago, IL	2020-05-29
Teleza Rodgers	Vernon Hills, IL	2020-05-29
Maritza Fontanez	Chicago, IL	2020-05-29
Fatima Huizar	Chicago, IL	2020-05-29
Tyrone Muhammad	Chicago, IL	2020-05-29
Fernando Zuniga	Chicago, IL	2020-05-29
Midori Himiko	Chicago, IL	2020-05-29
Franca Sparano	Chicago, IL	2020-05-29
melissa serrano	Chicago, IL	2020-05-29
Quinshedrick Muhammad	Bellwood, IL	2020-05-29
vickii coffey	Flossmoor, IL	2020-05-29
Louis Reed	Bridgeport, CT	2020-05-29
SOFIA KONSTANTINOU	Highland Park, IL	2020-05-29

Name	Location	Date
Marysol Mendes	Chicago, IL	2020-05-29
Navjot Heer	Chicago, IL	2020-05-29
Diana Hincapie	US	2020-05-29
Larry Turner	Chicago, IL	2020-05-29
Martina Spillane	Hickory Hills, IL	2020-05-29
Elizabeth Torres	Calumet City, IL	2020-05-29
Mayra Galvez	Chicago, IL	2020-05-29
adrienne kessler	Powell, US	2020-05-29
Nydia Medina	Richardson, US	2020-05-29
Destiny Taylor	Medina, US	2020-05-29
yanissa garcia	madison, US	2020-05-29
Eli D	Romulus, US	2020-05-29
Christian Maldonado	Dallas, US	2020-05-29
oskskak jajaja	new york, US	2020-05-29
Jameel Williamson	Columbus, US	2020-05-29
Leena Lee	Dearborn, US	2020-05-29
Kalani Williams	Shiprock, US	2020-05-29
Ivy Daitch	Charlotte, US	2020-05-29
Katie Syneider	Dayton, US	2020-05-29
Jenny Agagas	Murrieta, US	2020-05-29
Daisy Perez	Lake Worth, US	2020-05-29
Allison Kiska	Wheeling, US	2020-05-29

Name	Location	Date
Jocelyne Hernandez	Los Angeles, US	2020-05-29
Anastasia Brathwaite	Stratford, US	2020-05-29
mackinzie ponder	Fort Wayne, US	2020-05-29
Caleb Laney	Charlotte, US	2020-05-29
Charlotte Kent	Kansas City, US	2020-05-29
Frankia Pratt	Brooklyn, US	2020-05-29
Marissa Quintana	Chicago, US	2020-05-29
Jennifer Diggs	Burbank, CA	2020-05-29
Diana Razo	Chicago, IL	2020-05-29
Karen Canales	Chicago, IL	2020-05-29
Perla Chavez	East Chicago, IN	2020-05-29
Izabela Famularo	Chicago, IL	2020-05-29
Ahmmed Kha	Champaign, IL	2020-05-29
Alicia Del Real	Chicago, IL	2020-05-29
France Joseph	Evanston, IL	2020-05-29
Eladio Avalos	Chicago, IL	2020-05-29
Katlynn Bush	Chicago, IL	2020-05-29
Jacqueline Villarreal	Indianapolis, IN	2020-05-29
Tiarra Owens	Chicago, IL	2020-05-29
Lizete Patino	Indianapolis, IN	2020-05-29
Ruby Velazquez	Lansing, IL	2020-05-29
Irma Nevarez	Chicago, IL	2020-05-29

Name	Location	Date
Marisa Cazy	Oak Park, IL	2020-05-29
Marlon Chamberlain	Calumet City, IL	2020-05-29
Sarah Coulter	Chicago, IL	2020-05-29
Ahtziri Barba	Chicago, IL	2020-05-29
Stafford Floyd	Chicago, IL	2020-05-29
Antonio Lightfoot	Chicago, IL	2020-05-29
Christine Padilla	Chicago, IL	2020-05-29
Julian De La Rosa	Chicago, IL	2020-05-29
Alexandra Hernandez	Chicago, IL	2020-05-29
Aglaet De Santiago	Chicago, US	2020-05-29
JB	Chicago, IL	2020-05-29
Ali Andarcia	Chicago, IL	2020-05-29
Leah Scott	Chicago, IL	2020-05-29
Carla Luna	Chicago, IL	2020-05-29
Silvita Diaz Brown	Chicago, IL	2020-05-29
Louis Padilla	Chicago, IL	2020-05-29
Benjamin Garza	Chicago, IL	2020-05-29
Tania Martinez	Chicago, IL	2020-05-29
Deeva Evangelista	Lake In The Hills, IL	2020-05-29
Michelle Batad	Carpentersville, IL	2020-05-29
Mikayla Nuguid	Lake In The Hills, IL	2020-05-29
Sabrina Barajas	Chicago, IL	2020-05-29

Name	Location	Date
Arnold Julien	Richton Park, IL	2020-05-29
Stephany Padilla	Roselle, IL	2020-05-29
Claudia Muniz	Chicago, IL	2020-05-29
Blythe Rudloff	Hawthorne, CA	2020-05-29
Edgar Gamino	Chicago, IL	2020-05-29
karoline macias	Orland Park, IL	2020-05-29
Jackie Quezada	Chicago, IL	2020-05-29
Jose Magallanes	Chicago, IL	2020-05-29
Melissa Hernandez	Elgin, IL	2020-05-29
Danilo Malisic	Chicago, IL	2020-05-29
Alan Gaeta	Chicago, IL	2020-05-29
Manuel Franco	Chicago, IL	2020-05-29
Denisse R	Chicago, IL	2020-05-29
Marissa Quiroz	Chicago, IL	2020-05-29
Terri Santo	Orland Park, IL	2020-05-29
denette cox	Gary, IN	2020-05-29
kathleen valente	Chicago, IL	2020-05-29
Genesis Cervantes	Chicago, IL	2020-05-29
Desiree Warren	Philadelphia, PA	2020-05-29
Paige Warren	Chicago, IL	2020-05-29
Jazmin Diaz	Chicago, IL	2020-05-29
Hector Anduray	Chicago, IL	2020-05-29

Name	Location	Date
Pearlie Washington	Alpharetta, GA	2020-05-29
Seluvaia Taukolo	Portland, US	2020-05-29
Hannah Kidwell	Cumberland, US	2020-05-29
Vanessa Delgado	Chicago, IL	2020-05-29
Asma Yusuf	Syracuse, US	2020-05-29
Jada Martin	Fort Lauderdale, US	2020-05-29
Jeremiah Clarke	Perris, US	2020-05-29
ARIELLE ROSS	Kansas City, US	2020-05-29
Isabella Chaparro	Dallas, US	2020-05-29
Lexus Stambaugh	Moline, US	2020-05-29
Carl Rimando	Pinole, US	2020-05-29
Madison Bailey	Windermere, US	2020-05-29
Mila Rodarte	Whittier, US	2020-05-29
Grace Gray	Farmingdale, US	2020-05-29
Steven McCarter	Chicago, IL	2020-05-29
FELIX SENISAIS	CHICAGO, IL	2020-05-29
Nancy Kusler	Chicago Heights, IL	2020-05-29
Christina Flores	Evergreen Park, IL	2020-05-29
Olivia De La Rosa	Chicago, IL	2020-05-29
Wilburn Hester	South Holland, IL	2020-05-29
Sherard Howell	Chicago, IL	2020-05-29
Lily Galvan	Chicago, IL	2020-05-29

Name	Location	Date
Rose cerda	Chicago, IL	2020-05-29
MP	Chicago, IL	2020-05-30
Karen Peacher	Dolton, IL	2020-05-30
Roger Guerrero	Chicago, IL	2020-05-30
Dulce Patron	Elgin, IL	2020-05-30
Sebastian Sanchez	Chicago, IL	2020-05-30
Renee Carini	Mukwonago, WI	2020-05-30
Fabian Gonzalez	Westville, IN	2020-05-30
Belen Lopez	Chicago, IL	2020-05-30
Charlotte Taylor	Chicago, IL	2020-05-30
Chery Faulkner	Decatur, GA	2020-05-30
Emily Lozano	Chicago, IL	2020-05-30
Claudia Sandoval	Chicago, IL	2020-05-30
John Stajcic	Chicago, FL	2020-05-30
Jacquelyn M	Louisville, KY	2020-05-30
Esmeralda Hernandez	Chicago, IL	2020-05-30
Patricia Banks	South Holland, IL	2020-05-30
Roseann Chico	Chicag, IL	2020-05-30
Joseph Morales	Chicago, IL	2020-05-30
Giovanni Serrato	Hammond, IN	2020-05-30
Mirela Sparano	Chicago, IL	2020-05-30
Donna James	Chicago, IL	2020-05-30

Name	Location	Date
James Gonzales	Hammond, IN	2020-05-30
hyasmine gallardo	Chicago, IL	2020-05-30
Brenda Garcia	Chicago, IL	2020-05-30
Tesla Halverson	Chicago, IL	2020-05-30
Lisa Ramos	Chicago, IL	2020-05-30
Simon Cortes	Chicago, IL	2020-05-30
Eduardo Jasso	Chicago, IL	2020-05-30
Jessica Rosas	Clinton, IA	2020-05-30
Yolanda Cortes	Chicago, IL	2020-05-30
Rita Alvarez	Chicago, IL	2020-05-30
Yolanda Castillo	Chicago, IL	2020-05-30
Crispin Montelongo Jr	Chicago, IL	2020-05-30
Lucia Orozco	Chicago, IL	2020-05-30
Sue Velez	Riverside, US	2020-05-30
eunice tapia	9869, US	2020-05-30
cecy sanchez	Los Angeles, US	2020-05-30
Ava Poole	Floyds Knobs, US	2020-05-30
Seran Varatharajah	Troy, US	2020-05-30
Amira Fadil	Columbus, US	2020-05-30
Jaiyon Coar	Jonesboro, US	2020-05-30
Hannah Brody	Elmhurst, US	2020-05-30
Therese Nicholson	Boston, US	2020-05-30

Name	Location	Date
Jeslyn Jeong	Johns Creek, US	2020-05-30
Sara Fehring	Jupiter, US	2020-05-30
Yolanda Cas	Chicago, IL	2020-05-30
Chase Kane	Denver, US	2020-05-30
Alexia Mast	Batavia, US	2020-05-30
Lakeisha Allen	Charlotte, US	2020-05-30
Trina Garcia	Bronx, US	2020-05-30
Enrique Santana	Chicago, IL	2020-05-30
Ian Huang	Brooklyn, US	2020-05-30
Sandra Ortega	Chicago, IL	2020-05-30
Angelly Arias	Burbank, US	2020-05-30
Meera Phanse	Frisco, US	2020-05-30
M D	San Jose, US	2020-05-30
Samantha Barajas	Minneapolis, MN	2020-05-30
Juliana Yeboah	Dumfries, US	2020-05-30
Reese St. Jean	Peoria Heights, US	2020-05-30
Deangeo Perry	Matteson, US	2020-05-30
Leesa Johnson	Brooklyn, US	2020-05-30
Billy Springman Springman	Carrollton, US	2020-05-30
cece morgan	Naperville, US	2020-05-30
Eva pearman	Rapid City, US	2020-05-30
Marisela Saenz	Corpus Christi, US	2020-05-30

Name	Location	Date
Tanseem Manzoor	Astoria, US	2020-05-30
Rebecca D	Gainesville, US	2020-05-30
Julianne Cote	Cambridge, US	2020-05-30
Grace Wissled	New York, US	2020-05-30
Jessica Rivera	Chicago, IL	2020-05-30
Leticia Santana	Chicago, IL	2020-05-30
Camila Medrano	Natick, US	2020-05-30
Nicole Fronek	Chicago, US	2020-05-30
Sani Afell	San Antonio, US	2020-05-30
Madeline Ibarra	Dallas, US	2020-05-30
Arleen Rodriguez-Portal	Miami, US	2020-05-30
Flannery Dearborn	Alpharetta, US	2020-05-30
Alyssa Goudy	Syracuse, US	2020-05-30
Olivia Former	College Park, US	2020-05-30
bella d	Wesley Chapel, US	2020-05-30
Orla Patterson	New York, US	2020-05-30
Amenze Odeh	Jackson, US	2020-05-30
Hillary Brenz Brevi	Brooklyn, US	2020-05-30
Eva Dominguez	Chicago, IL	2020-05-30
Scott Fisher	Goodview, VA	2020-05-30
Arionah Gray	Belleview, US	2020-05-30
Kennedi Robbins	Chicago, US	2020-05-30

Name	Location	Date
Payton Porter	De Pere, US	2020-05-30
Melissa Ann Moyers	Memphis, US	2020-05-30
Melina Alcantar	El Cajon, US	2020-05-30
Christina Rivera	Chicago, IL	2020-05-30
Justin Ortiz	US	2020-05-30
Elizabeth Lopez	Saint John, IN	2020-05-30
caroline melton	Fairfax, US	2020-05-30
Layla Kimmons	Flossmoor, US	2020-05-30
Ana Gonzalez	Gainesville, US	2020-05-30
Kayli Heisner	Chicago, US	2020-05-30
Michael Mancha	Chicago, IL	2020-05-30
Rebekah McNiel	Gallup, US	2020-05-30
Rebecca Leal	Chicago, US	2020-05-30
Coohie Slayer	Ocean Springs, US	2020-05-30
Dianna Snelbaker	Havertown, US	2020-05-30
Ramsey Potur	Rockville, US	2020-05-30
Alyssa Ricks	New Orleans, US	2020-05-30
Irvin Soro	Las Vegas, US	2020-05-30
Ailani Barriga	Peoria, US	2020-05-30
Arewa Alade	Germantown, US	2020-05-30
Phoebe Parks	Richmond, US	2020-05-30
Stacy Cartwright	Irvine, US	2020-05-30

Name	Location	Date
Saskia Rubin	Los Angeles, US	2020-05-30
MARICELA ROMERO	Chicago, IL	2020-05-30
Raven Moody	Dardanelle, US	2020-05-30
Shawanda Gause	Chicago, US	2020-05-30
Joseph berrios	Fairview, US	2020-05-30
ari ochoa	Stamford, US	2020-05-30
shabih fatima	Arlington, US	2020-05-30
Leon Clarke	Williamsport, US	2020-05-30
E Bates	Dixon, US	2020-05-30
Patricia Lepichon	New York, US	2020-05-30
Laurice Djepeno	Washington, US	2020-05-30
Jenna Smith	Louisville, US	2020-05-30
Ava McKenzie	San Jose, US	2020-05-30
Alexia Blumberg	Alexandria, US	2020-05-30
Crystal Brine	Columbia, US	2020-05-30
Melissa Stovall	Evergreen Park, US	2020-05-30
Scarlet Garcia	Methuen, US	2020-05-30
Pheobe Osterbuhr	Paris, US	2020-05-30
Courtney D	Waukesha, US	2020-05-30
Darianna Mitchell	Indianapolis, US	2020-05-30
Charessa Hill	Joplin, US	2020-05-30
fiona swan	Oakland, US	2020-05-30

Name	Location	Date
Curtis Stevens	Philadelphia, US	2020-05-30
Joel Olivares	Grapevine, US	2020-05-30
Brian Ruiz	Melrose Park, US	2020-05-30
Myah Weber	Chico, US	2020-05-30
killerswordsman 9776	Clinton City, US	2020-05-30
Katie N	Chicago, US	2020-05-30
Adonay Werede	Oakland, US	2020-05-30
Olivia Diaz	Chicago, IL	2020-05-30
Johnelle Stephens	Buford, US	2020-05-30
Graciela De La Mora	Aurora, US	2020-05-30
Derek Hutchinson	Bronx, US	2020-05-30
Gregory Lewis	Philadelphia, US	2020-05-30
Aurora Badia	Fort Myers, US	2020-05-30
Jane Kubis	Námestovo, US	2020-05-30
Lily Cromika	Portersville, US	2020-05-30
Eduardo Camarena	Chicago, IL	2020-05-30
kris castillo	Rockledge, US	2020-05-30
Ms Me	Alviso, US	2020-05-30
breyann weaver	Clearfield, US	2020-05-30
Stella Sanchez	Houston, US	2020-05-30
Macy Johnson	Portland, US	2020-05-30
Jalyn Stoll	Mount Pleasant, US	2020-05-30

Name	Location	Date
Annsleigh Miller	Jacksonville, US	2020-05-30
Cristen Harvey	US	2020-05-30
Tess S	Ypsilanti, US	2020-05-30
Nichole Franco	Tucson, US	2020-05-30
Kristine Cervantez	Vallejo, US	2020-05-30
Prabhav Vaidya	Nutley, US	2020-05-30
Carissa Reyes	Los Angeles, US	2020-05-30
Bella Graber	Littleton, US	2020-05-30
Shawn Johnson	Tuskegee, US	2020-05-30
lizbet saenz	Burleson, US	2020-05-30
Bridget Quent	Lindenhurst, US	2020-05-30
Christine Velez	Orlando, US	2020-05-30
Megan Pacas	Plainfield, US	2020-05-30
Maria del Real	US	2020-05-30
Edema Theee	Chicago, US	2020-05-30
Ruth Pryor	Atlanta, US	2020-05-30
Jeff Michael	Bronx, US	2020-05-30
Wei Huang	Chicago, US	2020-05-30
Heather Bartlett	Huntsville, US	2020-05-30
asbed tchoboian	Glendale, US	2020-05-30
Devin Mccrary	Laredo, US	2020-05-30
Emily Santos	Los Angeles, US	2020-05-30

Name	Location	Date
Caricia Barragan	Phoenix, US	2020-05-30
Emily Guzman	Bologna, US	2020-05-30
Michelle Murray	Bellwood, US	2020-05-30
heather quill	Chicago, US	2020-05-30
Valerie Silva	Riverside, US	2020-05-30
Michael Schulte	Austin, US	2020-05-30
Nathaniel Lopez	Norcross, US	2020-05-30
Estefany Mandujano	Salinas, US	2020-05-30
Janet McKesey	US	2020-05-30
Drake Clooney	Chicago, US	2020-05-30
Lisa Alexander	Hollywood, US	2020-05-30
Lucy Moran	Mundelein, US	2020-05-30
Anne Bleu	Miami, US	2020-05-30
Lorena Rodriguez	Long Beach, US	2020-05-30
Addison Doty	Otisville, US	2020-05-30
Katelyn Ingles	Park Forest, US	2020-05-30
Edgar Rogiers	New York, US	2020-05-30
Miguel Herrera	New York, US	2020-05-30
Emily Valencia	Palmdale, US	2020-05-30
Nathan Williams	Chicago, US	2020-05-30
Peter Zucker	Chicago, IL	2020-05-30
Crayton Kidd	Flagstaff, US	2020-05-30

Name	Location	Date
Samantha Santiago	Bronx, US	2020-05-30
Polina Lichman	Olympia, US	2020-05-30
Marie Cox	Lynn, US	2020-05-30
Alexis Pilarczyk	Chicago, IL	2020-05-30
Wesly Seda	Philadelphia, US	2020-05-30
Carter Luttrell	Manhattan Beach, US	2020-05-30
Aniya Dixon	Winterville, US	2020-05-30
Jessica Noyola	Houston, US	2020-05-30
вн	Sulphur, US	2020-05-30
Rogelio Lopez	Chicago, IL	2020-05-30
Roxanny Yanez	Las Vegas, US	2020-05-30
Lizzy Ayalda	Brooklyn, US	2020-05-30
Sarah Dow	Schenectady, US	2020-05-30
Amanda Cortez	Whittier, US	2020-05-30
Ta'Mia Jones	Savannah, US	2020-05-30
kiley schmidt	Orinda, US	2020-05-30
Tomicia Ellis	Springfield, US	2020-05-30
Lynds Downs	Chester Springs, US	2020-05-30
emma simko	Clarkston, US	2020-05-30
Katrina Webb	US	2020-05-30
Sydney Pilarczyk	Chicago, IL	2020-05-30
Frgrf Turtg	Tampa, US	2020-05-30

Name	Location	Date
Rebecca Michelson	Durham, US	2020-05-30
edna star	new york, US	2020-05-30
Keneisha Robinson	Pittsburgh, US	2020-05-30
Faith MacLaren	Waterford, US	2020-05-30
Dyanara Beltrán	Rialto, US	2020-05-30
maria cielo valencia	Dallas, US	2020-05-30
Erika Cuanetl	Hammond, IN	2020-05-30
Camille Beck	Brooklyn, US	2020-05-30
Abena Ababio	Pittsburgh, US	2020-05-30
Simone Zhu	Garden Grove, US	2020-05-30
Bonnie Sutherland	Chicago, IL	2020-05-30
Lori Spencer	Aspen, US	2020-05-30
Rocelia Ruiz	Chicago, IL	2020-05-30
Carolina Barbalace	Woodland Hills, US	2020-05-30
Laura Cordoba	Chicago, IL	2020-05-30
Daniela Ramos	Auburndale, US	2020-05-30
Katrina Roberts	Chicago, US	2020-05-30
Alice Uribe	US	2020-05-30
piedad gomez	Chicago, IL	2020-05-30
Maria Gonzalez	Chicago, IL	2020-05-30
Stephanie Padilla	Chicago, IL	2020-05-30
Alexis Velez	Whittier, CA	2020-05-30

Name	Location	Date
Carmella Velez	Chicago, IL	2020-05-30
John Pilarczyk	Chicago, IL	2020-05-30
Barbara Weissenborn	New Baden, IL	2020-05-30
Eloisa Pacheco	Chicago, IL	2020-05-30
Ftero Nicholson	Chicago, IL	2020-05-30
Felipe Villa	Chicago, US	2020-05-30
Cristina Munoz	Chicago, IL	2020-05-30
Mary Cervantez	Whiting, IN	2020-05-30
Liz Aba	Surrey, Canada	2020-05-30
Jose Tapia	Chicago, IL	2020-05-30
STEPHANIE Tyer	Dothan, US	2020-05-30
Nicolas Otero	Temecula, US	2020-05-30
Abby Mackin	O Fallon, US	2020-05-30
Ariva Volkert	US	2020-05-30
Maura Stratton	Saint Paul, US	2020-05-30
Ayde Rivera	Catonsville, US	2020-05-30
Dijaniya Lawrence	Chicago, US	2020-05-30
Fernanda Melgar	Van nuys, US	2020-05-30
amoni cook	Chicago, US	2020-05-30
Keala Edwrds	Honolulu, US	2020-05-30
daja nelson	Chandler, US	2020-05-30
Bella Nicodeme	Jacksonville, US	2020-05-30

Name	Location	Date
Kyle Neilssien	Medford, US	2020-05-30
Vicky Mai	US	2020-05-30
brandy lopez	El Monte, US	2020-05-30
Tiffany Nguyen	Denver, US	2020-05-30
Kiarri Pugh	Binghamton, US	2020-05-30
Mahnoor Bhatti	Fairfax, US	2020-05-30
Abby Ferguson	Billings, US	2020-05-30
Armani Hooper	Chicago, US	2020-05-30
Jessica Gonzalez	Richmond, US	2020-05-30
Haley Stratton	St Albans, US	2020-05-30
Diana Prado	Miami, US	2020-05-30
Madison Little	Athens, US	2020-05-30
Samantha Batham	Turlock, US	2020-05-30
Ja'nyta Thiena	Dania, US	2020-05-30
Brandon Arjoon	Durham, US	2020-05-30
Koby C	Ninety Six, US	2020-05-30
Vanessa Trinidad	Channelview, US	2020-05-30
Agahan Sial	Bronx, US	2020-05-30
Asmaa Ibnoulaaroussi	Philadelphia, US	2020-05-30
desiree godinez	la, US	2020-05-30
Manjot Kaur	Anderson, US	2020-05-30
taylor summers	Moline, US	2020-05-30

Name	Location	Date
Ryan Michel	Waukegan, US	2020-05-30
Wyatt Renfro	East Lansing, US	2020-05-30
Kendo Ayala	Chicago, US	2020-05-30
Kyle Alyassir	Gurnee, US	2020-05-30
Shannon Hightower	Alamogordo, US	2020-05-30
Ashley Hernandez	La Habra, US	2020-05-30
Joselyn Garcia	Mecca, US	2020-05-30
- MiCROZi -	Lacey, US	2020-05-30
Christopher Christmas	Elizabeth, US	2020-05-30
Paola Renteria	Council Bluffs, US	2020-05-30
Unicorn Invader	US	2020-05-30
Sherry Lin	Pasadena, US	2020-05-30
Madison Goble	Bradford, US	2020-05-30
Hayley Matthews	Atlanta, US	2020-05-30
Marie Garcia	Los Angeles, US	2020-05-30
Lourdes DeJesus	North Dartmouth, US	2020-05-30
Fate Dragoo-Williams	Carlton, US	2020-05-30
Elizabeth Valdez	Buena Park, US	2020-05-30
Karen L	South Pasadena, US	2020-05-30
Drew Lovett	Chambersburg, US	2020-05-30
Lauren Seiders	Carmel, US	2020-05-30
Adam Droe	Rochester, US	2020-05-30

