

DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

CITY OF CHICAGO'S GOAL: *Take a whole-government approach to improve and protect the environment, health, and quality of life in environmental justice (EJ) communities through changes to internal policies, processes, practices and/or budgets.*

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Department Name: *Department of Public Health*

Department Scope and Authorities:

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to “encourage and conduct studies, investigations and research, including joint cooperative investigation and research with public and private agencies and organizations, relating to the environmental protection authorities conferred on the Commissioner pursuant to subsection (b) of this section, as the Commissioner may deem advisable and necessary;” and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(12), (c).

Environmental Justice Strategy: **Develop an electronic emission inventory collection tool to ensure up-to-date accounting of all emission sources and controls at permitted facilities.**

CDPH is committed to protecting the health of all Chicagoans, particularly those who live in Environmental Justice Neighborhoods that are disproportionately impacted by air pollution. Community residents have called upon CDPH to improve its capacity to collect and disseminate data for use in land use planning and zoning as well as environmental permitting, monitoring and enforcement. Through input at community meetings and a review of public comments, and as reflected in the Cumulative Impact Assessment “Community Input Summary,” CDPH has heard a call for us to address data gaps in pollution monitoring and be more transparent about how data is being used to hold companies accountable for their community impacts.

To that end, CDPH will develop a database to collect emissions data from facilities subject to the Department’s air pollution control permitting requirements. The database will include a web-based and/or mobile application, as well as detailed technical guidance, to assist applicants in the identification and collection of regulated sources at their facility and in the preparation, validation, and submission of the data to CDPH. To the extent possible, CDPH will try to minimize redundant efforts by facilities already subject to Illinois Environmental Protection Agency’s annual air emissions reporting requirements. Collected data will be made available to the public through a spatial data portal such as the City’s open data portal or ESRI’s ArcGIS Online platform.

The emissions inventory data will allow for the following:

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- More accurate categorization of certificates of operations issued by CDPH
- Better prioritization of CDPH's limited permitting and inspection resources
- Support for the City's Zoning Air Quality Ordinance by allowing cumulative air dispersion and human health risk modeling that inform cumulative air quality and health impacts to surrounding neighborhoods (such modeling is currently difficult or impossible due to the lack of emissions data)
- Identification of contributions from specific sources
- Tracking progress towards emissions reduction goals
- Comparison of emissions across city neighborhoods
- Information for public policy and regulatory decisions

Assembling emissions inventory data is an important step in addressing environmental justice, climate change, and air quality problems. By collecting and analyzing this data, CDPH can better understand the sources of air pollution and develop strategies to reduce emissions.

Supporting Department(s): Assets, Information & Services (AIS)

Impact Measures:

To improve transparency and maximize usage of the data, the emissions inventory will be published on a publicly available website where industry and community stakeholders, as well as researchers, will have access to this information.

Impact indicators may include the following:

- percent-compliance of facilities to this emissions reporting requirements;
- the accuracy, currency, and completeness of the data; and
- the level of utilization of the data by the City, other government agencies, the regulated community, researchers, and the general public.

Related Department Investments & Prior Commitments:

CDPH is in the process of promulgating rules and incorporating special conditions to its air permits to require submission of emissions data from certain facilities. CDPH is also working with a consultant and AIS to pilot the collection of the data using a mobile application and the publishing of the data to a Geographic Information System (GIS) enabled website.

Action Steps	Timeline	Status
Adopted rules for the annual collection of emissions inventory data from aggregate-reprocessing facilities	2022-2023	Completed
Piloting ESRI's Survey 123 application to collect spatially enabled data from aggregate-reprocessing facilities and publishing data to ARCGIS Online.	2023-2024	Ongoing

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Adoption of permit conditions or rules to require larger facilities (Class A1, A2, and B Air Certificate of Operation (C OOs)) to submit emissions inventory data annually	2023-2025	Planned
Adoption of permit conditions or rules to require small facilities (Class C COOs) to submit emissions inventory data annually	2025-2027	Planned
Provide online tool for community to report apparent data inconsistencies or refer non-reporting facilities to CDPH. Provide training to community on the use of the tool.	2025-2027	Planned
Community Input & Response		
Community Input: <i>There was community interest in the use of dispersion modeling to evaluate air quality at EJ areas and having this data be made available to the public. Others also expressed that EJ plans and actions have not been scientifically based. For instance, air monitoring is needed for PM pollution and care must be taken when setting up monitoring locations. With reliable data, air quality concerns and environmental justice plans will have a more concrete evidence base and be able to specify their plans and actions.</i>		
Response to Community Input: <i>No changes were made in response to the comments. However, the emissions inventory will support ongoing dispersion modeling and cumulative impact assessments that will drive more scientific and evidence-based EJ plans and actions.</i>		