

Request for a public hearing on Sims Metal Management ("Sims").

Brad Graves 

Fri 12/31/2021 2:55 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom It May Concern,

I want a **public hearing** in our community so we can voice our opposition to this permit. The City must stop ignoring the health and wellbeing of the people. We are opposed to this permit renewal.

Some of the reasons are listed below:

- ▶ We have more than our fair share of dangerous polluting industries in our communities. One way to reduce pollution is to oppose this renewal.
- ▶ We have the highest rate of asthma among children as well as cancer, heart disease and lung disease among the adults due to the large number of contaminating industries in our communities.
- ▶ The Attorney General has filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines.

Thank you,

Brad Graves

Sims Metal Management

Mary Gonzales <mary@gamaliel.org>

Mon 1/3/2022 4:09 PM

To: envcomments <envcomments@cityofchicago.org>; Allison Arwady <Allison.Arwady@cityofchicago.org>; Maurice Cox <Maurice.Cox@cityofchicago.org>

Cc: Byron Sigcho <Byron.Sigcho@cityofchicago.org>; Theresa McNamara [REDACTED]

[Warning: External email]


City of Chicago:

When will this constant support of polluters in our communities stop? I have become aware that Sims Metal Management is seeking a renewal of their permit to do their polluting hazardous work in our community.

I have lived in Pilsen since 1958. It has always been bad but it is now worse than ever and the most disappointing is that I believed I was helping to elect progressive, justice-committed leadership for Chicago. I was wrong!

The city has an obligation and responsibility to conduct a public forum where residents like myself can be heard. This company has a history of violations, is being sued by the Attorney General for violations, clearly cares little about the people living around this poisonous facility and now has the nerve to request a renewal to continue.

I am formally requesting the city to conduct a public hearing to discuss whether or not the people support a renewal. If the people say no, the city should listen, hear what was said and respond to the people who elected them. Please file this as a formal request. Thank you.

 Screen Shot 2017-09-19 at 7.07.22 PM.png

Mary Gonzales
[REDACTED]

Re: Sims Metal Management

Byron Sigcho <Byron.Sigcho@cityofchicago.org>

Mon 1/3/2022 4:58 PM

To: Mary Gonzales <mary@gamaliel.org>; envcomments <envcomments@cityofchicago.org>; Allison Arwady <Allison.Arwady@cityofchicago.org>; Maurice Cox <Maurice.Cox@cityofchicago.org>

Cc: Theresa McNamara [REDACTED]; Ruben Franco <Ruben.Franco2@cityofchicago.org>; Lucia Moya <Lucia.Moya@cityofchicago.org>; Javier Yanez <Javier.Yanez@cityofchicago.org>; Lori Lightfoot <Lori.Lightfoot@cityofchicago.org>

Thank you for reaching out Ms Gonzales.

I agree with you on the need and importance of a public meeting to discuss the renewal of this permit.

The 25th ward office is more than happy to help coordinate the logistics for this public meeting, and we expect CDPH and DPD to join us as well.

Hope to hear from Commissioner Arwady and Commissioner Cox soon so we can coordinate a day and time.

Thanks again,

Alderman BSL

Get [Outlook for Android](#)

From: Mary Gonzales <mary@gamaliel.org>

Sent: Monday, January 3, 2022 4:09:06 PM

To: envcomments <envcomments@cityofchicago.org>; Allison Arwady <Allison.Arwady@cityofchicago.org>; Maurice Cox <Maurice.Cox@cityofchicago.org>

Cc: Byron Sigcho <Byron.Sigcho@cityofchicago.org>; Theresa McNamara [REDACTED]

Subject: Sims Metal Management

[Warning: External email]

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I am formally requesting the city to conduct a public hearing to discuss whether or not the people support a renewal. If the people say no, the city should listen, hear what was said and respond to the people who elected them. Please file this as a formal request. Thank you.



Mary Gonzales

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 recipient of this e-mail (or the person responsible for delivering this document to the intended recipient), you are hereby notified that any dissemination, distribution, printing or copying of this e-mail, and any attachment thereto, is strictly prohibited. If you have received this e-mail in error, please respond to the individual sending the message, and permanently delete the original and any copy of any e-mail and printout thereof.

Public Hearing request

Anthony Avina [REDACTED]

Thu 1/6/2022 10:34 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

I'd like to submit a public comment regarding the renewal of the Class IVB recycling permit. I oppose the renewal of the permit.

There are 8 public schools within distance of the facility. The health of the children, faculty, and staff of them should be taken into account.

Other facilities are also within distance.

An asphalt plant, 6 TRI plants, and a brownfield; all compounding the amount of pollution dispersing in the area.

The effect of all this can be seen in the amount of asthmatic people, as well as those with cancer, heart disease, and lung disease.

Sims metal is also in the cross hairs of the Attorney General due to over 40 violations of guidelines.

I want to see green jobs being integrated in the area and actions like renewal of the above permit dismissed.

Thank you for your consideration,
Anthony Avina

Need public hearing about Sims Metal Mgmt.

Mary Gonzales <mary@gamaliel.org>


Sat 1/8/2022 10:02 AM

To: envcomments <envcomments@cityofchicago.org>

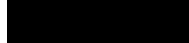
[Warning: External email]

I am a resident and want to see a public hearing on Sims. They are adding to the poison we live with and we are entitled to a hearing.

--

 Screen Shot 2017-09-19 at 7.07.22 PM.png

Mary Gonzales



Public Hearing for Sims Metal Management

Anna Schibrowsky [REDACTED]

Sat 1/8/2022 10:04 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: Theresa McNamara [REDACTED]

[Warning: External email]

I'm a resident of Bridgeport and am concerned that the City is considering renewing the operating permit for SIMS Metal Management in Pilsen at 2500 S. Paulina St. This facility has been polluting our air and water on the Southwest Side and is being sued by the Illinois Attorney General for violating the state's air pollution regulations. I demand a public hearing regarding this permit renewal.

Sincerely,

Anna Schibrowsky
[REDACTED]

Sims Metal Management Complaint

Maya Jones [REDACTED]

Sat 1/8/2022 10:04 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

I live in Bridgeport and I am concerned about Sims Metal Management on Paulina in Pilsen's application for a new permit. Sims has a history of polluting and contaminating the air quality of its surrounding neighborhood. There are 8 schools -- more than 3000 children -- in its radius who are affected by this pollution. As an educator and resident of a neighboring industrialized community, I am appalled by this violation of resident's rights to health and safety.

I demand a public hearing so that myself and like-minded community members can voice our opposition to Sims permit renewal.

Thank you,
Maya Jones
11th Ward

Opposition to SIMS Permit in Pilsen

Adam Gonzalez 

Sat 1/8/2022 10:07 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom It May Concern:

I am voicing my opposition to the SIMS receiving a permit. I am a resident of the Pilsen neighborhood and do not believe this is good for the community. Pilsen already is overburdened with heavy industry which causes pollution and distasteful health effects to the residents of the community. There should be hearing in Spanish and in English we all have a right to know what is going on in our community. The community should hear from the Chicago Department of Public Health ASAP about when and where this hearing on SIMS Metal Management will take place.

Sincerely,

Adam M Gonzalez, esq.

Demand for a public hearing on the Sims Metal Management facility on Paulina

Martin Gleason [REDACTED]

Sat 1/8/2022 10:12 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: treyesmcnamara@gmail.com [REDACTED]

[Warning: External email]

Good morning:

My name is Marty Gleason, and I am longtime resident of the Southwest Side who works with Chicago's children. I have also suffered from Asthma my entire life. I am extremely concerned about the amount of pollution being generated in or near my neighborhood, including the Sims Metal Management Facility on Paulina. This facility's permits are up for renewal, and I demand that a public hearing be called on this renewal.

Sim's is a dangerous polluter in the neighborhood:

- Sims is in violation of 40 environmental guidelines and the Illinois Attorney general is taking action based on those violations
- 8 public schools with 3,359 children are in the neighborhood, and 2 schools are less than two blocks away from Sims

Our young people are at risk for developing more heart and lung issues, and those of us who already have asthma are suffering from the impact this polluter is generating. Kids miss school, adults miss work, but more importantly, our quality of life — the ability to breathe — is at risk.

The city has a responsibility to hold Sims to environmental standards, and put the health of the city's residents above profit centers.

Again, as a resident of the southwest side, advocate for Chicago's children, and a person who has suffered due to pollution, I demand a public hearing on the Sims permits.

Respectfully,

Martin A Gleason, MS

Comment: NO on renewal for the of the Class IVB recycling permit for SIMSLoreen Targos 

Sat 1/8/2022 10:15 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Dr. Arwady and whom it may concern:

I am a resident of Pilsen, blocks from this site. I am also a public health scientist, graduate of the UIC School of Public Health. I am very aware of the externalities borne by myself and my neighbors by the existence and operation of this criminally violating polluter in Pilsen, near the high school at Ashland and Cermak.

I am demanding you DENY THE PERMIT to SIMS immediately and put the health of the environmentally justice burdened community before corporate greed and profit. I am also demanding a community meeting to inform the community of CDPH's process in protecting human health in Pilsen and to give assurance the permit will be denied.

The Attorney General has already filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines. Deny the permit.

Sincerely,

Loreen Targos

SEA SouthWest Enviromental Alliance

Emma Villarreal [REDACTED]

Sat 1/8/2022 10:39 AM

To: envcomments <envcomments@cityofchicago.org>; Theresa McNamara [REDACTED]

 1 attachments (32 KB)

My Letter to CDPH 1-6-21.docx;

[Warning: External email]

**RE: Sims Metal Management, 2500
S. Paulina St.**

**Letter: Sims Metal Management; "a
major Pilsen polluter"**



SEA

SOUTHWEST ENVIRONMENTAL ALLIANCE

Commissioner Dr. Arwady
Chicago Department of Public Health
121 N. LaSalle Street
Chicago, IL. 60609

January 6th, 2022

To Dr. Arwady,

I'm requesting a public Hearing on Sims Metal Management 2500 S. Paulina St. on behalf of our community.

I have to tell you, I was happy to see that Illinois Attorney General Kwame Raoul is suing SIMS for violating the state's air pollution regulations according to the lawsuit filed in Cook County Circuit Court. What this company is trying to get away with is sinful and we have so called city commissioners that are supposed to help but are nowhere to be seen. We are still waiting for you and commissioner Cox to call us with an action plan in regards to these companies that are poisoning us. It is a health issue. Stop hiding behind the Covid-19 by using it as an excuse why you cannot do anything. Well here is some information that you already have.

Sims Metal Management, 2500 S. Paulina St.

FYI 1-mile around this location we have:

▶ A total of 8 Chicago public schools with **3,359 children** (kindergarten to 8th grade).

One school is 0.29 from this location.

▶ 1 asphalt plant (Reliable Ogden LLC.)

▶ 6 TRI facilities (for example H KRAMER & CO and OZINGA READY-MIX CONCRETE).

These facilities emit 19 toxic chemicals including the carcinogens TRICHLOROETHYLENE, TETRACHLOROETHYLENE, METHYL ISOBUTYL KETONE, NICKEL, LEAD, and DI(2-ETHYLHEXYL) PHTHALATE. Facilities that file under the Toxic Release Inventory (TRI) Program are large scale producers that generate hazardous releases above a certain regulatory threshold.

▶ 1 brownfield. Large pieces of abandoned industrial land with a potential presence of toxic contaminants such as LEAD, MERCURY.

▶ Here on the south side we have many of our children with asthma, we have a high number of family members with cancer and upper respiratory problems. As the Attorney General says, Sims Metal Management is contributing to this.

I know you know this situation very well. I hope you can help make a positive change on how these companies continue to get permits over and over again without taking into consideration the impact on the health of the people that live nearby. There are 3,359 Public School children's lives at stake. We demand a public hearing in Spanish and in English so everyone will know what is going on in our community. We expect that you would be in touch with the Chicago Public Schools CEO Pedro Martinez, and have them call each of the parents on the school roll call to notify the parents of these children to attend this meeting. They have a right to know that there is a health risk situation.

I would like a call back on when, where this hearing will take place.

Thank you,

Theresa Reyes McNamara, President
Southwest Environmental Alliance
312-439-5928

letter opposing permit for Sims

Emma Lozano <emma@somosunpueblo.com>

Sat 1/8/2022 12:42 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (23 KB)

lincoln letter Demand Sims Clean up pay back or get out.docx;

[Warning: External email]

LINCOLN UNITED METHODIST CHURCH

2242 S. Damen Ave.

Chicago Illinois 60608

773/671-1798

emma@somosunpueblo.com

January 8, 2022

To Whom it may Concern:

I am the Pastor of Lincoln UMC located in the Pilsen Community located at 2242 S Damen Ave. Our congregation is demanding that there be a **public hearing** in our community so we can voice our opposition to Sims Management permit application. We are a small Church that serve approximately 150 families that are very concerned with the levels of contamination and pollution that Sims and other companies have been allowed to poison our community.

The City of Chicago is responsible for ensuring our families are not being poisoned by these companies. The City is responsible for ensuring guidelines and quality control that these companies must comply with, so that we are not put in harm's way. The city has failed and we are now one if not the worse contaminated neighborhood in the city of Chicago. Thousands are forced to live, work go to school and play while we breathe high levels of pollutants, and hundreds are sick with respiratory issues. The pollution is a principle cause why many suffer with asthma, but certainly these respiratory and other conditions are made worse by the Cities neglect to enforce necessary air and emission requirements. These uncontrolled levels are toxic and lethal.

The city has had knowledge of these contaminants for years but to allow this to continue for so long without any plan to clean up or informing the community of the dangers is reckless and criminal. The City of Chicago must stop ignoring the health and wellbeing of our families. We are opposed to this permit renewal, until proof that this company is clean and green and paying back reparations for what they have done to our families for years. Our Congregation would like a public hearing immediately. Sims needs to Clean up, Be Safe, and Pay Back or Get out.

We request a response in 48 hours or we will be forced to go to the press.

Please take this letter seriously.

In Christ, Siempre Adelante,

Pastor Emma Lozano
Lincoln United Methodist Church (Pilsen)



LINCOLN UNITED METHODIST CHURCH

2242 S. Damen Ave.
Chicago Illinois 60608
773/671-1798

emma@somosunpueblo.com

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We request a response in 48 hours or we will be forced to go to the press.

Please take this letter seriously.

In Christ, Siempre Adelante,

Pastor Emma Lozano
Lincoln United Methodist Church (Pilsen)

Sims Metal Management

Anna Gonzales [REDACTED]

Sat 1/8/2022 1:06 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: Theresa McNamara [REDACTED]

[Warning: External email]

Dear Chicago Department of Health,

I am requesting a public hearing on Sims Metal Management, on behalf of our community.

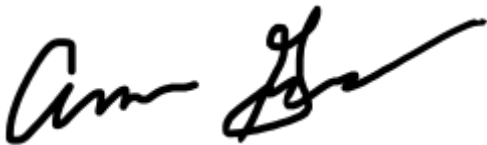
I live and work in Pilsen. I am a therapist and work with children from 0-3. These children are fragile. They are born with or have contracted something that has affected their ability to do what other children their age are doing. This can range from not talking to actually having a diagnosis. Some of the children have Asthma, some on the spectrum and some are more fragile, born with conditions that will affect their families lives forever. The air that these children and pregnant mom's breathe should be clean air. It is our right to have clean air. It seems so simple. There have been studies that show the contaminated air from companies like Sims have a direct link to some of the conditions of these children and pregnant mom's.

The air around this company smells so bad. They are putting more than steel through their machines. They're pushing plastics and basically anything that's in a junked car that they can crush.

I have lived in Pilen all of my life. I am so disgusted that Pilsen, Little Village, Back of the Yards, McKinley Park and most of the poorer neighborhoods, are the places where all the garbage is dumped and our city officials are giving companies like Sims permission to contaminate, infect and kill our children.

Again I am requesting, demanding a public hearing.

Thank you for your time.



Anna Gonzales

Public Hearing Sims Metal Management

Emma Villarreal [REDACTED]

Wed 1/12/2022 11:32 AM

To: envcomments <envcomments@cityofchicago.org>; Theresa McNamara [REDACTED]; Veronica Villarreal [REDACTED]; Olivia Villarreal [REDACTED]

[Warning: External email]

01-12-2022

Commissioner Dr. Arwady,
Chicago Department of Public Health
121 N. LaSalle St.
Chicago, IL

To; Dr. Arwady and to whom it may concern, I'm requesting a public hearing in (English and Spanish) on Sims Metal Management, 2500 S. Paulina St. on behalf of the Pilsen Community and my family.

Due to recent and past environmental hazards in our community, we are reaching out to you and our community members because we are alarmed with the pollution and the harm it is causing our health!!

Emma Villarreal

Sims Metal Management

Veronica Villarreal [REDACTED]

Wed 1/12/2022 11:39 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: treyesmcnamara@gmail.com [REDACTED]

[Warning: External email]

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Due to recent and past environmental hazards in our community, we are reaching out to you and our community members because we are alarmed with the pollution and the harm it is causing our community's health and quality of life!!

