



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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## MEMORANDUM

**DATE:** October 18, 2011

**TO:** Bob Smet, Construction Unit, Permits/BOA

**FROM:** Matthew Will, Modeling Unit, AQPS/BOA *MW*

**SUBJECT:** Environmental Justice Assessment Report Submitted by Universal Cement, Inc., (State ID 031600GVX, Permit Application #08120011)

Universal Cement, Inc. submitted to Illinois EPA a permit application with an accompanying air quality analysis for a proposed Portland cement production facility on the south side of Chicago. The Illinois EPA reviewed the air quality analysis and determined that the modeling methodology and results were acceptable. The air quality analysis included an "additional impacts analysis" which, among other things, considered impacts to soils and vegetation. Universal Cement recently has supplemented its application with a document entitled Environmental Justice Assessment for Illinois Environmental Protection Agency PSD Permit Application (October 2011). The document which was prepared by Gossman Consulting of Maquoketa, Iowa, assesses the possibility of significant adverse air quality impacts on communities characterized by minority and low income populations. The proposed location of the Universal Cement plant is near such communities.

Gossman Consulting has identified those communities, and has relied partly upon the previously submitted PSD air quality analysis in performing its environmental justice assessment. In determining the impact of criteria pollutants in the region, Gossman Consulting used the maximum impact concentrations from the significant impact modeling and then added a recent background concentration from a nearby Illinois EPA monitor, to demonstrate that the air quality in the region would not violate air quality standards. They further demonstrated based upon the modeling performed, that peak impacts will not occur in the Environmental Justice neighborhoods. Gossman Consulting also relied upon the Enhanced Soils and Vegetation Analysis and Ecological Screening Assessment (February 2011) produced by Cambridge Environmental Inc. to affirm that soil and vegetation impacts from emissions of metals, mercury, acids gases, organics, and dioxins and furans as well as SO<sub>2</sub>, NO<sub>x</sub>, CO, PM<sub>10</sub>, sulfuric acid mist, ammonia, hydrogen chloride, and hydrogen fluoride do not exceed recognized and accepted guideline benchmark concentrations or related depositional screening thresholds.

As noted above, elements of an air quality analysis previously reviewed and approved by Illinois EPA were used in the Gossman Consulting report. The report's use of modeling results and air quality data for the purpose of the Environmental Justice assessment are appropriate in demonstrating that no significant adverse impacts will occur.

cc: Chris Romaine, Construction Unit, Permits/BOA  
Rob Kaleel, Section Manager, AQPS/BOA  
Jeff Sprague, Modeling Unit Manager, AQPS/BO