Name	Location	Date
Zuzanna Malinowska	Franklin Springs, US	2020-05-30
Jasmine Roberson	Minneapolis, US	2020-05-30
Christopher Anane	Chicago, US	2020-05-30
Adriana Pantaleon	Islip, US	2020-05-30
Jasmin Bustos	San Jose, US	2020-05-30
nyree brady	Riverside, US	2020-05-30
Julianne DeSilva	Syosset, US	2020-05-30
Taylor Ku	San Gabriel, US	2020-05-30
Mona Atalla	Parlin, US	2020-05-30
Otgonbayar Badraa	Pleasant Hill, US	2020-05-30
Andrea Nelson	Austin, US	2020-05-30
Christopher Martinez	Anaheim, US	2020-05-30
katelynn jaquez	Chattanooga, US	2020-05-30
damia madden	Kennesaw, US	2020-05-30
Cassie Gruetter	Toledo, US	2020-05-30
Ashley Sanchez	Gilroy, US	2020-05-30
Britany Palarea	Houston, US	2020-05-30
Juju Williamson	Temecula, US	2020-05-30
ande fisher	Eagle Mountain, US	2020-05-30
Maria Baker	Albuquerque, US	2020-05-30
Rakeen Islam	Glendale, US	2020-05-30
Pooja Patel	Philadelphia, US	2020-05-30

Name	Location	Date
hailee wallis	Lancaster, US	2020-05-30
Destiny Stepp	Excelsior Springs, US	2020-05-30
malachi almeida	Baton Rouge, US	2020-05-30
Nicole Chaves	Santa Ana, US	2020-05-30
Diane Yarzebinski	Broomfield, US	2020-05-30
Danielle Dedios	Jacksonville, US	2020-05-30
Eve Gutierrez	Los Angeles, US	2020-05-30
Caleb Pilarczyk	Chicago, IL	2020-05-31
Jorge Martinez	Chicago, IL	2020-05-31
Marisa Castillo	Chicago, IL	2020-05-31
Luz ANAYA	Chicago, IL	2020-05-31
Angelica DeLaCruz	Chicago, IL	2020-05-31
morganna Lockett	Chicago, IL	2020-05-31
Sylvia Plotnick	Prospect Heights, IL	2020-05-31
Lucila Quintero	Chicago, IL	2020-05-31
Leticia Del Real	West Lafayette, IN	2020-05-31
Diane Graan	Chicago, IL	2020-05-31
Aisha Barnes Madro	Evergreen Park, IL	2020-05-31
Cristina Hernandez	Chicago, IL	2020-05-31
Joe Rincon	Chicago, IL	2020-05-31
Maria Sosa	Chicago, IL	2020-05-31
Ileana Gallegos	Chicago, IL	2020-05-31

Name	Location	Date
Kate Koval	Chicago, IL	2020-05-31
Alexia Martinez	Charleston, IL	2020-05-31
Jose Mendoza	Chicago, IL	2020-05-31
Helen Trinidad	Chicago, IL	2020-05-31
Adriana Ruiz	Maywood, IL	2020-05-31
Raul Galvan	Chicago, IL	2020-05-31
Alberto Covarrubias	Chicago, IL	2020-05-31
Jolisa Ramos	Somerset, US	2020-05-31
olivia castro	New Bedford, US	2020-05-31
stephanie ayala franco	norco, US	2020-05-31
Cassandra Ramirez	San Bernardino, US	2020-05-31
Maya Acacia	Evanston, US	2020-05-31
Christina Thomas	rockford, US	2020-05-31
Callie Haney	Kingsland, US	2020-05-31
Jaret Cordoba	Indianapolis, US	2020-05-31
Marissa Szczesny	Troy, US	2020-05-31
WJ	West Liberty, US	2020-05-31
Nena Ally	New York City, US	2020-05-31
Dena Heshmati	Paterson, US	2020-05-31
Amie Freeman	Plano, US	2020-05-31
Lee Williams	Hyattsville, US	2020-05-31
Khalia Mullin	Wheaton, US	2020-05-31

Name	Location	Date
Caitlyn Voskanyan	Wilmington, US	2020-05-31
Jessica Sanisaca	Chicago, US	2020-05-31
Nicole Viveros	Chicago, IL	2020-05-31
Laura Cortez	Chicago, IL	2020-06-01
W Dalmatian	Chicago, IL	2020-06-01
Samuel Sosa	Burnham, IL	2020-06-01
Bianca Castaneda	Chicago, IL	2020-06-01
Geri Roberts	Chicago, IL	2020-06-01
Victor Carreon	Chicago, IN	2020-06-01
Daisy Diaz	Chicago, IL	2020-06-01
marisela romero	Indianapolis, IN	2020-06-01
Amanda Weaver	Chicago, IL	2020-06-01
Victoria Diaz	Chicago, IL	2020-06-01
Tasia Wilson	Chicago, IL	2020-06-01
giselle escobedo	Chicago, US	2020-06-01
Elizabeth Harper	Chicago, IL	2020-06-01
Ambrelyn Rodriguez	Chicago, IL	2020-06-01
Megan Adamski	Oak Park, IL	2020-06-01
Martha Garcia	Chicago, IL	2020-06-01
Velia Ortega	New Lenox, IL	2020-06-01
Ghadir Wreidan	Winter Park, US	2020-06-01
Theodore Wise	Birdsboro, US	2020-06-01

Name	Location	Date
Charlee Dilley	West Columbia, US	2020-06-01
Velanda Guillaume	Brooklyn, US	2020-06-01
Melody Revels	Peoria, US	2020-06-01
Shandi Louis	Hollywood, US	2020-06-01
ariana garcia	Rancho Cucamonga, US	2020-06-01
Sharon Oladeji	Philadelphia, US	2020-06-01
Octavia Harper	Saint Petersburg, US	2020-06-01
Patrice Princivil	Sanford, US	2020-06-01
cynthia elerick	Pacoima, US	2020-06-01
Amber Thompson	LaSalle, US	2020-06-01
Ashlynn Bolton	Chicago, US	2020-06-01
Citlali Santamaria	Columbus, US	2020-06-01
Jeanne Vermenouze	Dallas, US	2020-06-01
Michelle Moray	Chicago, US	2020-06-01
Best Mee懶�###� Jsjd	Burbank, US	2020-06-01
Brittany Velarde	Las Vegas, US	2020-06-01
Joshua Cofer	Atlanta, US	2020-06-01
elise cruz	Chicago, US	2020-06-01
Mahima Mudde	Des Plaines, US	2020-06-01
Abena Galloway	Fort Worth, US	2020-06-01
Angelica Castillo	Vallejo, US	2020-06-01
Rosa Silva	San Luis, US	2020-06-01

Name	Location	Date
Brooklyn Day	Tampa, US	2020-06-01
Daryella Gutierrez	Pharr, US	2020-06-01
Alicia Silva	Delray Beach, US	2020-06-01
Cherie J	Dallas, US	2020-06-01
Nikayla Smith	Midlothian, US	2020-06-01
Emmy Graham	Bangs, US	2020-06-01
Riley Corcoran	Liverpool, US	2020-06-01
Nana-Shika Wilson	Boca Raton, US	2020-06-01
Nakedra Hill	Farmerville, US	2020-06-01
ash adriano	san diego, US	2020-06-01
Rosalind Gibson	Lombard, US	2020-06-01
Paroma Zaman	Seattle, US	2020-06-01
TréLa Poole-Beard	Washington, US	2020-06-01
Ja'Nya Crews	Nashville, US	2020-06-01
Karina Liceaga	Covina, US	2020-06-01
Manuela Barrientos	Miami, US	2020-06-01
Skylar Tolls	Houston, US	2020-06-01
Josephine Rudoff	Boulder, US	2020-06-01
Alex Aquino	Panorama City, US	2020-06-01
anna c	Shorewood, US	2020-06-01
Isabella Vasquez	San Pedro, US	2020-06-01
Rayanne Berlanga	Riverside, US	2020-06-01

Name	Location	Date
Mary Bolito	Arlington, US	2020-06-01
Makayla Burdekin	Roseville, US	2020-06-01
Ashlyn Givens	Fort White, US	2020-06-01
Jenna Sissom	West Frankfort, US	2020-06-01
Kate Roe	Asheville, US	2020-06-01
emerald campbell	Middle River, US	2020-06-01
Amanda Prokos	Park Ridge, US	2020-06-01
Vivian Moda	Amherst, US	2020-06-01
Laura Lundy	Hartselle, US	2020-06-01
Katie Lennon	Littleton, US	2020-06-01
jordyn toler	New Bern, US	2020-06-01
Jacob Kaufman	Bakersfield, US	2020-06-01
Sarah Panza	Melville, US	2020-06-01
Devin Wyatt	Arlington, US	2020-06-01
Sara Cook	Homewood, US	2020-06-01
bethania thomas	lorton, US	2020-06-01
Heydi Flores	Gaithersburg, US	2020-06-01
Kiah Taylor	Greenwood, US	2020-06-01
Teri Cotton	Pekin, US	2020-06-01
Memphis Szakelyhidi	Pittsburgh, US	2020-06-01
Charlotte Collins	Chicago, US	2020-06-01
Judaya Foster	Jacksonville, US	2020-06-01

Name	Location	Date
Tatiana Gonzalez	Lawton, US	2020-06-01
Allison Gunderson	Carlsbad, US	2020-06-01
Evie Angevine	Denver, CO	2020-06-01
nico deangleo	Brooklyn, US	2020-06-01
Bianca Boyd	Montgomery, US	2020-06-01
Jonah Greenwell	Louisville, US	2020-06-01
Mia Hetlinger	Parsons, US	2020-06-01
Lauren Harper	Tucson, US	2020-06-01
Lydia Magnuson	Gig Harbor, US	2020-06-01
Calvin Davis	Houston, US	2020-06-01
Lorenza Najera	Houston, US	2020-06-01
joanna mcgovern	Deltona, US	2020-06-01
Dawn Perkins	Brooklyn, US	2020-06-01
Desiree' Carey	Luling, US	2020-06-01
Britney mcdonald	Houston, US	2020-06-01
Alyssa C.	Humble, US	2020-06-01
Giulia Kotsakis	Brookfield, US	2020-06-01
Jill Hisey	Ranson, US	2020-06-01
Andrea Turkson	Elk Grove Village, US	2020-06-01
Melisa Zamora	Miami, US	2020-06-01
Yasmin Suarez	Houston, US	2020-06-01
Dawny Cherrop	Columbus, US	2020-06-01

Name	Location	Date
Skylah Plank	West Liberty, US	2020-06-01
Rhiannon Parker	Plainfield, US	2020-06-01
Samantha Mayfield	Lamar, US	2020-06-01
Ava Zavala	Joliet, US	2020-06-01
Anthony Lewis-Royal	Minneapolis, US	2020-06-01
Zanai Jenkins	Dayton, US	2020-06-01
Linda Visconti	Port Jervis, US	2020-06-01
Nathaly Cortes	Tampa, US	2020-06-01
Jenna Duda	Omaha, US	2020-06-01
Sharon Brown	Brooklyn, US	2020-06-01
Taylor Kells	Parkton, US	2020-06-01
Itze Mendoza	Aurora, US	2020-06-01
Dania Padilla	Chicago, US	2020-06-01
Irma Camacho	Chicago, IL	2020-06-02
Martin Arambula	Chicago, IL	2020-06-02
Alicia Maldonado	Hammond, IN	2020-06-02
Carlos Luna	Chicago, IL	2020-06-02
Melissa Aguilera	Chicago, IL	2020-06-02
Isaura Pacheco	Chicago, IL	2020-06-02
Elliot Villarreal	Frankfort, IL	2020-06-02
Anne Winslow	Chicago, IL	2020-06-02
Lucina Bonilla	Chicago, IL	2020-06-03

Name	Location	Date
España Ramírez	Wheeling, IL	2020-06-03
Daniel Jackson	Lyons, IL	2020-06-03
Michelle Hawkins	Chicago, IL	2020-06-03
Michelle Bocian	Chicago, IL	2020-06-03
Jacquelyn Mitrovich	Chicago, IL	2020-06-04
Erin Mitrovich	Chicago, IL	2020-06-04
Thomas Utrata	Chicago, IL	2020-06-04
Shannon Mitrovich	Brookfield, IL	2020-06-04
bryan rodriguez	Chicago, IL	2020-06-04
Bertha Gonzalez	Chicago, IL	2020-06-04
Alex Rosen	Chicago, IL	2020-06-04
Yesenia Arellano	Chicago, IL	2020-06-04
Stephanie Griggs	Chicago, IL	2020-06-04
Correta Brown	Chicago, IL	2020-06-05
Melissa Renzi	Forest Park, IL	2020-06-05
Ivan M	Chicago, IL	2020-06-05
Kiana Courtney	Chicago, IL	2020-06-05
Sonia Aguilar	Chicago, IL	2020-06-06
Serena Herrejon	Chicago, IL	2020-06-06
Alexis Gonzalez	Chicago, US	2020-06-06
Joel Mares	Chicago, IL	2020-06-06
Raul Flores	Indianapolis, IN	2020-06-06

Name	Location	Date
Molly Blancarte	Chicago, IL	2020-06-06
Nadia Arnold	Chicago, US	2020-06-06
Blake Gillespie	Chicago, IL	2020-06-06
Juan Espinoza	Orland Park, IL	2020-06-06
Brian Berman	Saint Louis, MO	2020-06-06
Megan West	Palatine, IL	2020-06-06
cynthia Porras	Chicago, IL	2020-06-06
Beatriz Gómez	Chicago, IL	2020-06-07
Angelica Angeles	San Diego, US	2020-06-07
laury patino	Burbank, US	2020-06-07
Seth Martinez	Chicago, US	2020-06-07
Mariela Mendoza	South Houston, US	2020-06-07
Jeorgia Henry	Brunswick, US	2020-06-07
Hazel Mcgee	Des Plaines, US	2020-06-07
Marley Buchanan	Papillion, US	2020-06-07
Suzy Feeney	Mount Pleasant, US	2020-06-07
Arianna Castañeda	Eagle Pass, US	2020-06-07
Suleiman Jimoh	Chicago, US	2020-06-07
Michele Hays	Evanston, IL	2020-06-07
Aniya Evans	Evanston, US	2020-06-07
Megan Klokkenga	Peoria, US	2020-06-07
Shamarcus Dwight griffin	Duluth, US	2020-06-07

Name	Location	Date
Diana Mendez	Cicero, US	2020-06-07
Junior Perez	Springfield, US	2020-06-07
Shnaia Johnson	Vonore, US	2020-06-07
Niko Tena	Chicago, US	2020-06-07
Simran Dhillon	Union City, US	2020-06-07
McKenna Simmons	Bountiful, US	2020-06-07
Juwairiyah Ahmed	Westmont, US	2020-06-07
Isabel Cuellar	Chicago, US	2020-06-07
kait o.	Davis City, US	2020-06-07
karen leonardo	Dorchester, US	2020-06-07
Misty Howard	Augusta, US	2020-06-07
Taylor Emanuel	Miami, US	2020-06-07
Katie Silverman	Indianapolis, US	2020-06-07
Mondrell Fields	Burbank, US	2020-06-07
Dylan Hartmann	New Braunfels, US	2020-06-07
Haley Wolf	US	2020-06-07
Alondra Corro	Milwaukee, US	2020-06-07
Ana Calderon	Los Angeles, US	2020-06-07
Marie Hemphill	Muskegon, US	2020-06-07
Mandreil Henry Jr	Tunica, US	2020-06-07
Tessa Perry	Decatur, US	2020-06-07
Marie Contreras	Chicago, IL	2020-06-07

Name	Location	Date Date
Josy Rodríguez	Chicago, IL	2020-06-07
Erinn Lawber	Chicago, IL	2020-06-07
Paloma Campillo	Oak Park, IL	2020-06-08
Mercedes Gonzalez	Chicago, IL	2020-06-08
Zhenya Polozova	Chicago, IL	2020-06-08
Matt Harvey	Chicago, IL	2020-06-08
Toni Oplt	Edwardsville, IL	2020-06-08
Gia Rivera	Chicago, IL	2020-06-08
Mary Shesgreen	Elgin, IL	2020-06-08
Dejah Powell	Ithaca, NY	2020-06-08
Sarah Eddy	Chicago, IL	2020-06-08
Brad De Ark	Elgin, IL	2020-06-08
Richard Stuckey	Chicago, IL	2020-06-08
Cynthia Linton	Chicago, IL	2020-06-08
Sabrina Linton	Northbrook, IL	2020-06-08
Kathleen Hamill	Elgin, IL	2020-06-08
Rita Billon	Chicago, IL	2020-06-08
Quincy Crump	Homewood, IL	2020-06-08
Mary Roberti	Elgin, IL	2020-06-08
Kendra Campbell	Salem, US	2020-06-08
Archer Koenig	Marietta, US	2020-06-08
Olivia Davis	Benicia, US	2020-06-08

Name	Location	Date
Jacquelyn Eadie	Chicago, IL	2020-06-08
Emoni Kellum	Chicago, IL	2020-06-08
Sara Lignell	Metuchen, US	2020-06-08
Tyler Herrera	Kalamazoo, US	2020-06-08
Zafu Fett	Brooklyn, US	2020-06-08
Barbara Evans	Elgin, IL	2020-06-08
Cassandra Contreras	Pomona, US	2020-06-08
MM	Denver, US	2020-06-08
Noah Buford	Chicago, IL	2020-06-08
Tonika Myles	Bogalusa, US	2020-06-08
John Butler	Elgin, IL	2020-06-08
Faith M	Oak Forest, US	2020-06-08
Isaiah Washington	Killeen, US	2020-06-08
Arhum Chaudhry	Manchester, US	2020-06-08
Sofia Vera	Chicago, US	2020-06-08
Trinity Shay	Chicago, IL	2020-06-08
Debby Scully	North aurora, IL	2020-06-08
Karen Mendez	Sandy, US	2020-06-08
Louis Quintero	Los Angeles, US	2020-06-08
Celeste Ford	Louisville, US	2020-06-08
Lara Keene	Lithonia, US	2020-06-08
Julieanna Perez	Fontana, US	2020-06-08

Name	Location	Date
Rena Damian	US	2020-06-08
Cameron McKinney	Virginia Beach, US	2020-06-08
Shivani Chikine	Teaneck, US	2020-06-08
Giovanni Russo	Elmwood Park, US	2020-06-08
Hayden Mason	Fond Du Lac, US	2020-06-09
Guadalupe Bautista	Graham, US	2020-06-09
Ava Zins	Cincinnati, US	2020-06-09
Mireyda Cruz	Fresno, US	2020-06-09
Mouna Saab	Kingsport, US	2020-06-09
Barbara Njus	Elgin, IL	2020-06-09
Carlos Enriquez	Chicago, IL	2020-06-09
Adan Escutia	Rome, US	2020-06-09
Chad Umoja	Charlotte, US	2020-06-09
Emily Mikhail	Chicago, IL	2020-06-09
Jonathan Ng	Tustin, US	2020-06-09
Tiffany Stanley	Mays Landing, US	2020-06-09
Anna Packard	South Weymouth, US	2020-06-09
Scott Trinkle	Chicago, IL	2020-06-09
Nura Abdusalam	Denver, US	2020-06-09
teresa noynay	Valley Stream, US	2020-06-09
Jordan Micus	Chicago, IL	2020-06-09
Jaren Merrell	Chicago, IL	2020-06-09

Name	Location	Date
Richard Keng	Las Vegas, NV	2020-06-09
Lindsey Richter	glencoe, IL	2020-06-09
Edgar Montoya	Denver, CO	2020-06-09
Jamie Smith	Hamilton, Canada	2020-06-09
Christian Bravo	Chicago, IL	2020-06-09
Cole Weber	Thibodaux, LA	2020-06-09
Lisa West	Baton Rouge, US	2020-06-09
Mitchell Perun	Rochester Hills, MI	2020-06-09
Nathalie Chartrand	Montréal, Canada	2020-06-09
Christopher Montanez	Miami, FL	2020-06-09
Sarah Kim	Chicago, IL	2020-06-09
Nicole C	Austin, TX	2020-06-09
Richard Demery	Carson, CA	2020-06-09
Ben McGee	Philadelphia, PA	2020-06-09
Madison Chastain	Valdosta, GA	2020-06-09
eliseo romero	Lancaster, CA	2020-06-09
Jimmy Hogan	Chicago, IL	2020-06-09
Andrea Renteria	Hemet, CA	2020-06-09
Jhurrell Thompson	Plainfield, IL	2020-06-09
Megan Michaels	Chicago, US	2020-06-09
Christine Hickman	Chicago, IL	2020-06-09
Hannah Maris	Sandy Hook, CT	2020-06-09

Name	Location	Date
Michael Macks	Holland, MI	2020-06-09
Ellen Krok	Detroit, MI	2020-06-09
Molly Gunther	Chicago, IL	2020-06-09
Taylor Truskowski	Grayslake, IL	2020-06-09
Brandon Grant	Newnan, US	2020-06-09
Nicole Escobar	Atwater, CA	2020-06-09
Brianna Ortega	Dumont, NJ	2020-06-09
Gabriel Elias	California	2020-06-09
Thomas Bravos	Bloomington, IL	2020-06-09
Robert Evans	Overland Park, KS	2020-06-09
Shello Johnson	Leichhardt, Australia	2020-06-09
Eric Calamari	Northfield, IL	2020-06-09
Milton Lawrence	Chicago, IL	2020-06-09
De'Mara Radford	Dayton, OH	2020-06-09
Nicole Demchishin	San Rafael, CA	2020-06-09
Juwaun Gibson	Chicago, IL	2020-06-09
Emma Johnson	Chicago, IL	2020-06-09
Dominique Pender-Bey	Springfield, IL	2020-06-09
Kaylie Godfrey	Cleveland, OH	2020-06-09
Carrie Douglas	Crystal Lake, IL	2020-06-09
Miranda Lung	Chicago, IL	2020-06-09
Blythe Milby	Chicago, IL	2020-06-09

Name	Location	Date
Chelsey Tillman	Country Club Hills, IL	2020-06-09
Michael Dutton	Chicago, IL	2020-06-09
Matthew Anticoli	N/A, FL	2020-06-09
Megan Brown	Lansing, MI	2020-06-09
Timm Krueger	Wheaton, IL	2020-06-09
Brent Wolff	Des Plaines, IL	2020-06-09
Stephen Rosenberger	Chicago, IL	2020-06-09
Layla Payne	Los Angeles, US	2020-06-09
Paisley Blondin	Gatineau, Canada	2020-06-09
Anthony Meyer	Minneapolis, MN	2020-06-09
Nick Amedin	Rockton, IL	2020-06-09
Joshua Spaugh	Mocksville, NC	2020-06-09
Molly Walters	Sanderson, FL	2020-06-09
eileen forrest	philadelphia, PA	2020-06-09
Ann Bisognano	Chicago, IL	2020-06-09
Nick Salata	Chicago, IL	2020-06-09
nancy burmistrz	Chicago, IL	2020-06-09
kealey koritko	Toronto, Canada	2020-06-09
Ryan Sandy	Hamilton, OH	2020-06-09
Autumn Smith	Mobile, AL	2020-06-09
Andrew Bontrager	Darien Center, NY	2020-06-09
Mark Novotny	Illinois	2020-06-09

Name	Location	Date
Matthew Jacobs	Chicago, IL	2020-06-09
Kiana Klein	Indianapolis, IN	2020-06-09
Bettina Perillo	Elgin, IL	2020-06-09
Cameron Cooper	Des Moines, IA	2020-06-09
Ireland Flannery	Oak Park, IL	2020-06-09
Christine Pham	Los Angeles, CA	2020-06-09
Kirsty Potts	Preston, UK	2020-06-09
Olivia Leonardi	Chicago, IL	2020-06-09
Meira Chasman	Fort Lee, NJ	2020-06-09
David Gallego del Valle	London, UK	2020-06-09
Alexus Smith	Bowling Green, IL	2020-06-09
Andre Lloyd	Buffalo, US	2020-06-09
Carmilla Morrell	Chicago, IL	2020-06-09
Josie Naypauer	Cleveland, OH	2020-06-09
Colleen Kolasa	Munster, IN	2020-06-09
Daniel Lazzar	New York, NY	2020-06-09
Sarha Abraham	Chicago, IL	2020-06-09
Charlotte Bradley	Chicago, IL	2020-06-09
Kara Hutson	Chicago, IL	2020-06-09
Stephanie Senanou	Plainfield, IL	2020-06-09
Erika Mcpherson	Chicago, IL	2020-06-09
Bryce Bull	Vancouver, WA	2020-06-09

Name	Location	Date
Melissa Mcpherson	Chicago, IL	2020-06-09
Melani Smith	Carlsbad, CA	2020-06-09
Lucas Pereira	West Jordan, UT	2020-06-09
Lea Arechiga	Los Angeles, CA	2020-06-09
Shalin Berman	Hialeah, FL	2020-06-09
Alex Mauro	Shirley, NY	2020-06-09
Jorrie Cull	Toronto, Canada	2020-06-09
Ryan Jewell	Broomall, PA	2020-06-09
Alison Cassity	Chicago, IL	2020-06-09
Damian Lopez	Downey, CA	2020-06-09
Elizabeth LaSalle	chicago, IL	2020-06-09
Edwin Gutierrez	Addison, IL	2020-06-09
Celeste Gutierrez	Addison, IL	2020-06-09
Shanice Viner	Waterloo, Canada	2020-06-09
Kaitlyn Owens	Athens, AL	2020-06-09
Jada Ritchie	Chicago, IL	2020-06-09
Stephanie Anglin	Salt Lake City, UT	2020-06-09
Sydnee Struthers	Clinton, Canada	2020-06-09
Mary Coleman	Chicago, IL	2020-06-09
Gerardo Zavala	Chicago, IL	2020-06-09
Emerson Sanderson	Sudbury, Canada	2020-06-09
Matthew Kokic	La Salle, IL	2020-06-09