Stopping pollution is everyone's responsibility!!

Veronica Villarreal

Sims Comment

Troy Hernandez [REDACTED]

Thu 1/13/2022 10:19 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

The permit application has a key component—the Air Dispersion Model—that is fatally flawed. The modeling data, since it is based on an emissions test in September 2019 that is known to be invalid, cannot be used at all. Moreover, for other claims made, the application is missing necessary explanatory or predictive data that would allow those claims to be properly interpreted by the community.

Effective comments cannot be made using this permit application. The permit application should be rejected until it can incorporate accurate emissions data. Any comment filed on the modeling data in this report is playing against a stacked deck. That Sims Metal Management (SMM) would file a permit application this flawed should serve as evidence and as a warning to the City of Chicago that this company's leadership either lacks the necessary technical sophistication, or the forthrightness, to safely run a piece of critical infrastructure less than a thousand feet from Pilsen's neighborhood high school.

Operations should cease at SMM until proper tests and accurate emissions data is obtained and a permit is issued.

Renewal of Sims Metal Manufacturing permit

Gregory Galluzzo [REDACTED]

Thu 1/13/2022 11:05 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

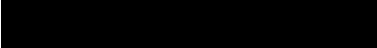
The Pilsen Community has been designated as an “environmental justice community” that is supposed to give us some protection from polluters. The state has also called us an “sacrificial community” meaning we must pay the price of others by accepting far more pollution than is safe. The city ignores the first designation and continues to sacrifice our health for that of others. Sims Metal has proven that it cannot be trusted. It is emitting twice the amount of poisons that is permitted. Since the city has a very lax policy for checking the emissions in plants such as Sims, we assume that the level of pollution coming out of their plant today has been going on for years.

Pilsen is already burdened. We need relief and not continued poisoning of our community.

1. We need a public hearing before a permit is even considered.
2. We want Sims closed for the outrageous levels of pollution it has been emitting.

Gregory Galluzzo
Resident of Pilsen

Shredder in Pilsen

jonathan zupkus 

Thu 1/13/2022 12:42 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Please stop the permit for a company that allows itself to make our air harmful. People and the environment should come before profits!

Sent from my iPhone

SIMS metal

Caroline Acosta [REDACTED]

Sat 1/15/2022 3:47 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Commissioner Dr. Arwady
January 15th, 2022
Chicago Department of Public Health
121 N. LaSalle Street
Chicago, IL. 60609

To Dr. Arwady,

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I have to tell you, I was happy to see that Illinois Attorney General Kwame Raoul is suing SIMS for violating the state's air pollution regulations according to the lawsuit filed in Cook County Circuit Court. What this company is trying to get away with is sinful and we have so called city commissioners that are supposed to help but are nowhere to be seen. We are still waiting for you and commissioner Cox to call us with an action plan in regards to these companies that are poisoning us. It is a health issue. Stop hiding behind the Covid-19 by using it as an excuse why you cannot do anything. Well here is some information that you already have.

Sims Metal Management, 2500 S. Paulina St.

FYI 1-mile around this location we have:

- A total of 8 Chicago public schools with 3,359 children (kindergarten to 8th grade).

- One school is 0.29 from this location.

- 1 asphalt plant (Reliable Ogden LLC.)

- 6 TRI facilities (for example H KRAMER & CO and OZINGA READY-MIX CONCRETE). These facilities emit 19 toxic chemicals including the carcinogens TRICHLOROETHYLENE, TETRACHLOROETHYLENE, METHYL ISOBUTYL KETONE, NICKEL, LEAD, and DI(2-ETHYLHEXYL) PHTHALATE. Facilities that file under the Toxic Release Inventory (TRI) Program are large scale producers that generate hazardous releases above a certain regulatory threshold.

- 1 brownfield. Large pieces of abandoned industrial land with a potential presence of toxic contaminants such as LEAD, MERCURY.

Here on the south side we have many of our children with asthma, we have a high number of family members with cancer and upper respiratory problems. As the Attorney General says, Sims Metal Management is contributing to this.

I know you know this situation very well. I hope you can help make a positive change on how these companies continue to get permits over and over again without taking into consideration the impact on the health of the people that live nearby. There are 3,359 Public School children's lives at stake. We demand a public hearing in Spanish and in English so everyone will know what is going on in our community. We expect that you would be in touch with the Chicago Public Schools CEO Pedro Martinez, and have them call each of the parents on the school roll call to notify the parents of these children to attend this meeting. They have a right to know that there is a health risk situation.

I would like a call back on when, where this hearing will take place.

Thank you,

Caroline Acosta

Sims metal management- please help!

Anna Yas [REDACTED]

Sat 1/15/2022 6:16 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Commissioner Dr. Arwady
January 15th, 2022
Chicago Department of Public Health
121 N. LaSalle Street
Chicago, IL. 60609

To Dr. Arwady,

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Sims Metal Management, 2500 S. Paulina St.

FYI 1-mile around this location we have:

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attend this meeting. They have a right to know that there is a health risks and how you plan to support their health and futures.

Thank you!

Anna Yas

Call to Action RE Sims Metal Management

Maddie Steiger [REDACTED]

Sun 1/16/2022 9:06 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Dr. Arwady,

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FYI 1-mile around this location we have:

- A total of 8 Chicago public schools with 3,359 children (kindergarten to 8th grade). One school is 0.29 from this location.

- 1 asphalt plant (Reliable Ogden LLC.)

- 6 TRI facilities (for example H KRAMER & CO and OZINGA READY-MIX CONCRETE). These facilities emit 19 toxic chemicals including the carcinogens TRICHLOROETHYLENE, TETRACHLOROETHYLENE, METHYL ISOBUTYL KETONE, NICKEL, LEAD, and DI(2-ETHYLHEXYL) PHTHALATE. Facilities that file under the Toxic Release Inventory (TRI) Program are large scale producers that generate hazardous releases above a certain regulatory threshold.

- 1 brownfield. Large pieces of abandoned industrial land with a potential presence of toxic contaminants such as LEAD, MERCURY.

Here on the south side we have many of our children with asthma, we have a high number of family members with cancer and upper respiratory problems. As the Attorney General says, Sims Metal Management is contributing to this.

I know you know this situation very well. I hope you can help make a positive change on how these companies continue to get permits over and over again without taking into consideration the impact on the health of the people that live nearby. There are 3,359 Public School children's lives at stake. We demand a public hearing in Spanish and in English so everyone will know what is going on in our community. We expect that you would be in touch with the Chicago Public Schools CEO Pedro Martinez, and have them call each of the parents on the school roll call to notify the parents of these children to attend this meeting. They have a right to know that there is a health risk situation.

Thank you,

Madeleine Steiger

SIMS Metal Management Permit

Lindsay Miller [REDACTED]

Sun 1/16/2022 12:42 PM

To: envcomments <envcomments@cityofchicago.org>; [REDACTED]
Gonzales <mary@gamaliel.org>

Mary

[Warning: External email]

To whom it may concern:

It has come to my attention that SIMS Metal Management has applied for a permit renewal to continue to do business in my neighborhood in Pilsen. Through several community meetings I have learned that Sims has a history of permit violations and is currently being sued by the attorney general for these violations. We need to have a public hearing to discuss the permit and drive to a better outcome for the residents of Pilsen than the continued status quo of disregard for the community in which it operates that SIMS has demonstrated.

As a person who works in the oil and gas industry, I am a firm believer that industries need to partner with the communities within which they operate and must always strive to improve their operations to maintain the safety of those who live in that community. I believe that permits are an industry's license to operate within the community. It is a commitment the company has made to those around them. Violations of those permits should be so penalizing that a company will not violate and that when consistent violation of a permit occurs the industry loses its right to operate within the community both from permit rejection and due to the financial implications of the stiff penalties incurred. I also believe that those permits should always be moving forward and challenging the industry to continue to apply technology to improve its safety and environmental standards.

At the moment, SIMS has demonstrated a consistent violation of its permits, operates without sufficient monitoring against its permits (ie at night when permit measurements are not being taken), and is not sufficiently penalized when it does violate the permits.

SIMS and the City of Chicago are doing a disservice to the community of Pilsen. You are writing us off as a "Sacrificial Community." We are not a Sacrificial Community, we are a community of people that deserves the same protection and improvements as the city has preserved and made on the north side.

As a long time resident of Pilsen and a mother raising two small children in the area I demand that the city raise the bar for SIMS or remove their license to operate. We should have a public hearing where the community's voice can be heard.

Lindsay Miller

[REDACTED]
Chicago IL 60608

Public Hearing for Sims

Charlotte Piowar [REDACTED]

Mon 1/17/2022 9:39 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: Theresa McNamara [REDACTED]

[Warning: External email]

Good morning,

I am a Bridgeport resident writing in regards to the permit renewal of the Sims Metal Shredding Plant in Pilsen. I urge you to offer a public hearing on the renewal and take residents' concerns seriously. The southwest side is overburdened with pollution with a lot of industry in the area, and this plant contributes to the problem. Sims already has documented violations against them. These environmental problems have serious health consequences for neighbors and their voices should be heard. Please host a public meeting on this permit renewal and listen to what residents have to say.

Thank you,
Charlotte Piowar

Sims Metal Management

Ashia Aubourg 

Mon 1/17/2022 12:15 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

H
i

I am emailing to request a public hearing for the permit renewal for Sims Metal Management at 2500 S. Paulina St. As a Pilsen resident, it's concerning that companies are furthering pollutions into this community.

Best regards,
Ashia Aubourg

SIMS Metal Concerns

Amaryssa Garcia [REDACTED]

Mon 1/17/2022 2:46 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: treyesmcnamara@gmail.com [REDACTED]

[Warning: External email]

Commissioner Dr. Arwady
January 6th, 2022
Chicago Department of Public Health
121 N. LaSalle Street
Chicago, IL. 60609

To Dr. Arwady,

I'm requesting a public Hearing on Sims Metal Management 2500 S. Paulina St. on behalf of our community.

I have to tell you, I was happy to see that Illinois Attorney General Kwame Raoul is suing SIMS for violating the state's air pollution regulations according to the lawsuit filed in Cook County Circuit Court. What this company is trying to get away with is sinful and we have so called city commissioners that are supposed to help but are nowhere to be seen. We are still waiting for you and commissioner Cox to call us with an action plan in regards to these companies that are poisoning us. It is a health issue. Stop hiding behind the Covid-19 by using it as an excuse why you cannot do anything. Well here is some information that you already have.

Sims Metal Management, 2500 S. Paulina St.
FYI 1-mile around this location we have:

- A total of 8 Chicago public schools with 3,359 children (kindergarten to 8th grade). One school is 0.29 from this location.

- 1 asphalt plant (Reliable Ogden LLC.)

- 6 TRI facilities (for example H KRAMER & CO and OZINGA READY-MIX CONCRETE). These facilities emit 19 toxic chemicals including the carcinogens TRICHLOROETHYLENE, TETRACHLOROETHYLENE, METHYL ISOBUTYL KETONE, NICKEL, LEAD, and DI(2-ETHYLHEXYL) PHTHALATE. Facilities that file under the Toxic Release Inventory (TRI) Program are large scale producers that generate hazardous releases above a certain regulatory threshold.

- 1 brownfield. Large pieces of abandoned industrial land with a potential presence of toxic contaminants such as LEAD, MERCURY.

Here on the south side we have many of our children with asthma, we have a high number of family members with cancer and upper respiratory problems. As the Attorney General says, Sims Metal Management is contributing to this.

I know you know this situation very well. I hope you can help make a positive change on how these companies continue to get permits over and over again without taking into consideration the impact on the health of the people that live nearby. There are 3,359 Public School children's lives at stake. We demand a public hearing in Spanish and in English so everyone will know what is going on in our community. We expect that you would be in touch with the Chicago Public Schools CEO Pedro Martinez, and have them call each of the parents on the school roll call to notify the parents of these children to attend this meeting. They have a right to know that there is a health risk situation.

I would like a call back on when, where this hearing will take place.
Thank you, Amaryssa Garcia

Stop Sims

LoreArt 

Mon 1/17/2022 2:53 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

I am a resident of the Chicago area suburb of Brookfield, and I am emailing in regards to the issue surrounding Sims Metal operating in the Chicago neighborhood of Pilsen. The operation is a risk to the health of community members who deserve clean air and safety. I insist along with many others that a public hearing be had on the issue.

Lorena Hinojosa

SIMS Metal Management

Alexia Villa [REDACTED]

Mon 1/17/2022 3:03 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Commissioner Dr. Arwady
January 6th, 2022
Chicago Department of Public Health
121 N. LaSalle Street
Chicago, IL. 60609

To Dr. Arwady,

I'm requesting a public Hearing on Sims Metal Management 2500 S. Paulina St. on behalf of our community.

I have to tell you, I was happy to see that Illinois Attorney General Kwame Raoul is suing SIMS for violating the state's air pollution regulations according to the lawsuit filed in Cook County Circuit Court.

What this company is trying to get away with is sinful and we have so called city commissioners that are supposed to help but are nowhere to be seen. We are still waiting for you and commissioner Cox to call us with an action plan in regards to these companies that are poisoning us. It is a health issue. Stop hiding behind the Covid-19 by using it as an excuse why you cannot do anything. Well here is some information that you already have.

Sims Metal Management, 2500 S. Paulina St.

FYI 1-mile around this location we have:

- A total of 8 Chicago public schools with 3,359 children (kindergarten to 8th grade). One school is 0.29 from this location.

- 1 asphalt plant (Reliable Ogden LLC.)

- 6 TRI facilities (for example H KRAMER & CO and OZINGA READY-MIX CONCRETE). These facilities emit 19 toxic chemicals including the carcinogens TRICHLOROETHYLENE, TETRACHLOROETHYLENE, METHYL ISOBUTYL KETONE, NICKEL, LEAD, and DI(2-ETHYLHEXYL) PHTHALATE. Facilities that file under the Toxic Release Inventory (TRI) Program are large scale producers that generate hazardous releases above a certain regulatory threshold.

- 1 brownfield. Large pieces of abandoned industrial land with a potential presence of toxic contaminants such as LEAD, MERCURY.

Here on the south side we have many of our children with asthma, we have a high number of family members with cancer and upper respiratory problems. As the Attorney General says, Sims Metal Management is contributing to this.

I know you know this situation very well. I hope you can help make a positive change on how these companies continue to get permits over and over again without taking into consideration the impact on the health of the people that live nearby. There are 3,359 Public School children's lives at stake. We demand a public hearing in Spanish and in English so everyone will know what is going on in our community. We expect that you would be in touch with the Chicago Public Schools CEO Pedro Martinez, and have them call each of the parents on the school roll call to notify the parents of these children to attend this meeting. They have a right to know that there is a health risk situation.

I would like a call back on when, where this hearing will take place.

Thank you,

Alexia Villasana

[Sent from Yahoo Mail for iPhone](#)

Public Comment against Sims permit

Miguel B [REDACTED]

Mon 1/17/2022 5:55 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

Hello,

I am writing as a concern citizen of Chicago and would like a public hearing with respect to Sims permit. This is a company that has been pulling our community. We want environmental justice so that my kids and neighbors can grow up with clean air. We want Sims to be held accountable for of the damage their pollution has done to our communities. All the health issues that they caused including cancer.

Near this location we have:

- ▶ Eight public schools with 3,359 children (K-8). One school is 2 blocks away from Sims.
- ▶ 1 asphalt plant (Reliable Ogden LLC.)
- ▶ 6 TRI facilities (H KRAMER & CO and OREMUS CONCRETE are examples) that emit 19 toxic chemicals. They are large scale producers that generate hazardous toxins above regulatory thresholds.
- ▶ One "brownfield" which is a large piece of abandoned industrial land contaminated with toxic contaminants like LEAD and MERCURY.
- ▶ We have more than our fair share of dangerous polluting industries in our communities. One way to reduce pollution is to oppose this renewal. We want industries that will bring green jobs.
- ▶ We have the highest rate of asthma among children as well as cancer, heart disease and lung disease among the adults due to the large number of contaminating industries in our communities.
- ▶ The Attorney General has filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines.

We want a public hearing in our community so we can voice our opposition to this permit. The City must stop ignoring the health and wellbeing of the people. We are opposed to this permit renewal.

Thank you,

Miguel Bautista
[REDACTED]

Inquiry and Request of Public Hearing on Sims Metal Management Permit Renewal

Christina Seo <seo@bubblydynamics.com>

Tue 1/18/2022 9:39 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

Hello-

As the new year begins, I find it paramount that the honorable City of Chicago continue to go on the path of less harm and more support for the constituents of this city.

Collectively, environmentalists like myself, request a public hearing on Sims Metal Management.

As a resident of Chicago, I respectfully oppose, and do not want Sims Metal Management to continue polluting the 2500 block of S. Paulina St., an area with factual evidence of the detrimental affects these and other industrial facilities have caused in the lungs of the youth and adults in the surrounding community.

I wish you and your team a welcome 2022 of health and prosperity in community.

--



Christina Seo she/her/hers

Communications Coordinator

310/384-9982

[1400 W. 46th St. Chicago, IL 60609](#)

insidetheplant.com



Do not renew SIMS permit, have public hearing

Anne Knafl [REDACTED]

Tue 1/18/2022 2:29 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

Hello,

I am a Chicago resident and registered voter. I am writing to voice my opposition to the renewal of the Sims permit and demand a public hearing. The Attorney General has filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines.

We want a public hearing in our community so we can voice our opposition to this permit. The City must stop ignoring the health and wellbeing of the people. We are opposed to this permit renewal.

Listen to residents!

Near this location we have:

- ▶ Eight public schools with 3,359 children (K-8). One school is 2 blocks away from Sims.
- ▶ 1 asphalt plant (Reliable Ogden LLC.)
- ▶ 6 TRI facilities (H KRAMER & CO and OREMUS CONCRETE are examples) that emit 19 toxic chemicals. They are large scale producers that generate hazardous toxins above regulatory thresholds.
- ▶ One "brownfield" which is a large piece of abandoned industrial land contaminated with toxic contaminants like LEAD and MERCURY.
- ▶ We have more than our fair share of dangerous polluting industries in our communities. One way to reduce pollution is to oppose this renewal. We want industries that will bring green jobs.
- ▶ We have the highest rate of asthma among children as well as cancer, heart disease and lung disease among the adults due to the large number of contaminating industries in our communities.

--

Anne K. Knafl, Ph.D. (she/her)

Bibliographer for Religion, Philosophy, and Jewish Studies

The University of Chicago Library

Public hearing for Permit for SIMS Metal Management Plant in Pilsen

Catherine Sullivan [REDACTED]

Tue 1/18/2022 7:45 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

To The Chicago Department of Public Health,

I am a resident of Pilsen and am writing to demand a public hearing regarding SIMS Metal Management's application for the renewal of their Class IVB recycling permit. I am opposed to the renewal of this permit on the grounds that SIMS has demonstrated gross negligence toward the health of the community.

According to the lawsuit brought by Illinois Attorney General Kwame Raoul, this facility is currently in violation of air pollution codes, capturing less than 50% of the harmful emissions they are mandated to control. This plant is a public health risk exposing the community to uncontrolled emissions, and I am vehemently opposed to the renewal of their permit given the disregard they have shown toward nearby residents.

I have lived in Pilsen since 2006 and experience poor air quality on a regular basis. I am outraged by the number of polluting industries allowed to operate in one community in such close proximity to its citizens.

Sincerely,

Catherine Sullivan
[REDACTED]

In support of a public hearing for the permit renewal for Sims Metal Management

Izzy Hannigan [REDACTED]

Tue 1/18/2022 8:16 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern,

My name is Isabel Hannigan and I am a lifelong resident of Chicago, IL currently living in the Ravenswood neighborhood.

I am writing in support of the demands of Healthy Hood Chi and Ald. Byron Sigcho-Lopez for a public hearing regarding the renewal of the permit for Sims Metal Management located at 2500 S. Paulina in the Pilsen neighborhood.

In 2018 Sims paid a \$225,000 civil penalty and agreed to limit volatile organic material emissions to less than 25 tons per year after the EPA observed hydrocarbons exiting the shredder and fugitive particulate matter crossing the property line. The facility is mandated to capture at least 81% of emissions but was capturing less than 50% as of May 2021.

This pollutes the Southwest Side's air, leading to increased risk of illnesses and respiratory conditions for residents, particularly children. As a Chicago elementary school teacher, I feel it is unconscionable for the city to allow this polluter to continue harming our citizens' wellbeing and poisoning their air.

I call for a public hearing regarding the renewal of this permit and the subsequent denial of this permit if Sims Metal Management does not immediately clean up their operation.

Thank you for your time and attention to this matter.

Sincerely,

Isabel Hannigan
Chicago, IL 60613

SIMS Public Hearing - Please Have One!

Carl Towner [REDACTED]

Wed 1/19/2022 11:14 AM

To: envcomments <envcomments@cityofchicago.org>; [REDACTED] Mary
Gonzales <mary@gamaliel.org>

[Warning: External email]

To whom it may concern:

We need to have a public hearing to discuss the SIMS metal shredding operating permit to ensure a better outcome for the residents of Pilsen.

In their annual report to shareholders, SIMS states that they are committed to operating responsibly, investing in innovative technologies, and ensuring a safe, healthy and productive value chain. The company has the money to make needed improvements to the facility to prevent polluting the area. The company has a market capitalization of over \$3 billion. They restructured their business last year (laying off thousands of people) and, combined with the increase in commodity prices, will likely exceed their 2021 performance which by all measures was exceptionally strong.

SIMS has a history of permit violations and is currently being sued by the attorney general for these violations. SIMS should be meeting permit levels at a minimum in order to operate. The company should be installing new technologies to reduce pollution in the area. Perhaps if the penalties for permit violations were enforced and more severe, SIMS would upgrade their metal shredding facility.

I've been a resident of Pilsen since 2005 and have two children. Raise the bar for SIMS or remove their license to operate. We should have a public hearing where the community's voice can be heard.

Carl Towner

[REDACTED]
Chicago, IL 60608

Deny the sims metal permit.

Fen King 

Wed 1/19/2022 8:35 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Fen and I am resident of Chicago. I stand with activists in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academy. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of environmentally burdened community.

Halt Sims Metals Operations

Maria Quinones 

Thu 1/20/2022 11:58 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Maria Quinones and I am a resident of Pilsen, Chicago. I stand with activists in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academy and my home. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

Please halt Sims Metals operations.

Thanks,
Maria Quinones

Halt Sims Metals Operations

Gabe Klooster [REDACTED]

Thu 1/20/2022 12:16 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

My name is Gabe Klooster and I live in the Pilsen neighborhood. I am writing to request that you deny the permit to Sims Metals. Sims Metal is located a quarter mile from Benito Juarez Community Academy and my home. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

I urge you to deny their permit. Please halt Sims Metals operations and protect our community.

Thanks,
Gabe

PROTECT OUR AIR, DENY SIMS METALS PERMIT

Emily Nevius [REDACTED]

Thu 1/20/2022 1:10 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Emily Nevius and I am a resident of Bridgeport, Chicago. I stand with activists in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to **deny the Sims Metals permit based on inaccurate data.**

Sims Metal is located within one mile of THREE schools, including Benito Juarez Community Academy which is only a quarter mile away. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

Please shut down Sims Metals operations until they can prove they are operating according to good faith and environmental law. The health of local residents cannot be a cost of their operations.

I DEMAND ACCOUNTABILITY. THE CITIZENS OF CHICAGO DEMAND ACCOUNTABILITY.

Sincerely,

Emily Nevius

Chicago resident, registered and active voter

[REDACTED]

request for PUBLIC HEARINGS ON SIMS METAL MANUFACTURING

edward mchnamara [REDACTED]

Thu 1/20/2022 2:53 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: Theresa McNamara [REDACTED]

[Warning: External email]

Commissioner Dr. Allison Arwady
20th, 2022

January

Department of Public Health
Chicago City Hall
121 N. LaSalle Street
Chicago, IL. 60601

Request for Public Hearing on Sims Metal

Manufacturing

Dear Dr. Arwady,

Our community is asking for a bilingual public hearing on Sims Metal Management's request for a permit renewal.

I was heartened reading about your experience in under-resourced communities around the world facing serious health hazards without the necessary resources to be able to fight back. A quote of yours reflecting your experience in Liberia really hit home for me mirroring our communities' dependence on outside actors and public officials to remedy the serious health hazards we face. Your quote says it all: "Everybody knew what needed to be done, and nobody had what they needed to do it." To me, this reflects our common experience of the combined impact of polluters in our neighborhoods. The Natural Resource Defense Council's color-coded map of pollution in Chicago highlights graphically the problem our little ones and pregnant moms face daily.

Our partners at the University of Illinois – Chicago's School of Public Health has brought to our attention that six (6) of Chicago's eight (8) major railyards are in our communities and given how compact our neighborhoods are these six are very near our public schools, virtually guaranteeing that our youngsters have years of breathing in polluted air during their formative primary school years.

I must also add that I enjoyed your poem emphasizing for you what are and are not criteria for you to act, simply stated from your perspective:

We don't care about your politics /
Don't care about your views /
Don't care about the channel where you watch your evening news /

Doesn't matter how you voted /
We don't care to whom you give /
The only thing we care about is: Do you want to live?

Doctor, we for sure want to live. We want our babies and our elderly to live. We need your help to clean up the air in our neighborhoods.

Please schedule a public hearing on Sims Metal Management (in English and Spanish).

Sincerely,

Edward T. McNamara

[REDACTED]
Chicago, IL 60609

Letter emailed to: envcomments@cityofchicago.org

Copy to: [REDACTED]

Sent from [Mail](#) for Windows

Sims Metal management comment

M. Chavez [REDACTED]

Thu 1/20/2022 5:51 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Sims Metal Management is located in an Environmental Justice area in the Pilsen community. It is already overburdened with pollution and yet this shredder continues to operate while in violation of emission capture standards that the state of illinois requires.

Sims emissions testing showed that they do not capture the required 80% of the fugitive emissions . In fact, they capture less than 50%, which is why the attorney General is currently suing this company. There is no significant buffer between this facility and residential homes, schools, and businesses. They should NOT be allowed to operate in the middle of a bustling community, especially now that they are not meeting illinois air regulations.

The city permit application that sims submitted is based on flawed data from earlier testing. In fact, the illinois EPA acknowledges that the data was inadequate and has required sims to retest. This permit process should be halted since their (Sims) data is flawed and the public is unable to properly and fairly comment. I strongly urge you to examine all the aspect of the data Sims submitted on their application and to keep in mind that real people are being negatively affected. Chicago residents rely on your agency to protect them from possible and likely harm.

The residents in Pilsen should be provided the opportunity for community meetings to express their concerns and learn more about the risks that this shredder poses to their health and the environment. In order to provide a just process, I hope you decide to immediately stop the permit process and not allow Sims to continue operating while violation air regulations and polluting the air and demand that they provide more clear and valid data and testing.

The Pilsen community should not be the victim of a deficient permit process, so please stop the permit process now!

Sincerely,

María Chavez

Sims Recycling

Juan Soto <jfsoto@gamaliel.org>

Thu 1/20/2022 6:53 PM

To: Allison Arwady <Allison.Arwady@cityofchicago.org>

Cc: envcomments <envcomments@cityofchicago.org>; Manuel J. Medina <j_manny@sbcglobal.net>; Diana Perez <perez.diana@gamalielmetrochi.org>

📎 1 attachments (41 KB)

Sims Letter.pdf;

[Warning: External email]

Dr. Awardy,

Please see attached letter requesting a meeting on the matter of Sims Recycling.

Thank you

Juan F. Soto

Executive Director

Gamaliel of Metro Chicago

Pilsen Neighbors Community Council

2026 S. Blue Island Ave. / Chicago, Illinois 60608

312-666-2663 (o) 312-666-4661 (f)





PILSEN NEIGHBORS COMMUNITY COUNCIL

2026 S. Blue Island Ave., Chicago, IL 60608 312.666.2663 FAX 312.666.4661 www.pilsenneighbors.org

January 20, 2022

Dr. Allison Arwady
Chicago Department of Public Health
City of Chicago

Dear Dr. Arwady,

Pilsen Neighbors Community Council is a grassroots, leadership driven, social justice organization serving the greater Pilsen community since 1954.

Our organization, along with many others, has great concerns about the contamination families in our community endure because polluting industries have increased within adjacent corridors and little to no inspections or monitoring to measure the toxins they release into the air.

Now, it has come to our attention that one of the most polluting industries, Sims Metal Management, who shreds automobiles and other machinery seeks a renewal of their permit to continue their operation. The city must know the Attorney General has filed a lawsuit charging them with more than forty violations related to the quantity of toxins they release.

We urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academy and our office. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

It is time for the people who reside, and work here, and those who must breathe what Sims sends into the air, to have a voice in the decision. We support a public hearing to be held in Pilsen so residents can attend and give input. We welcome a meeting to further discuss this matter.

Sincerely,

Manuel Medina
President
Board of Directors

Sims Metals

Savannah Marie Bell <sbell9@saic.edu>

Thu 1/20/2022 7:36 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Savannah Bell and I am a resident of Chicago. I stand with activists in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academy. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

Protect Pilsen's Air

Emily Stephens [REDACTED]

Fri 1/21/2022 1:50 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

My name is Emily and I am a resident of Chicago. I stand with the activists in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academt. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

Protect the Air in Pilsen

Julie Dworkin [REDACTED]

Fri 1/21/2022 2:29 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Julieanne Dworkin and I am a resident of Chicago. I stand with activists in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academy. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

IN SUPPORT OF HALTING SIMS METALS OPERATIONS

Peyton Billingsley 

Fri 1/21/2022 2:38 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Peyton Billingsley and I am a resident of Pilsen, Chicago. I stand with activists in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academy. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

Sincerely, Peyton Billingsley

Protect Pilsen Air

aaron stanaway 

Fri 1/21/2022 3:52 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

My name is Aaron Stanaway and I am a resident of Chicago. I stand with activists in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academy, and as a teacher for Chicago Schools that frightens me that students are exposed to this pollution. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community. Please take action on this and stand with the activists fighting against Sims Metals.

Thank you,
Aaron Stanaway
he/him

Permit Renewal for Sims

Carmen Velasquez 

Sat 1/22/2022 5:19 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern:

We are opposed to Sims receiving a permit !!!!! It is detrimental to myself and my family's health!
Carmen Velasquez

Sent from my iPhone

Deny Sims Metal Management Permit

Anne Jacobs [REDACTED]

Tue 1/25/2022 7:45 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Good Evening-

My name is Annie Jacobs (member of 11th Ward IPO, Bridgeport Alliance, The People's Lobby and resident/homeowner in the 11th Ward) and I am writing to oppose the renewal of the permit for Sims Metal Management at 2500 S. Paulina.

I am aware that Sims was recently fined \$225,000 for EPA violations, but fining polluters is simply not enough. I speak from experience here, as I grew up in a community that had long been polluted by heavy metals. My siblings and I were all diagnosed with "elevated lead" as children; though the diagnosis is considered less severe than lead poisoning, the effects of such toxicity do not decrease with time. Rather, they have long standing health implications that we will live with for the rest of our lives.

That is why it is unconscionable to continue to allow polluters like Sims to poison our neighborhoods. Sims in particular poses a serious threat as it resides in the same neighborhood as eight public schools with **3,359 children** (K-8). One school is 2 blocks away from Sims. It is no coincidence that our area has the highest rate of asthma among children as well as cancer, heart disease and lung disease among adults due to the large number of contaminating industries in our communities.

Companies like Sims must be held accountable to the communities in which they reside. I am therefore demanding a public meeting be held and urging the city not to renew this permit.

Regards,

--

Annie Jacobs

She/her
[REDACTED]

Requesting a Public Hearing on Sims Metal Management

Diana Yung [REDACTED]

Tue 1/25/2022 8:06 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello, my name is Diana Yung and I am a resident in Chicago's Southwest Side. I am writing to you today to request a public hearing on SIMS Metal Management, located at 2500 S. Paulina St. I believe the community should be heard and included in the permit decision considering how greatly a facility like SIMS Metal Management affects the pollution in the immediate area where so many families live, eat, and shop.

I oppose the renewal of the Class IVB recycling permit of this metal shredder. This area is already overburdened with polluting industries, and it's past time we shift to industries that will bring green jobs instead. Due to the large number of contaminating industries in our communities, the area has the highest rate of asthma among children, as well as cancer, heart disease and lung disease among adults. There are 8 elementary schools, including one school just 2 blocks away from SIMS Metal Management. Considering this company's history of violating air pollution regulation guidelines, their presence in the area is especially concerning.

I am requesting a public hearing so that the community can voice our concerns about this metal shredding facility, how it operates, and how it affects the greater area.

Thanks,
Diana Yung

[REDACTED]

Opposing the renewal of a permit for Sims Metal Management

Martin Gleason [REDACTED]

Tue 1/25/2022 8:40 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: Theresa McNamara [REDACTED]

[Warning: External email]

To whom it may concern -

I am writing in opposition to the permit for Sims Metal Management plant in Pilsen.

The Southwest side is littered with polluters and facilities that do more harm than good. Sims is one of them. Pilsen, Bridgeport, McKinley Park, Little Village, and Canaryville bear the burden of dirty transit (diesel trucks, old rail stations) and polluters like MAT asphalt and it has taken a toll on our communities. Our rates of Asthma and respiratory issues outpace other neighborhoods and suburbs — and given the glut of last mile facilities, this is only going to get worse.