Name	Location	Date
Isaiah Frank	Nashville, US	2020-06-09
Mary Danfelser	Centennial, CO	2020-06-09
Alexander Chaisson	Toronto, Canada	2020-06-09
Joseph Beeler	Lawrence, KS	2020-06-09
Liz Kantor	Chicago, IL	2020-06-09
Amanda Gourlay	Hobart, IN	2020-06-09
Heather Blackburn	Hobart, IN	2020-06-09
Omo Ogbomo	Kalamazoo, MI	2020-06-09
Margaret Hammond	Perris, US	2020-06-09
Brian Percival	Seattle, WA	2020-06-09
Eve Suva	Berkeley, CA	2020-06-09
Jair Chavarin-Pena	Chicago, IL	2020-06-09
Sara Reilly	Chicago, IL	2020-06-09
Skylee McCrobie	Masontown, WV	2020-06-09
Nicole Ortiz	Yonkers, NY	2020-06-09
Lavannya Pulluveetil Barrera	Chicago, IL	2020-06-09
Grettel Aranda	Chicago, IL	2020-06-09
Ryan Shearin	New Britain, CT	2020-06-09
Nicholas Ward	Chicago, IL	2020-06-09
Robert Reed	Chicago, IL	2020-06-09
KR	Chicago, US	2020-06-09
Maggie Ball	New York, NY	2020-06-09

Name	Location	Date
Jarik Hieronymus	Dallastown, PA	2020-06-09
Sylwia Filipowska	Des Plaines, IL	2020-06-09
sydney benedict	Camas, US	2020-06-09
Nicole Marmo	Orlando, FL	2020-06-09
Anthony Taylor	Chicago, IL	2020-06-09
Andy Fitzpatrick	Chicago, IL	2020-06-09
Stefanie Kopp	Arlington Heights, IL	2020-06-09
Brennan Sanford	Bay Minette, US	2020-06-09
Zach Garn	Toledo, OH	2020-06-09
Raquisha Johnson	Rincon, GA	2020-06-09
daphne pozdol	Toledo, OH	2020-06-09
Sandra Buschdorf	Germany	2020-06-09
Dominic Ferrara	Chicago, IL	2020-06-09
bri questelles	Cambria Heights, NY	2020-06-09
Elizabeth Walle	Chevy Chase, MD	2020-06-09
Natosha Dobbins	Orange, US	2020-06-09
Alainna Belknap	Denver, CO	2020-06-09
Brian Luna	Perth Amboy, NJ	2020-06-09
Emma Mueller	Coralville, IA	2020-06-09
Alexis Garces	Brooklyn, NY	2020-06-09
Timothy Nemec	Chicago, IL	2020-06-09
Nathaniel Oakley	Pontiac, US	2020-06-09

Name	Location	Date
Sophia Gardner	Chicago, IL	2020-06-09
Andres Alcala	Chicago, IL	2020-06-09
Clare Sullivan	New Orleans, LA	2020-06-09
Tiana Vassolo	Calgary, Canada	2020-06-09
Michelle Molitor	Evanston, IL	2020-06-09
Kathleen Robidas	Surrey, Canada	2020-06-09
Kaz Spellman	Shelbyville, KY	2020-06-09
Benjamin Richarson	Chicago, IL	2020-06-09
Isa Griffin	Addison, US	2020-06-09
AJ Bliss	Mountain Home, ID	2020-06-09
Saidah Rothleutner	Houston, TX	2020-06-09
Florence Alozie	Glendale, AZ	2020-06-09
Allison Molina	Manassas, US	2020-06-09
Nautica House	Chicago, IL	2020-06-09
Leondra Knight	Jacksonville, US	2020-06-09
james rosario	New York, US	2020-06-09
Claire Haley	Pennsylvania	2020-06-09
Nia Blibo	Manassas, VA	2020-06-09
Lyv Thom	Virginia Beach, US	2020-06-09
Erik Roberts	Calumet City, US	2020-06-09
Carlos Saucedo	Chicago, IL	2020-06-09
Jade Brown	Chicago, IL	2020-06-09

Name	Location	Date
Christopher Judge	Lexington, US	2020-06-09
fletcher hurley	san diego, CA	2020-06-09
Brandon Pryor	Chicago, IL	2020-06-09
Trenton Garrett	Missouri City, US	2020-06-09
Ashley Alvarez	Chicago, US	2020-06-09
Rosie Liu	Middletown, US	2020-06-09
Grace Lewis	Oconomowoc, US	2020-06-09
Evelyn Flores	Chicago, IL	2020-06-09
Katie Anne	Boise, US	2020-06-09
Tony Baker	Chicago, US	2020-06-09
Holden Thomas	Chicago, IL	2020-06-09
kyla perry	Chicago, IL	2020-06-09
Travis Wolf	Orchard Park, NY	2020-06-09
Gina Ross	El Segundo, US	2020-06-09
Keolani Young	Los Angeles, US	2020-06-09
Alvin Hall	Albany, US	2020-06-09
Jordan Mendoza	La puente, US	2020-06-09
Jacqueline Miranda	Mcallen, US	2020-06-09
Riley Whitlock	Queens, US	2020-06-09
Gylanni Carrington	Secaucus, NJ	2020-06-09
Mikey Sanchez	Mcallen, US	2020-06-09
Selma Shepherd	Conifer, US	2020-06-09

Name	Location	Date
katrina smith	Philadelphia, US	2020-06-09
Madison Creamer	Woodridge, US	2020-06-09
Omar Carranza	Chicago, US	2020-06-09
Melody Aguirre	Montclair, US	2020-06-09
Carter Brown	Washington, US	2020-06-09
Kaylie Lopez	Seattle, US	2020-06-09
Maylyn Gomez	Santa Rosa, US	2020-06-09
Jose Santos	Sacramento, US	2020-06-09
Taylor Cordingley	Toronto, Canada	2020-06-09
Caleb Joyner	Woodstock, GA	2020-06-09
Eliza Raizen	Winnipeg, Canada	2020-06-09
Steph Billeck	Fox Lake, IL	2020-06-09
Kyle Feistmantl	Oakville, Canada	2020-06-09
Kyndall Bovinett	Saint Charles, US	2020-06-09
Adeline Snagel	Chicago, IL	2020-06-09
Kelly Piña	Melrose Park, IL	2020-06-09
Jade Moreno	Chicago, US	2020-06-09
Jasmine Figures	Toronto, Canada	2020-06-09
Anna Kochakian	Chicago, CT	2020-06-09
Connor Lewis	US	2020-06-09
Sara Murphy	Mississauga, Canada	2020-06-09
Tessa Redlich	Lippstadt, Germany	2020-06-09

Name	Location	Date
Kate Gray	Milton Keynes, UK	2020-06-09
Llinos Lewis	Chepstow, UK	2020-06-09
Anne Kantor	Trenton, NJ	2020-06-09
Stephanie Moffett-Hugg	Minneapolis, MN	2020-06-09
Shay Law	Gary, US	2020-06-09
Laura Wu	Los Angeles, CA	2020-06-09
Oleksandra Buravlova	Bonn, Germany	2020-06-09
Jewellius Green	Palmdale, CA	2020-06-09
Adrianna Maxwell	Broadview, IL	2020-06-09
Aidan Curran	Edinburgh, UK	2020-06-09
Shelby Roesner	US	2020-06-09
Lisa Culligan	Downers Grove, US	2020-06-09
Christopher Genco	Brooklyn, NY	2020-06-09
Caroline Ryan	North Kingstown, US	2020-06-09
Ray Harper	Springfield, PA	2020-06-09
Amber Sedwick	Roselle, US	2020-06-09
Azeez Owokoniran	Chicago, US	2020-06-09
Ciara Lawlor	Maynooth, Ireland	2020-06-09
zoe Yasmine	New York, NY	2020-06-09
Alexandrea Rivera	Chicago, IL	2020-06-09
Samantha Ouertani	Miami, FL	2020-06-09
Jayci Milgate	Eagle Mountain, UT	2020-06-09

Name	Location	Date
Abby Hornberger	Northbrook, IL	2020-06-09
Stefan Witten	Highland Park, US	2020-06-09
Alexi Stamatis	Fontana, US	2020-06-09
Raynecha Davis	Akron, US	2020-06-09
michelle favia	Chicago, IL	2020-06-09
Kathryn Bourgeois	Chicago, IL	2020-06-09
Dan Hurowitz	Chicago, IL	2020-06-09
Hannah Overbeek	Chicago, IL	2020-06-09
Max Kurinsky	Chicago, IL	2020-06-09
Ricardo Cifuentes	Chicago, IL	2020-06-09
Sophie Lipman	Chicago, IL	2020-06-09
Hugo Reyes	Chicago, IL	2020-06-09
Jaelen Jackson	Chicago, US	2020-06-09
William Miller	Chicago, IL	2020-06-09
Travis Watson	Chicago, IL	2020-06-09
Erin Rusmi	Chicago, IL	2020-06-09
Emily Purcell	Chicago, IL	2020-06-09
ANTHONY MADIA	Chicago, IL	2020-06-09
Tim Makowski	Chicago, IL	2020-06-09
Patrick Chesnut	Chicago, IL	2020-06-09
Alexa Viscius	Detroit, MI	2020-06-09
Courtnie Williams	Lawrenceville, US	2020-06-09

Name	Location	Date
Dennis Kreiner	Carpentersville, IL	2020-06-09
Gabriel Jackson	Pompano Beach, US	2020-06-09
Rachel Flahive	Chicago, IL	2020-06-09
Connor Dosch	Brick, US	2020-06-09
Michelle Rojas	Iowa City, IL	2020-06-09
Michael Solomon	Chicago, IL	2020-06-09
Brian Cerny	Des Plaines, IL	2020-06-09
Gabriella Ramirez	El Paso, US	2020-06-09
Jaime Hernandez Lujan	Toronto, Canada	2020-06-09
Laura Ellis	Towson, MD	2020-06-09
Justin Hernandez	West orange, US	2020-06-09
Zach Goodman	Chicago, IL	2020-06-09
Alexandria Bortell	Livonia, MI	2020-06-09
Danielle Higgins	New Orleans, US	2020-06-09
Abby Donarski	Oak Park, US	2020-06-09
Ella Garza	Akron, OH	2020-06-09
Maddie Brockmyre	Spring Lake, MI	2020-06-09
Mack Perez	US	2020-06-09
Clayton Lindhorst	Minneapolis, US	2020-06-09
Melanie Gramajo	Los Angeles, US	2020-06-09
Chanel Bell	Chicago, IL	2020-06-09
Sharon Cashel	Chatham, US	2020-06-09

Name	Location	Date
Nicholas Ward	Chicago, IL	2020-06-09
martina zivko	Zagreb, Croatia	2020-06-09
Samiyah Ansari	Dallas, US	2020-06-09
Pratap Jayaram	Chicago, IL	2020-06-09
Audrey Kristofferson	Lake Stevens, US	2020-06-09
Erin Paige	Milwaukee, WI	2020-06-09
Nayeli Torres	Joliet, US	2020-06-09
Eveyanna Kyles's	Matteson, US	2020-06-09
Christopher Cranston	Chicago, IL	2020-06-09
Dottie P	Pittsburgh, US	2020-06-09
Shawn Bady	Chicago, IL	2020-06-09
christopher nwajei	chicago, IL	2020-06-09
River Stephens	Coventry, US	2020-06-09
Martin Patino	US	2020-06-09
Tavi Veraldi	Chicago, IL	2020-06-09
Tegan Jetton	Chicago, IL	2020-06-09
Amy Huske	Elmwood Park, IL	2020-06-09
Reagan M	Plainfield, US	2020-06-09
Mary Wells	Chicago, IL	2020-06-09
Sam Meier	Seattle, WA	2020-06-09
Margaret Galka	Chicago, IL	2020-06-09
Derrick Golon	Chicago, IL	2020-06-09

Name	Location	Date
Jessica Watson	Chicago, US	2020-06-09
Isabel De la Cruz Ruiz	Aurora, US	2020-06-09
Townes Jones	Los Angeles, US	2020-06-09
Samantha Barajas	Chicago, IL	2020-06-09
Deborah Hubbard	Western Springs, US	2020-06-09
Norah Carlos	Annapolis, MD	2020-06-09
Alex Ramirez	Addison, IL	2020-06-09
Stephanie Williams	Alabaster, US	2020-06-09
T Fleischmann	Dowelltown, TN	2020-06-09
Brittany Araujo	New Albany, US	2020-06-09
Maggie O'Brien	Chicago, IL	2020-06-09
Alex Gallardo	Chicago, IL	2020-06-09
riley fernandez	Chicago, IL	2020-06-09
Brittany Dawkins	Hazel Crest, IL	2020-06-09
Josue Navarro	Chicago, IL	2020-06-09
Athena Chagolla	Longmont, US	2020-06-09
Zac halden	Chicago, US	2020-06-09
Justin Orr	Chicago, IL	2020-06-09
Janet Valdez	Chicago, IL	2020-06-09
Matthew Gonzalez	chicago, IL	2020-06-09
Michelle Rico	Chicago, IL	2020-06-09
Pascual Ramirez	Springfield, IL	2020-06-09

Name	Location	Date
Asja Stamps	Chicago, IL	2020-06-09
Samuel Thomas	Lawrenceville, US	2020-06-09
Robin pitts	Springfield, US	2020-06-09
Kayla B	Bunker Hill, US	2020-06-09
Taylor Misner	Chicago, US	2020-06-09
Alma Husejnagić	Twin Falls, US	2020-06-09
Noah Gomes	Howell, NJ	2020-06-09
Kelli poindexter	Columbia, US	2020-06-09
Paulina Velazquez	Los Angeles, US	2020-06-09
Grace Campisi	Pittsburgh, US	2020-06-09
Brianna Dear	Houston, US	2020-06-09
Anshul Shukla	Chalfont, US	2020-06-09
Tina McNally	Chicago, US	2020-06-09
Veronica Hernandez	Chicago, IL	2020-06-09
Brian Ruiz	Santa Clara, CA	2020-06-09
Catalina Morse	St. Augustine, US	2020-06-09
Briyanna Jones	Chicago, IL	2020-06-09
Michael Zak	Chicago, IL	2020-06-09
LM	bemus Point, US	2020-06-09
Austin Hendricks	Chicago, US	2020-06-09
Anayeli Francisco	Chicago, IL	2020-06-09
Nora Prodanoff	Jacksonville, US	2020-06-09

Name	Location	Date
Thalia Kouchoukos	Chicago, US	2020-06-09
Jessica Estrada	San Antonio, US	2020-06-09
John Di San Martino	Chicago, IL	2020-06-09
Chloe Cohn	Evanston, US	2020-06-09
Adelina Avalos	Chicago, IL	2020-06-09
Jens Ericson	Sherman Oaks, CA	2020-06-09
Sara Sliazas	Chicago, US	2020-06-09
Alexandria Dwan	Chicago, IL	2020-06-09
Vanesa Williams	Peoria, US	2020-06-09
Erin Moreland	Tinley Park, IL	2020-06-09
Mary Kate House	LaGrange Park, IL	2020-06-09
Monika Wojnowski	Nashville, TN	2020-06-09
Bridget Foster	Tacoma, WA	2020-06-09
Vanessa Hernandez	Chicago, IL	2020-06-09
Kristin reid	Chicago, IL	2020-06-09
Khayin Maheia	Chicago, IL	2020-06-09
Faith Adekeye	Illinois	2020-06-09
Eric Rawls	Chicago, IL	2020-06-09
Alexis Johnson	Chicago, IL	2020-06-09
Amber Anderson	Chicago, IL	2020-06-09
Kameron Howard	Chicago, IL	2020-06-09
Jihan Dinkins	Albany, NY	2020-06-09

Name	Location	Date
Liz Banos	Miami, FL	2020-06-09
Ingrid Perez	Chicago, IL	2020-06-09
Amira Williams	Chicago, US	2020-06-09
Yamilet Oliveros	Chicago, IL	2020-06-09
Ryane Jackson	Chicago, IL	2020-06-09
Mary Kate Tantillo	Chicago, IL	2020-06-09
Kierra Wooden	Chicago, IL	2020-06-09
Cache Petters-Matthews	Niagara Falls, NY	2020-06-09
Eboni Wilson	Edwardsville, IL	2020-06-09
Eliza Alvarado	Chicago, IL	2020-06-09
Jaylen Cato	Chicago, IL	2020-06-09
Marcela Calderon	Downers Grove, IL	2020-06-09
Alaijia James	Mesa, AZ	2020-06-09
Lauren Norman	Chicago, IL	2020-06-09
Ayanna Williams	Dekalb, IL	2020-06-09
Jill Tollefson	Willmar, MN	2020-06-09
elinam anyidoho	White Plains, NY	2020-06-09
Tashay Cox	Chicago, IL	2020-06-09
Abigail Alvarez	US	2020-06-09
Gabrielle Sadler	Chicago, IL	2020-06-09
Alana Larry	Los Angeles, CA	2020-06-09
Grace Juracka	Chicago, US	2020-06-09

Name	Location	Date Date
Kim McEvilly	Chicago, IL	2020-06-09
Star Bolden	Chicago, IL	2020-06-09
Felipe Ramirez	Chicago, IL	2020-06-09
Danny Curley	Chicago, US	2020-06-09
Gladys Deleon	Chicago, IL	2020-06-09
Valerie Nelson	Batavia, IL	2020-06-09
Alex W	Chicago, IL	2020-06-09
Andrea Munoz	Chicago, IL	2020-06-09
Judith Ordonez	Beaumont, US	2020-06-09
Nadia Arnold	Chicago, IL	2020-06-09
Arianna G	Hammond, IN	2020-06-09
julian green	Chicago, IL	2020-06-09
Ben Tancredi	Chicago, IL	2020-06-09
Valentina Lopez	Oak Lawn, IL	2020-06-09
Ari Jasper	Chicago, IL	2020-06-09
Julian Salvatore	Buenos Aires, Argentina	2020-06-09
Kyla Hubbard	Chicago, IL	2020-06-09
emma sack	Chicago, IL	2020-06-09
Joshua Bobbitt	Chicago, IL	2020-06-09
Brenna Washington	Los Angeles, CA	2020-06-09
Avby Sarah	Philadelphia, PA	2020-06-09
Tito Ramirez	Glendale Heights, IL	2020-06-09

Name	Location	Date
amy rayas	Melrose Park, IL	2020-06-09
em green	vienna, VA	2020-06-09
Joy Bunton	Oak Park, IL	2020-06-09
johnathan miller	US	2020-06-09
Summer Sprott	Los Angeles, CA	2020-06-09
Mia Martinez	Schererville, IN	2020-06-09
Bernadette Dvorscak	Chicago, IL	2020-06-09
Robert Hundley III	Rock Island, IL	2020-06-09
yolanda portillo	Chicago, IL	2020-06-09
Nadia Portillo	Chicago, IL	2020-06-09
Alejandra Jimenez	US	2020-06-09
Paul Berland	Elgin, IL	2020-06-09
Sophia Salinas	Chicago, IL	2020-06-09
Miles Leavitt	Chicago, IL	2020-06-09
Brian Laverde	Ozone Park, US	2020-06-09
Denisse Perez	Chicago, US	2020-06-09
Matthew C	Old Bridge, US	2020-06-09
Shariah White	Roanoke, US	2020-06-09
Abigail Flanagan	Chicago, IL	2020-06-09
Karen Cervantes	Chicago, IL	2020-06-09
Karim Pierre	Laurelton, US	2020-06-09
Nicole Fernandez	Chicago, US	2020-06-09

Name	Location	Date
Jessica Simonds	New Castle, US	2020-06-09
Sydney Evans	South Holland, IL	2020-06-09
Nick Falk	Highland Park, US	2020-06-09
Mallorie Crouch	Colorado Springs, US	2020-06-09
Tariah Taylor	Philadelphia, US	2020-06-09
Blanca Oliva	Miami, US	2020-06-09
Christopher Banks	Chicago, IL	2020-06-09
Patty Migler	Chicago, IL	2020-06-09
Aimee Hanna	Lompoc, CA	2020-06-09
Gabe Estrada	Bloomington, US	2020-06-09
Morgan Dorsey	Kankakee, US	2020-06-09
sebastian Govea	Grand Rapids, MI	2020-06-09
sara osvath	Arlington, US	2020-06-09
say wah	Omaha, US	2020-06-09
jordan luc	Las Vegas, US	2020-06-09
Julisa Alcazar	Fullerton, US	2020-06-09
Amanda Ott	Chicago, IL	2020-06-09
salma diaz	Cicero, US	2020-06-09
Christa Valencia	Blue Island, IL	2020-06-09
Aiyanna Bryant	Philadelphia, US	2020-06-09
KeAndre Lee	Park Forest, US	2020-06-09
Erin Kinsella	Chicago, IL	2020-06-09

Name	Location	Date
Rodger smith	Winchester, US	2020-06-09
Olivia Ramirez	Chicago, US	2020-06-09
Tommy Nouansacksy	Janesville, WI	2020-06-09
Javier Larios	Chicago, IL	2020-06-09
Madelyn Horning	Anchorage, US	2020-06-09
Vanessa Tirado	Chicago, IL	2020-06-09
Leslie Gamboa	Albany, US	2020-06-09
Damien Rock	Dallas, US	2020-06-09
Aylin Khamesieh	Bartlett, US	2020-06-09
william carey	chicago, IL	2020-06-09
Esther Munoz	Chicago, IL	2020-06-09
Ania Mohan	Bakersfield, US	2020-06-09
Adriana Gutierrez	Riverview, US	2020-06-09
Vironika Lau	Dallas, US	2020-06-09
Jordan Burghardt	Plainfield, IL	2020-06-09
Kelly Stewart	Tampa, US	2020-06-09
Lori Garavartanian	US	2020-06-09
Jordan Swint	Baytown, TX	2020-06-09
William DaCosta	Richmond Hill, US	2020-06-09
Yiran Zhang	Chicago, IL	2020-06-09
Divonna Miller	Loganville, US	2020-06-09
Tyler Aleshire	US	2020-06-09

Name	Location	Date
Juan Gaudier	IRVINE, US	2020-06-09
Montana Jackson	Upper Marlboro, US	2020-06-09
Andreia Marcuccio	Denver, CO	2020-06-09
Courtney Jackson	Columbia, US	2020-06-09
Samuel Molina	Arcadia, US	2020-06-09
Charles Rentiers	Summerville, US	2020-06-09
Linda Haley	Oak Park, IL	2020-06-09
Ashley Gonzales	Chicago, IL	2020-06-09
Joshua Selles	San Diego, US	2020-06-09
Lori Garavartanian	Los Angeles, US	2020-06-09
Tyler Titel	Lakewood, US	2020-06-09
Maria Gante	Calumet City, IL	2020-06-09
Christina Mireles	Chicago, IL	2020-06-09
Teresa Davies	Chicago, US	2020-06-09
Zeytun Ahmed	Kent, WA	2020-06-09
isabelle choi	Louisville, US	2020-06-09
Cristen Leifheit	Chicago, IL	2020-06-09
Kim Rutherford	Inglewood, US	2020-06-09
April Austin	Bowie, US	2020-06-09
Aaliyah Taylor	Chicago, IL	2020-06-09
ari karafiol	Chicago, US	2020-06-09
Donavan Noble	Chicago, IL	2020-06-09

Name	Location	Date
Elizabeth C	Chicago, IL	2020-06-09
Siauna Respress	Chicago, IL	2020-06-09
Jeremiah Shade	Chicago, IL	2020-06-09
Adrian Cedillo	Chicago, IL	2020-06-09
peter parker	New York, US	2020-06-09
Samantha Ibarra	Spring, US	2020-06-09
alondra lozano	Chicago, IL	2020-06-09
Saige S	Roseville, US	2020-06-09
Ayana Loyd	Chicago, IL	2020-06-09
Reese McMullen	Chicago, IL	2020-06-09
Damani Hood	Chicago, IL	2020-06-09
Joselyn Chave	Chicago, IL	2020-06-09
Frances Harris	Chicago, IL	2020-06-09
Damian Anguiano	Santa Ana, US	2020-06-09
joanna luckey	Guyton, US	2020-06-09
Michaela Garcia	Chicago, IL	2020-06-09
Josh Alamillo	Grand Prairie, TX	2020-06-09
Janice Cen	Chicago, US	2020-06-09
Fabian Michaca	Chicago, IL	2020-06-09
Patience Bridges	Chicago, IL	2020-06-09
Jailyn Dart	Everett, US	2020-06-09
Kye Thompson	Chicago, IL	2020-06-09

Name	Location	Date
mae jiang	Chicago, IL	2020-06-09
Jócelyn Talamantes	El Paso, US	2020-06-09
Catalina Torres Reyes	Chicago, IL	2020-06-09
Anaitsirhc Reffocilloz	Chicago, IL	2020-06-09
Nayeli Lopez	Chicago, IL	2020-06-09
Michelle Favela	Chicago, IL	2020-06-09
Kimya Outlaw	Richmond, US	2020-06-09
Delaney Nelson	Algonquin, IL	2020-06-09
Kaleigh Gaffney	Chicago, IL	2020-06-09
Emma Garcia	Chicago, IL	2020-06-09
veronica gipson	Chicago, IL	2020-06-09
Samantha Jade	Irwin, US	2020-06-09
Milan Hasmonek	Chicago, IL	2020-06-09
Braulio Cornejo	Chicago, IL	2020-06-09
Angela Foote	Tampa, US	2020-06-09
Iñaky Garibay	Chicago, IL	2020-06-09
Amanda Lynn	Chicago, US	2020-06-09
Javier Goldstein	Chicago, IL	2020-06-09
samantha rodriguez	Chicago, IL	2020-06-09
Aarthi Kottapalli	Hickory Hills, IL	2020-06-10
Roe Herbert	Chicago, IL	2020-06-10
noah mckay	chicago, IL	2020-06-10

Name	Location	Date
Sam Andrews	Chicago, IL	2020-06-10
Zak Wilson	Chicago, IL	2020-06-10
Annette Grant	New York, US	2020-06-10
Julia Rademacher-Wedd	Chicago, US	2020-06-10
Sarah D	Chicago, IL	2020-06-10
Elvira Martinez	Chicago, US	2020-06-10
Ana Gore	Chicago, IL	2020-06-10
Joel Mort	Seattle, US	2020-06-10
cristal de santiago	Dallas, US	2020-06-10
SANDI LONCAR	Chicago, IL	2020-06-10
Janell Nocentelli	Chicago, IL	2020-06-10
Dawayne Sankey	Taylor, US	2020-06-10
Miracle Hyman	Roanoke Rapids, US	2020-06-10
Asha Edwards	Chicago, IL	2020-06-10
Jamie Miller	Huntington Station, NY	2020-06-10
Eden H	Chicago, IL	2020-06-10
marlem olivar	Elmwood Park, IL	2020-06-10
Marley Mattheo	Chicago, US	2020-06-10
Nicole Chavez	Chicago, IL	2020-06-10
Kathy Mason	Sebewaing, MI	2020-06-10
Amanda Fong	Chicago, IL	2020-06-10
Erendira Corona	Chicago, IL	2020-06-10

Name	Location	Date
Sidney Justus	Chicago, IL	2020-06-10
Guinevere Yoseyva	Chicago, IL	2020-06-10
Criage Lynnette Althage	Chicago, IL	2020-06-10
Mary Ellen Oliver	Chicago, IL	2020-06-10
Evan McMahon	Chicago, IL	2020-06-10
Amanda Reis	Fresh Meadows, US	2020-06-10
roxana castro	Chula Vista, US	2020-06-10
nhi duong	Chicago, IL	2020-06-10
Ivy Weston	Chicago, IL	2020-06-10
lucy hoying	Chicago, IL	2020-06-10
Erika Gonzalez	Elgin, IL	2020-06-10
Matthew Bales	South Bend, IN	2020-06-10
Frank Esquivel	Chicago, IL	2020-06-10
Katie Esquivel	Chicago, IL	2020-06-10
Victoria Xie	Chicago, IL	2020-06-10
Mitchelle M	Chicago, IL	2020-06-10
Kyle Young	Chicago, IL	2020-06-10
Adriana Nava	Aurora, IL	2020-06-10
Joaquin Martinez	Chicago, IL	2020-06-10
Jada Middleton	Chicago, IL	2020-06-10
Molly Spencer	Chicago, IL	2020-06-10
jonathan swain	Chicago, IL	2020-06-10

Name	Location	Date
Sharon Adeyinka	Chicago, IL	2020-06-10
Samantha Kam	Chicago, IL	2020-06-10
Allison Chhay	Chicago, IL	2020-06-10
Karen Mei	Chicago, IL	2020-06-10
Leila Stallone	Bridgeview, IL	2020-06-10
Maggie Davis	Chicago, IL	2020-06-10
milena bedell	Chicago, IL	2020-06-10
Rebecca Ridenour	Santa Barbara, CA	2020-06-10
Yumeko Jabami	Chicago, IL	2020-06-10
maahum imran	Chicago, IL	2020-06-10
Abigail Pfister	Cambridge, MA	2020-06-10
Grace Wilkerson	Chicago, IL	2020-06-10
Jazmin Bustamante	Chicago, IL	2020-06-10
Charlotte Johnston	Chicago, IL	2020-06-10
James Pruitt	Chicago, IL	2020-06-10
Aislinn McHass	Philadelphia, PA	2020-06-10
Jasmin Flores	Los angeles, CA	2020-06-10
Delores Dousias	Chicago, IL	2020-06-10
Sara Wagenmaker	Chicago, IL	2020-06-10
Viviana Montes	Chicago, IL	2020-06-10
Mei Lin Morales	Chicago, IL	2020-06-10
Xanthe Brown	Champaign, IL	2020-06-10

Name	Location	Date
Alex Onion	Chicago, IL	2020-06-10
Antonia Pecoraro	Chicago, IL	2020-06-10
Madison Smith	Hudson, NY	2020-06-10
Josh Sanford	Champaign, IL	2020-06-10
Lauren Sharp	Chicago, IL	2020-06-10
Abigail Ramirez	Aurora, IL	2020-06-10
Jo Roz	Medina, OH	2020-06-10
Krystal Aranda	Chicago, IL	2020-06-10
Sophia Ng	Chicago, IL	2020-06-10
Sharon Li	Chicago, IL	2020-06-10
Kayleigh Peng	Chicago, IL	2020-06-10
Caleb Kowalkowski	Chicago, IL	2020-06-10
Jennifer Gomez	Chicago, IL	2020-06-10
Joshua Chin	Chicago, IL	2020-06-10
Michaela Zollicoffer	Chicago, US	2020-06-10
Vanessa Bustillos	Marquette, MI	2020-06-10
karima Ghimire	Sunnyvale, US	2020-06-10
Jason Mejia	Aurora, US	2020-06-10
Zachary Lewis	Wichita, US	2020-06-10
Ariana Ascencio	Chicago, IL	2020-06-10
Christine Summers	Glen Ellyn, US	2020-06-10
Esther Chung	Savoy, IL	2020-06-10

Name	Location	Date
Arthur Sangster	Chicago, IL	2020-06-10
Jazmin Vazquez	Chicago, IL	2020-06-10
Isabel Davila	Chicago, IL	2020-06-10
Freddy Maldonado	Chicago, IL	2020-06-10
Sydney Laurent	Chicago, IL	2020-06-10
Erika Juarez	Aurora, IL	2020-06-10
Denise Arroyo	Denver, US	2020-06-10
leonel quintero	california, US	2020-06-10
Mayra Loredo	Houston, US	2020-06-10
Amber Holland	US	2020-06-10
Melissa Tapia	US	2020-06-10
Kendll Taylor-Wright	Denver, US	2020-06-10
Sabrina Tsang	Chicago, IL	2020-06-10
Brian Sanchez	Chicago, IL	2020-06-10
Angie P	Chicago, US	2020-06-10
Mone Hernandez	1447 Driftwood way, US	2020-06-10
Debra Wilburn	Fort Smith, US	2020-06-10
Jerry Pendergast	Chicago, IL	2020-06-10
Eva Tervala	Espoo, US	2020-06-10
Arianna Ponce	Chicago, IL	2020-06-10
Mia Askew	Chicago, IL	2020-06-10
Kayla Cain	Chicago, IL	2020-06-10

Name	Location	Date
Miguel Zamudio	Reading, US	2020-06-10
Destiny Harris	Chicago, IL	2020-06-10
Alexandra Vazquez	Berwyn, IL	2020-06-10
Danielle Bradley	Jacksonville, US	2020-06-10
Millia Richter	Boynton Beach, FL	2020-06-10
Rocio Montes	Chicago, IL	2020-06-10
Mary Kate Leed	Ulster, US	2020-06-10
Hailey Laurencell	Chicago, US	2020-06-10
beth rose	Agus-us, Philippines	2020-06-10
Nuala MacDonald	No, IL	2020-06-10
Makiyah H	Elkridge, MD	2020-06-10
Eamon Duffy	New Milfored, CT	2020-06-10
Matt A	US	2020-06-10
Keely Fouts	Hilliard, OH	2020-06-10
Mickayla Jade Visagie	Johannesburg, South Africa	2020-06-10
Gary Eliano	US	2020-06-10
Atianah Thomas	Lansdowne, PA	2020-06-10
Ricardo Roman	Chicago, US	2020-06-10
Sophia Deeb	Chicago, IL	2020-06-10
daniel pellecer	Bolingbrook, IL	2020-06-10
Sydney S	Chicago, US	2020-06-10
Denise Williams	Enterprise, US	2020-06-10

Name	Location	Date
Micaela Gaffo	Palatine, IL	2020-06-10
aaron boscanin	New York, US	2020-06-10
Karen Gallardo	Mount Prospect, US	2020-06-10
Alejandra Saavedra	Chicago, US	2020-06-10
Ariel Garcia	San Antonio, US	2020-06-10
reneé yankah	Odenton, US	2020-06-10
Molly S	Des Plaines, IL	2020-06-10
Cate' BlueEagle	Olathe, US	2020-06-10
Caitlin Foster	Schertz, US	2020-06-10
Maritza Padilla	Chicago, IL	2020-06-10
Natalie S	Tinkers, DE	2020-06-10
Elizabeth Ladas	Naperville, US	2020-06-10
Maggie O'Brien	Chicago, IL	2020-06-10
dursha ragunanthan	College Park, MD	2020-06-10
Patrick Lorilla	Rowland Heights, US	2020-06-10
Kara Beamish	East Syracuse, US	2020-06-10
Samuel Tedrowe	Chicago, IL	2020-06-10
Andrew Atwood	Minneapolis, MN	2020-06-10
Chris Liggett	Chicago, IL	2020-06-10
Elena Petrova	Lagrange, US	2020-06-10
aimee layo	virginia, US	2020-06-10
Emily Reformado	Chicago, IL	2020-06-10

Name	Location	Date
Jack Durning	Los Angeles, CA	2020-06-10
Ben Favreau	Libertyville, IL	2020-06-10
Rogelio Rodriguez	Chicago, US	2020-06-10
Gabrielle C	Hubertus, WI	2020-06-10
Tonyisha Harris	Chicago, IL	2020-06-10
Katie Moynihan	Chicago, IL	2020-06-10
Kiona Gedeon	New York, US	2020-06-10
Laura Thomas	Western Springs, IL	2020-06-10
Hannah Hartung	Chicago, IL	2020-06-10
Nicolette Levy	US	2020-06-10
Malachi Brown	New York, US	2020-06-10
Shai Brown	New York, US	2020-06-10
Carolyn Ten Eyck	Chicago, IL	2020-06-10
Aryel Goulbourne	Bronx, US	2020-06-10
Gustavo CAMPOS	Chicago, IL	2020-06-10
Erica Garibay	Pico Rivera, US	2020-06-10
Sarah Chapman	Lithonia, GA	2020-06-10
Simon Dastrup	Chicago, IL	2020-06-10
Cameron Catayong	Chicago, US	2020-06-10
Madelyn Fisher	Libertyville, IL	2020-06-10
Nicole Davis	Chicago, IL	2020-06-10
Evelyn Garcia	Lancaster, US	2020-06-10

Name	Location	Date
Cesilia Antonio	Chicago, US	2020-06-10
Rayauna Stokes	Pensacola, US	2020-06-10
Amanda Schwarz	Mabank, US	2020-06-10
Sam Nelson	Libertyville, IL	2020-06-10
Maria Perez	Chicago, IL	2020-06-10
Favian Carreon	Houston, US	2020-06-10
Alondra Valdes	Chicago, IL	2020-06-10
Hugo Palacios	Santa Rosa, CA	2020-06-10
Sofia Ramos	Pflugerville, US	2020-06-10
Nicole Balay	Bowie, MD	2020-06-10
daniel walker	Chicago, IL	2020-06-10
Daniel De La Torre	Bensenville, IL	2020-06-10
Erick Hernandez	Milwaukee, WI	2020-06-10
Johana Gutierrez	Chicago, IL	2020-06-10
Tarilayefa Bomodi	Alma, US	2020-06-10
Justus Hightower	Chicago, IL	2020-06-10
Elijah Jagours	Garland, TX	2020-06-10
Tracy Bun	Snellville, US	2020-06-10
Salena Williams	Fayetteville, US	2020-06-10
Maria John	Edinburg, US	2020-06-10
Rachel Stafford	Nova, US	2020-06-10
Avnee Sharma	Bowie, MD	2020-06-10

Name	Location	Date
Kim Jaimes	Austin, US	2020-06-10
Stephanie Flores	Chicago, IL	2020-06-10
harmony castro	Chicago, US	2020-06-10
Rachel Neuburger	Chicago, IL	2020-06-10
Rosaline Stoykov	Chicago, IL	2020-06-10
Michel Cassio	Edmonds, US	2020-06-10
Liz Hodge	San Jose, US	2020-06-10
Abigail Winn	Chicago, IL	2020-06-10
Grace Keiger	Sanford, US	2020-06-10
Steve Man	Evanston, IL	2020-06-10
A G	Chicago, IL	2020-06-10
Ellie Scoggins	Stanwood, US	2020-06-10
Deziree Bradford-Yancey	Bowie, MD	2020-06-10
Isaiah Uribe	Plano, IL	2020-06-10
Noemy Escamilla	Joliet, IL	2020-06-10
Courtland Carr	Bowie, MD	2020-06-10
Corey Squibb	Greenbelt, MD	2020-06-10
Victoria Harris	Gaffney, US	2020-06-10
Brian Watson	US	2020-06-10
A Tin Can	Hacienda Heights, US	2020-06-10
Lauren Kendall-Brooks	Charlotte, US	2020-06-10
Gabriela Torrico	Los Angeles, US	2020-06-10

Name	Location	Date
Zaire Moorer	Clearwater, US	2020-06-10
Miku Nambara	Springfield, US	2020-06-10
Rosa Hernandez	Lakeview, Chicago, IL	2020-06-10
Siena Navarro	Chicago, IL	2020-06-10
Simone Hoekstra	Chicago, IL	2020-06-10
Chelsea Rodriguez	memphis, US	2020-06-10
patrick gleason	Elkridge, MD	2020-06-10
Julissa Leon	Chicago, IL	2020-06-10
Miguel soto	Chicago, IL	2020-06-10
Claudia Soto	Chicagi, IL	2020-06-10
Wafia Tayeeba	New York City, US	2020-06-10
Jenna Lambert	Delphos, OH	2020-06-10
Hope Woods	Chicago, IL	2020-06-10
Dianna Torres	Chicago, US	2020-06-10
Caitlyn Montejano	Chicago, IL	2020-06-10
Julieta Trejo	Chicago, IL	2020-06-10
Rachael McLees	San Diego, US	2020-06-10
Elizabeth Behnke	Libertyville, IL	2020-06-10
Mikey DeMatteo	El Centro, US	2020-06-10
Pooja Bansiya	Fremont, US	2020-06-10
Lindy Groark	Chicago, IL	2020-06-10
Alison Molina	Manassas, US	2020-06-10

Name	Location	Date
Grae Orvella	Puyallup, US	2020-06-10
Gilberto Colunga	Hammond, IN	2020-06-10
Olivia Gotsch	Chicago, IL	2020-06-10
Jasmine Martin	Chicago, IL	2020-06-10
Emely Cabrera	Cicero, US	2020-06-10
Danielle Salazar	Chicago, IL	2020-06-10
Jocelyn Almazán	Melrose Park, IL	2020-06-10
Naomi Anaya	Northridge, US	2020-06-10
Nathaniel Smith	Chicago, IL	2020-06-10
Oscar Patino	Chicago, IL	2020-06-10
Andrew Carney	US	2020-06-10
Patrick Nitti	Forest Hills, US	2020-06-10
Nya Lindsey	Leesburg, US	2020-06-10
blas guevara	Phoenix, US	2020-06-10
Elysia Bruce	Chattanooga, US	2020-06-10
Roberto Gonzalez	Calumet city, IL	2020-06-10
maderas santalone	New York, US	2020-06-10
Mariah Cabrales	Chicago, IL	2020-06-10
kaliyah anderson	Rochester, US	2020-06-10
Taylor Carrion	Capitol Heights, MD	2020-06-10
Raul Garcia	Chicago, IL	2020-06-10
Lisa Pearson	Buena Vista, US	2020-06-10

Name	Location	Date
Lydia Johnson	Chicago, US	2020-06-10
Benjamin Galdamez	Orange, US	2020-06-10
Elizabeth Earle	London, England, UK	2020-06-10
sam contreras	Fort Collins, US	2020-06-10
Lily Alvarez	Chicago, IL	2020-06-10
Naomi Corlette	Chicago, IL	2020-06-10
Mya Shepard	Alabaster, US	2020-06-10
Jayden Tyndale	Elkridge, US	2020-06-10
Vija Cunculs	Addison, IL	2020-06-10
Mary McClelland	Chicago, IL	2020-06-10
Alondra Serrano	Chicago, IL	2020-06-10
Cynthia Martinez	Chicago, IL	2020-06-10
Mary Carroll	Chicago, IL	2020-06-10
Paulina Mozdzierz	Chicago, IL	2020-06-10
Karina Valdivia	Chicago, IL	2020-06-10
Deja Boyd	Chicago, IL	2020-06-10
Eileen Cendejas	Chicago, IL	2020-06-10
Brianna Alba	Saint John, IN	2020-06-10
Krista Lopez	Chicago, IL	2020-06-10
Mia Engelmann	Chicago, IL	2020-06-10
TaCarra Meaux	Chicago, IL	2020-06-10
Krystal Meza	Chicago, IL	2020-06-10

Name	Location	Date
Jonathan Ortega	Chicago, IL	2020-06-10
devin otero	Highland, IN	2020-06-10
noami guerrero	chicago, IL	2020-06-10
Maria cervantes	Chicago, IL	2020-06-10
Annie Pike	Chicago, IL	2020-06-10
Sarah Zhao	Chicago, IL	2020-06-10
Isabella Park	Johns Creek, GA	2020-06-10
Nancy Perez	Chicago, IL	2020-06-10
Rahela Habazin-Ljubanic	Chicago, IL	2020-06-10
Madison Hayden	Albuquerque, US	2020-06-10
Alana Walker	Chicago, IL	2020-06-10
Natalie Garcia	Irving, US	2020-06-10
Sydney Merydith	Rochester, US	2020-06-10
Natalie Pietrzak	Chicago, IL	2020-06-10
Citlalli Carrasco	Cicero, IL	2020-06-10
eva spencer	US	2020-06-10
Ariel Hirschhorn	Newton Centre, MA	2020-06-10
Osbaldo Jimenez	Chicago, IL	2020-06-10
Adelaide Sanchez	Phoenix, US	2020-06-10
Xiaoyu Wang	Irvine, US	2020-06-10
Josie Kleve	Chicago, IL	2020-06-10
Cottrell Doss	Minneapolis, US	2020-06-10

Name	Location	Date
Osciel Jaquez	Chicago, IL	2020-06-10
Theresa Garcia	Chicago, IL	2020-06-10
Ramon Neira	Gurnee, IL	2020-06-10
Joset Diaz-Garcia	Chicago, IL	2020-06-10
Idalia Heredia	Chicago, IL	2020-06-10
Han Fain	Wylie, US	2020-06-10
Ekaterina Lopez	Chicago, IL	2020-06-10
Elizabeth Castaneda	Chicago, IL	2020-06-10
Vanessa Jasso	Plainfield, US	2020-06-10
Emma Medina	North Hollywood, US	2020-06-10
Joselyne Carrasco	Jackson Heights, US	2020-06-10
Arlyne Acosta	Chicago, US	2020-06-10
Lorena Bollas	Algonquin, US	2020-06-10
Maya Rangel	Visalia, US	2020-06-10
Bianca Salazar	Chicago, IL	2020-06-10
Asa Zoyes	Port Saint Lucie, US	2020-06-10
Lily Blaustein	Chicago, IL	2020-06-10
Lily Asbury	Nashville, US	2020-06-10
Sara Rothe	Fitchburg, US	2020-06-10
Tony Nguyen	Houston, US	2020-06-10
Ana Betancourt	Calumet City, IL	2020-06-10
Leah Malan	Chicago, IL	2020-06-10

Name	Location	Date
Alana Alvarado	Antioch, US	2020-06-10
Sasha Di Giovanni	Miami, US	2020-06-10
April E	Panorama City, US	2020-06-10
lina m	Denver, US	2020-06-10
carlos mendoza	Staten Island, US	2020-06-10
Richard Oneill	Lexington, US	2020-06-10
Gail Tierney	Princeton, NJ	2020-06-10
Adam Gruezo	Morton Grove, US	2020-06-10
Maria Tellez	Chicago, IL	2020-06-10
Nicholas Valdez	US	2020-06-10
Paulette Finnegan	Melrose Park, IL	2020-06-10
Taylor Knight	Chicago, IL	2020-06-10
Darius Stanley	Chicago, IL	2020-06-10
laia rodriguez	Chicago, IL	2020-06-10
Juan Herrera	Illinois	2020-06-10
Matthew Chico	Chicago, IL	2020-06-10
Samantha Paz	Chicago, IL	2020-06-10
Nairobi Toombs	Chicago, IL	2020-06-10
Victoria Cabrales	Chicago, IL	2020-06-10
Alexis Rosales	Chicago, IL	2020-06-10
Abby Smith	Evergreen, CO	2020-06-10
Maritza Ceja	Chicago, IL	2020-06-10

Name	Location	Date
Nikola Filipovic	Chicago, IN	2020-06-10
Madeline Mendoza	Chicago, IL	2020-06-10
Alma Zepeda	Chicago, IL	2020-06-10
Simone Ross	Chicago, IL	2020-06-10
Isabella Crame	Chicago, US	2020-06-11
Gerardo L	Chicago, IL	2020-06-11
Molly Nelson	Chicago, IL	2020-06-11
Noalanie Rivera	Chicago, IL	2020-06-11
Ruby Cardenas	Chicago, IL	2020-06-11
Yaritza Velazquez	Chicago, IL	2020-06-11
Victoria Kessinger	Springfield, MO	2020-06-11
Vanessa Chavez	Chicago, IL	2020-06-11
Michelle Garcia	Chicago, IL	2020-06-11
Paola Sanchez	Brooklyn, NY	2020-06-11
Dallan Halkias	Pittsburgh, PA	2020-06-11
Alejandro Llamas	Chicago, IL	2020-06-11
Edgar Diaz	Chicago, IL	2020-06-11
bryanna padilla	Chicago, IL	2020-06-11
Lilian Coleman	Chicago, US	2020-06-11
Christian Serratos	Houston, TX	2020-06-11
Devante Blount	Raleigh, US	2020-06-11
Rachelle Bartholomew	Brooklyn, US	2020-06-11

Name	Location	Date
Jordan Grunawalt	Winona, US	2020-06-11
Jasper muir	Sarasota, US	2020-06-11
Alissa Beets	Knoxville, US	2020-06-11
Giselle R	Chicago, IL	2020-06-11
Daniel Olvera	Vernon Hills, US	2020-06-11
Mebam Tankwa	Allentown, US	2020-06-11
chelsea Rodriguez	New York, US	2020-06-11
Mimi Im	Vienna, US	2020-06-11
Mayra Herrera	Chicago, IL	2020-06-11
KM	Arlington, US	2020-06-11
Morgan Rogers	Salem, US	2020-06-11
Marshall Lowe	Sunset Beach, US	2020-06-11
Sarah Von Alt	Cleveland, US	2020-06-11
Hartley Walker Money	Thetford Center, US	2020-06-11
Deondre Morris	Chicago, US	2020-06-11
shi keeling	st louis, US	2020-06-11
Dillon Shen	Chicago, IL	2020-06-11
Giana Darby	Kennesaw, US	2020-06-11
Nick Keller	Clifton park, US	2020-06-11
Debbie Deruse	Reno, US	2020-06-11
Skye Owen	US	2020-06-11
Quran Lumumba	Cleveland, US	2020-06-11

Name	Location	Date
Josue De La Riva	Idaho Falls, US	2020-06-11
Sofie Pawlowski	Taunton, US	2020-06-11
Rosario Fienes	California	2020-06-11
Jayden White	Belmont, US	2020-06-11
Lisa Green	Chicago, US	2020-06-11
yimin Fang	Springfield, US	2020-06-11
Tori White	Naperville, US	2020-06-11
Madeline Santos	Indianapolis, IN	2020-06-11
Austin Tripp	Florissant, US	2020-06-11
Aleksandra Zych	Round Lake, US	2020-06-11
melissa mcwherter	Deerfield, US	2020-06-11
Angela Aguilera	Aurora, US	2020-06-11
Gwilym Horner	Portland, US	2020-06-11
Evelyne salama	Chicago, IL	2020-06-11
Cody Stanley	Lincoln Park, US	2020-06-11
Jules Goduco-Bunting	Chicago, IL	2020-06-11
Rachel Parnell	Murfreesboro, US	2020-06-11
Sher Dionisio	Chicago, US	2020-06-11
Jamal Ransom	Chula Vista, US	2020-06-11
Dena Ferguson	Evansville, US	2020-06-11
Joe mama Bendover	Chicago, IL	2020-06-11
Daniel Gomez	Chicago, IL	2020-06-11

Name	Location	Date
Kiara Dillon	Chicago, IL	2020-06-11
Serenity Toney	Southfield, MI	2020-06-11
Leticia Marquez	Chicago, IL	2020-06-11
Sonja Berg	Chicago, IL	2020-06-11
Megan Brizuela	Chicago, IL	2020-06-11
Tatiana Sheppard	Chicago, IL	2020-06-11
Gabriel MArulanda	Chicago, IL	2020-06-11
Cecilia Cortes	Park Ridge, IL	2020-06-11
Naomi Maldonado	Chicago, IL	2020-06-11
Emma Lynch	Chicago, IL	2020-06-11
Tiani Salgado	Chicago, IL	2020-06-11
Maren Nielsen-Thompson	US	2020-06-11
Sacha Kingsley	Chicago, US	2020-06-11
Jimmy Dean	Hyattsville, US	2020-06-11
Alex Shahinian	Beverly Hills, US	2020-06-11
Alyss Scollard	San Antonio, US	2020-06-11
Diane Dietz	Chicago, US	2020-06-11
Jason Sumpter	Pismo Beach, CA	2020-06-11
De'Angelo Hale	Hanford, US	2020-06-11
Jonathen Guzman	Bronx, US	2020-06-11
Paul Trotter	Greensboro, US	2020-06-11
Alexandra Muralles	Houston, US	2020-06-11