SIMS metal management has violated each and every environmental and community safeguard. They must be held to account. I, in solidarity with my neighbors, demand that a public hearing be held for their permit.

The people of the southwest side should not bear the burden for others economic success. Put people over profit and hold the hearing.

Martin A Gleason

Re: Opposing the renewal of a permit for Sims Metal Management

Theresa McNamara [REDACTED]

Wed 1/26/2022 1:59 AM

To: Martin Gleason [REDACTED]

Cc: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Received, thank you.

On Tue, Jan 25, 2022 at 8:39 PM Martin Gleason [REDACTED] wrote:

To whom it may concern -

I am writing in opposition to the permit for Sims Metal Management plant in Pilsen.

The Southwest side is littered with polluters and facilities that do more harm than good. Sims is one of them. Pilsen, Bridgeport, McKinley Park, Little Village, and Canaryville bear the burden of dirty transit (diesel trucks, old rail stations) and polluters like MAT asphalt and it has taken a toll on our communities. Our rates of Asthma and respiratory issues outpace other neighborhoods and suburbs — and given the glut of last mile facilities, this is only going to get worse.

SIMS metal management has violated each and every environmental and community safeguard. They must be held to account. I, in solidarity with my neighbors, demand that a public hearing be held for their permit.

The people of the southwest side should not bear the burden for others economic success. Put people over profit and hold the hearing.

Martin A Gleason

STOP SIMS

Maureen Wierema 

Thu 1/27/2022 10:12 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

I am writing to demand a public hearing for the permit renewal for Sims Metal Management at 2500 S. Paulina.

Sims is emitting twice the legal level of pollutants and is causing higher rates of asthma, cancer, lung disease, and heart attacks in the community of Pilsen. Sims Metal Management needs to be closed. The health of our neighbors is too important to continue looking the other way and accepting payoffs to continue unhealthy, illegal, and immoral practices.

Thank you,
Maureen Wierema
Cook County Resident

Sims Permit Renewal - public hearing

Beatrice Weiner <bweiner@hawk.iit.edu>

Thu 1/27/2022 4:52 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Good afternoon,

I'm writing to urge you to take public opinion into consideration prior to making this decision. Sims is poisoning our neighborhood.

At the very least, a public hearing should be held.

Thank you.

Please don't renew the Sims permit!

Erin Vogel [REDACTED]

Thu 1/27/2022 8:05 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

Hi there,

I am writing to request that the permit Sims has does not get renewed. As a concerned Chicago resident, I've posted some of the many reasons why Sims should not be operating below. Please do your part and vote no!

Near this location we have:

- ▶ Eight public schools with 3,359 children (K-8). One school is 2 blocks away from Sims.
- ▶ 1 asphalt plant (Reliable Ogden LLC.)
- ▶ 6 TRI facilities (H KRAMER & CO and OREMUS CONCRETE are examples) that emit 19 toxic chemicals. They are large scale producers that generate hazardous toxins above regulatory thresholds.
- ▶ One "brownfield" which is a large piece of abandoned industrial land contaminated with toxic contaminants like LEAD and MERCURY.
- ▶ We have more than our fair share of dangerous polluting industries in our communities. One way to reduce pollution is to oppose this renewal. We want industries that will bring green jobs.
- ▶ We have the highest rate of asthma among children as well as cancer, heart disease and lung disease among the adults due to the large number of contaminating industries in our communities.
- ▶ The Attorney General has filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines.

We want a public hearing in our community so we can voice our opposition to this permit. The City must stop ignoring the health and wellbeing of the people. We are opposed to this permit renewal.

Best,

Erin Vogel

SIMS permit

Sara Dickett [REDACTED]

Thu 1/27/2022 8:08 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

As a community member of Bridgeport, I oppose the renewal of the Sims permit and strongly ask for a public hearing.

Near this location we have:

- ▶ Eight public schools with **3,359 children** (K-8). One school is 2 blocks away from Sims.
- ▶ 1 asphalt plant (Reliable Ogden LLC.)
- ▶ 6 TRI facilities (H KRAMER & CO and OREMUS CONCRETE are examples) that emit 19 toxic chemicals. They are large scale producers that generate hazardous toxins above regulatory thresholds.
- ▶ One “brownfield” which is a large piece of abandoned industrial land contaminated with toxic contaminants like LEAD and MERCURY.
- ▶ We have more than our fair share of dangerous polluting industries in our communities. One way to reduce pollution is to oppose this renewal. We want industries that will bring green jobs.
- ▶ We have the highest rate of asthma among children as well as cancer, heart disease and lung disease among the adults due to the large number of contaminating industries in our communities.
- ▶ The Attorney General has filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines.

We want a **public hearing** in our community so we can voice our opposition to this permit. The City must stop ignoring the health and wellbeing of the people. We are opposed to this permit renewal.

Sincerely,

Sara Dickett (they, them)

Request for public hearing

Denise Serna [REDACTED]

Thu 1/27/2022 8:09 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

Hello,

My name is Denise Yvette Serna and I am a resident of the 11th ward. As a community member, I am opposed to renewal of the Sims permit and along with my neighbors demand a public hearing. My understanding is there is an application for renewal of the Class IVB recycling permit metal shredding facility located at 2500 S. Paulina Street.

Near this location we have:

- ▶ Eight public schools with 3,359 children (K-8). One school is 2 blocks away from Sims.
- ▶ 1 asphalt plant (Reliable Ogden LLC.)
- ▶ 6 TRI facilities (H KRAMER & CO and OREMUS CONCRETE are examples) that emit 19 toxic chemicals. They are large scale producers that generate hazardous toxins above regulatory thresholds.
- ▶ One “brownfield” which is a large piece of abandoned industrial land contaminated with toxic contaminants like LEAD and MERCURY.
- ▶ We have more than our fair share of dangerous polluting industries in our communities. One way to reduce pollution is to oppose this renewal. We want industries that will bring green jobs.
- ▶ We have the highest rate of asthma among children as well as cancer, heart disease and lung disease among the adults due to the large number of contaminating industries in our communities.
- ▶ The Attorney General has filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines.

We want a public hearing in our community so we can voice our opposition to this permit. The City must stop ignoring the health and wellbeing of the people. We are opposed to this permit renewal.

Thank you,

Denise

Denise Yvette Serna, M.F.A.

Theatre Practitioner and Arts Activist | deniseyvetteserna.com

Associate Artistic Director | [Rivendell Theatre Ensemble](#)

Co-Founder | [Global Hive Laboratories](#)

pronouns: she/her/hers

Note: My working day may not align with your working day. Please do not feel obliged to reply to my emails outside of your normal working hours. I will do the same.

Public Hearing on Sims Permit Renewal

Andi Piper [REDACTED]

Thu 1/27/2022 8:10 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

Hello,

I'm writing in regards to the renewal of the Sims permit. This facility is near 8 public schools (one just 2 blocks away) that already have to contend with an asphalt plant, six TRI facilities and one contaminated brownfield.

This community has more than our fair share of polluters, and the effects of that are seen in the high rates of asthma, cancer, heart disease and lung disease. Sims Metal Management has more than 40 violations, leading to a suit filed by the Attorney General.

We must have a public hearing so the concerned voices of our community can be heard.

Thank you,
Andi Piper

Public Hearing re: Sims Metal Midwest permit

Sara Hindmarch [REDACTED]

Thu 1/27/2022 8:13 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

I am writing to express my opposition to the renewal of the Sims Metal Midwest's permit, and to demand a public hearing. The community deserves to have its voice heard regarding this harmful industry located in our area. Of specific concern is the impact of this site on the more than three thousand children attending eight public schools in this area. Our community faces a high rate of asthma among children as well as cancer, heart disease and lung disease among the adults due to the large number of contaminating industries in our communities, including Sims. By closing the Sims site we would have the power to reduce the dangerous polluting industries in our communities that are negatively impacting us. The city MUST stop ignoring the health and wellbeing of its people, and we demand to be heard at a public hearing where our specific voices and concerns can be heard.

Thank you,

Sara Hindmarch
[REDACTED]

I am opposed to renewal of the Sims permit and demand a public hearing

ellen grimes [REDACTED]

Thu 1/27/2022 8:16 PM

To: envcomments <envcomments@cityofchicago.org>; [REDACTED]

[Warning: External email]

Dear CDOPH!

I love all of the wonderful work you do to keep our city safe and healthy. As you know, people like me, who live on the South Side, deal with significant levels of air pollution, which is a threat to many of us.

One of my "neighbors," the Sims metal shredding site, is applying for a renewal of their recycling permit. We need to have a public meeting to discuss denying the permit for the following reasons:

- The Attorney General has filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines.
- Eight public schools with **3,359 children** (K-8) are located nearby. One school is 2 blocks away from Sims.
- There is 1 asphalt plant (Reliable Ogden LLC.) and 6 TRI facilities (H KRAMER & CO and OREMUS CONCRETE are examples) that emit 19 toxic chemicals also located nearby. They are large scale producers that generate hazardous toxins above regulatory thresholds.
- In addition, there is 1 "brownfield" nearby, a large area of abandoned industrial land contaminated with toxic contaminants like LEAD and MERCURY.

We have more than our fair share of dangerous polluting industries in our communities. One way to reduce pollution is to oppose this renewal. We have the high rate of asthma among children as well as cancer, heart disease and lung disease among the adults due to the large number of contaminating industries in our communities.

Please set up a public hearing, and allow our voices to be heard.

Thank you,

Ellen Grimes, Bridgeport



From: Joshi Radin <joshi@pilsenperro.org>
Sent: Monday, January 31, 2022 2:49 PM
To: Letterforthemayor <Letterforthemayor@cityofchicago.org>; Healthy Chicago <HealthyChicago@cityofchicago.org>; Allison Arwady <Allison.Arwady@cityofchicago.org>; Candace Moore <Candace.Moore@cityofchicago.org>
Cc: dorian breuer [REDACTED]; Jack Ailey <jack@aileysolarelectric.com>; Troy Hernandez

[REDACTED]; Joshi Radin <joshi@pilsenperro.org>

Subject: PERRO letter of Request regarding SIMS Metal Management LRF permit application

[Warning: External email]

Honorable Mayor, Dr. Arwady and Officer Moore:

Please find a letter from the Pilsen Environmental Rights and Reform Organization attached, as well as a supplemental white paper, on issues regarding Sims Metal Management's LRF permit application to the City of Chicago.

This is an issue that deeply concerns us, and we hope you will review these materials and respond accordingly.

Sincerely
Joshi Radin Flores

PERRO Organizer, [IL Solar for All](#)
617-821-3224

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Concerns on information within SIMS Application for a City of Chicago Large Recycling Facility (LRF) Permit

January 7, 2021

Prepared by Donald Wink,¹ donald.wink@comcast.net

Summary: In November, 2021, Metal Management Midwest, Inc., also known as “SIMS Metal Management,” filed an application to the City of Chicago to operate a Large Recycling Facility permit within the rules that the city issued in June, 2020. The comment period for this permit application goes until February 28, 2022. However, it is not possible to provide meaningful comments at this point, because the application, especially its Modeling Analysis, lacks clarity or information that can be interpreted in a meaningful way. Two problems are prominent. First, there is inadequate documentation of the results of the crucial Air Dispersion Modeling Analysis. Second, the data used for the Modeling Analysis is certainly based on incorrect information that also compromises any Modeling Analysis no matter how it is reported. Indeed, members of the ILEPA have indicated that they will not do their own, independent, modeling of the emissions from SIMS using this data. These concerns mean that the application may not be something that should be accepted for review in its current form.

I. Introduction

SIMS Metal Management operates a recycling facility on Paulina Street just south of Blue Island Avenue and west of Ashland Avenue. A key part of the operations, and certainly the largest source of hazardous pollutants, is the shredding of vehicles by a Hammerhill Shredder that, among other operations, processes “end-of-life” vehicles. This location is near to homes in the Pilsen community located north of Blue Island and across the South Branch of the Chicago River from homes in Bridgeport. There are two Chicago Public Schools facilities nearby: Whittier Elementary School (450 meters, 1500 feet) and Benito Juarez Community Academy (700 meters, 2300 feet).

The SIMS facility is subject to review and approval at three different levels: the Federal government (led by the United States Environmental Protection Agency, USEPA), the State of Illinois (led by the Bureau of Air within the Illinois Environmental Protection Agency, ILEPA), and the City of Chicago, under rules issued by the Chicago Department of Public Health (CDPH). At this time, there are various reviews going on. The CDPH is considering a permit for a Large Recycling Facility. The ILEPA, specifically the Bureau of Air, is involved in reviewing both an application for a Federally Enforceable State Operating Permit and an application for a construction permit required as part of an action by the Illinois Attorney General. The USEPA is awaiting the issuance of the FESOP as part of an Administrative Consent Order agreement after violations of the Clean Air Act that were revealed in 2019.

1. This comment is prepared by Donald J. Wink, PhD, Professor of Chemistry at the University of Illinois Chicago. This is part of his work to provide scientific advice and analysis to PERRO. This comes as a continuation of work initiated with the NSF-Funded UIC INCLUDES project (Award 1649298) and its support of community-identified science, technology, engineering, and mathematics issues. Any opinions, findings, and conclusions or recommendations expressed in this material are those of the author and do not necessarily reflect the views of the National Science Foundation, the University of Illinois System, or the University of Illinois at Chicago.

The most immediate review in terms of time will be the review by the CDPH. This includes a public comment period for the application that SIMS has filed with CDPH. This white paper concerns material in that LRF application and, briefly, some issues with a pending construction permit for a new emissions system as part of the Illinois Attorney General's action of October, 2021.

II. Background information

II.a. Recap of major events with respect to SIMS permitting and emissions data

There have been multiple issues with pollution from SIMS, dating back more than 5 years. In December, 2018 the United States Environmental Protection Agency issued an Administrative Consent Order and entered into a Consent Agreement with SIMS, imposing a \$225,000 settlement and laying out a process whereby SIMS was required to obtain a Federally Enforceable State Operating Permit (FESOP) from the State of Illinois. An application for this Permit was filed in January 2019 and amended in January 2020. The draft permit has not been issued.

One reason for the delay in issuing a draft permit was the requirement that SIMS obtain accurate information on emissions from the shredder. The original FESOP application included emissions data from a different SIMS facility, in Rhode Island. As part of the Administrative Consent Order, SIMS agreed to have testing done by an independent group. This was done by Mostardi Platt in September 2019.² That data, which showed emissions fully 10 times that suggested based on the Rhode Island data, was then put into a revised FESOP application in 2020. According to the ILEPA, the next step would be to issue a draft permit for public comment and, since the area around SIMS is considered an Environmental Justice community by the State of Illinois, public hearings about the permit. There has been no action taken on this application as of January, 2022.

One reason why the draft permit has not been issued came to light in Fall, 2021. At that time, it was revealed that testing was done in May, 2021 that showed major problems with the ability to capture, let alone measure, emissions. Specifically, the test involved adding calibrated amounts of an inert tracer gas (sulfur hexafluoride) into the shredder's air stream. The test showed "it was likewise confirmed that the capture efficiency of the system was estimated to be less than 50%."³

Although the Spring, 2021 testing did not measure the emissions of any pollutants, a direct conclusion is that any measurements made of emissions from the shredder would be inaccurate, likely by a factor of at least 2.

As a result of the discovery that emissions could not be captured properly, it was determined that SIMS was likely emitting more than 25 tons per year of volatile organic material (VOM), in violation of the Air Pollution Regulations of the State. This was the basis of a suit filed by the Illinois Attorney General preliminary injunction order against SIMS. The order, which was agreed to by SIMS, included a requirement that SIMS immediately develop a plan to properly capture emissions and, at the same time, to implement pollution controls on the shredder.

2. *Metal Shredder Emissions Report*, October 18, 2019, Mostardi Platt, Inc., Elmhurst, IL.

3 Memo "Metals Management Midwest (031600FFO) Proof-of-Concept Test for Alternative Capture Technique (May 13 & 14, 2021)" from Kevin Mattison, Illinois Environmental Protection Agency, dated July 14, 2021.

As this is being worked out (the application for the new controls was just filed with the state on December 20), the facility continues to operate with existing technology and controls. These are the technology and emission controls that are referred to in the LRF permit application to the CDPH.

b. CDPH Modeling Analysis Requirements

As mentioned, the SIMS facility is currently under scrutiny by the USEPA, the ILEPA, and the CDPH. The most immediate issue is with the LRF application to the CDPH. This application was filed by SIMS in November, 2021 and the City has given the community until the end of February, 2022, to give comments. This paper relates to whether such comments can be meaningfully provided, based on the data and Modeling Analysis in the LRF application.

The LRF application needs to adhere to rules issued by the Chicago Department of Public Health in 2020.⁴ These rules have been criticized in other venues but for the purpose of this comment the rules will be treated as is.