Name	Location	Date
Lauren Stanich	Oak Creek, WI	2020-06-11
Alyssa Gonzalez	Buford, US	2020-06-11
Medjina Joseph	West palm beach, US	2020-06-11
catherine seng	Dubuque, US	2020-06-11
Kathy Goepel	Chicago, IL	2020-06-11
Tiffany Nedzlek	Taylor, US	2020-06-11
Savannah Dinh	Jacksonville, US	2020-06-11
Sara Casanova	Bedford Hills, US	2020-06-11
Bryant Hernandez	Philadelphia, US	2020-06-11
Erica Chick	Chicago, IL	2020-06-11
Antonio Lewis	Joliet, IL	2020-06-11
Thomas Melendez	Chicago, IL	2020-06-11
Sophie Roberts	Birmingham, UK	2020-06-11
Nadine Irizarry	Chicago, IL	2020-06-11
Amalia G	Bronx, US	2020-06-11
Ricardo Nunez	Waco, US	2020-06-11
Mikayla Hensley	Asheville, US	2020-06-11
Julia Ulziitugs	Fairfax, US	2020-06-11
Juan Garwood	Springfield, US	2020-06-11
Michelle Jasielec	Oak Lawn, IL	2020-06-11
Aris Psyhojos	Chicago, US	2020-06-11
Jack Du Couteau	Almont, US	2020-06-11

Name	Location	Date
Aveeda Biparva	Frederick, US	2020-06-11
Olivia Margre	Fort Lauderdale, US	2020-06-11
Ian Gleason	Hyattsville, MD	2020-06-11
Layth Christianson	Austin, US	2020-06-11
katherine martin	Norcross, US	2020-06-11
no name	Haddonfield, US	2020-06-11
Camila Ramirez	Palos Hills, US	2020-06-11
Tyrique Everett	Portsmouth, US	2020-06-11
Dederick Gunn	New Bedford, US	2020-06-11
Marcela Lopez	Devine, US	2020-06-11
Asia L.	US	2020-06-11
Kizmet Knox	Atlanta, US	2020-06-11
Roel Garcia	New York, NY	2020-06-11
Sii'Ren Vega	Woonsocket, US	2020-06-11
Wendy Rosiak	Chicago, IL	2020-06-11
Jesus J Gonzalez	Tulare, US	2020-06-11
Alex McCraw	London, UK	2020-06-11
Estefani Fructuoso	Jeffersonville, US	2020-06-11
Denisse Gutierrez	Chicago, IL	2020-06-11
Andrea Rosiak	Chicago, IL	2020-06-11
Deangelo Williams	Chicago, IL	2020-06-11
Mishelle Trejo	Columbus, OH	2020-06-11

Name	Location	Date
Leonie Körting	Butjadingen, Germany	2020-06-11
Monchel Young	New Orleans, US	2020-06-11
Aby Medina	Chicago, IL	2020-06-11
Kaylee Sanchez	Danbury, US	2020-06-11
Jaida Barney	Millington, US	2020-06-11
Alayza cruz	Chicago, IL	2020-06-11
Sandra Abdelmalak	Redondo Beach, US	2020-06-11
Molly Mellifluous	Sitka, US	2020-06-11
Yulisa Hernandez	Chicago, IL	2020-06-11
Jordan Ng	Greenwich, US	2020-06-11
Jacqueline Cervantes	Chicago, IL	2020-06-11
Akimia Wilson	Chicago, IL	2020-06-11
Chris m	Fort Worth, US	2020-06-11
Jasmin Munoz	Chicago, IL	2020-06-11
Sadie Swenson	Chicago, US	2020-06-11
Madison Yeh	Bellmore, US	2020-06-11
Briana Carrera	Chicago, IL	2020-06-11
John Kasra	Des Moines, US	2020-06-11
Jean Traudt	Milwaukee, US	2020-06-11
Laura Masterson	Saint Joseph, US	2020-06-11
Brelle Johnson	Nashville, US	2020-06-11
Alexander Salinas	Chicago, IL	2020-06-11

Name	Location	Date
Michael Bagger	Lisle, US	2020-06-11
Jo Hightshoe	Chicago, US	2020-06-11
Andrew West	Chicago, US	2020-06-11
Deanna Jones	Jacksonville, US	2020-06-11
Nyah Rivas	Chicago, IL	2020-06-11
FAtuma HUssein	Gresham, US	2020-06-11
Rogelio De Santiago	Kennesaw, US	2020-06-11
Jesse Bulmer	Chicago, IL	2020-06-11
Matthew Craffey	Chicago, US	2020-06-11
Nayeli Sanchez	Chicago, IL	2020-06-11
Luis Colon	Chicago, IL	2020-06-11
Clark Bullard	Urbana, IL	2020-06-11
Tiffany Ram	West Orange, US	2020-06-11
Desiree Guadalupe	Odessa, US	2020-06-11
Jasmine Rodriguez	Hoboken, US	2020-06-11
Lucas Irvin	Atlanta, US	2020-06-11
Theresa Yoon	Chicago, IL	2020-06-11
Ryan Smith	Weston, US	2020-06-11
Denise Daquilanea	Columbia, US	2020-06-11
samantha de dios	Ontario, US	2020-06-11
Morean Dorsey	Middletown, US	2020-06-11
Gabriel Corona	Hammond, IN	2020-06-11

Name	Location	Date
Wonetta Layne	Chicago, IL	2020-06-11
abby wells	Arlington, US	2020-06-11
Shannon King	Fort worth, US	2020-06-11
Isa Murillo	Chicago, IL	2020-06-11
Lili Lopez	Cicero, IL	2020-06-11
Benoris Green	oklahoma city, US	2020-06-11
soph bustos	Chicago, US	2020-06-11
Christian Hernandez	Brandon, US	2020-06-11
Alejandro Robledo	Louisville, KY	2020-06-11
Laila Mitchel	River Forest, IL	2020-06-11
Lamar Dawkins	Havertown, US	2020-06-11
carly teal	Charlotte, US	2020-06-11
Karina Nieves	Chicago, IL	2020-06-11
Arihana Figueroa	Chicago, IL	2020-06-11
Katie Williams	Rutledge, US	2020-06-11
Zarai Brown	Chicago, IL	2020-06-11
Grace Durzo	Pittsburgh, US	2020-06-11
Veronica Cornejo	Chicago, IL	2020-06-11
Jessica Cornejo	Chicago, IL	2020-06-11
Jerry Ramirez	Chicago, IL	2020-06-11
Sjsh Shusk	Brooklyn, US	2020-06-11
Hamdi Ahmed	Brownsburg, US	2020-06-11

Name	Location	Date
Jade McCoy	Hollywood, US	2020-06-11
Kylie Vargas	Seattle, US	2020-06-11
brenda farfan	Houston, US	2020-06-11
Victor Y	Watsonville, US	2020-06-11
Molly Neyens	Olathe, US	2020-06-11
Amber Cashen	Haines City, US	2020-06-11
Jacqueline Zhou	Flushing, US	2020-06-11
Yariana Esparza	Chicago, IL	2020-06-11
Megan Riordan	Chicago, IL	2020-06-11
Devi Banik	Queens, US	2020-06-11
Andrew Gomez	Chicago, IL	2020-06-11
Melissa Medina	Berwyn, IL	2020-06-11
Magaly Serrano	Chicago, IL	2020-06-11
Gloria Ramirez	Ukiah, US	2020-06-11
Jorge Calderón	Chicago, IL	2020-06-11
Victoria L	Cypress, US	2020-06-11
Xikako Alberto	Oakland, US	2020-06-11
Hugo Gonzalez	Boiling Springs, US	2020-06-11
Hector Lynn	Brooklyn, US	2020-06-11
Megan Bott	Springfield, IL	2020-06-11
Marissa Ramirez	Sebastopol, US	2020-06-11
Vanessa Magallanes	Chicago, IL	2020-06-11

Name	Location	Date
Chakra Gardner	Avondale, US	2020-06-11
Maleena Gaona	Chicago, IL	2020-06-11
Bethany Ingram	Laurel, MD	2020-06-11
Karen Courtright	Evanston, IL	2020-06-11
Hope BAUER	Davenport, US	2020-06-11
antelma acosta	Chicago, IL	2020-06-11
Jonathan Madrigal	Chicago, IL	2020-06-11
Mia Barnes	Kansas City, US	2020-06-11
Kayla passini	Conroe, US	2020-06-11
Luis Garcia	Chicago, IL	2020-06-11
Sophia Rowley	Dayton, US	2020-06-11
Melanie Vallejo	Eltopia, US	2020-06-11
Angellica Gordon	Burton, US	2020-06-11
jasmine cromedy	Atlanta, US	2020-06-11
Lashonda Lust	US	2020-06-11
Emily Yanez	San Ysidro, US	2020-06-11
Marilyn Carroll	Lafayette, IN	2020-06-11
Tishawn Hatchett	Irvington, US	2020-06-11
Brianna Tapia	Flanders, US	2020-06-11
Kelly Kell	Chicago, US	2020-06-11
klara mcpherson	San Diego, US	2020-06-11
Madelyn Ullsperger	Milwaukee, US	2020-06-11

Name	Location	Date
Quinette maclin	Chicago, IL	2020-06-11
Samantha Kulik	Rockaway, NJ	2020-06-11
Marisol Mendez	Union City, US	2020-06-11
Cristina Bravo	Huntington park, US	2020-06-11
Jaylen Jackson	Washington, US	2020-06-11
Na'ilah Johnson	Chicago, US	2020-06-11
Hector Ayala	Bakersfield, US	2020-06-11
Ulysses Garcia	Lansing, US	2020-06-11
Faiza Hassan	Chicago, US	2020-06-11
Pamela Ausejo	Oakland, US	2020-06-11
Stephanie Villafranco	Texas, US	2020-06-11
Elijah Reid	Matteson, US	2020-06-11
Ernesto Zamora	Fresno, US	2020-06-11
Elijah Dantignac	Augusta, US	2020-06-11
Maria D. Cacho	Chicago, IL	2020-06-11
Brooks Courtright	Evanston, IL	2020-06-11
Trinity Pruitt	Whitestown, US	2020-06-11
Yan Wang	Walnut, US	2020-06-11
Jen Pagnini	Evanston, IL	2020-06-11
Sarahi Garcia	Garden Grove, US	2020-06-11
John Smith	Franklin, US	2020-06-11
Mckenzye Lopez	Mcallen, US	2020-06-11

Name	Location	Date
Thomas Stibich	Chicago, IL	2020-06-11
Keith Marek	Chicago, IL	2020-06-11
Maleah Johnson-Wong	Portland, US	2020-06-11
Karena Maloney	Chicago, US	2020-06-11
Elliott Serna	Riverside, US	2020-06-12
Liz K	Loves Park, US	2020-06-12
Nyla Boynton-Jarrett	Montclair, US	2020-06-12
Kheela Davis	Killeen, US	2020-06-12
Hiba Haddad	Chicago, US	2020-06-12
molly m	Rockhampton, Australia	2020-06-12
Dhruvi Patel	Berlin, US	2020-06-12
Olivia Schwamberger	Parrottsville, US	2020-06-12
Mariel Dizon	San Diego, US	2020-06-12
Elizabeth Cisar	Chicago, IL	2020-06-12
Sreypich Chau	Renton, US	2020-06-12
Monicadejesus Fuentes	Chicago, IL	2020-06-12
Madisyn Racine	Miami, US	2020-06-12
Chloe Espiritu	South San Francisco, US	2020-06-12
Edgars Cers	Chicago, IL	2020-06-12
Airek Hovland	Susanville, US	2020-06-12
Aaliyah Johnson	Chicago, IL	2020-06-12
April Battaglino	Philadelphia, US	2020-06-12

Name	Location	Date
Martin Garcia	Chicago, IL	2020-06-12
Gabby Park	Arlington, US	2020-06-12
Peter Bergstrom	Sauk Rapids, US	2020-06-12
Diana Rios	Prescott, US	2020-06-12
lilah abarno	Tahoe City, US	2020-06-12
julian gonzalez	Port Chester, US	2020-06-12
Dishon Wint	Brooklyn, US	2020-06-12
Jennifer Brooks	Martinsville, US	2020-06-12
amanda flynn	Maryville, US	2020-06-12
akiera bynum	Palmdale, US	2020-06-12
Michelle DiMuzio	Chicago, IL	2020-06-12
Mayra Perea	Chicago, IL	2020-06-12
Amanda Gray	Saint Helens, US	2020-06-12
beth fitzpatrick	Glenside, US	2020-06-12
Jennifer Ellis	Denver, US	2020-06-12
Robin Lam	Bellwood, CA	2020-06-12
Kenyia Houston	Gonzales, US	2020-06-12
jhaz afolabi	Huntersville, US	2020-06-12
Fatima Nomair	Tarzana, US	2020-06-12
Jacob Fuentes	Chicago, IL	2020-06-12
Carol Torres	Monrovia, US	2020-06-12
Reanna Renteria	Laredo, US	2020-06-12

Name	Location	Date
Andrew haddad	Chicago, IL	2020-06-12
Isabel Hawker	Mount Vernon, US	2020-06-12
Ellie Fauteux	Bridgeport, US	2020-06-12
Tiffany Quinonez	Chicago Heights, IL	2020-06-12
Aaliyah sapp	Lancaster, US	2020-06-12
Shante Moore	Pasadena, US	2020-06-12
Mya Carter	Brooklyn, US	2020-06-12
Karlee Miller	Bellefonte, US	2020-06-12
Maria Altamirano	Chicago, IL	2020-06-12
Alexis L	Chicago, IL	2020-06-12
Lavonte Mcgary	Las Vegas, US	2020-06-12
Monroe Weitz	Stockton, US	2020-06-12
Jaden Sanders	Chicago, US	2020-06-12
Cesar Sanchez	Chicago, IL	2020-06-12
Angela Hernandez	Esparto, US	2020-06-12
Daddin Fucking Snerto	Avon, US	2020-06-12
Cali Ramos	Spokane, US	2020-06-12
Floresita Fuentes	Chicago, IL	2020-06-12
PRISCILLA CHICO	Chicago, IL	2020-06-12
Julian Coward	Chicago, IL	2020-06-12
Joshua Salgado	Chicago, IL	2020-06-12
Alejandra Orellana	Arlington, US	2020-06-12

Name	Location	Date
John Lanternier	New York, US	2020-06-12
Ciara Simon	Myrtle Beach, US	2020-06-12
Bianca Martinez	Chicago, US	2020-06-12
Destiny Palacio	Fall River, US	2020-06-12
Karla Zoquiapa	South Gate, US	2020-06-12
Jasmin Barajas	Los Angeles, US	2020-06-12
Yulinka Warren	Kennebunk, US	2020-06-12
Nicole Occhino	Union City, US	2020-06-12
esme mendez	Arlington, US	2020-06-12
Adan De loera	Streamwood, US	2020-06-12
Khloe Carter	Valdosta, US	2020-06-12
Alexis Arcos	Laveen, US	2020-06-12
david cornelio	Palo Alto, US	2020-06-12
Miguel Perea	Chicago, IL	2020-06-12
Miya Serna	Elgin, US	2020-06-12
aditi iyer	Sammamish, US	2020-06-12
Eden Adams	Wisconsin Rapids, US	2020-06-12
Karen Doh	Great Neck, US	2020-06-12
Hailey Cerna	Cypress, US	2020-06-12
Madison Smith	Petal, US	2020-06-12
Maribel Sanchez	Los Angeles, US	2020-06-12
Monica Vargas	Carson, US	2020-06-12

Name	Location	Date
Marshall Burton	Chicago, IL	2020-06-12
Ana Ababseh	Daly City, US	2020-06-12
kaylee dinh	Westminster, US	2020-06-12
Madalyn Hockinberry	Columbus, US	2020-06-12
Christian Castro	Chicago, IL	2020-06-12
Cesely bolanos	Rancho Cordova, US	2020-06-12
Clarie Robinson	Albany, US	2020-06-12
Alyssa Cruz	Framingham, US	2020-06-12
Chelsea dill	Sterling, US	2020-06-12
Stav Geffner	Los Angeles, US	2020-06-12
Megan Baldwin	Pomona, US	2020-06-12
Natasha Torres	Tampa, US	2020-06-12
Isabel Altuzlawi	Chesterfield, US	2020-06-12
Vincent Oliver	Richmond, US	2020-06-12
Eski Tam	Portland, US	2020-06-12
Meaghan Milone	Clarence Center, US	2020-06-12
Shirese Hart	Toledo, US	2020-06-12
Arianna —-	US	2020-06-12
Natascha Curbow	Mcdonough, US	2020-06-12
Pat Stickley	South Bend, US	2020-06-12
Haley Burns	Cabot, US	2020-06-12
Tahnauj Jaudon	Jacksonville, US	2020-06-12

Name	Location	Date
Raymond Moreno	Griffith, IN	2020-06-12
Kalia daily	Indianapolis, US	2020-06-12
Ashley Rosenbaum	Massapequa, US	2020-06-12
Lindsey Van Der Meid	Laurel, US	2020-06-12
whitney morris	Montgomery, US	2020-06-12
Sol Rodriguez	Tampa, US	2020-06-12
Liam Walsh	Rossford, US	2020-06-12
Sydney Roundtree	Jacksonville, US	2020-06-12
olivia frasca	Lexington, US	2020-06-12
Kate Allgeier	Chicago, IL	2020-06-12
Caitlin Hullett	Lenoir, NC	2020-06-12
Kylin Horne	Brecksville, US	2020-06-12
Ariana Vance	Clarksville, US	2020-06-12
Raphael Moore	Detroit, US	2020-06-12
Jacqueline Glover	Olathe, US	2020-06-12
Emily Blackmon	Belleview, US	2020-06-12
Lezly Hernandez	ELGIN, US	2020-06-12
Gabby Ramirez	San Marcos, US	2020-06-12
Serena M	West Covina, US	2020-06-12
Noah Kozminski	Houghton, US	2020-06-12
Joseph Ryan	Lansing, US	2020-06-12
Sasha Soto	Springfield, US	2020-06-12

Name	Location	Date
Sofia Albers	Palo Alto, US	2020-06-12
saba afaque	Niles, US	2020-06-12
Corey V	Harrison, US	2020-06-12
Karen Lu	Saint Charles, US	2020-06-12
Anonymous Anonymous	Stone Mountain, US	2020-06-12
Azaria Bailey	Richmond, US	2020-06-12
Nishta Boys	US	2020-06-12
Pastor Hilda Harrison	Wilson, US	2020-06-12
Cynthia Austin	Seattle, US	2020-06-12
Maia Hodgins	Saint Paul, US	2020-06-12
Arthur Dorsey	Chicago, US	2020-06-12
Terrel North	Chicago, US	2020-06-12
Korlu Jallah	Pecatonica, US	2020-06-12
Martha Lopez	Oklahoma City, US	2020-06-12
Elyna Ito	Chicago, US	2020-06-12
Leslie Buezo	Santa Ana, US	2020-06-12
Zahirah Harvey	Philadelphia, US	2020-06-12
Brett Samuelson	Clarinda, US	2020-06-12
Lola Goffner	Louisville, US	2020-06-12
Bailey murray	Centereach, US	2020-06-12
emilin guzman	Dallas, US	2020-06-12
Rhonda Bell	Philadelphia, US	2020-06-12

Name	Location	Date
Nat Weir	Laguna Beach, US	2020-06-12
Kaylene Thomas	Schiller Park, US	2020-06-12
Nadine Cornejo	Delano, US	2020-06-12
Anna Ling	Queens, NY	2020-06-12
Denise Nava	Champaign, US	2020-06-12
Jillian Gibson	Oak Park, US	2020-06-12
Geidy Gonzalez	Miami, US	2020-06-12
Eunice Gonzalez	Ontario, US	2020-06-12
garett sarmiento	Glendale, US	2020-06-12
Abigail Rabbitt	Sparta, US	2020-06-12
Emma Flores	Anaheim, US	2020-06-12
Jatziry Carrillo	Escondido, US	2020-06-12
Zaria Joseph	Atlanta, US	2020-06-12
Anderi Bailey	Sacramento, US	2020-06-12
Anthony Latina	Las Vegas, US	2020-06-12
Sabrina Pervez	Des Moines, US	2020-06-12
Cassidy Smith	Newport Beach, US	2020-06-12
Jocelyn Galvan	Kirkland, US	2020-06-12
Hannah Rios	Anaheim, US	2020-06-12
Katie Gemmell	Manchester, US	2020-06-12
Shabre Wilson	Glen Burnie, US	2020-06-12
Vanessa Amezcua	Phoenix, US	2020-06-12

Name	Location	Date
Lesly Lopez	Laredo, US	2020-06-12
Queequeg Boosinger	Culver City, US	2020-06-12
Fernando Campos	Bellflower, US	2020-06-12
Brittany Sowell	San Antonio, US	2020-06-12
danielle brusco	Naples, US	2020-06-12
Luisa F.	Oberlin, US	2020-06-12
Elijah Boyd	Long Beach, US	2020-06-12
Kaitlyn Ackerman	Libertyville, US	2020-06-12
claire marasigan	glendale, US	2020-06-12
Stephanie McCaster	Marietta, US	2020-06-12
Jose Alvizo Jr	Mesa, US	2020-06-12
Marisa Connell	Miami, US	2020-06-12
daisy laslie	Westchester, US	2020-06-12
Adina Brown	Chicago, US	2020-06-12
Mayra Cuevas	Chicago, IL	2020-06-12
Maria Schudt	Macomb, US	2020-06-12
Ismaila Diallo	Beltsville, US	2020-06-12
Jesse b	Fremont, US	2020-06-12
Jasbeth Quintas	Chicago, IL	2020-06-12
Kelsey Fulsher	Chicago, US	2020-06-12
Sierra Hudspeth	Chicago, US	2020-06-12
Jenna Sean	Long Beach, US	2020-06-12

Name	Location	Date
Estuardo Monterroso	Marina, US	2020-06-12
Sam Mercer	Englewood, US	2020-06-12
Pamela J. Richart	Champaign, IL	2020-06-12
Richa Kumari	Corpus Christi, US	2020-06-12
Ashley Prat	El Paso, US	2020-06-12
Emily Polanowicz	Dallas, TX	2020-06-12
brooke bryson	Memphis, US	2020-06-12
Diego Estrada	Cleveland, US	2020-06-12
Erin Blackstone	Columbia, US	2020-06-12
Melanie Morin	Holtsville, US	2020-06-12
Jesus gomez	Chicago, IL	2020-06-12
Maire Hollert	West Hartford, US	2020-06-12
Fatima Anda	East Los Angeles, US	2020-06-12
BJORN KRAMMER	Concord, US	2020-06-12
Keith Cozart	Chicago, US	2020-06-12
Yessenia Balcazar	Chicago, US	2020-06-12
Xander Melby	Highland, US	2020-06-12
Alexandra Jones	Fort Lauderdale, US	2020-06-12
Dana Price	Chicago, US	2020-06-12
Sam Jalalpour	Fontana, US	2020-06-12
Estif Abundez	Phoenix, US	2020-06-12
Zoe Linan	San Francisco, US	2020-06-12

Name	Location	Date
Tae Will	Nashville, US	2020-06-12
Timothy Wilson	Harbor City, US	2020-06-12
Libby Schout	Chicago, US	2020-06-12
Victoria Granato	Orland Park, US	2020-06-12
Carolina Santana	Conway, US	2020-06-12
Leonel Najera	Arlington, US	2020-06-12
Cole Miller	Naperville, US	2020-06-12
Alan Roberto	Chicago, IL	2020-06-12
Connie Preciado	Los Angeles, US	2020-06-12
Alex Ramirez	Boise, US	2020-06-12
Elisa Lopez	Chicago, IL	2020-06-12
Deno Warlick	Chicago, US	2020-06-12
Kaylee Spink	Louisville, US	2020-06-12
Margaret Pham	Trabuco Canyon, US	2020-06-12
Madison Hampton	Newport News, US	2020-06-12
Azara Butts	Las Vegas, US	2020-06-13
Dilon Bryan	Denver, US	2020-06-13
Richard Diaz	Murphysboro, US	2020-06-13
Harold Skulte	Chicago, IL	2020-06-13
angelica arana	Chicago, IL	2020-06-13
joanne cahnman	Palos Park, IL	2020-06-13
sasha neri	Carol Stream, US	2020-06-13

Name	Location	Date
Phoebe Santiago	Bronx, US	2020-06-13
Luis Jimenez	Chicago, IL	2020-06-13
Rachel Whittington	Birmingham, US	2020-06-13
Samantha Martinek	Central Square, US	2020-06-13
Yara Jabri	Chicago, US	2020-06-13
Luna Tavares	Portland, US	2020-06-13
Joni Bautista	Chino Hills, US	2020-06-13
Monica Fuentes	Chicago, IL	2020-06-13
Tyra Leopold	Irving, US	2020-06-13
Stephanie Arevalo	Chicago, IL	2020-06-13
Delcia Norwood	Chicago, IL	2020-06-13
Selah Ayala	Goodyear, US	2020-06-13
Andreaco Rhetta	Chicago, US	2020-06-13
Kefira Fields	Hinsdale, IL	2020-06-13
Ingjierd Marquez	Houston, US	2020-06-13
Daisy Collazo	Sebring, FL	2020-06-13
Anna Jacobi	San Francisco, US	2020-06-13
Ceola Hull	Sioux City, IA	2020-06-13
Megan Thomas	Bay City, US	2020-06-13
Eliza Patlan	Zion, US	2020-06-13
Aziah Flores	Smyrna, US	2020-06-13
Isabella Macias	Port Arthur, US	2020-06-13

Name	Location	Date
Brenda Flores	Bolingbrook, US	2020-06-13
Cordero Paraf	Chicago, IL	2020-06-13
Charity Love	US	2020-06-13
Anice Wyche	Clayton, US	2020-06-13
lina Mateos	Morgan Hill, US	2020-06-13
Ashley Jarillo	Mississippi, US	2020-06-13
eddie c	San Jose, US	2020-06-13
Lea Abebe	Silver Spring, US	2020-06-13
Danielle Fletcher	Englewood, US	2020-06-13
harman kaur	Sacramento, US	2020-06-13
gabby c	Douglasville, US	2020-06-13
Danae MarQuand	New Albany, US	2020-06-13
Mila Aguilar	Los Angeles, US	2020-06-13
melanie balaj	Nanuet, US	2020-06-13
Shanee Smith	Chicago, US	2020-06-13
Giselle Martinez	Chicago, US	2020-06-13
Brandyn Gray	Chicago, US	2020-06-13
kimaya ivy	Chicago, US	2020-06-13
Sophia Pacheco	US	2020-06-13
Kayla Espinosa	El Paso, US	2020-06-13
Elle Park	Katy, US	2020-06-13
Flora Nash	Seattle, US	2020-06-13

Name	Location	Date
Yolanda Porras-Velazquez	Chicago, IL	2020-06-13
Jesus Fuentes	Chicago, IL	2020-06-13
Jennifer Linton	Northbrook, IL	2020-06-13
Lana G	Williamstown, US	2020-06-13
Maria Johnson	Dunedin, US	2020-06-13
jennifer hernandez	Stephens City, US	2020-06-13
Shayla Knight	Savannah, US	2020-06-13
Kadence Thomson	Spartanburg, US	2020-06-13
Hibaq Mohamed	Atlanta, US	2020-06-13
Steven Walsh	Boston, US	2020-06-13
anasazi bhakti	Chicago, IL	2020-06-13
Layonna Parker	Mount Vernon, US	2020-06-13
Jenna Jean	La Plata, US	2020-06-13
Yuritzi Flores	Chicago, US	2020-06-13
ella b	Greenville, US	2020-06-13
Ariane Fermin	Orlando, US	2020-06-13
Kelly Jakubiak	Shrewsbury, US	2020-06-13
una myatt	Dallas, US	2020-06-13
Carolyn Gonzalez	Nacogdoches, US	2020-06-13
Victor Aranda	Phoenix, US	2020-06-13
Kayley Glazner	Leesburg, US	2020-06-13
Dylan Batton	Crystal Lake, US	2020-06-13

Name	Location	Date
hajira abdulle	los angeles, US	2020-06-13
Noelisa Lopez	Haverstraw, US	2020-06-13
Natalie Rodriguez	Los Angeles, US	2020-06-13
Jessenia Aponte	Greenwich, US	2020-06-13
Devon Munn	South Haven, US	2020-06-13
bri griffith	Soddy Daisy, US	2020-06-13
Shirley Mozo	Nashville, US	2020-06-13
Sophie Reckard	Charlotte, US	2020-06-13
Kaeylla Cooks	Chicago, US	2020-06-13
Jennifer Bahena	Waukegan, US	2020-06-13
Marissa Keo	Waukegan, US	2020-06-13
Danielle Jones	US	2020-06-13
London Tucker	Miami, US	2020-06-13
madison sneed	Las Cruces, US	2020-06-13
Ryan West	Portland, US	2020-06-13
Jeremy Mayerhofer	Chicago, US	2020-06-13
Pamela Gladney	Champaign, US	2020-06-13
areli rosales	El Paso, US	2020-06-13
Jade Isabelle	Spokane, US	2020-06-13
Sat K	Eugene, US	2020-06-13
brianna hitchcock	Mount Pleasant, US	2020-06-13
Pilar Reichlein	Portland, US	2020-06-13

Name	Location	Date
Haley Lewis	Powder Springs, US	2020-06-13
Ashlee Kirk	Gardena, US	2020-06-13
Ryleigh Crumbley	Yuma, US	2020-06-13
Anza Butt	Utica, US	2020-06-13
Xochitl Garcia	Portland, US	2020-06-13
Amaury Guevara	Phoenix, US	2020-06-13
Gus Strawn	Chesapeake, US	2020-06-13
Eva Goubert	Olympia, US	2020-06-13
Kaitlin Moody	Millington, US	2020-06-13
Duggan Mabvirakare	Fort Lauderdale, US	2020-06-13
Lesly Verdugo	Phoenix, US	2020-06-13
Breonna Gaskin	Tallahassee, US	2020-06-13
Delia Otoole	New York, US	2020-06-13
Cynthia Ayala	Boise, US	2020-06-13
Malia Gray	Ventura, US	2020-06-13
Nemeh Tabally	Hickory Hills, US	2020-06-13
Zakai X	Atlanta, US	2020-06-13
luis lopez	Opa Locka, US	2020-06-13
D Simmons	Costa Mesa, US	2020-06-13
James Schramm	Lima, US	2020-06-13
Diana dlm	Queens, US	2020-06-13
Angie Umanzor	Lilburn, US	2020-06-13

Name	Location	Date
Naijah Walter	Holyoke, US	2020-06-13
Rachel Wales	Chicago, IL	2020-06-13
Jace Hand	Auburn, US	2020-06-13
Alexus Wells	Raleigh, US	2020-06-13
Jesus Briseno	Chicago, IL	2020-06-13
Mi Koscinch	Pflugerville, US	2020-06-13
Madalyn Knittel	Ponca City, US	2020-06-13
Sophie Steck	Atlanta, US	2020-06-14
Waris Azimi	New York, US	2020-06-14
Jasmin Gross	Sunbury, US	2020-06-14
Natalie Plunge	Crest Hill, US	2020-06-14
Jay Perez	Mastic, US	2020-06-14
Hana Endale	Scarborough, Canada	2020-06-14
Nick Sheppard	San Francisco, US	2020-06-14
Abigail Tuohy	Elizabeth, US	2020-06-14
Javier Blake-Vazquez	Spring, US	2020-06-14
Avissa Abba	Brentwood, US	2020-06-14
Gaia Avril	Las Vegas, US	2020-06-14
Kelvin Vang	Minneapolis, US	2020-06-14
Alana Barfield	Chipley, US	2020-06-14
Rosa Salinas	Blue Island, US	2020-06-14
Vanessa Schwartz	Chicago, IL	2020-06-14

Name	Location	Date
Megan Wahn	Marietta, US	2020-06-14
Adriana Miranda	Valencia, US	2020-06-14
Alanna Luong	Stockton, US	2020-06-14
Jassmin Sanchez	Gaithersburg, US	2020-06-14
Selena Fuentes	Indianapolis, IN	2020-06-14
Gianna Dizon	Bartlett, US	2020-06-14
madison r	Duluth, US	2020-06-14
Sophia Totten	Decatur, US	2020-06-14
Sam Waters	Chicago, US	2020-06-14
Nia Todd	US	2020-06-14
Francesca DePalo	Ramsey, US	2020-06-14
Isabella Ramirez	Eau Claire, US	2020-06-14
Faith F	Mechanicsburg, US	2020-06-14
ana Islas	US	2020-06-14
Emma Rivera	Houston, US	2020-06-14
Diana Barraza	Chicago, IL	2020-06-14
Melissa Staton	Toledo, OH	2020-06-14
Susan Allen	Raleigh, NC	2020-06-14
June Cherb	Amarillo, US	2020-06-14
Tracy Hill	Mt Morris, US	2020-06-14
Grap Yuos	Nigeria, US	2020-06-14
Madison Tamez	Mcallen, US	2020-06-14

Name	Location	Date
Miles Barnes	Hatboro, US	2020-06-14
Kristen Easton	Niagara Falls, US	2020-06-14
Hugo Castillo	Ventura, US	2020-06-14
Alejandra Munoz	Chicago, US	2020-06-14
xenia diaz	Eugene, US	2020-06-14
Ariel Salahuddin	Hammond, US	2020-06-14
Adriana Acevedo	Pacoima, US	2020-06-14
TYRELL BEGAY	salt lake city, US	2020-06-14
Amelia Keating	Chicago, US	2020-06-14
Fiona McMahon	Oak Lawn, US	2020-06-14
Andrea Carranza	Merced, US	2020-06-14
simbiat bakare	Breezy Point, US	2020-06-14
alissen asuncion	Las Vegas, US	2020-06-14
Coumbel Tambadou	Brooklyn, US	2020-06-14
Lily Mata	Fredericksburg, US	2020-06-14
Melina Cheraghi	Oklahoma City, US	2020-06-14
adriana berduo	Atlanta, US	2020-06-14
Priscilla Reyes	DeForest, US	2020-06-14
Emily Alvarado	Chula Vista, US	2020-06-14
Vanesa Dominguez	Detroit, MI	2020-06-14
Erica Dominguez	Chicago, IL	2020-06-14
Karla Dominguez	Indianapolis, IN	2020-06-14

Name	Location	Date
Daisy Espana	Chicago, IL	2020-06-14
Rickey HAYTON	Chicago, US	2020-06-14
Ava Harris	Houston, US	2020-06-14
Maddie Auer	Deerfield, US	2020-06-14
Andrea Dalzell	Brooklyn, US	2020-06-14
Lauren Spearman	Oak Lawn, IL	2020-06-14

Exhibit 211

From: Guy, Jeff on behalf of EPA.PublicHearingCom

To: <u>Daniel Villarreal</u>

Subject: RE: [External] Opposition to General Iron in Southeast Side

Date: Monday, June 15, 2020 11:54:12 AM

Attachments: <u>image001.png</u>

Hello,

Thank you for your comments, which will be included as an exhibit with the hearing record. The Agency will prepare a responsiveness summary that will include a summary of all the views, significant comments, criticisms, and suggestions - in addition to the Agency's specific response and final action. You will be notified of the final decision in this matter and of the availability of the responsiveness summary.

Thanks.

Jeffrey J. Guy

Hearing Officer, Illinois Environmental Protection Agency Office of Community Relations (217) 785-8724

Jeff.Guy@illinois.gov



From: Daniel Villarreal <dvillarreal.h@gmail.com>

Sent: Monday, June 15, 2020 12:56 AM

To: EPA.PublicHearingCom <EPA.PublicHearingCom@Illinois.gov>; letterforthemayor@cityofchicago.org; ward10@cityofchicago.org **Subject:** [External] Opposition to General Iron in Southeast Side

To Illinois Environmental Protection Agency, Alderwoman Susan Sadlowski Garza, & Mayor Lori Lightfoot,

I am writing to you today to oppose allowing General Iron to move their facilities to the Southeast Side. As a lifelong resident of both the South Chicago and East Side neighborhoods, I am fed up with the constant pollution that continues to harm this community, and having General Iron come here will only exacerbate it. The evidence is clear, having this neighborhood continue to face such pollution puts the health at risk of thousands of its residents.

Pollution, including the kind that General Iron might impose on this community, can directly impact the health of the residents subjected to it. Local Physician Kohar Jones has noted in the past how pollution has worsened cardiovascular and lung disease among the patients she has served in South Chicago and the East Side. The particulate matter that runs through the air can permeate in the lungs, worsening the cases of asthma she has witnessed. These health effects extend to the adversities we face today as well.

If pollution continues to plague this community by allowing General Iron to come here, risks to our health are deteriorated further with the ongoing pandemic. A nationwide study from Harvard's

School of Public Health has found that higher death rates of COVID-19 were found in communities where residents had long-term exposure to fine particulate air pollution. [2] My family, my friends, and myself have lived here numerous years and all have been exposed to air pollution in some way. Not only do we have to worry about our long-term health of having difficulty breathing by living here, but we are at greater risk of succumbing to COVID-19 if we happen to contract it.

Our lives are on the line and we cannot continue to accept having our home subjected to careless pollution—we are not Chicago's dumping grounds. The explosion at the General Iron plant is alarming, forcing it to close in Lincoln Park. This closure was good for the residents of Lincoln Park because they too fought to close this plant; however, if they agree that it is not beneficial for them, then it cannot be good for the East Side or anywhere else as well. The East Side is one of many areas in the city that is referred to as a 'Sacrifice Zone' and the Natural Resources Defense Council also finds that the burden of pollution is at its highest in the Southeast Side. [3] [4] These high burden areas are made up of a majority of black and Latino people and we once again see these people placed at a disadvantage.

I am not an expert by any means, but from my experience living here I come as a concerned resident and constituent. I worry about the health and quality of life of my family, friends, and neighbors. General Iron and other polluters are not welcome in the East Side. Any violations they have committed should not be treated as a business expense for them, but rather serve as an actual punishment for their wrongdoings. I urge the IEPA to delay and ultimately oppose the permit allowing General Iron into this neighborhood. Alderman Garza and Mayor Lightfoot, I implore you to support the efforts in ceasing the pollution that affects this area, because if it is allowed to continue, our lungs will continue to burn and we will struggle to be able to do life's simplest task—to breathe.

Thank you for your time,

Daniel Villarreal

E-Mail: <u>DVillarreal.h@gmail.com</u>

Jones, Kohar. "Asthma And Injustice On Chicago's Southeast Side." *Health Affairs*, 1 May 2016, www.healthaffairs.org/doi/full/10.1377/hlthaff.2015.0117

^{[2] &}quot;Air Pollution Linked with Higher COVID-19 Death Rates." *Harvard SPH News*, Harvard T.H. Chan School of Public Health, 5 May 2020, www.hsph.harvard.edu/news/hsph-in-the-news/air-pollution-linked-with-higher-covid-19-death-rates/

^[3] Chase, Brett. "Interactive Map: Pollution Hits Chicago's West, South Sides Hardest." Better Government Association, 9 June 2020, www.bettergov.org/news/interactive-map-pollution-hits-chicagos-west-south-sides-hardest/

^[4] Fussell, Sidney. "Covid-19 Flares Up in America's Polluted 'Sacrifice Zones'." Wired, Conde Nast, 25 May 2020, www.wired.com/story/covid-19-flares-americas-polluted-sacrifice-zones/?fbclid=lwAR017tp3cgcDg-gk5FkHhQlDxjXoAy1NDlrt9SvwCCGOxZVdStOPUhuFT9g

Exhibit 212

 From:
 Guy, Jeff

 To:
 Hal Tolin

Subject: RE: General III, LLC

Date: Monday, June 15, 2020 1:52:00 PM

Attachments: image001.png image002.png

Hello,

Thank you for your comments, which will be included as an exhibit with the hearing record. The Agency will prepare a responsiveness summary that will include a summary of all the views, significant comments, criticisms, and suggestions - in addition to the Agency's specific response and final action. You will be notified of the final decision in this matter and of the availability of the responsiveness summary.

Thanks,

Jeffrey J. Guy

Hearing Officer, Illinois Environmental Protection Agency Office of Community Relations (217) 785-8724

Jeff.Guy@illinois.gov



From: Hal Tolin < HalTolin@reserve-group.com>

Sent: Monday, June 15, 2020 1:48 PM **To:** Guy, Jeff <Jeff.Guy@Illinois.gov>

Cc: Steve Joseph <SteveJoseph@reserve-group.com>

Subject: [External] General III, LLC

Importance: High

HAL TOLIN / RESERVE MANAGEMENT GROUP HALTOLIN@RESERVE-GROUP.COM 11600 SOUTH BURLEY AVE, CHICAGO, IL 60617 (O) 773-382-0123 (C) 773-491-3153

a reserve management group company

providing safe, responsible + sustainable recycling solutions for our customers and the environment.



RESERVE MANAGEMENT GROUP

Mr. Jeff Guy Hearing Officer Illinois Environmental Protection Agency PO Box 19276 1021 North Grand Ave. Springfield, IL 62974-9276

June 15, 2020

Dear Mr. Guy:

We are writing this letter to express support for Illinois EPA's approval of the pending air permit application for General III, LLC. There were numerous false allegations regarding General III's permit application and business made during the public hearing. We also know that your agency has received many written comments over the weeks since the hearing that reiterate and add to this list of inaccuracies. Given this mountain of unsubstantiated claims made by opponents to the permit application, we would like to use this letter to correct the record as it relates to General III and the metals recycling industry.

1) Repeated references were made to General Iron "poisoning people." There is no scientific evidence of this, and the use of such inflammatory language, especially when unsubstantiated by any fact or evidence, is irresponsible and defamatory. Repeated references were also made to the long, unresolved environmental track record of General Iron. These assertions also display a willful ignorance of actual events.

While the statute for evaluating this air permit application is limited in scope to the details of the applicant's (i.e., General III, LLC) proposed operation, the allegation that General Iron's track record is unresolved is unsupported by the facts.

In 2012 General Iron worked extensively with the United States EPA to perform a detailed feasibility study and design an emissions capture system and particulate filter that would address alleged fugitive particulate matter emissions from its hammermill shredder. As part of a negotiated settlement with the EPA, General Iron installed a state-of-the-art, multi-million dollar high-efficiency filter system. Upon completion of this project, General Iron became the only hammermill shredder in Illinois equipped with a high-efficiency particulate filter. This effort demonstrated General Iron's commitment to environmental compliance and the resolution of any alleged violations of emission standards.

Until recently, measured volatile organic material (VOM) emission rates from hammermill shredders were not readily available to the industry or to regulatory agencies such as the US EPA and Illinois EPA. In fact, prior to IEPA's February 2019 issuance of a construction permit for installation of a regenerative thermal oxidizer (RTO) at General Iron, no construction or operating permit issued by

IEPA to hammermill shredders in Illinois had ever included VOM emission limitations. Even General Iron's aforementioned 2012 settlement with USEPA did not include any reference to VOM emissions. The primary reason for this is that the vast majority of commercial hammermill shredders are not equipped with emissions capture systems that capture and route shredder exhaust gases through a stack or duct where VOM emissions can be measured in accordance with approved USEPA test methods.

In 2017, General Iron received an Information Request from USEPA requiring that testing of the shredder be performed to assess VOM emissions. Again, General Iron worked extensively with USEPA to design and implement a testing program to document VOM emissions from the shredder. This testing confirmed that VOM emissions exceeded the level above which capture and control of VOM is required by state regulations. General Iron worked diligently to research, design, and install a multi-million dollar VOM control system consisting of an RTO and packed tower scrubber. In accordance with a negotiated Administrative Consent Order (ACO) with USEPA, these controls were installed in 2019 and subsequent testing has demonstrated that the system meets and exceeds applicable VOM control requirements. Not only did this control system cost over two million dollars, but installation and operation of these controls represent a significant competitive disadvantage to other shredders in the Chicago area that continue to operate without any emission controls. These actions further demonstrate General Iron's commitment to environmental compliance and the resolution of any alleged violations of emission standards.

General III, LLC's new facility will utilize both the existing RTO as well as other pollution control measures to ensure that the new operation is among the most environmentally responsible metal shredders in the nation. Beyond that, General III's new location will be sited more than five times further from any public right-of-way than General Iron's current facility, further limiting the impact of the shredding operation on the surrounding area.

2) Repeated references were made to environmental justice. A narrative has been constructed around this operation being moved from a rich white neighborhood to a lower income neighborhood where a majority of the population comprises people of color. Those facts are not in dispute. The population of Lincoln Park is approximately 80% white and the median household income is around \$95,000, while the population of East Side is approximately 80% Hispanic and has a median income around \$43,000. However, the suggestion that the business is moving because of the demographics or income levels of the two neighborhoods is false and unsupported by the facts.

The former General Iron Industries was essentially zoned out of business. The company has operated at its current Lincoln Park location for over 60 years. This facility is located within the Clybourn Corridor that became Chicago's first Planned Manufacturing District (PMD 1) in 1988. City Council repealed the PMD designation for the area that includes General Iron's current site in 2017, forcing the company to look at alternatives. The decision was made to sell the company to an affiliate of Reserve Management Group that already operates recycling facilities on the Southeast Side of Chicago at a site zoned for such operations as part of PMD 6. The RMG location had both the space and the proper zoning to expand by adding a shredding operation.

Prior to the announcement that the General III shredding operation would be built on its property, RMG had never been made aware of a single neighborhood complaint regarding the existing facility or operations. RMG and its businesses have operated at the site, which was formerly a steel mill dating to the early 1900s, since 1997. The current RMG workforce is approximately 80% minorities — a product of both the location and the company's history as a good neighbor. In spite of the loud opposition, many people on the Southeast Side support RMG and are in favor of the General III project.

RMG's decision to build this shredding operation on the Southeast Side site was prompted by political and business realities. No company would ever decide to spend tens of millions of dollars to relocate a profitable and compliant facility unless forced to by outside factors. Racial or socioeconomic motivations are not and were not ever a factor and any suggestion to the contrary is wholly untrue.

3) Opponents of the pending air permit application made multiple references to two prior environmental battles that played out on the Southeast Side – one involving the storage of petroleum coke, or petcoke, and the other related to testing that showed high manganese levels. Neither of these past episodes is at all tied to General Iron or RMG, any recycling operation that currently takes place at RMG's site, or any activity that will take place upon the startup of the shredding operation. The businesses of General III and RMG are in no way related to petcoke or manganese storage or processing, and this argument against the permit currently under consideration only serves to illustrate how these unrelated issues are being intentionally misapplied to the General III project in an attempt to disrupt the permitting process.

As a recycler of obsolete metal products, RMG serves a vital environmental role within supply chains for essential manufacturing activities. Producing new steel and other metals from recycled materials, while an industrial process, is environmentally beneficial in multiple ways. First, obsolete metal products are kept out of landfills and are instead redirected back into manufacturing processes. Second, this use of recycled materials replaces virgin ores in steel and other metal production. Mining of such ores is incredibly resource, energy, and waste intensive. According to calculations from the Institute of Scrap Recycling Industries (ISRI), replacing iron ore with recycled ferrous scrap in steel production leads to reductions of 60% in energy requirements and 58% in carbon dioxide emissions. Per these same ISRI calculations, recycling just one car can eliminate the need for 2,500 lbs. of iron ore, 1,400 lbs. of coal, and 120 lbs. of limestone.

Specifically, General III's air permit application applies to a proposed steel shredding operation. As defined by ISRI, "Shredded Steel Scrap is homogeneous iron and steel scrap magnetically separated, originating from automobiles, unprepared No. 1 and No. 2 steel, miscellaneous baling and sheet scrap." Recycling obsolete steel products to be remade into new steel is in no way a petroleum refining process that generates petcoke as a byproduct. Recycling obsolete steel products to be remade into new steel is in no way the handling or storage of manganese. Any conflation of those activities with the operations that would be covered by General III's air permit is misinformed.

4) Reference was made to RMG having the worst environmental track record in the entire country.

This is yet another baseless claim that is not supported by any fact, filing, or other documentation

that can be found anywhere in the United States. RMG is a family of distinct but related businesses involved in the processing and recycling of ferrous metals, nonferrous metals, and scrap electronics. The company's businesses operate responsibly across 14 facilities located in 10 states. As stated previously, RMG's location on the Southeast Side had operated for more than 20 years before the announcement of the General III project without receiving a single environmental complaint.

5) References were made to General Iron's existing location in Lincoln Park being the cause of poor air quality in that area. The evidence cited to support such a claim comes from air monitors manufactured by a company called PurpleAir that are located in proximity to General Iron's Lincoln Park site. The readings from the PurpleAir monitors are published online for public viewing. Analysis of these publicly available readings reveals that the air monitors have recorded elevated levels of particulate matter on countless occasions when General Iron's shredding equipment was idle. Such findings call into question the assertions that General Iron is a source of air pollution in the Lincoln Park neighborhood. Given the importance that opponents of General Iron have assigned to the readings from these PurpleAir monitors, their claims about the company's environmental malfeasance fall well short of credibility.

It should be further noted that PurpleAir products are not approved by the EPA for monitoring to determine compliance with the National Ambient Air Quality Standard (NAAQS). Additionally, tests conducted by various municipal and regional air quality monitoring agencies have shown PurpleAir products to regularly return higher readings than those taken from more precise EPA approved devices. As a result of these discrepancies, PurpleAir introduced a "Conversion" function to their online map that, when enabled, adjusts the readings from their monitors to bring them closer to the data registered by approved regulatory monitors. By default, the Conversion function is set to "None" when a user opens the map from PurpleAir's website.

6) As both the Illinois and U.S. EPA are fully aware, environmental controls and equipment at the new General III facility on the Southeast Side will exceed those found at any other steel shredding operation in Illinois or in the surrounding states of Indiana, Wisconsin, Iowa, and Missouri.

As outlined, none of the contentions levied in opposition to this permit application are based in fact or quantitative scientific evidence. Given all of the relevant information, we urge the Illinois EPA to proceed with the issuance of this air permit to General III, LLC.