Among the rationale for the rules is a clear concern that “these facilities can be significant sources of dust, contaminated storm and process water discharges, metal-containing particulate or vapor, and possible radiation with the potential to harm human health and the environment, and cause a public nuisance or adversely impact the surrounding area or surrounding users.” As a consequence, the rules require that permits include an Air Quality Impact Assessment (Section 3.9.21). This requires a study that “shall evaluate PM10 emissions that may be generated at the Facility,” where PM10 refers to particulate matter that is 10 microns or greater in size. The rules for the Modeling Study also require that “In addition to PM10, *Facilities that receive scrap metal or metallic Recyclables shall evaluate the following HAPs in the modeling study: antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, nickel, and selenium compounds.*”

This Modeling Analysis is then the basis of a required dust monitoring plan to be implemented on an ongoing basis at the perimeter of the Facility and “each location of the Facility or Property determined in the air-dispersion modeling study to potentially exceed EPA’s 24-hour standard for PM10 or relevant acute or chronic health screening limits or standards for the modeled HAPs.”

Therefore, a central part of the CDPH rules is the availability of an air modeling analysis for both PM10 and specific HAPs that can be interpreted in a meaningful way and that can allow for comment. Absent a meaningful Modeling Analysis, the community (and presumably the CDPH) cannot understand the potential impact of the proposed LRF operation and cannot make effective comments.

III. Examination of Modeling Analysis in the SIMS application

The Modeling Analysis in the SIMS application is provided in Appendix R, also prepared by Trinity Consultants. This uses the required USEPA AERMOD software, which is publicly available from the USEPA. The Modeling Analysis notes that the AERMOD is “incorporated within Trinity’s BREEZE™ AERMOD Pro software”, which is, apparently, proprietary and therefore not available for review.

⁴ *Rules for Large Recycling Facilities*, City of Chicago, Effective June 5, 2020

III.a. Meteorological and geographic information.

The Analysis details how important information on the influence of wind and weather is input into the software. Though using wind data from Midway airport is not ideal, it is likely the best possible highly accurate input. The Analysis also presents a detailed, and meaningful, discussion of how the surrounding land use was considered. On the other hand, there is no information about how the particular geography of Pilsen, including especially the presence of the Chicago River and its impact on wind patterns, was considered. Regardless, a reasonable interpretation is that the Modeling Analysis was prepared following standard practice and, though data from closer to Pilsen would be better, it is difficult to improve on these considerations.

III.b. Modeling of PM10.

More important are considerations of how to model the parameters that are specific to SIMS and its operations. Within the report, there is an indication of what input data for different emissions sources (including but not limited to the shredder) are used as input data for the software. The report indicates “PM10 emission rates are based on *existing permit limits, AP-42 emission factors, and stack test results*” (emphasis added). This is the first indication of a severe problem interpreting the results. At this critical point, information is provided that *cannot be interpreted by anyone wishing to comment on the permit application*. For example:

- In general terms, there is no definition of the units or the time span for the rates.
- The discussion of the inputs for the Modeling Analysis is incomplete, for example regarding why it would use permit limits and, if so, which permit limits are used.
- Terminology is not explained, for example the meaning or use of an AP-42 emission factor.
- There is no indication of *which* stack test results are used. Even given that there are no valid stack tests to work from (see later), the reader at least needs to know whether what was used here were the Rhode Island data, the revised data from Mostardi Platt, or some correction given the May 2021 capture test results.

The Modeling Analysis does provide Attachment Tables with values for 24 hour PM10 emission rates from different locations in the facility.⁵ Presumably these are some form of *average* emission rates over a 24 hour period. The major source is the shredder (Attachment Table B-1, pdf page 385), with a value of 0.7507 g/s. This would equate to 64860 grams per day (143.2 pounds) and 2.369×10^7 grams per year (52,300 pounds, 26.15 tons). How the value of 0.7507 g/s was determined is not described, though this does seem in line with the data in the revised FESOP permit, which has a total potential to emit value for all PM emissions of 29.38 tons per year (Revised Table 1).

The analysis then presents what are deemed to be the “Criteria Pollutant Modeling Results” (Section 2.10 of Appendix R). This is done in two ways. One, Table 2-2, “presents the predicted highest 6th high

⁵ The Modeling Analysis does not include a discussion of the emissions that will result from the trucks that are used to bring materials to SIMS. It is noted that these emissions are not required for the LRF permit, though it is important to note that the impact of the facility on the community certainly includes those truck emissions. This, as is noted elsewhere, may be a problem with the CDPH permitting process and, therefore, I am not including them in this paper.

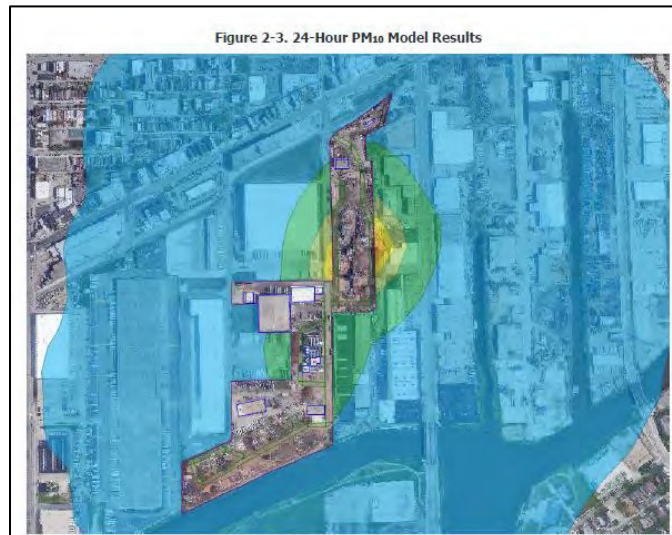
24-hour average concentration over five (5) years from 2012 to 2016.” This table is presented in the figure below, a screen shot from the report (taken from p. 378 of the full pdf).

Pollutant	AEMOD Predicted Concentration ($\mu\text{g}/\text{m}^3$)	Coordinates	
		East (m)	West (m)
PM ₁₀	145.69	444619.2	4633188.9

There are several reasons why this Table may be inadequate for the requirements of the CDPH rules and is certainly inadequate for the ability of the community to offer substantial comment on the application. Among these are the following:

- There is no discussion of why 2012-2016 data are used. These are certainly out of date for any understanding of what the facility might be emitting today.
- This offers only information on the “highest 6th 24-hour average.” Besides not explaining what that means, this seems to embed an assumption that *peak* and not total PM10 emissions is the basis of health concerns.
- The location of the coordinates is not explained. There are multiple areas of concern, not just the one select for reporting.

The second representation of the results is given in a figure, shown here (it is on p. 378 of the full pdf). It is easy to understand that the SIMS facility covers the space that is presented at the center of the figure in a “clear” and not color-coded region site at the center of the figure. The meaning of the red, orange, yellow, green, and blue coding is *not* provided. The description of this Figure suggests that it is “outlining the 24-hour PM10 concentrations surrounding the Paulina Street Facility.” But it is not explained what the colors mean or what “24-hour PM10 concentrations” mean.



Problems with this representation include the following:

- All of the comments presented for Table 2-2, above, including the dates of analysis and just what 24-hour results mean.
- A lack of information on the color coding, both in absolute terms and in comparison to available standards and references.
- Information on the impact *outside of* the Figure—presumably extending further north, east, and west in Pilsen and south / southeast into the Bridgeport community.

Hence, the information provided about the PM10 modeling is not in a form or with explanation to allow meaningful interpretation and comment by the community.

III.b. Modeling of hazardous air pollutants

The next section of the Modeling Analysis covers the requirement in the rules for “antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, nickel, and selenium compounds.” This *does* reference a specific stack test: the Mostardi Platt results from September 2019. The Analysis also presents the specific standards (taken from different sources, presented in Table 3-1). The presentation of the table is somewhat confusing at first glance, especially given that in some cases there are multiple references for some HAPs. But, it does provide the expected benchmarks. It would be better if the table noted which of these are incorporated in regulation (lead, for example) and which are guidelines that have not been validated (manganese). There may also be reasons to think that the standards are not ideal, especially for example with manganese and lead, based on the latest scientific information. However, they are the ones that are currently applicable.

The methodology used for HAP modeling is not described in a meaningful way, making the results unreliable. Specifically, the Modeling Analysis includes an indication that “metal HAP emission rates obtained during sampling were used to scale the PM10 emission rates for all emission units to their respective metal HAP emission rates.” Why this was done and, importantly, the actual values of inputs used for the scaling are not presented. Further, the known problems with the September 2019 data again mean that the input data are unreliable as an indication of emission rates from the shredder.

The actual results in this case are presented in terms of a single output value of a “Predicted average” for different time scales, as is probably appropriate given the different standards that are used. Screenshots for two cases, lead and manganese (excerpted from Table 3-3) are presented here.

Metal HAP	Maximum 3-Month Rolling Average Period	Predicted Monthly Average ($\mu\text{g}/\text{m}^3$)	Predicted Maximum 3-Month Rolling Average ($\mu\text{g}/\text{m}^3$)	Pb NAAQS Standard (3-Month Rolling Avg) ($\mu\text{g}/\text{m}^3$)	Predicted Impact Meets Standard (Y/N)?
Lead	November 2015	0.0104	0.0092	0.15	Yes
	December 2015	0.0089			
	January 2016	0.0084			

Metal HAP	Averaging Period	Year	Predicted Impact ($\mu\text{g}/\text{m}^3$)	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	Comparative Level ($\mu\text{g}/\text{m}^3$)	Predicted Impact Meets Comparative Level (Y/N)?
Manganese	24-hr	2012	0.02761	0.03692	4.80 (NR 445)	Yes
		2013	0.03692			
		2014	0.03043			
		2015	0.03601			
		2016	0.03451			
	Annual	2012	0.00474	0.00526	0.30 (ATSDR)	Yes
		2013	0.00513			
		2014	0.00509			
		2015	0.00526			
		2016	0.00464			

There are again several problems with this presentation of these results that prevent interpretation for the purposes of preparing comments to the permit. Among these are:

- No indication of where, geographically, these results are determined and certainly no presentation of a map showing how the levels might vary depending on location or by time of year and weather patterns.
- Unexplained presentation of results from several years ago and, for the case when the averaging period is less than one full year, which averaging period was selected.
- In the case of lead, presentation of a “maximum rolling average,” which is actually the simple average of results from three different periods.
- For the HAPs other than lead, presentation of a “maximum predicted impact” for the HAPs other than lead that seems to be just a maximum from a list of unspecified dates within a particular year.
- No information on what modeling might be for the current situation (i.e, December 2021) or even at the last time any kind of actual emissions data were actually collected (September, 2019).

As with the PM10 data, the Modeling Analysis presented for the HAPs lacks essential information and explanation to let the community comment on this application at this point.

IV. Issues of emissions

A key question for the new modeling analysis is associated with the uncertain nature of what SIMS has been emitting and its impact on the community. Still, it is helpful to note some of what has been reported and to raise issues that the Modeling Analysis, properly done, should address.

IV.a. Questions raised by SIMS Emission Testing, September 2019

In September 2019, an independent company (Mostardi Platt) did emissions testing at the SIMS site in Pilsen. This included manganese along with lead (and other metals). Excerpts from the reports are given below.

TEST RESULTS		
Test Parameter	Concentration	Emission Rate, lb/hr
FPM	0.0195 gr/dscf	6.301
CPM	0.0010 gr/dscf	0.320
TPM	0.0205 gr/dscf	6.622
Sb	≤ 0.81 ppb	6.36E-04
As	≤ 1.19 ppb	≤ 5.72E-04
Ba	10.59 ppb	9.39E-03
Be	≤ 0.54 ppb	≤ 3.10E-05
Cd	≤ 0.31 ppb	≤ 2.26E-04
Cr	5.58 ppb	1.90E-03
Co	≤ 0.72 ppb	≤ 2.73E-04
Cu	9.59 ppb	3.93E-03
Pb	6.24 ppb	8.30E-03
Mn	17.11 ppb	6.07E-03
Hg	≤ 0.82 ppb	≤ 1.07E-03
Ni	4.45 ppb	1.70E-03
P	≤ 195.94 ppb	≤ 3.90E-02
Se	≤ 0.68 ppb	≤ 3.00E-04
Ag	≤ 0.09 ppb	≤ 6.28E-05
Tl	≤ 0.03 ppb	≤ 4.16E-05
Zn	349.38 ppb	1.47E-01

Summary Test Results for Particulates and Metals from Mostardi Platt report, September 2019

Metal Management Midwest, Inc. Paulina Street Facility Shredder Emissions Volatile Organic Compound Summary															
Test No.	Date	Start Time	End Time	Operating Rate, net tons/hr	Flowrate, SCFM	THC ppm as C ₃ H ₈ (wet)	CH ₄ ppm as CH ₄ (wet)	CH ₄ ppm as C ₃ H ₈ (wet)	C ₂ H ₆ ppm as C ₃ H ₈ (wet)	C ₂ H ₆ ppm as C ₃ H ₈ (wet)	NMNE ppm as C ₃ H ₈ (wet)	NMNE VOC lb/hr Emission Rate	NMNE VOC Emission Factor, lb/net ton	Estimated Capture Efficiency, %	Adjusted VOC Emission Factor, lb/net ton
1	09/20/19	9:00	9:59	198.50	47,120	48.9	2.6	1.0	1.1	0.8	47.1	15.21	0.077	98.00%	0.078
2	09/20/19	11:40	12:39	195.15	45,445	70.1	2.3	0.9	1.9	1.3	67.9	21.15	0.106	98.00%	0.111
3	09/20/19	13:45	14:44	200.32	40,241	60.0	2.3	0.9	1.8	1.2	57.9	15.95	0.080	98.00%	0.081
Average				197.99	44,269	59.7	2.4	1.0	1.6	1.1	57.8	17.44	0.086	98.00%	0.090

Summary Test Results for Organic Emissions from Mostardi Platt report, September 2019

These and other data in the September 2019 test were used in a revised table in the FESOP application.

Shredding Plant

Hourly Throughput	200	tons/hour
Annual Throughput ⁴	371,900	tons/year

Compound	Potential Emissions		
	lb/ton ¹	lb/hour	ton/year
Mercury ¹	5.40E-06	0.001	1.00E-03
Beryllium ¹	1.57E-07	3.13E-05	2.91E-05
Phosphorus ¹	1.97E-04	0.039	3.66E-02
Chromium ¹	9.60E-06	1.92E-03	1.78E-03
Cobalt ¹	1.38E-06	2.76E-04	2.56E-04
Nickel ¹	8.59E-06	1.72E-03	1.60E-03
Arsenic ¹	2.89E-06	5.78E-04	5.37E-04
Selenium ¹	1.52E-06	3.03E-04	2.82E-04
Cadmium ¹	1.14E-06	2.28E-04	2.12E-04
Antimony ¹	3.21E-06	6.42E-04	5.97E-04
Lead ^{1,2}	4.19E-05	8.38E-03	7.80E-03
Manganese ¹	3.07E-05	6.13E-03	5.70E-03
Methylene Chloride ³	6.00E-05	0.01	0.01
1,1,1-Trichloroethane ³	2.00E-04	0.04	0.04
Benzene ³	4.00E-04	0.08	0.07
Tetrachloroethene (PCE) ³	2.67E-06	5.33E-04	4.96E-04
Trichloroethene (TCE) ³	6.67E-05	0.01	0.01
Toluene ³	3.33E-04	0.07	0.06
Ethylbenzene ³	6.67E-05	0.01	0.01
Styrene ³	1.33E-05	0.003	0.002
o-Xylene ³	6.67E-05	0.01	0.01
m,p-Xylene ⁴	1.33E-04	0.03	0.02

¹ Emission factors based on 9/20/2019 source testing at Paulina Street Facility.

² Lead is conservatively assumed to be lead compounds rather than elemental lead

³ Emission rates, as presented in ISRI Title V Applicability Workbook, Table D-11.F (As seen in Appendix E).

⁴ Per Paragraph 36.b of the ACO, the quantity of ELVs and other recyclable metallic material fed into the hammermill shredder must be no more than 50% ELVs by weight.

Potential Emissions from FESOP Application January 2020

In general, these results showed emission rates more than 10 times higher than originally suggested (based on the Rhode Island data), including 15 pounds per year for lead. The results also noted a potential to emit 11 pounds per year for manganese, which was not part of the Rhode Island data. These results can be compared to a similar test done at the shredder at the General Iron location in Lincoln Park, which was conducted in Fall, 2018. Emissions measured at SIMS for these metals are 8-9 times higher than those that had been measured at General Iron.