Respectfully,

Chief Executive Officer

Hal Tolin

Chief Operating Officer

Exhibit 213

From: <u>Josh Ellis</u>

To: <u>EPA.PublicHearingCom</u>; <u>Guy, Jeff</u>

Cc: Chloe Gurin-Sands; Justin Williams; Chloe Gurin-Sands; Shehara Waas; MarySue Barrett

Subject: [External] MPC Statement in Opposition to issuance of permit for Gill/General Iron relocation

Date: Monday, June 15, 2020 5:23:42 PM

Attachments: <u>image001.png</u>

MPC Statement in Regard to General Iron.pdf

Dear Mr. Guy,

Thank you for the opportunity to provide comments on GIII, LLC's ("GIII") request to construct a recycling facility at 11600 S. Burley Avenue in Chicago. The Metropolitan Planning Council has a longstanding interest in healthy, thriving rivers and racially equitable development policies. **As we consider the environmental racism and poor planning embedded in this proposal, we urge the Illinois EPA to deny GIII's construction permit.** Our statement is included here, and attached as a PDF.

The most important reason to deny this permit is because it **epitomizes institutional environmental racism**. Racist outcomes do not require racist intent. We do know the intent behind the permit request, nor of the reviewers, and we are not claiming to. But based on the following three components, we are confident of the outcome.

- Racially unjust siting. Put frankly: GIII is proposing to relocate a harmful industrial use from a wealthier, whiter part of the city to one that has more black and brown residents. Again, racist outcomes do not require racist intent. The outcome of this relocation is to remove a health hazard from an affluent white neighborhood and place it in a lower-income Latinx neighborhood. Institutional racism, intentionally or not, produces outcomes that chronically favor or disfavor racial groups. That is exactly what a permit for this would do. This is most assuredly a racist outcome.
- Compounding health hazards already exist for low-income communities of color in Calumet Industrial Corridor, and would be worsened by this. This relocation would layer yet another health hazard on top of the overlapping health threats that already exist near the proposed site. The site is located within the Calumet Industrial Corridor and the greater Calumet region, where multiple industries contribute to poor air quality. Compared to citywide averages and most other industrial corridors in Chicago, there are higher rates of chronic obstructive pulmonary disease and heart disease within this corridor, signaling existing negative health impacts. Some of these compounding health effects are spelled out in additional detail in a letter submitted to your office by NRDC and signed by groups throughout the state (including MPC). Residents of the Southeast Side should not be asked to bear yet another health burden.
- **Insufficient participatory process.** The public outreach process undertaken was insufficient, meaning that a Latinx community was effectively left out of the decision-making process. The insufficiencies of that process for instance, outreach meetings held in only in English, a language which many residents of the community do not speak have been documented in the aforementioned letter submitted to your office.

In addition to - and in many ways because of - the environmental racism embedded in this relocation proposal, it also represents **poor land-use planning**.

• Inconsistent with vision for rivers. The proposal is inconsistent with Chicago's documented vision

for healthy, thriving rivers, as document in *Our Great Rivers*. Among other goals, that plan envisions river-adjacent land uses that address environmental impacts. These uses must create ecologically focused and inviting places for both humans and wildlife. It is unclear that this facility will abide by these values and provide riverfront access as well as habitat. These goals also champion the need for more robust stakeholder engagement to improve land use planning and policies, something that did not occur with selecting the location of this facility.

• Undermines long-term industrial planning in Chicago. The City of Chicago has embarked upon a process of Industrial Corridor Modernization, reviewing and potentially modifying existing land uses within its industrial corridors. Some corridors, such as along the North Branch of the Chicago River, are complete, while others, such as the Calumet River, are not. At best, it is premature to relocate an industrial facility of this magnitude given that this planning process has not yet occurred. At worst, relocating this project would have an outsized influence on any future planning efforts, incentivizing other businesses to similarly move to the Southeast Side. This plant should not be relocated until a planning process is allowed to occur.

Bad planning like this will only beget worse planning. This and other relocations must stop until there can be a thorough, thoughtful, participatory planning process for the whole of the City, which should mitigate the risk of cost-driven, but racially unjust, moves such as this.

There are additional reasons to deny this permit application. For example, GIII's proposed relocation would undermine the Clean Water Act's "national goal" to achieve, "wherever attainable," water quality which provides "for recreation in and on the water." The facility would introduce new odors to the Calumet, further impeding recreational goals. Having personally led close to a dozen educational boat tours of the corridor – the smell is already noxious, and will be made worse by this. Additionally, because of the location of this site on the lakeward side of the O'Brien Lock, we are concerned that discharges and other runoff could pose a risk to both the ecosystem of Lake Michigan and the millions of people who rely on it for drinking water. To date we have not seen that risk assessed, which we would welcome.

We encourage GIII to explore alternatives to relocation; it cannot be allowed to do so at the expense of the health of black and brown communities. However, we also strongly encourage General Iron, the State of Illinois and the City of Chicago to vastly improve environmental performance of its current North Branch location, as well as oversight and performance.

Thank you for the opportunity to weigh in on this development. We welcome the opportunity to speak with you more about why this proposal should not be allowed to proceed and how IEPA can interrupt this cycle of racially unjust industrial siting.

Sincerely,



Josh Ellis, Vice President, Metropolitan Planning Council jellis@metroplanning.org, 312.863.6045

Executive Advisors

Nicholas W. Alexos

Dentsply Sirona, Inc.
Carol L. Bernick

Management

John Bucksbaum

Bucksbaum Retail

Properties, LLC

BMO Financial Group

Robert M. Chapman

Marsha Cruzan

J. Michael Drew

Craig J. Duchossois

John R. Ettelson

William Blair

Bob Flannery

CA Residential

U.S. Bank

LLC

CenterPoint Properties

Structured Development,

The Duchossois Group, Inc.

David Casper

Polished Nickel Capital

Metropolitan Planning Council

Illinois EPA
Attn: Jeff Guy, Hearing Officer
PO Box 19276
1021 North Grand Avenue Springfield, IL 62794-9276

Submitted electronically to: http://epa.publichearingcom@illinois.gov

June 12, 2020

RE: Comments on Proposed Draft Construction Permit to GIII, LLC

Dear Mr. Guy,

Thank you for the opportunity to provide comments on GIII, LLC's ("GIII") request to construct a recycling facility at 11600 S. Burley Avenue in Chicago. The Metropolitan Planning Council has a longstanding interest in healthy, thriving rivers and racially equitable development policies. As we consider the environmental racism and poor planning embedded in this proposal, we urge the Illinois EPA to deny GIII's construction permit.

The most important reason to deny this permit is because it **epitomizes institutional environmental racism**. Racist outcomes do not require racist intent. We do know the intent behind the permit request, nor of the reviewers, and we are not claiming to. But based on the following three components, we are confident of the outcome.

- Racially unjust siting. Put frankly: GIII is proposing to relocate a harmful industrial use from a wealthier, whiter part of the city to one that has more black and brown residents. Again, racist outcomes do not require racist intent. The outcome of this relocation is to remove a health hazard from an affluent white neighborhood and place it in a lower-income Latinx neighborhood. Institutional racism, intentionally or not, produces outcomes that chronically favor or disfavor racial groups. That is exactly what a permit for this would do. This is most assuredly a racist outcome.
- Compounding health hazards already exist for low-income communities of color in Calumet Industrial Corridor, and would be worsened by this. This relocation would layer yet another health hazard on top of the overlapping health threats that already exist near the proposed site. The site is located within the Calumet Industrial Corridor and the greater Calumet region, where multiple industries contribute to poor air quality. Compared to citywide averages and most other industrial corridors in Chicago, there are higher rates of chronic obstructive pulmonary disease and heart disease within this corridor, signaling existing negative health impacts. Some of these compounding health effects are spelled out in additional detail in a letter submitted to your office by NRDC and signed by groups throughout the state (including MPC). Residents of the Southeast Side should not be asked to bear yet another health burden.
- **Insufficient participatory process.** The public outreach process undertaken was insufficient, meaning that a Latinx community was effectively left out of the decision-making process. The insufficiencies of that process for instance, outreach meetings held in only in English, a language which many residents of the community do not speak have been documented in the aforementioned letter submitted to your office.

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Theodore Weldon III Lendlease Development Inc In addition to - and in many ways because of - the environmental racism embedded in this relocation proposal, it also represents **poor land-use planning**.

- Inconsistent with vision for rivers. The proposal is inconsistent with Chicago's documented vision for healthy, thriving rivers, as document in *Our Great Rivers*. Among other goals, that plan envisions river-adjacent land uses that address environmental impacts. These uses must create ecologically focused and inviting places for both humans and wildlife. It is unclear that this facility will abide by these values and provide riverfront access as well as habitat. These goals also champion the need for more robust stakeholder engagement to improve land use planning and policies, something that did not occur with selecting the location of this facility.
- Undermines long-term industrial planning in Chicago. The City of Chicago has embarked upon a process of Industrial Corridor Modernization, reviewing and potentially modifying existing land uses within its industrial corridors. Some corridors, such as along the North Branch of the Chicago River, are complete, while others, such as the Calumet River, are not. At best, it is premature to relocate an industrial facility of this magnitude given that this planning process has not yet occurred. At worst, relocating this project would have an outsized influence on any future planning efforts, incentivizing other businesses to similarly move to the Southeast Side. This plant should not be relocated until a planning process is allowed to occur.

Bad planning like this will only beget worse planning. This and other relocations must stop until there can be a thorough, thoughtful, participatory planning process for the whole of the City, which should mitigate the risk of cost-driven, but racially unjust, moves such as this.

There are additional reasons to deny this permit application. For example, GIII's proposed relocation would undermine the Clean Water Act's "national goal" to achieve, "wherever attainable," water quality which provides "for recreation in and on the water." The facility would introduce new odors to the Calumet, further impeding recreational goals. Having personally led close to a dozen educational boat tours of the corridor – the smell is already noxious, and will be made worse by this. Additionally, because of the location of this site on the lakeward side of the O'Brien Lock, we are concerned that discharges and other runoff could pose a risk to both the ecosystem of Lake Michigan and the millions of people who rely on it for drinking water. To date we have not seen that risk assessed, which we would welcome.

We encourage GIII to explore alternatives to relocation; it cannot be allowed to do so at the expense of the health of black and brown communities. However, we also strongly encourage General Iron, the State of Illinois and the City of Chicago to vastly improve environmental performance of its current North Branch location, as well as oversight and performance.

Thank you for the opportunity to weigh in on this development. We welcome the opportunity to speak with you more about why this proposal should not be allowed to proceed and how IEPA can interrupt this cycle of racially unjust industrial siting.

Sincerely,



Josh Ellis, Vice President, Metropolitan Planning Council jellis@metroplanning.org, 312.863.6045

Exhibit 214

From: Nancy Loeb

To: Guy, Jeff; EPA.PublicHearingCom

Subject: [External] Re: Public Comments on the Draft Permit for General III, LLC, 11600 S. Burley, Chicago, IL 60617,

Application No. 19090021, I.D. No. 031600SFX

Date: Monday, June 15, 2020 6:06:03 PM

Attachments: GIII Comment Environmental NGOs Letter 6-15-20.pdf

To the Hearing Officer:

Attached please find public comments submitted on behalf of 28 non-governmental environmental protection and environmental justice organizations on the Draft Permit for General III, LLC, 11600 S. Burley, Chicago, IL 60617, Application No. 19090021, I.D. No. 031600SFX.

Please contact me if you have any questions concerning this submission.

Nancy C. Loeb
Clinical Associate Professor of Law
Director, Environmental Advocacy Clinic
Bluhm Legal Clinic
Northwestern Pritzker School of Law
375 East Chicago Avenue, Chicago, IL 60611-3069

Tel: 312-503-0052

E-Mail: <u>n-loeb@northwestern.edu</u>

The preceding email message may be confidential or protected by the attorney-client, attorney work-product, or common-interest privilege. It is not intended for transmission to, or receipt by, any unauthorized persons.

Illinois EPA Attn: Jeff Guy, Hearing Officer PO Box 19276 1021 North Grand Avenue Springfield, IL 62794-9276

Submitted electronically to: epa.publichearingcom@illinois.gov
jeff.guy@illinois.gov

Re: Public Comments on the Draft Permit for General III, LLC, 11600 S. Burley, Chicago, IL 60617, Application No. 19090021, I.D. No. 031600SFX

To the Hearing Officer:

We write as representatives of organizations dedicated to environmental protection and environmental justice to urge that Illinois EPA ("IEPA") deny a construction permit to GIII, LLC ("GIII") for construction of a proposed recycling facility at 11600 S. Burley Avenue in Chicago. Further, we write to comment on numerous insufficiencies in the Draft Permit proposed by IEPA for this facility.

As a foundational matter, the proposed GIII large industrial recycling facility does not belong in the Southeast Side of Chicago. The Southeast Side is an environmental justice community that has been long overburdened by pollution from heavy industrial operations. In recent years, the community has suffered from health and environmental hazards, including contamination from petcoke, manganese, lead, arsenic, and other metals and pollutants, on top of an even longer history of industrial contamination. The cumulative effects of this pollution are already causing negative health consequences to residents, including asthma and other respiratory illnesses. Moreover, the Southeast Side faces among the highest cumulative environmental burdens in the City of Chicago and the state, given these impacts and numerous other environmental threats in combination with sociodemographic factors that make the community more susceptible to environmental impacts. As a matter of environmental justice, the community overall should not be subjected to the additional pollution from the proposed facility. Moreover, there are homes, schools, and parks in the immediate vicinity of the 11600 S. Burley Avenue site, which makes location of the GIII facility there both more dangerous and more unjust.

We also note that IEPA's public participation process in this proceeding was not designed or carried out to enable participation by many members of the community directly impacted by this facility. Many residents of the Southeast Side lack the resources or technical skills to participate in on-line hearings. And, announcement of the hearing was made only in English, despite it being well-known to IEPA that the affected community includes many Spanish-only speakers. Likewise, the hearing itself did not provide translators. Finally and significantly, IEPA has persisted with holding the public hearing and written comment period during the local, state and

national COVID-19 pandemic, coupled with demonstrations around racial injustice that have rocked Chicago and the nation. During this time, it is absurd to expect the residents of this overburdened community – residents who are struggling to protect themselves and their families from disease, layoffs, racial injustice and literally bullets in their streets – to be able meaningfully to participate in a permit process. This non-inclusive process has a clear impact on an environmental justice community and requires IEPA to step back from issuing a permit until true community participation is made possible.

Further, the Draft Permit is legally insufficient and thus fails to protect both the community and the environment. Key shortcomings of the Draft Permit include:

- 1. In addition to the problematic public participation process described above, IEPA's broader permitting action will result in significant, disproportionate impacts on communities of color and other protected classes, in violation of federal and state civil rights laws.
- 2. The permit application is an inadequate basis for permit review and is incomplete. General Iron's current facility experienced an explosion that caused significant damage to the facility and equipment in use there. The permit application represents that this equipment will be relocated to and used at the 11600 S. Burley Avenue site. The transfer of any equipment that can cause this kind of catastrophic failure requires that the permit application be revised to address risks related the proposed use of any equipment, its control efficiency, and the applicant's ability to operate the equipment safely and effectively. Further, existing emission estimates and air quality models do not account for emissions during periods of catastrophic failure and also must be revised. And, additional permit terms and conditions are clearly necessary to prevent future accidents and to ensure the integrity of the equipment and the applicant's operating systems.
- 3. Both companies involved in the GIII facility have long histories of environmental noncompliance, including on issues directly relevant to this permitting process. IEPA has the statutory authority under 415 ILCS 5/39(a) and relevant case law to consider these compliance histories in deciding both whether to grant a permit and whether to require stringent permit conditions. The companies' history of noncompliance consists of numerous adjudicated violations from the Chicago Department of Public Health ("CDPH") and the Chicago Department of Administrative Hearings; 32 currently pending NOVs from CDPH since this past winter (whose hearings have been delayed due to COVID-19) against General Iron on uncontrolled shredder emissions, visible emissions beyond the fenceline, other fugitive dust issues, and ASR dispersal into the community; CDPH and potentially other agency actions around the explosion on May 18; U.S. EPA's multiple enforcement actions against General Iron; IEPA's NOV against several Reserve Management Group ("RMG") facilities at 11600 S. Burley for failing to obtain required permits, violations that the companies voluntarily admitted to in order to obtain enforcement protections; and even more numerous CDPH inspection reports and community complaints, which detail a range of failings on both air and other environmental matters at both General Iron and the RMG facilities..
- 4. The Draft Permit is based on artificially high control assumptions and underestimated emissions from the hammermill shredder. There is substantial evidence of uncontrolled emissions from the shredder in its current location, including with the hood/RTO set-up. These

shortcomings are exacerbated by weak testing and monitoring requirements that omit continuous monitoring, FLIR and other options.

- 5. The Draft Permit fails in-fact to treat GIII and the RMG facilities already located at 11600 S. Burley Avenue as a "single source" for Clean Air Act purposes, instead bifurcating the permitting into two separate tracts (the construction permit for GIII and a FESOP for the RMG facilities), without consideration of the RMG facilities in the Potential to Emit or air quality modeling of the proposed GIII.
- 6. The Draft Permit is, in reality, unenforceable in critical respects. Numerous permit limits, in particular on fugitive sources, are vague, require only weak or nonexistent testing or monitoring, and/or require insufficient recordkeeping, with virtually no mandated reporting.
- 7. Emissions limitations in the Draft Permit are based on underestimated emissions of air pollutants, developed from self-serving models submitted by the regulated companies. Likewise, the permit is based on artificially high control assumptions and greatly underestimated emissions for a range of fugitive sources including paved roads, vehicle loading/unloading, and piles).
- 8. The Draft Permit fails to prevent the dispersal of auto shredder residue (a/k/a ASR or auto fluff), despite ASR's potentially hazardous characteristics and significant evidence of ASR being blown into communities surrounding metals recycling facilities.
- 9. The Draft Permit improperly assesses emissions from torch cutting and fails entirely to propose controls for torch cutting, an activity that is associated with substantial emissions of heavy metals and has been identified as the source of increased cancer risk at some metals recycling facilities.
- 10. The Draft Permit is based on deficient air quality modeling. The modeling assumes exceptionally high and artificial levels of control, given the shortcomings set out above; it also omits the co-located, unpermitted sources already operating at 11600 S. Burley as well as other known nearby sources of fugitive air toxics; fails to justify employing Wisconsin's air toxics rules versus other available state approaches; and omits PM10 modeling altogether.
- 11. The Draft Permit fails to protect air quality for recreators and other users of the Calumet River. In addition to the failure to protect homes, schools and parks, the permit terms do not sufficiently protect ambient air quality over the Calumet River to the immediate West of the proposed facility, which is used for recreational and other activities.

For the reasons stated, Illinois EPA must deny the permit application. Further, if a permit is issued, the numerous deficiencies of the Draft Permit described above must be addressed.

Sincerely,

Alliance for the Great Lakes Alliance of the Southeast (ASE) Center for Neighborhood Technology Chicago Audubon Society Climate Reality Project Crossroads Collaborative

Elevate Energy

Environmental Law and Policy Center

Faith in Place Action Fund

Friends of the Chicago River

Friends of the Forest Preserve

Illinois Environmental Council

IL Poor People's Campaign: National Call for a Moral Revival

Little Village Environmental Justice Network

Metropolitan Planning Council

Midwest SOARRING Foundation

Neighbors for Environmental Justice

Natural Resources Defense Council

Nuclear Energy Information Service (NEIS)

Openlands

People For Community Recovery

Respiratory Health Association

Shared-Use Mobility Center

Sierra Club

Southeast Environmental Task Force

Southeast Side Coaltion to Ban Petcoke

Southeast Youth Alliance

The Wetlands Initiative

Exhibit 215

From: Guy, Jeff on behalf of EPA.PublicHearingCom

To: John Pinion

Subject: RE: Corrected Comment Letter from RKA for General III written responses

Date: Tuesday, June 16, 2020 12:57:21 PM

Attachments: image002.png

Mr. Pinion,

The additional email and corrected document will be included with the original information sent (all as one exhibit).

Thanks,

Jeffrey J. Guy

Hearing Officer, Illinois Environmental Protection Agency Office of Community Relations (217) 785-8724 Jeff.Guy@illinois.gov



From: John Pinion <jpinion@rka-inc.com> **Sent:** Tuesday, June 16, 2020 10:55 AM To: Guy, Jeff <Jeff.Guy@Illinois.gov>

Cc: Zwick, Ann M. <azwick@freeborn.com>

Subject: [External] Corrected Comment Letter from RKA for General III written responses



Jeff,

Attached is a correct version of the letter I sent you last evening.

In the letter sent last evening, there was a phrase highlight in yellow that appeared on Page 5 in the second paragraph to a response from a verbal comments from Meleah Geertsma from NRDC.

The highlighted phrase indicates that material discharged from the hammermill was saturated with water.

General III representative felt that it would be more accurate to describe the material as "having a high moisture content" rather than being 'saturated with water."

I failed to make this change prior to sending you the letter last evening.

Please accept the attached letter which includes this minor correction. I hope you will be able to accept this corrected letter to ensure accuracy in the record documents for this project.

Thank you.

If you have any questions, please do not hesitate to contact me.

Regards, John Pinion

RK & Associates, Inc.

2 South 631 Route 59, Suite B Warrenville, Illinois 60555 Phone: 630-393-9000 x 208

Fax: 630-393-9111 Cell: 630-917-1455

E-mail: jpinion@rka-inc.com

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 From:
 John Pinion

 To:
 Guy, Jeff

 Cc:
 Zwick, Ann M.

Subject: [External] Corrected Comment Letter from RKA for General III written responses

Date: Tuesday, June 16, 2020 10:56:33 AM

Attachments: 2020-06-15 GIII Response to IEPA Modeling Report and select verbal comments.pdf



Jeff.

Attached is a correct version of the letter I sent you last evening.

In the letter sent last evening, there was a phrase highlight in yellow that appeared on Page 5 in the second paragraph to a response from a verbal comments from Meleah Geertsma from NRDC.

The highlighted phrase indicates that material discharged from the hammermill was saturated with water.

General III representative felt that it would be more accurate to describe the material as "having a high moisture content" rather than being 'saturated with water."

I failed to make this change prior to sending you the letter last evening.

Please accept the attached letter which includes this minor correction. I hope you will be able to accept this corrected letter to ensure accuracy in the record documents for this project.

Thank you.

If you have any questions, please do not hesitate to contact me.

Regards,

John Pinion

RK & Associates, Inc.

2 South 631 Route 59, Suite B Warrenville, Illinois 60555 Phone: 630-393-9000 x 208

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E-mail: jpinion@rka-inc.com

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June 15, 2020

VIA EMAIL jeff.guy@illinois.gov

Mr. Jeff Guy, Hearing Officer Illinois Environmental Protection Agency P.O. Box 19276 1021 North Grand Avenue Springfield, IL 62794-9276

Written Comments on Draft Construction Permit 19090021 General III, LLC - 11600 South Burley - Chicago, Illinois Site ID No. 031600SFX

Dear Mr. Guy:

RK & Associates, Inc. (RKA) is submitting these written comments on the General III, LLC (GIII) draft construction permit, permit number 19090021, to address dispersion modeling questions raised during the public hearing on May 14, 2020 and to discuss the Illinois Environmental Protection Agency (IEPA) modeling Memorandum from Jeffrey Sprague to German Barria dated March 2, 2020 (Modeling Memorandum).

The IEPA requested air quality modeling of hazardous air pollutant (HAP) metal emissions from the proposed General III facility in support of the construction permit application. RKA performed the modeling in accordance with USEPA modeling guidance and incorporating additional modeling directives from IEPA. A final modeling analysis was submitted to IEPA on February 12, 2020. Predicted modeled concentrations were compared against the National Ambient Air Quality Standard (NAAQS) for lead, and for other metals against the Agency for Toxic Substances and Disease Registry (ATSDR) risk levels and Wisconsin Department of Natural Resources (WDNR) air toxics rule NR 445. Predicted concentrations for all metals were well below the identified limits. For carcinogenic substances, the inhalation risk was calculated using established USEPA or California Air Resource Board unit risk factors. Estimated risk levels for all carcinogenic substances were less than 1 in 1,000,000.

Comments to IEPA Modeling Memorandum dated March 2, 2020.

Page 3, Table 2 – Summary of Predicted Lead (Pb) Air Quality Impacts
 IEPA's independent modeling showed a maximum predicted concentration and location for Lead that is identical to what was reported in GIII's modeling report.



Page 3, Table 3 – Summary of Predicted Manganese (Mn) Air Quality Impacts

IEPA's independent modeling showed a maximum predicted off-site 24-hour concentration of Manganese that was identical to the value identified in GIII's modeling report. IEPA's independent modeling showed a maximum predicted off-site annual concentration of Manganese that was slightly lower than the value identified in GIII's modeling report. The predicted locations of the maximum 24-hour average and annual concentrations were identical to the values identified in GIII's modeling report.

 Page 4, Table 4 – Maximum Predicted 24-Hour Concentrations of Selected Metal HAPs and Related Health Standards

IEPA's independent modeling showed predicted maximum 24-hour average concentrations for select HAP metals other than Lead and Manganese that were identical to the values reported in GIII's modeling report. The predicted locations of IEPA's maximum predicted 24-hour average impacts were essentially the same as the locations reported in GIII's modeling reports.

 Page 4, Table 5 – Maximum Predicted Annual Concentrations of Selected Metal HAPs and Related Health Standards

IEPA's independent modeling showed predicted maximum annual average concentrations for select HAP metals other than Lead (Pb) and Manganese (Mn) that were slightly lower than values reported in GIII's modeling report. The predicted locations of IEPA's maximum predicted annual average impacts were essentially the same as the locations reported in GIII's modeling reports.

 Page 5, Remarks and Recommendations – Modeling Other Metal HAPs from Offsite Sources -First Dot-Point entry

IEPA confirms that the GIII modeling was performed consistent with IEPA requirements and was focused on Pb and Mn emissions. The report states that a more exhaustive modeling assessment would have included emissions of the other selected metals (other than Pb and Mn) from offsite sources, if available.