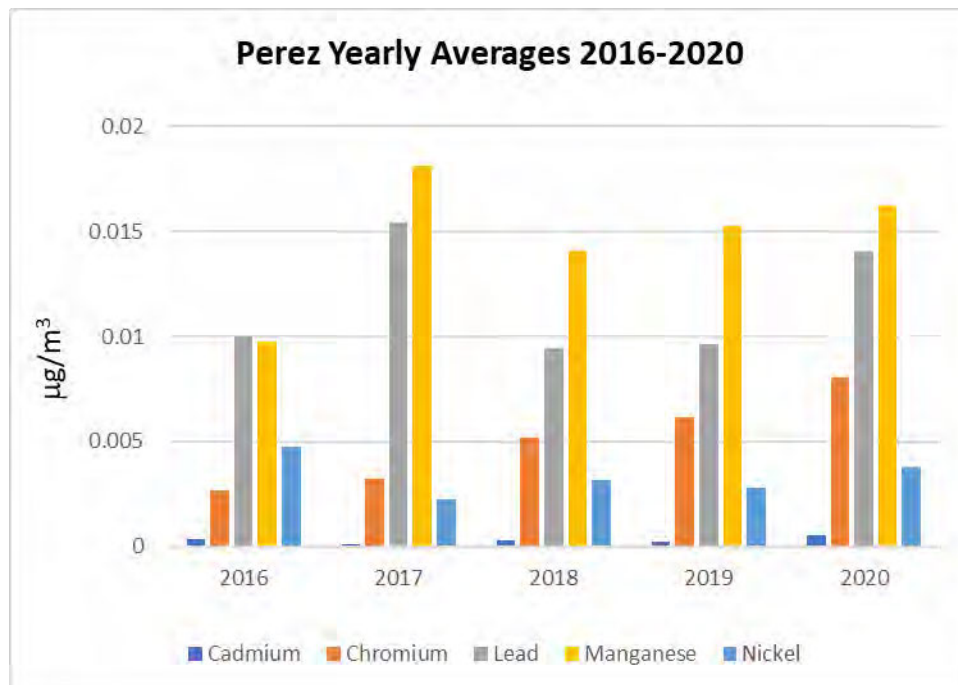
There is one other important point to consider about these data. As noted, the May, 2021 capture efficiency testing that was required by the ILEPA showed that less than half of the emissions were likely being captured at the measurement point. As a result, the actual emissions may be much higher than are being used in the Modeling Analysis. This is never mentioned in the LRF application.

With this in mind, it is clear that the data used in the Modeling Analysis in the LRF application is not reliable at this point. *Members of the ILEPA Bureau of Air have indicated to PERRO members that they will not do their own, independent, modeling of the emissions from SIMS using this data.*

IV.b. Airborne lead and other metals in the Pilsen neighborhood: Perez Elementary School data

One of the important parts of the environment in Pilsen is the continuous monitoring of the air adjacent to the H. Kramer site at 21st and Loomis for many metals, including lead. This includes a station at Perez Elementary School that is close to H. Kramer but also about 1300 meters (4300 feet, 0.80 miles) from SIMS. This shows a dramatic decrease in lead in the air in the period since 2010, along with the almost complete elimination of lead releases as reported by H. Kramer through the EPA Toxic Release Inventory, to just 5 pounds in the 2018 and 2019 reporting year. Data provided to PERRO by the ILEPA

and graphed in the figure below shows that lead in the air has increased since 2018 (as have manganese, chromium, and cadmium).⁶



IV.c. Implications of SIMS and Pilsen monitoring data

The values of lead in the air at Perez are, it should be noted, below the current levels that require action by the USEPA (0.15 µg/m³), though in 2020 they were close to 10% of the USEPA action level. Still, given that the lead measured at Perez has not gone away and has in fact shown a recent increase, it is highly likely there is another source of airborne lead in the community. We know from the Fall 2019 data that, at a minimum, SIMS is operating a shredder capable of putting more than 15 pounds of lead in the air per year, and may well be emitting more than twice that. That, and these data, suggest that SIMS may be the source of the continuing, and growing, measurements at Perez, 1800 meters from SIMS. It is also important to note that the Perez monitor is by no means “close” to SIMS. By comparison, Whittier Elementary is only 450 meters away.

IV.d. Implications of December, 2021 SIMS proposal for additional VOM controls

As mentioned, an important change may be coming for the operation of the shredder at SIMS, as outlined in a recent submission of a plan for additional controls based on the outcome of the Illinois Attorney General’s injunctive action in October, 2021. The proposal for this change centers on the introduction of a regenerative thermal oxidizer (RTO) to process emissions prior to release in the atmosphere. The RTO will likely have a significant impact on the rate of emissions of volatile organic material per ton of processed material, since it introduces an additional combustion step applied to the gas emissions, turning that organic matter into carbon dioxide and water. There is no information or

⁶ The graph does show an increase in lead in 2017, something that can be explained based on data on emissions for H. Kramer. What cannot be explained in that way is the increase since 2018.

expectation that that process will have any impact on particulate matter, which is often mineralized. And it will certainly have no impact on emissions of HAPs, since all additional oxidation will do is, perhaps, to turn metal dust into metal oxide dust.



**Pilsen Environmental
Rights & Reform Organization**

—
PO Box 891140
Chicago, IL 60608
312-854-9247
info@pilsenperro.org

January 24, 2022

OPEN LETTER TO THE ADMINISTRATION OF THE CITY OF
CHICAGO AND THE CHICAGO DEPARTMENT OF PUBLIC
HEALTH

**Chicago must reject the SIMS Metal Management
Application for a Large Recycling Facility
Permit immediately!**

Dr. Allison Arwady, Commissioner, Chicago Department of Public
Health (CDPH)

Honorable Lori Lightfoot, Chicago Mayor

Candace Moore, Chief Equity Officer, City of Chicago

Dear Dr. Arwady, Mayor Lightfoot, and Ms. Moore:

We are members of the Pilsen Environmental Rights and Reform Organization (PERRO). Over the last 18 years, we have worked with many agencies as part of improving the environment in Pilsen. PERRO was formed in 2004, and we are a diverse group of concerned residents, activists, teachers, business owners, environmental science students, engineers, former industrial laborers, artists, mothers, and others. We formed PERRO in response to the pollution problems with the Pilsen neighborhood. We believe that due to the multiple sources of pollution emanating from local industry, the residents are disproportionately subjected to pollution-related health risks. The Pilsen neighborhood is a majority low income and immigrant neighborhood with many residents who are not citizens and many who speak little English. The combination of low income, immigrant residents with many local industrial sites has made Pilsen a clear case of an environmental justice community.

In the years since our founding, we have been involved in work to address multiple sources of pollution in the Pilsen community, including controlling the massive lead emissions from H. Kramer, advocating for cleanup of soil by H. Kramer and BNSF, and the ending of coal burning at the Fisk Power Station. We were also forceful in our opposition to the proposed opening of the "Pure Metal" shredder in 2014. More recently, we have been working against the continued operation of the SIMS recycling plant at

2500 S. Paulina, which continues to pollute our community without restraint.

We know that there is a deadline of February 28 for comments about the application of SIMS Metal Management, 2500 S. Paulina, for a Large Recycling Facility permit under the 2020 rules issued by the Chicago Department of Public Health. We feel there are many reasons to deny this application, including SIMS history of violating regulations. These include actions from the US EPA in 2018 and the Illinois Attorney General in 2021. SIMS has yet to complete the steps expected in those actions. This includes finally getting accurate data on actual emissions. **Yes, even as SIMS applies for a permit from CDPH, no one, not even SIMS, actually knows how much pollution they are producing!**

We also want to alert you to a **pressing problem with the application itself**. As is detailed in the attached analysis by Dr. Donald Wink, a chemistry professor at the University of Illinois Chicago, **the application that SIMS has submitted lacks critical information that we need to make comments!** We don't know how the community can comment when the application doesn't explain, even to a technical expert, what is really going on.

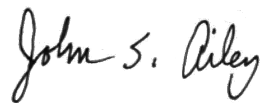
Therefore, we call the CDPH to immediately reject the application as incomplete and based on inaccurate information.

It is also clear that the community doesn't fully understand what is going on at SIMS. Therefore, ***we also call on CDPH to schedule a public hearing around all aspects of SIMS's operation. This would include clearly explaining to the community the nature of SIMS' violations over the last 10 years, including details of the US EPA and Illinois AG actions.***

Signed,



Joshi Radin Flores
PERRO member, IL Solar for All Educator



John S Ailey
PERRO treasurer, Pilsen resident



Citlalli Trujillo, *PERRO member and Pilsen resident*



Maria Chavez
PERRO member



Michelle Hathaway
PERRO member and Pilsen resident



Troy Hernandez, PhD
PERRO Coordinating Committee, Pilsen resident



Dorian Breuer
PERRO Coordinating Committee



Rose Gomez
PERRO Member

Regarding SIMS

Theresa McNamara 

Thu 2/10/2022 4:06 PM

To: envcomments <envcomments@cityofchicago.org>; Mary Gonzales <mary@gamaliel.org>

 1 attachments (26 KB)

25th Ward stakeholders letter.doc;

[Warning: External email]

THE TWENTY-FIFTH WARD STAKEHOLDERS

February 10, 2022

Dear City of Chicago:

The 25th Ward Stakeholders is a coalition of organizations, congregations, schools, universities, elected officials, medical facilities, agencies, and other key leaders who work together to better serve the residents of the 25th Ward.

The 25th Ward is particularly unique because of its surrounding industrial corridors and railyards. We know, firsthand, the health impact on children, their families, and especially, their grandparents because they live here. Higher levels of asthma among children and cancer as well as lung and heart diseases among adults and the elderly. Records will prove this community became much more vulnerable to the pandemic because of these industries.

We know one of the industries in our area, Sims Metal Management at 25th and Paulina, is seeking a renewal of their permit to continue operating. They have accumulated more than forty violations related to toxins they have released into the air. Despite that, they want a renewal. We believe this is unacceptable.

We are also aware that you are seeking input from the community about whether a public hearing should be held about the renewal. We, the 25th Ward Stakeholders, believe a public hearing should be held. It is important for residents of the community to have their stories heard and to give their opinion about this renewal.

Sincerely,

Members of the 25th Ward Stakeholders who live and/or work within the Pilsen Community

Kerime Alejo, Resurrection Project	Rich Gray, 2532 Corp.
Robert DeBonnett	Nancy Quintana, Finkl Academy
Laura Leon, Sinai Community Institute	Ruben Franco, 25 th Ward office
Luz Maria Solis, Día de los Niños	Guacolda Reyes, Resurrection Project
Jasmine Juarez, Pilsen Community Academy	Luis Narvaez, City Colleges of Chicago
Florencia Carmona, Sinai Community Institute	Celeste Holmes, Senator Tony Muñoz
Esther Corpuz, Alivio Medical Center	Dalia Radecki, Mi Hogar
Jeylu Gutierrez, Cook County Commissioner Alma E. Anaya	Malik Bader, 2532 Corp.
Antonio Guillen, Wintrust Bank in Pilsen	Juan Soto
Mary Gonzales, Southwest Environmental Alliance	Alvaro Obregon
Grace Chan McKibben, Coalition for a Better Chinese American Community	

Letter asking the Mayor for a hearing on Sims and a report on Pilsen that is overburdened.

Theresa McNamara [REDACTED] >

Sun 2/13/2022 3:40 PM

To: Lori Lightfoot <Lori.Lightfoot@cityofchicago.org>; Allison Arwady <Allison.Arwady@cityofchicago.org>; Maurice Cox <Maurice.Cox@cityofchicago.org>; Kim, John J. <John.J.Kim@illinois.gov>; gov.press@illinois.gov <gov.press@illinois.gov>; Angela Tovar <Angela.Tovar@cityofchicago.org>; envcomments <envcomments@cityofchicago.org>

 1 attachments (144 KB)

LT. SIMS METAL MANAGEMENT.docx;

[Warning: External email]



Mayor Lori Lightfoot
Chicago City Hall^[SEP]
121 N. LaSalle Street
Chicago, IL. 60601

February 12, 2022

RE: Hearing on Renewal Permit for Sims Metal Management

Dear Mayor,

We would like a public hearing in both Spanish and English on Sims Metal Management That is located at 2500 S. Paulina.

SIMs, has shown itself to be a serial polluter showing little regard for our little ones and pregnant^[SEP] moms. There are over 3,300 primary public school children in the schools within one mile of the Sims facility. I am inclosing a report by Dr. Michael Cailas, UIC School of Public Health detailing the OVERBURDENED impact on the residents of Pilsen.

Given your prioritizing the health of Chicago children and your calling for a new ordinance targeting the cumulative impact on communities of color, we are asking that your administration put in place a moratorium on new and renewal permits in Environmental Justice communities until your ordinance is written and passed.

There has been an outpouring of community support for a public hearing on Sims Metal Management. As residents send in letters to Dr. Allison Arwady requesting this hearing, they are sending me a copy; the outreach is still on going.

I am a resident of McKinley Park the health of Pilsen's children is no less important to me than it is to you. The implosion of Hilco, General Iron that is now on the southeast side, MAT Asphalt here in McKinley Park now SIMs in Pilsen. Each of these companies in Latin X and African American communities is a big problem for us. No one is being held responsible for the pollution that comes with having companies like these in close proximity to so many other companies that are spewing different chemicals into the atmosphere. And they continue being dropped here on the Southside. Along with the diesel trucks coming in to pick up or drop off product rolling through our neighborhoods. We know these companies are just the tip of the iceberg.

We need this cumulative impact ordinance that you mention written and implemented ASAP for this pollution is a health risk to our children, our elderly and our poor. And ignoring this problem will be critical causing more asthma, more upper respiratory infections, stroke and heart attacks in our communities.

For what we are living in is a health risk.

Sincerely,

Theresa Reyes McNamara^[SEP]
Southwest Environmental Alliance, President
3528 S Seeley Ave.^[SEP] Chicago, IL 60609^[SEP]
312-439-5928

Public Hearing for Sims Metal Management permit

Bridgeport Alliance of Chicago <bridgeportalliance@gmail.com>

Tue 2/15/2022 8:18 PM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

Good evening,

I'm writing to you in my capacity as chair of Bridgeport Alliance, a community activist organization on the Southwest Side, to demand a **public hearing** regarding the application for a renewed operating permit (Class IVB recycling permit) for Sims Metal Management at 2500 S. Paulina St., to urge you to **not renew** their permit, and to insist you **enforce a shut down** while they are not permitted.

The Chicago Department of Public Health must hold a public hearing and listen to the people who live and attend school near Sims to understand the negative effect this facility has on their air quality and their community.

Bridgeport Alliance opposes the renewal of the operating permit because Sims has shown through repeated violations of clean air regulations that they are willing to sacrifice the health of Chicago residents in order to increase profits for their Australian parent company, Sims Limited.

In 2016, the U.S. EPA observed hydrocarbons exiting Sim's hammermill shredder and fugitive particulate matter crossing the property line. In 2018, Sims paid a \$225,000 civil penalty for those violations of the Clean Air Act and agreed to limit volatile organic material emissions.

In 2021, an emissions capture test to check on Sims' remediation of the 2016 violations showed their shredder was capturing less than 50% of emissions when it was mandated to capture at least 81%. The Illinois EPA referred Sims to the Illinois Attorney General for enforcement, and, in October 2021, the AG filed a lawsuit against Sims for more than 40 violations of the Illinois Environmental Protection Act and Illinois Pollution Control Board Air Pollution Regulations.

While this process has dragged out, Southwest Side residents have been subjected to another five years of air pollution! The Chicago Department of Public Health has the power to stop Sims' harmful emissions by denying the permit and enforcing a shut down.

Sincerely,

Charlotte Piwowar

Chair, Bridgeport Alliance

--

Bridgeport Alliance is a grassroots organization of local people and institutions committed to engage in the decision making that impacts our community utilizing education, advocacy, and collaborative action to promote responsive government and an improved quality of life for all residents and their future.

PUBLIC HEARING on SIMS Metal Management

Guille Leon <gleon@lucha.org>

Sat 2/19/2022 9:07 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: Theresa McNamara [REDACTED]

[Warning: External email]

To Whom it may Concern,

I would like a PUBLIC HEARING in SPANISH and in ENGLISH on :

SIMs Metal Management 2500 S. Paulina

I grew up in Pilsen where my family lives. I work and attend my religious services there as well. This it's off much concern to me. Thank you.

Sincerely,

Guillermina León
3620 S. Damen Ave.
Chicago, IL. 60609

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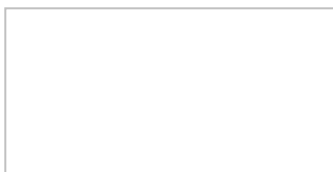
GUILLE LEON
HUD-CERTIFIED HOUSING
COUNSELOR, HOUSING
OPPORTUNITIES PROGRAM

EMAIL: gleon@lucha.org

TEL: 773.489.8484 x255

FAX: 773.489.9085

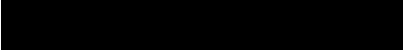
3541 W. NORTH AVE. | CHICAGO, ILLINOIS 60647



ADVANCING HOUSING AS A HUMAN RIGHT

Due to concerns surrounding COVID-19, LUCHA is only accepting visitors at our offices by appointment. Most meetings are being held remotely. LUCHA staff continues to be available via email and telephone. Your patience is appreciated as we all adjust to this new work environment.

Concerns about SIMs Metal Management

Lindsey G 

Sat 2/19/2022 9:45 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

I am concerned about the environmental contamination in the Pilsen neighborhood, which the business of SIMs Metal Management contributes to.

I would like a PUBLIC HEARING in SPANISH and in ENGLISH on SIMs Metal Management at [2500 S. Paulina](#).

thank you,
Lindsey Gorry

Opposed to renewal of the Sims permit

Jonah Bondurant [REDACTED]

Sat 2/19/2022 11:04 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: [REDACTED]

[Warning: External email]

Hello,

I am opposed to renewal of the Sims permit and I demand a public hearing about the permit. Near this location we have **1** eight public schools with 3,359 children (K-8), including one school which is 2 blocks away from Sims, **2** 1 asphalt plant (Reliable Ogden LLC.), **3** 6 TRI facilities (H KRAMER & CO and OREMUS CONCRETE are examples) that are large scale producers which generate hazardous toxins above regulatory thresholds and emit 19 toxic chemicals, and **4** one "brownfield" which is a large piece of abandoned industrial land contaminated with toxic contaminants like LEAD and MERCURY.

We have more than our fair share of dangerous polluting industries in our communities. One way to reduce pollution is to oppose this renewal. We want industries that will bring green jobs. We have the highest rate of asthma among children as well as cancer, heart disease and lung disease among adults due to the large number of contaminating industries in our communities. The Attorney General has filed suit against Sims Metal Management on Paulina Street due to more than 40 violations of the guidelines. We want a public hearing in our community so we can voice our opposition to this permit. The City must stop ignoring the health and wellbeing of the people. We are opposed to this permit renewal.

Sincerely,

Jonah Bondurant

[REDACTED]
Chicago, IL, 60608

Sims Metal Shredder

Bo0sT

Wed 2/23/2022 6:22 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Onyx and I am a resident of Chicago. I stand with activists and community members in halting Sims Metal operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their permit based on inaccurate data. Sims Metal is located a quarter mile from Benito Juarez Community Academy. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community.

Sims Metals - Pilsen (EJ Community)

Citlalli Trujillo 

Thu 2/24/2022 11:29 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Citlalli Trujillo and I am a resident of Chicago. I stand with activists and community members in halting Sims Metals operations until there is a reliable model that mitigates pollutants and reduces the greatest harms. I urge you to deny their LFR permit based on inaccurate data. Sims Metals is located a quarter mile from Benito Juarez Community Academy and Whittier Elementary School. Projections show that toxic metal shredder dust is blowing directly towards the high school and residents of an already environmentally burdened community. Deny the permit! Sims has been in numerous violations documented over 20 years. Pilsen deserves CLEAN AIR.

Deny Permit for Metal Management Midwest

Pilsen Alliance <info@thepilsenalliance.org>

Fri 2/25/2022 9:24 AM

To: envcomments <envcomments@cityofchicago.org>

 1 attachments (68 KB)

Written comment against Metal Management Midwest (sims)-Pilsen Alliance.docx;

[Warning: External email]



Sunburst chart

Description automatically
generated with low
confidence

February 25, 2022

Chicago Department of Public Health and to whom it may concern,

The Pilsen Alliance submits its formal opposition to the renewal of the operating permit requested by Metal Management Midwest (Sims).

As a social justice organization fighting against toxic polluters for well over two decades due to environmental racism; we are standing strong with Pilsen residents, community stakeholders and our local elected officials including 25th ward Alderman Byron Sigcho-Lopez to deny the permit for Metal Management Midwest and end the environmental racism that continues to impact our Black and Brown communities in the City of Chicago. The negative health impacts to the families in Pilsen and adjacent neighborhoods outweighs the benefit of having a toxic polluter like Metal Management Midwest in our community.

Coming off the heels of a historic community victory to Stop General Iron from operating in the southeast side, we are digging our heels to send a strong message to polluters like Metal Management Midwest and many others who have chosen our communities for their dirty business that we will stand together and united to demand the City of Chicago reject the permit for Metal Management Midwest.

We are prepared to defend our community against toxic polluters at all costs to defend the health and wellbeing of tens of thousands of residents living in the lower west and south west sides. Please deny

the permit for Metal Management Midwest and respect our right to live in a clean and safe community!

Signed,

Martha Herrera-President, Pilsen Alliance

Moises Moreno-Executive Director, Pilsen Alliance



February 25, 2022

Chicago Department of Public Health and to whom it may concern,

The Pilsen Alliance submits its formal opposition to the renewal of the operating permit requested by Metal Management Midwest (Sims).

As a social justice organization fighting against toxic polluters for well over two decades due to environmental racism; we are standing strong with Pilsen residents, community stakeholders and our local elected officials including 25th ward Alderman Byron Sigcho-Lopez to deny the permit for Metal Management Midwest and end the environmental racism that continues to impact our Black and Brown communities in the City of Chicago. The negative health impacts to the families in Pilsen and adjacent neighborhoods outweighs the benefit of having a toxic polluter like Metal Management Midwest in our community.

Coming off the heels of a historic community victory to Stop General Iron from operating in the southeast side, we are digging our heels to send a strong message to polluters like Metal Management Midwest and many others who have chosen our communities for their dirty business that we will stand together and united to demand the City of Chicago reject the permit for Metal Management Midwest.

We are prepared to defend our community against toxic polluters at all costs to defend the health and wellbeing of tens of thousands of residents living in the lower west and south west sides. Please deny the permit for Metal Management Midwest and respect our right to live in a clean and safe community!

Signed,

Pilsen Alliance

SIMS PERMIT

Erik Torres



Fri 2/25/2022 12:46 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To the City Of Chicago Public Health

Sims shredder is putting fluff out in the neighborhood. It's been going on since before and after the city gave them tickets. They have done nothing to correct it.

You can see and smell the emissions coming off the shredder. They have no pollution control.

Thank You sincerely Erik Torres

SIMS PERMIT

Joseluis Palomino 

Fri 2/25/2022 12:56 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

City Public Health Department

With as many people live in Pilsen and with schools with in two Blocks of the junk yard, they should not be allow to continue to pollute the neighborhood. It's smells terrible, and you can see the smoke coming from the shredder I sincerely hope the city cares about the people of Pilsen and denies the permit.

JoseLuis Palomino.

Sims Metal

Juan Rivera 

Fri 2/25/2022 1:08 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

PLEASE DENY SIMS PERMIT!

Why does the shredder on the south east side get denied and there still is a shredder in Pilsen polluting the community? The smoke pours out of the car shredder and there is fuzz leaving the site. The city needs to stop this operation. Its too close to the schools and neighbors.

-Juan

SIMS PERMIT

Saul Torres 

Fri 2/25/2022 1:10 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

How can the Public Health Department of Chicago allow SIMS to continue harming Pilsen neighborhood. I demand to stop the shredder from causing pollution, toxic chemicals.

Saul Torres.

Metal Management Permit

Luis Leon 

Fri 2/25/2022 1:17 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

The permit application for SIMS must be denied. Help protect the people of Pilsen. Shut them down now! This is not fair to the community!!!

-Luis

Deny The Permit

Jose Alba 

Fri 2/25/2022 1:25 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lightfoot

The permit needs to be denied, because theirs too many people who live near the company. Their are so many students at the schools near them that shouldn't have to breathe the toxic chemicals coming from the place.

Sincerely JOSE ALBA

SIMS permit

Manuel Ruiz 

Fri 2/25/2022 1:35 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lightfoot

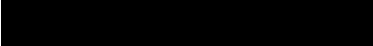
How can this place still be running?? The smells coming from this business are disgusting and place the citizens health at risk.

Does the public health department even know what is in the auto fluff blowing around the neighborhood?

There is no way they should be allowed to continue to operate. I am asking for you to deny the permit application.

sincerely,
Manuel Ruiz

Environment racism

Gregorio Torres 

Fri 2/25/2022 1:37 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

By allowing Sims to keep operating is racist to the people of Pilsen. As our mayor I beg you to prevent their permit approval. Thank you for your consideration.

Gregorio Torres

Sims Metal Management

Cristian [REDACTED]

Fri 2/25/2022 4:19 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lori Lightfoot.

As everyone knows, Sims has requested a shredder permit to be renewed. I ask to please this be denied. The smell by this business is Awful, the Air Quality is poor and polluted due to the black smoke coming out of this facility. It is time for them to stop. I ask you and the city of Chicago to stop the renewal of Sims Metal Management Shredder Permit.

Best Regards.

Sent from my iPhone

Deny Sims Shredder Permit

Cristian Estrada [REDACTED]

Fri 2/25/2022 4:22 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lori Lightfoot.

I work for RMG recycling, a longtime employee of General Iron as it may be and also a manager with several employees to tend to; I am in a position to have to be aware of industry trends and particularly as it relates to matters where my job and livelihood is concerned, it is public news that SIMS Metal Management is seeking a permit renewal for the shredder at their location, needless to say, I am not happy that OUR permit was denied for RMG southside recycling, for fairness, will you deny their permit??

circumstances surrounding operations of SIMS / RMG southside recycling are about the same, if a permit is afforded them what about ours then??

I would love to see that the city of Chicago does take into account the needs of ours as well.

Best Regards.

Deny Permit please

Juana Delgado [REDACTED]

Fri 2/25/2022 4:30 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

City of Chicago.

As everyone know Sims Metal Management is renewing their shredder permit. I as a citizen of Chicago, ask to please deny their shredding permit. There is too much pollution coming out. Dark smoke that can be seen from blocks away. Deny the Permit.

Thanks!

Sent from my iPhone

Deny Permit please

Juana Delgado [REDACTED]

Fri 2/25/2022 4:30 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

City of Chicago.

As everyone know Sims Metal Management is renewing their shredder permit. I as a citizen of Chicago, ask to please deny their shredding permit. There is too much pollution coming out. Dark smoke that can be seen from blocks away. Deny the Permit.

Thanks!

Sent from my iPhone

Complaints on simms recycling

Jesse Serrano [REDACTED]

Fri 2/25/2022 7:01 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern. I am a concern citizen of the city of Chicago. Regarding the scrap metal yard simms. As we drive down to our house all you smell is the pollution in the air from simms.plus all the fluff and dust that is on our sidewalks and cars. I literally have to wash my car twice a week at times six times a month It's ridiculous. They recently had a fire at their facility and should be investigated. They are located near a charter school and a high school as well. Imagine the air those kids are breathing and the damage it is causing. For the taxes I'm paying to own my home here I should be able to breath FRESH AIR. Thank you!

para el departamento de salud. Les pido por favor tinen que parar la grande contaminación que la compnia sims esta aciendo en vecindario de pilsen no es justo que los estudiantes de la escuela benito juarez y la comunidad respiren toda esa contaminacio...

Cele Martinez 

Sat 2/26/2022 6:57 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Atentamente :
Ciudadano de esta ciudad.

Sent from my iPhone

SIMS METAL MANAGEMENT

Francisco Martinez 

Sat 2/26/2022 6:57 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear City of Chicago it is my understanding that Sims metal management has applied to renew their shredding permit. After General Iron was denied their permit on February 15th, I believe it is only fair to DENY Sims permit as well. They are in the same situation as General Iron was claimed to be as polluting to residents close by, a school close by, and received fines as well. There is no way Sims should get their permit renewed, they have been polluting and been fined for years. If General Iron created a state of the art efficient shredder AND was deniedwhat makes Sims special to have their shredder renewed. Deny the permit !!

Sent from my iPhone

SIMS METAL MANAGEMENT

Cristian [REDACTED]

Sat 2/26/2022 7:00 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lori Lightfoot.

I write to you today due to concerns about the renewal of The shredding facility located in Pilsen (Sims Metal Management). Every time I drive by I can see how they are polluting the environment and have not been stopped. It is long overdue for this facility to face the facts and stop their shredding system. There is a high school 2 blocks away and all this black smoke coming out of this facility is just not good for anyone.

I ask to please DENY THEIR SHREDDING PERMIT.

Best Regards.

Sent from my iPhone

Deny Shredder Permit

Darryl Cooper [REDACTED]

Sat 2/26/2022 7:18 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lori Lightfoot.

It has come to my attention that Sim Metal Management is renewing their permit to shred.

They have issues bad air. There are schools , restaurants and other sites that are being damaged by this polluting company. I ask as a citizen for this Permit to be Denied.

To the Department of Health.

I ask them to do a Heath study in the surrounding area. My biggest concern is the kids and the future to come.

Again please DENY the Permit.

Best Regards.

Cooper.

Deny Permite ti Sims

Jose Martinez 

Sat 2/26/2022 7:27 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear City of Chicago.

As it has come to my attention, sims metal management is trying to renew their shredding permit. As a concerned citizen I ask this Permit to be DENIED. There is too much at stake in that particular area. The amount of smoke , noise and pollution coming out of this facility needs to stop immediately. PLEASE DENY THIER SHREDDING PERMIT !!!

Sims Metal Management

L.C Davis 

Sat 2/26/2022 7:33 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lori Lightfoot.

I am against Sims shredding due to air pollution.

And hopefully my voice is heard and help stop their permit of them shredding.

Thank you very much.

Deny Shredding permit

Popoca Ismael 

Sat 2/26/2022 7:51 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lori Lighfoot

As a citizen of Chicago I want to rise my voice about the Shredding Permit for Sims Metal Management. They are environmentally unfit to run an operation as such. They are polluting the air in Pilsen and this will be damage to the citizens of the surrounding area.

Again PLEASE DENY THE SHREDDING PERMIT.

Thank and have a great day!

Sent from my iPhone

Negar un permiso a Sims Metal Management

Cipriano Almazan [REDACTED]

Sat 2/26/2022 7:58 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Estimada alcaldesa me dirijo a usted para dejarle saver nuestra preocupación acerca de este permiso ya qe nos afectara atodos nuestros vesinos nuestros hijos por tanta contaminación producida por esta compania de metal ..espero y rectifiquen ese permiso y negarlo de lo contrario estaría matando a nuestras familias con tanta contaminacion..gracias.

Negar El Permiso A Sims Metal Management

Ramon Rodriguez 

Sat 2/26/2022 8:13 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Querida Ciudad.

Como un Ciudadano más de esta Ciudad . Les pido con todo el respeto que por favor les NIEGUEN la Renovación del permiso para moler a esta compañía. El medio ambiente ya tiene suficientes problemas y Sims nada más esta esperando la situación. El olor que sale de ese lugar es insoportable. El polvo vuela blocks de ahí y dana la salud de los niños que están cerca. Es tiempo de que sims sea removida como fue removida la otra compañía con molino.

Att. Ciudadano de Illinois

Sims DENY SHREDDING PERMIT

Rafael Guzmán 

Sat 2/26/2022 8:26 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

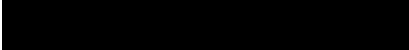
Dear Mayor Lori Lightfoot

It has come to my attention that Sims Metal Management is in renewal of their shredder permits. This company has polluted the area of Pilsen long enough. I ask for this Permit to be DENIED. There is a school 2 blocks from sims and it's a Hispanic school. I'm my opinion this is racially wrong. This facility doesn't have the ability to keep toxic fumes from the environment. The about of contaminated dust blowing out is outrageous. This facility is long overdue for an immediate shutdown as other shredding facilities have been. I want my voice heard: PLEASE DENY THE SHREDDING PERMIT TO SIMS METAL MANAGEMENT.

Thanks, have a good day.

Enviado desde mi iPhone

Deny Sims Permit To Shred

Jorge Hilario 

Sat 2/26/2022 8:32 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Department of Health.

It has come to my attention that Sims Metal Management is renewing their shredder permit. I ask as a citizen of Illinois for this permit to be DENIED. This company has been polluting the air in the area. Every time I have to drive by I see black smoke coming out of the facility. Fluf and other damming particles come out from that shredder. Please shut down this operation as General Iron was. Thanks!!!

Enviado desde mi iPhone

Sims Metal Management

Carlos Ochoa 

Sat 2/26/2022 9:31 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

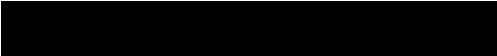
Dear City of Chicago.

As a abiding citizen I request the permit of Sims Metal Management be revoked. They are polluting our city specially in Pilsen. I have family that is concerned of all the smoke coming out of this facility. I am aware of the situation and environmentally is not good for anyone. So I ask PLEASE DENY THE SHREDDER PERMIT.

Have a great day.

Thanks!

Sims

faustorodriguez470 

Sat 2/26/2022 9:38 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Querida ciudad.

Les envio este email para pedir que por favor le nieguen el permiso para moler a la compañía de Sims Metal Management.

Gracias

Enviado desde mi Galaxy

Sims metal management permit

janet 

Sat 2/26/2022 10:35 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear, Mayor Lori Lightfoot

I am sending this email to address my concerns and complaints about Sims Metal Management whose operations and activities cause severe environmental pollution in our community, Their is schools close by, small business, neighborhoods.