This is an observation that could be applied to any modeling assessment because there is often more data that could be evaluated if it were readily available. For this modeling exercise, IEPA provided emission inventory data identifying the emission rates, emission point locations, and emission point characteristics required for modeling for other nearby sources with permitted Pb



and Mn emission limits only. IEPA did not have corresponding emission inventory data for offsite emissions of other metals; therefore, offsite emissions of other metals could not be included in the modeling analysis. Off-site sources of the other metals are not readily identifiable as there are no specific metal permit limits for permitted sources. In addition, the model requires emission rates, exact coordinates of the source, and emission point characteristics, including stack height and diameter, exhaust flow rate and temperature, which are also not readily available.

Furthermore, there are no potential major emitters of these metals in the area. Small emissions will only have minimal, localized impact close to the emission source, as metal particles tend to settle quickly to the ground and are not being carried off-site. Adding those sources to the modeling, even if possible, would refine the model insignificantly without resulting in detectable impact.

Page 5, Remarks and Recommendations – Ambient Air Boundaries –
 Second Dot-Point entry

GIII has committed to implementing improvements to the ambient air boundary as agreed to by IEPA prior to permit issuance.

 Page 5, Remarks and Recommendations - Hours of Operation – Third Dot-Point entry

GIII modeled emissions for only the anticipated hours of operation identified in Table 1 of IEPA's memorandum. The modeled hourly emission rate (lb/hr) for each emission source at the plant was calculated to be representative of the maximum hourly operating rate of the equipment. This is a very conservative approach because the annual throughput limit for each process is based on an average material throughput; however, the modeling assumes that each emission unit operates at its maximum capacity during each hour of operation. Based on this approach, the assumed emission rates used for modeling were at least 1.75 times higher than the corresponding emission rates requested in the construction permit application. The results of the modeling showed that even these unrealistically high emission rates, the predicted offsite metals impacts were less than the identified standards.

The model was performed using five years of meteorological data that was preprocessed following IEPA recommendations. The model restricts emissions from the sources outside of their operating schedule, i.e. if the source is not operating, there are no emissions, but it does not exclude meteorological data. Because the permit restricts the hours of operation of emission units, modeling based on these hours of operation represent the worse case scenario with respect to emissions and the resulting predicted 24-hour and annual offsite concentrations.



We believe the modeling performed by GIII accurately represents the operating hours identified in Table 1.

 Page 5, Remarks and Recommendations – GIII Roadway Emissions – Fourth Dot-Point entry

The roadway fugitive emissions calculations from vehicle traffic includes all types of haul trucks, including small truck deliveries by "peddlers." The number and size of vehicles modeled reasonably represents anticipated plant vehicle traffic. The model also includes all anticipated vehicle paths.

GIII has developed a Fugitive Particulate Operating Program that identifies that vehicle rumble strips will be installed at the exit of the outgoing scale to prevent or minimize material track out. As a result, material track out is anticipated to be negligible and associated emissions of HAP metals will be insignificant.

The vast majority of employees will park in a lot located outside of the ambient air boundary established for modeling, east of the railroad tracks and adjacent to 116th Street. Therefore, employee vehicles will not routinely enter the facility. Due to the slow vehicle speeds in the parking lot and the low travel distances from the extent of the parking area to 116th Street, emissions from employee vehicles are anticipated to be negligible.

 Page 5, Remarks and Recommendations – SCPM Metal Emissions -Fifth Dot-Point entry

GIII modeling was conducted in accordance with USEPA published guidance and directives from IEPA. Modeling was limited to operations covered under the draft GIII construction permit. Additional (non GIII) sources included in the model and their emission rates and modeling parameters were provided by IEPA. Metal emissions from existing South Chicago Property Management (SCPM) entities (SCPM Entities) were not available at the time GIII modeling was performed.

IEPA recently confirmed that the SCPM Entities, as a whole, continue to qualify for eligibility under the Registration of Smaller Sources (ROSS) program. Sources are eligible for the ROSS program if combined actual emissions of PM, CO, NOx, VOM and SO2 from non-exempt sources are less than 5.0 tons per year, or less than 10 tons over the two most recent years and total hazardous air pollutant (HAP) emissions are less than 0.50 tons per year.



Combined emissions of PM, CO, NOx, VOM and SO2 from the SCPM Entities' ROSS affected sources were less than 0.5 tpy annually from 2012 (the year the ROSS Program was established) through 2019. During this same period, metal HAP emissions from the SCPM Entities' ROSS affected sources were less than 0.1 tons annually.

ROSS sources are not required to obtain construction and operating permits until actual emissions exceed these thresholds. ROSS sources must track actual emissions to verify their eligibility for the ROSS program annually, however, they are not required to submit emissions data to the IEPA. For these reasons, the SCPM Entities do not have permitted emission limits that can be modeled and emissions data for selected HAP compounds are not identified in IEPA emissions inventories.

Although the SCPM Entities were not directly included in the modeling analysis, ambient air impacts from these operations are accounted for in the background monitoring values at the IEPA's monitoring station at Washington High School.

In addition, the construction of GIII will increase the number of paved roads at the SCPM industrial campus and will result in significant reduction of the number of miles traveled on unpaved roads at the existing facilities. These road improvements are expected to reduce roadway emissions from SCPM operations by as much as 44%.

<u>Comments to Verbal Modeling Questions Raised at the General III Draft Permit Public Hearing on May 14, 2020.</u>

Meleah Geertsma, Senior Attorney, NRDC.

Ms. Geertsma commented during the public hearing that GIII did not assess the cumulative impact of metal and toxics on the area. GIII modeling was performed to address air quality impacts in the area under the directive of IEPA. Air quality impacts were shown to be within the established health standards. GIII's proposed facility does not trigger the requirements to assess cumulative impacts, as described under the National Environmental Policy Act (NEPA).

Meleah Geertsma, Senior Attorney, NRDC.

Ms. Geertsma commented during the public hearing that GIII did not describe the proposed new source along with the four SCPM Entities as a single source for permitting purposes. GIII clearly stated in its permit application that the existing SCPM Entities will be a single source with GIII. Based on discussions with IEPA, GIII and the SCPM Entities will be required to separately obtain



Federally Enforceable State Operating Permits (FESOPs) that will incorporate site-wide emission limits and corresponding conditions. Single source issues are typically addressed as part of the operating permit application process.

Meleah Geertsma, Senior Attorney, NRDC.

Ms. Geertsma commented during the public hearing that GIII did not consider the impact of all sources of pollutants and assumed control levels that it cannot meet. GIII modeling accounted for all sources at the facility, which includes emissions from the metal shredder, conveyors, separators, storage piles and roadway traffic. Manufacturer-guaranteed control efficiencies are used to estimate emissions from point sources, which is standard practice. In fact, the RTO that will be used at GIII was installed and tested at GII and the measured VOM destruction efficiency of 99% exceeded the manufacturer guaranteed efficiency of 98%.

Due to the lack of published USEPA emission factors for material handling operations at metal shredding facilities, the metal recycling industry typically uses surrogate emission factors from a list of published emission factors for crushed stone processing. Using these surrogate emission factors results in conservative estimates of particulate matter emissions because the material processed through a hammermill has a high moisture content, thereby greatly reducing the potential for particulate matter emissions from the downstream ferrous material processing operations. Moreover, roadway dust emissions will be controlled by applying appropriate dust suppressant options as described in the Fugitive Particulate Operating Program. Therefore, all of the GIII source emissions have been considered and the emissions have been conservatively estimated.

• Kiana Courtney, Associate Attorney, ELPC.

Ms. Courtney commented that GIII did not consider the cumulative impact in the community and the impact of the existing operations at the site. As discussed above, cumulative impact analysis was not required for this project. GIII performed air dispersion modeling in support of the air construction permit application and demonstrated that the air impact will not exceed any established standards. Metal emissions from the existing SCPM Entities were not available at the time GIII modeling was performed. However, as stated above, ambient impacts from these operations are already accounted for in the background monitoring values at the IEPA's monitoring station at Washington High School.



• Peggy Salazar, Executive Director, Southeast Environmental Task Force and lifelong resident.

Ms. Salazar stated that she was concerned that diesel trucks were not included in the pollution assessment and that truck traffic will increase additionally because of the seven warehouses that are coming to the area. The construction permit application only includes emissions from stationary sources and roadway emission within site boundaries. GIII is not required by the air permitting process to address off-site or on-site emissions from mobile sources. GIII's proposed operations are not related to the warehouses that are being added in the area and is not responsible for the traffic associated with them.

If you have any questions need any additional information, please don't hesitate to contact me at 630-393-9000 or by e-mail at <u>ipinion@rka-inc.com</u>.

Sincerely,

RK & Associates, Inc.

John G. Pinion Principal Engineer From: Guy, Jeff on behalf of EPA.PublicHearingCom

To: <u>John Pinion</u>

Subject: RE: RKA Comments on IEPA Modeling Report and Select Verbal Comments

Date: Tuesday, June 16, 2020 12:55:22 PM

Attachments: image002.png

Mr. Pinion,

Thank you for your comments, which will be included as an exhibit with the hearing record. The Agency will prepare a responsiveness summary that will include a summary of all the views, significant comments, criticisms, and suggestions - in addition to the Agency's specific response and final action. You will be notified of the final decision in this matter and of the availability of the responsiveness summary.

Thanks,

Jeffrey J. Guy

Hearing Officer, Illinois Environmental Protection Agency Office of Community Relations (217) 785-8724

Jeff.Guy@illinois.gov



From: John Pinion <jpinion@rka-inc.com> **Sent:** Monday, June 15, 2020 9:24 PM **To:** Guy, Jeff <Jeff.Guy@Illinois.gov>

Cc: Zwick, Ann M. <azwick@freeborn.com>

Subject: [External] RKA Comments on IEPA Modeling Report and Select Verbal Comments



Mr. Guy,

Please find attached comments submitted on behalf of General III, LLC, responding to an IEPA report on the GIII Modeling analysis submitted by RKA and to select verbal comments made during the public hearing.

We requested that these response be entered into the pubic records for this project.

If you have any questions, please do not hesitate to contact me.

Regards, John Pinion

RK & Associates, Inc.

2 South 631 Route 59, Suite B Warrenville, Illinois 60555 Phone: 630-393-9000 x 208

Fax: 630-393-9111 Cell: 630-917-1455

E-mail: jpinion@rka-inc.com

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 From:
 John Pinion

 To:
 Guy, Jeff

 Cc:
 Zwick, Ann M.

Subject: [External] RKA Comments on IEPA Modeling Report and Select Verbal Comments

Date: Monday, June 15, 2020 9:24:09 PM

Attachments: 2020-06-15 GIII Response to IEPA Modeling Report and select verbal comments.pdf



Mr. Guy,

Please find attached comments submitted on behalf of General III, LLC, responding to an IEPA report on the GIII Modeling analysis submitted by RKA and to select verbal comments made during the public hearing.

We requested that these response be entered into the pubic records for this project.

If you have any questions, please do not hesitate to contact me.

Regards,

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June 15, 2020

VIA EMAIL jeff.guy@illinois.gov

Mr. Jeff Guy, Hearing Officer Illinois Environmental Protection Agency P.O. Box 19276 1021 North Grand Avenue Springfield, IL 62794-9276

Written Comments on Draft Construction Permit 19090021 General III, LLC - 11600 South Burley - Chicago, Illinois Site ID No. 031600SFX

Dear Mr. Guy:

RK & Associates, Inc. (RKA) is submitting these written comments on the General III, LLC (GIII) draft construction permit, permit number 19090021, to address dispersion modeling questions raised during the public hearing on May 14, 2020 and to discuss the Illinois Environmental Protection Agency (IEPA) modeling Memorandum from Jeffrey Sprague to German Barria dated March 2, 2020 (Modeling Memorandum).

The IEPA requested air quality modeling of hazardous air pollutant (HAP) metal emissions from the proposed General III facility in support of the construction permit application. RKA performed the modeling in accordance with USEPA modeling guidance and incorporating additional modeling directives from IEPA. A final modeling analysis was submitted to IEPA on February 12, 2020. Predicted modeled concentrations were compared against the National Ambient Air Quality Standard (NAAQS) for lead, and for other metals against the Agency for Toxic Substances and Disease Registry (ATSDR) risk levels and Wisconsin Department of Natural Resources (WDNR) air toxics rule NR 445. Predicted concentrations for all metals were well below the identified limits. For carcinogenic substances, the inhalation risk was calculated using established USEPA or California Air Resource Board unit risk factors. Estimated risk levels for all carcinogenic substances were less than 1 in 1,000,000.

Comments to IEPA Modeling Memorandum dated March 2, 2020.

■ Page 3, Table 2 – Summary of Predicted Lead (Pb) Air Quality Impacts

IEPA's independent modeling showed a maximum predicted concentration and location for Lead that is identical to what was reported in GIII's modeling report.



Page 3, Table 3 – Summary of Predicted Manganese (Mn) Air Quality Impacts

IEPA's independent modeling showed a maximum predicted off-site 24-hour concentration of Manganese that was identical to the value identified in GIII's modeling report. IEPA's independent modeling showed a maximum predicted off-site annual concentration of Manganese that was slightly lower than the value identified in GIII's modeling report. The predicted locations of the maximum 24-hour average and annual concentrations were identical to the values identified in GIII's modeling report.

 Page 4, Table 4 – Maximum Predicted 24-Hour Concentrations of Selected Metal HAPs and Related Health Standards

IEPA's independent modeling showed predicted maximum 24-hour average concentrations for select HAP metals other than Lead and Manganese that were identical to the values reported in GIII's modeling report. The predicted locations of IEPA's maximum predicted 24-hour average impacts were essentially the same as the locations reported in GIII's modeling reports.

 Page 4, Table 5 – Maximum Predicted Annual Concentrations of Selected Metal HAPs and Related Health Standards

IEPA's independent modeling showed predicted maximum annual average concentrations for select HAP metals other than Lead (Pb) and Manganese (Mn) that were slightly lower than values reported in GIII's modeling report. The predicted locations of IEPA's maximum predicted annual average impacts were essentially the same as the locations reported in GIII's modeling reports.

 Page 5, Remarks and Recommendations – Modeling Other Metal HAPs from Offsite Sources -First Dot-Point entry

IEPA confirms that the GIII modeling was performed consistent with IEPA requirements and was focused on Pb and Mn emissions. The report states that a more exhaustive modeling assessment would have included emissions of the other selected metals (other than Pb and Mn) from offsite sources, if available.

This is an observation that could be applied to any modeling assessment because there is often more data that could be evaluated if it were readily available. For this modeling exercise, IEPA provided emission inventory data identifying the emission rates, emission point locations, and emission point characteristics required for modeling for other nearby sources with permitted Pb



and Mn emission limits only. IEPA did not have corresponding emission inventory data for offsite emissions of other metals; therefore, offsite emissions of other metals could not be included in the modeling analysis. Off-site sources of the other metals are not readily identifiable as there are no specific metal permit limits for permitted sources. In addition, the model requires emission rates, exact coordinates of the source, and emission point characteristics, including stack height and diameter, exhaust flow rate and temperature, which are also not readily available.

Furthermore, there are no potential major emitters of these metals in the area. Small emissions will only have minimal, localized impact close to the emission source, as metal particles tend to settle quickly to the ground and are not being carried off-site. Adding those sources to the modeling, even if possible, would refine the model insignificantly without resulting in detectable impact.

Page 5, Remarks and Recommendations – Ambient Air Boundaries –
 Second Dot-Point entry

GIII has committed to implementing improvements to the ambient air boundary as agreed to by IEPA prior to permit issuance.

 Page 5, Remarks and Recommendations - Hours of Operation – Third Dot-Point entry

GIII modeled emissions for only the anticipated hours of operation identified in Table 1 of IEPA's memorandum. The modeled hourly emission rate (lb/hr) for each emission source at the plant was calculated to be representative of the maximum hourly operating rate of the equipment. This is a very conservative approach because the annual throughput limit for each process is based on an average material throughput; however, the modeling assumes that each emission unit operates at its maximum capacity during each hour of operation. Based on this approach, the assumed emission rates used for modeling were at least 1.75 times higher than the corresponding emission rates requested in the construction permit application. The results of the modeling showed that even these unrealistically high emission rates, the predicted offsite metals impacts were less than the identified standards.

The model was performed using five years of meteorological data that was preprocessed following IEPA recommendations. The model restricts emissions from the sources outside of their operating schedule, i.e. if the source is not operating, there are no emissions, but it does not exclude meteorological data. Because the permit restricts the hours of operation of emission units, modeling based on these hours of operation represent the worse case scenario with respect to emissions and the resulting predicted 24-hour and annual offsite concentrations.



We believe the modeling performed by GIII accurately represents the operating hours identified in Table 1.

 Page 5, Remarks and Recommendations – GIII Roadway Emissions – Fourth Dot-Point entry

The roadway fugitive emissions calculations from vehicle traffic includes all types of haul trucks, including small truck deliveries by "peddlers." The number and size of vehicles modeled reasonably represents anticipated plant vehicle traffic. The model also includes all anticipated vehicle paths.

GIII has developed a Fugitive Particulate Operating Program that identifies that vehicle rumble strips will be installed at the exit of the outgoing scale to prevent or minimize material track out. As a result, material track out is anticipated to be negligible and associated emissions of HAP metals will be insignificant.

The vast majority of employees will park in a lot located outside of the ambient air boundary established for modeling, east of the railroad tracks and adjacent to 116th Street. Therefore, employee vehicles will not routinely enter the facility. Due to the slow vehicle speeds in the parking lot and the low travel distances from the extent of the parking area to 116th Street, emissions from employee vehicles are anticipated to be negligible.

 Page 5, Remarks and Recommendations – SCPM Metal Emissions -Fifth Dot-Point entry

GIII modeling was conducted in accordance with USEPA published guidance and directives from IEPA. Modeling was limited to operations covered under the draft GIII construction permit. Additional (non GIII) sources included in the model and their emission rates and modeling parameters were provided by IEPA. Metal emissions from existing South Chicago Property Management (SCPM) entities (SCPM Entities) were not available at the time GIII modeling was performed.

IEPA recently confirmed that the SCPM Entities, as a whole, continue to qualify for eligibility under the Registration of Smaller Sources (ROSS) program. Sources are eligible for the ROSS program if combined actual emissions of PM, CO, NOx, VOM and SO2 from non-exempt sources are less than 5.0 tons per year, or less than 10 tons over the two most recent years and total hazardous air pollutant (HAP) emissions are less than 0.50 tons per year.



Combined emissions of PM, CO, NOx, VOM and SO2 from the SCPM Entities' ROSS affected sources were less than 0.5 tpy annually from 2012 (the year the ROSS Program was established) through 2019. During this same period, metal HAP emissions from the SCPM Entities' ROSS affected sources were less than 0.1 tons annually.

ROSS sources are not required to obtain construction and operating permits until actual emissions exceed these thresholds. ROSS sources must track actual emissions to verify their eligibility for the ROSS program annually, however, they are not required to submit emissions data to the IEPA. For these reasons, the SCPM Entities do not have permitted emission limits that can be modeled and emissions data for selected HAP compounds are not identified in IEPA emissions inventories.

Although the SCPM Entities were not directly included in the modeling analysis, ambient air impacts from these operations are accounted for in the background monitoring values at the IEPA's monitoring station at Washington High School.

In addition, the construction of GIII will increase the number of paved roads at the SCPM industrial campus and will result in significant reduction of the number of miles traveled on unpaved roads at the existing facilities. These road improvements are expected to reduce roadway emissions from SCPM operations by as much as 44%.

<u>Comments to Verbal Modeling Questions Raised at the General III Draft Permit Public Hearing on May 14, 2020.</u>

Meleah Geertsma, Senior Attorney, NRDC.

Ms. Geertsma commented during the public hearing that GIII did not assess the cumulative impact of metal and toxics on the area. GIII modeling was performed to address air quality impacts in the area under the directive of IEPA. Air quality impacts were shown to be within the established health standards. GIII's proposed facility does not trigger the requirements to assess cumulative impacts, as described under the National Environmental Policy Act (NEPA).

Meleah Geertsma, Senior Attorney, NRDC.

Ms. Geertsma commented during the public hearing that GIII did not describe the proposed new source along with the four SCPM Entities as a single source for permitting purposes. GIII clearly stated in its permit application that the existing SCPM Entities will be a single source with GIII. Based on discussions with IEPA, GIII and the SCPM Entities will be required to separately obtain



Federally Enforceable State Operating Permits (FESOPs) that will incorporate site-wide emission limits and corresponding conditions. Single source issues are typically addressed as part of the operating permit application process.

Meleah Geertsma, Senior Attorney, NRDC.

Ms. Geertsma commented during the public hearing that GIII did not consider the impact of all sources of pollutants and assumed control levels that it cannot meet. GIII modeling accounted for all sources at the facility, which includes emissions from the metal shredder, conveyors, separators, storage piles and roadway traffic. Manufacturer-guaranteed control efficiencies are used to estimate emissions from point sources, which is standard practice. In fact, the RTO that will be used at GIII was installed and tested at GII and the measured VOM destruction efficiency of 99% exceeded the manufacturer guaranteed efficiency of 98%.

Due to the lack of published USEPA emission factors for material handling operations at metal shredding facilities, the metal recycling industry typically uses surrogate emission factors from a list of published emission factors for crushed stone processing. Using these surrogate emission factors results in conservative estimates of particulate matter emissions because the material processed through a hammermill shredder is saturated with water, thereby greatly reducing the potential for particulate matter emissions from the downstream ferrous material processing operations. Moreover, roadway dust emissions will be controlled by applying appropriate dust suppressant options as described in the Fugitive Particulate Operating Program. Therefore, all of the GIII source emissions have been considered and the emissions have been conservatively estimated.

Kiana Courtney, Associate Attorney, ELPC.

Ms. Courtney commented that GIII did not consider the cumulative impact in the community and the impact of the existing operations at the site. As discussed above, cumulative impact analysis was not required for this project. GIII performed air dispersion modeling in support of the air construction permit application and demonstrated that the air impact will not exceed any established standards. Metal emissions from the existing SCPM Entities were not available at the time GIII modeling was performed. However, as stated above, ambient impacts from these operations are already accounted for in the background monitoring values at the IEPA's monitoring station at Washington High School.



Peggy Salazar, Executive Director, Southeast Environmental Task Force and lifelong resident.

Ms. Salazar stated that she was concerned that diesel trucks were not included in the pollution assessment and that truck traffic will increase additionally because of the seven warehouses that are coming to the area. The construction permit application only includes emissions from stationary sources and roadway emission within site boundaries. GIII is not required by the air permitting process to address off-site or on-site emissions from mobile sources. GIII's proposed operations are not related to the warehouses that are being added in the area and is not responsible for the traffic associated with them.

If you have any questions need any additional information, please don't hesitate to contact me at 630-393-9000 or by e-mail at <u>ipinion@rka-inc.com</u>.

Sincerely,

RK & Associates, Inc.

John G. Pinion Principal Engineer

Exhibit 216

From: Guy, Jeff on behalf of EPA.PublicHearingCom

To: <u>Ted Stalnos</u>

Subject: RE: [External] Letter regarding public hearing Illinois EPA

Date: Tuesday, June 16, 2020 1:23:18 PM

Attachments: <u>image001.png</u>

Mr. Stalnos,

Thank you for your comments, which will be included as an exhibit with the hearing record. The Agency will prepare a responsiveness summary that will include a summary of all the views, significant comments, criticisms, and suggestions - in addition to the Agency's specific response and final action. You will be notified of the final decision in this matter and of the availability of the responsiveness summary.

Thanks,

Jeffrey J. Guy

Hearing Officer, Illinois Environmental Protection Agency Office of Community Relations (217) 785-8724

Jeff.Guy@illinois.gov



From: Ted Stalnos <ted@calumetareaindustrial.com>

Sent: Monday, June 15, 2020 11:33 PM

To: EPA.PublicHearingCom <EPA.PublicHearingCom@Illinois.gov>

Cc: Hal Tolin <HalTolin@reserve-group.com>

Subject: [External] Letter regarding public hearing Illinois EPA

Please see the attachment regarding public hearing.

__

Ted Stalnos President & CEO
Calumet Area Industrial Commission
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"Connecting Industry to Growth"



June 15, 2020

Mr. Jeff Guy
Hearing Officer
Illinois EPA
Jeff.Guy@illinois.gov
epa.publichearingcom@illinois.gov

Mr. Guy:

On behalf of the Calumet Industrial Commission a not-for-profit established in 1967 I wish to express our support for Reserve Management Group and the construction of General III, LLC at 11600 S. Burley Avenue in Chicago.

The metals recycling industry is key to keeping unwanted and unused metals out of landfills and reduce the need for virgin materials in the manufacturing of new products. The CAIC is a strong supporter of recycling and the recycling of metals is key to the steel industry. CAIC is a membership organization with members producing steel locally in the Calumet Area which is then used by other members to build their products. These industries employ thousands of workers in the region. Most employees of these industries are unionized earning livable wages with benefits.

The CAIC operates a no cost, no fee Workforce Center that Reserve Management group has utilized in the past to hire local residents. We are sure that we will receive future job orders when the need arises. We look forward to referring qualified local job seekers to them. Needless to say, keeping employers in Southeast Chicago is critical at this time to our local economy.

We urge the Illinois EPA to support this new expansion for the inherent economic benefits and for the less obvious benefit of supplying the steel industry also critical to economic vitality of the Calumet Area.

Sincerely,

Ted Stalnos
President/CEO

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