Sims Metals is the major source of air pollution in our community. Air pollution leads to suffocation, breathing problems and lung diseases. If the air we breathe is polluted then we will surely be a victim of such diseases. Sims Metal Management should be aware of this.

The thick smoke and metal shavings emitted by their shredder is full of poisonous gases affecting everyone in the community. Before reissuing their permit, I strongly request your office to consider my complaint and to find time to examine and inspect the operation of Sims Metal Managements.

Thank You.

Stop Sims Metal Management

Cristian Estrada [REDACTED]

Sat 2/26/2022 11:26 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lori Lightfoot.

As is all over the news, Sims is trying to get their shredder permit renewed. i would like to express that this company has been pouting for many years. Sims Metal Management has so many violations and all they do is pay the fine and keep polluting. This situation is unacceptable, they are paying to pollute the environment. As a concerned citizen of Illinois I beg you take hands on this matter. General Iron was forced to close for the same reason, why not Sims? Dust, Fluf, Black smoke coming out from this facility needs to stop now! with all due respect, TAKE ACTION AND DENY THE PERMIT. for the future of our kids.

Best Regards.

Public Comments on Metal Management Midwest, Inc. Application for a Large Recycling Permit

John Pinion <jpinion@rka-inc.com>

Sat 2/26/2022 5:03 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (500 KB)

2022-02-25 RKA Comments on SIMS Modeling Analysis for LRF Pmt App.pdf;

[Warning: External email]



Dear Mayor Lightfoot and Chicago Dept. of Public Health:

The air dispersion modeling prepared by Trinity Consultants and attached to Metal Management Midwest, Inc. application for a Large Recycling Facility Permit cannot be reasonably evaluated with the information provided. The report identified a maximum projected PM10 impact of 145.69 ug/M3; however, the analysis failed to add background concentrations of PM10. As identified in the IEPA 2020 Air Quality Report, the average background PM10 concentration across in the City of Chicago exceed 20 ug/m3. Adding the average background concentration to the predicted impact will result in an impact that exceeds the NAAQS standard..

Relevant acute or chronic health screening standards/levels were used to evaluate modeled metal HAPs impact. However, comparative levels for carcinogenic compounds were selected as a risk of 1.00E-05. The proposed level of 1.00E-5 from the Wisconsin NR 445.08(03) is for cumulative inhalation impact of all contaminants. Individual carcinogenic risk must be compared to a standard risk of 1.00E-06. The inhalation risk for arsenic from the MMW modeling report was reported to be 2.15E-06, which exceed the acceptable inhalation risk level.

The modeling report did not identify the emission rates of PM and metals from modeled sources. The modeling report states that emission data is confidential. The modeling analysis cannot be reasonably evaluated without identification of all emission rates and assumptions used to set the modeled emission rates.

For these reasons, the modeling analysis should be revised to address the comments identified in the attached evaluation prepared by RKA.

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

Confidentiality Notice

This message, together with any attachments, is intended for the use of only the identified recipient and might contain information that is legally privileged, confidential, and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message and any attachments, is strictly prohibited. If you have received this message in error, please notify the original sender immediately by telephone (630) 393-9000, or by return e-mail and delete this message, including all attachments, from your computer. Thank you.



February 25, 2022

Allison Arwady, M.D.
Chicago Department of Public Health
333 S. State Street, Room 200
Chicago, IL 60604

E-Mail
envcomments@cityofchicago.org

**Comments to Air Dispersion Modeling Study for
CDPH Large Recycling Facility Permit Application
Metal Management Midwest, Inc. – Paulina Facility/Chicago, IL**

Dear Dr. Arwady,

RK & Associates, Inc. (RKA) reviewed the Air Dispersion Modeling Study submitted by Metal Management Midwest, Inc. – Paulina Facility (MMW) as part of their City of Chicago Permit Application. The modeling study was included in Appendix R of the Application. The dispersion modeling study must meet the requirements of the City of Chicago Rules for Large Recycling Facilities. The modeling must evaluate the impact from PM₁₀ emission sources, as well as the following metals: antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, nickel, and selenium compounds.

The following inconsistencies with the dispersion modeling procedures were identified:

Emission Rates

Emission calculations to show how emission rates were calculated were not included in this application. At a minimum the emission estimate information that was submitted to the IEPA with construction permit applications or facility Federally Enforceable State Operating Permit (FESOP) must be provided.

Not identifying source of emissions and proper calculations procedures raises questions of the validity of the calculations, especially the history of questionable testing performed without quantifying capture efficiency.

It was stated that AP-42 emission factors and stack test results were used. However, stack test results here appear to refer to testing performed by MMW at their South Paulina facility which were determined by IEPA and others, to be not representative because of poor capture efficiency.

It was not described what emissions factors from AP-42 were used and for what processes. Numerous fugitive emission sources that include stockpiles, screeners, conveyors, and vehicle traffic were modeled without providing any description of how emissions were estimated. Additional information must be provided to verify the approach used to estimate emissions from these sources.

Modeled emissions rates must be representative of the maximum hourly emission rates for each source to estimate the worst-case impact. However, emission rates were listed as 24-hour emission rates, which implies that the maximum hourly emissions were not used for modeling but the averaged 24-hour emissions. Therefore, it is likely that the modeled impacts were significantly underestimated.

Building Downwash

The modeling analysis excludes buildings outside the facility boundary. Buildings outside the facility boundary are located in less than 100 ft from the nearest sources. These buildings may significantly impact the ground concentrations from point sources. Building downwash from nearby buildings, even buildings outside the property line, must be considered in this modeling analysis.

Meteorological Data

Meteorological data for the period of 2012 to 2016 was used in the dispersion model. However, a University of Chicago Chemistry professor retained by a local citizen's group publicly criticized the choice of 2012-2016 met data because it is too old. Met data from local stations might be utilized.

Presentation of Emission Sources

The Hammermill Shredder was modeled as one point source at the infeed chute and one area source at the under-mill oscillator. However, the under-mill oscillator must be modeled as a volume source, similarly to conveyor transfers, as it will be better represented to account for the plume rise. In addition, it was not described how emissions were split between the two sources, what capture efficiency was assumed and why, and if all of the uncaptured emissions were modeled.

Emissions from the shredder top, point source, were modeled at a rate of 0.7507 g/s. However, emissions from shredder bottom were listed as 5.56E-2 g/s/m². The area of this source was not included, which does not allow to compare what part of the emissions were modeled as an area source and a justification was not provided.

Torch cutting emissions were also modeled as an area source, while they would be better presented as a volume source. Emissions calculations are not provided.

Roadway emissions were modeled as an area source. Roadway emissions should be modeled as a line of volume sources. In addition, release height and initial vertical dimension for each roadway area source were selected as release height of 3.50 m and vertical dimension of 2.37 m, without justification. Recommended values for release height and vertical dimension for light-duty vehicles are 1.3 m and 1.2 m, correspondingly, and for heavy-duty vehicles 3.4 m and 3.2 m, correspondingly.

Roadway segments were not shown on the map. It cannot be determined if all roadways at the facility were properly modeled. Each road segment was modeled with the same emission rate of $1.45E-5$ g/s/m². However, traffic on some roads would be much heavier than others. For example, all traffic would go through the entry gate and through the weighing scale. Some areas in the facility would have higher emissions from vehicle traffic than others. The model did not account for this non-homogeneity and possibly underestimated the impact from vehicle traffic closer to the property boundaries.

In general, description of emission sources was missing. Sources were only identified by a Model ID. What was included in each source ID was not identified anywhere in the analysis. Operating rates were not listed. Emission rate calculations were missing. Supporting testing results and specific published emission factors were not provided.

Criteria Pollutants Modeling Results – PM₁₀

The current 24-hour PM₁₀ NAAQS standard is 150 µg/m³. AERMOD predicted PM₁₀ concentration was reported at 145.69 µg/m³. This included only the impact from MMW facility operations. Modeled concentrations were plotted on Figure 2-3, however, a legend was not provided and the figure is not informative of the results.

The modeling analysis stated that there were no predicted exceedances of the NAAQS standard. However, PM₁₀ background levels must be added to the facility predicted impact to compare against the NAAQS standard. If background concentration was added, the impact from this facility would exceed the PM₁₀ NAAQS standard.

The NAAQS standards are protective of public health. Therefore, this modeling analysis demonstrates that the facility endangers the health of the nearby community.

Metal HAPs Modeling Analysis

The reports states that metal HAPs emission rates were scaled to PM₁₀ emissions rates for all emissions units. However, what scaling factors were used and how they were measured and developed was not provided. Emission rates for none of the HAPs were listed.

Lead modeling results were compared against the lead NAAQS standard. However, lead background concentration from the nearest monitoring station must be added to the modeled predicted concentrations before comparing to the NAAQS standard.

Relevant acute or chronic health screening standards/levels were used to evaluate modeled metal HAPs impact. However, comparative levels for carcinogenic compounds were selected as a risk of 1.00E-05. The proposed level of 1.00E-5 from the Wisconsin NR 445.08(03) is for cumulative inhalation impact of all contaminants. Individual carcinogenic risk must be compared to a standard risk of 1.00E-06. The

inhalation risk for arsenic from MMW was estimated at 2.15E-06. This exceeds the acceptable inhalation risk level.

Conclusion

The dispersion modeling analysis is incomplete. It does not identify each emission source at the facility. The report does not demonstrate how PM₁₀ emission rates were developed, nor how HAP emissions were estimated. No testing results, demonstration of control efficiency, or specific AP-42 emission factors were identified. The report does not justify the selected modeling parameters for each source group and how emissions were assigned to each source. PM₁₀ background levels were not added to the predicted AERMOD concentration to compare to NAAQS. If background concentrations are considered, the impact from the facility will exceed the NAAQS standard. Lead background concentrations were not considered in the modeling results. Inhalation risk for carcinogenic compounds must be less than one in a million. This report failed to identify that the inhalation risk for arsenic exceeded the acceptable public inhalation risk.

If you have any questions or require any additional information regarding the above, please do not hesitate to call me at (630) 393-9000.

Yours very truly,
RK & Associates, Inc.



Darina Demirev
Senior Project Engineer

Public Comments on Metal Management Midwest, Inc. Application for a Large Recycling Permit

John Pinion <jpinion@rka-inc.com>

Sat 2/26/2022 5:03 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (147 KB)

IL DOJ Complaint for Injunctive Relief and Civil Penalties - Metal Management Midwest.pdf;

[Warning: External email]



Dear Mayor Lightfoot and Chicago Dept. of Public Health:

The application submitted by Sims for a Large Recycling Facility permit is incomplete since it does not include the following:

- A description of operations that will occur over graveled areas and detailed specifications such as the aggregate material type and gradation, installation lift thicknesses, and the compaction and compaction-testing methods.
- The waste characterization profile of the shredder fluff currently generated at the facility including any treatment that may be necessary to render the shredder fluff a non-hazardous waste prior to its shipment offsite.
- The disposition of the shredder full at the landfill (used as daily cover, disposed of as waste, etc.) and a copy of the landfill approval.
- The rated effectiveness of the proposed street sweeper at removing fine particulates such as PM10.
- A plan drawing showing the spatial coverage of any water suppression equipment.
- A detailed plan and schedule for patrolling and cleaning adjacent areas for litter and ASR Fiber.
- An odor control plan that addresses the strong odors of burning metal/oil that are routinely being noted during CDPH inspections. Such plan shall include, but may not be limited to, the following:
 - An inventory of odor-emitting activities;
 - The location, time, and duration of each odor-emitting activity;
 - An odor mitigation plan that includes specific administrative and/or engineering controls and best management practices for each odor-emitting activity;
 - Routine odor inspections around the Facility and nearby adjacent Sensitive Areas; and

- Protocols for investigating odors discovered during routine inspections or as reported in an odor complaint.
- - Detailed information regarding the shredder emissions control system that Sims will be installing as required by the Illinois Attorney General in the attached lawsuit.

If you have any questions, please do not hesitate to contact me.

Regards,
John Pinion

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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

PEOPLE OF THE STATE OF ILLINOIS,)
ex rel. KWAME RAOUL, Attorney General)
of the State of Illinois,)
)
Plaintiff,)
)
v.)
)
METAL MANAGEMENT MIDWEST, INC.,)
d/b/a SIMS METAL MANAGEMENT, an)
Illinois corporation,)
)
Defendant.)

15213756

No. 2021CH05279

COMPLAINT FOR INJUNCTIVE RELIEF AND CIVIL PENALTIES

Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), complains of Defendant, METAL MANAGEMENT MIDWEST, INC., d/b/a SIMS METAL MANAGEMENT, as follows:

COUNT I

FAILURE TO DEMONSTRATE OVERALL REDUCTION IN UNCONTROLLED EMISSIONS OF AT LEAST 81 PERCENT

1. This Count is brought on behalf of the People of the State of Illinois, *ex rel.* Kwame Raoul, Attorney General of the State of Illinois, against Defendant, METAL MANAGEMENT MIDWEST, INC., d/b/a SIMS METAL MANAGEMENT (“Sims”), on his own motion and at the request of the Illinois EPA, pursuant to Section 42(d) and (e) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/42(d) and (e) (2020).

2. The Illinois EPA is an administrative agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2020), and charged, *inter alia*,

FILED DATE: 10/15/2021 8:30 AM 2021CH05279

with the duty of enforcing the Act.

3. At all times relevant to this Complaint, Defendant Sims was and is an Illinois corporation in good standing.

4. At all times relevant to this Complaint, Sims owned and operated and continues to own and operate a metal shredding and recycling facility at 2500 South Paulina Street, Chicago, Illinois (“Facility”). The Facility is located in a community the Illinois EPA has designated as an environmental justice area.

5. Sims receives, stores, recycles, and ships ferrous and non-ferrous recyclable metallic materials at the Facility, including end-of-life vehicles (“ELV”), major appliances, and other post-consumer sheet metal and metal clips.

6. ELVs and other metallic materials are processed through a hammermill shredder at the Facility.

7. The hammermill shredder at the Facility, through the shredding process, emits and/or has the potential to emit volatile organic material (“VOM”) into the environment.

8. On December 18, 2018, Sims and the United States Environmental Protection Agency entered into an Administrative Consent Order (“Administrative Consent Order”).

9. On January 22, 2019, or a date better known to Sims, Sims submitted an application for a Federally Enforceable State Operating Permit (“FESOP”) to the Illinois EPA, as required by the Administrative Consent Order.

10. On May 13 to 14, 2021, or on dates better known to Sims, Sims initiated a proof-of-concept emissions capture test on the hammermill shredder at the Facility as part of Sims’ FESOP application. The purpose of the test was to evaluate Sims’ capability for meeting applicable testing methodologies to demonstrate, consistent with the requirements of the Administrative

Consent Order, that the shredder operations did not possess the potential to emit 25 tons or more of VOM per year, and therefore avoid emission control requirements set forth in the current Illinois Pollution Control Board (“Board”) regulations at 35 Ill. Adm. Code Part 218, Subpart TT.

11. The results of the proof-of-concept emissions capture test revealed that the hammermill shredder at the Facility was achieving less than 50 percent estimated capture efficiency, which was below the level needed to show that the Facility operates below the potential to emit threshold in the Board’s Part 218, Subpart TT regulations.

12. Sims’ operation of the Facility is subject to the Act and the rules and regulations promulgated by the Board and the Illinois EPA. The Board’s regulations for air pollution are found in Title 35, Subtitle B, Chapter I of the Illinois Administrative Code (“Board Air Pollution Regulations”).

13. Section 9(a) of the Act, 415 ILCS 5/9(a) (2020), provides as follows:

No person shall:

- (a) Cause or 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, or so as to violate regulations or standards adopted by the Board under this Act.

14. Section 3.315 of the Act, 415 ILCS 5/3.315 (2020), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

15. Sims, a corporation, is a “person” as that term is defined by Section 3.315 of the Act, 415 ILCS 5/3.315 (2020).

16. Section 3.165 of the Act, 415 ILCS 5/3.165 (2020), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

17. VOM is a “contaminant” as that term is defined by Section 3.165 of the Act, 415 ILCS 5/3.165 (2020).

18. Section 218.980(b) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.980(b), provides, in pertinent part, as follows:

b) Potential to emit:

1) A source is subject to this Subpart if it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from emission units, other than furnaces at glass container manufacturing sources and VOM leaks from components, that are:

A) Not regulated by Subparts B, E, F, H, Q, R, S, T, (excluding Section 218.486 of this Part), V, X, Y, Z, or BB of this Part, or

B) Not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.

c) If a source ceases to fulfill the criteria of subsections (a) and/or (b) of this Section, the requirements of this Subpart shall continue to apply to an emission unit which was ever subject to the control requirements of Section 218.986 of this Part.

19. Section 211.4970 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4970, provides the following definition:

“Potential to emit (PTE)” means 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.

20. The hammermill shredder at the Facility has the potential to emit 25 tons or more of VOM per year.

21. Sims is subject to the control requirements of Section 218.986 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986, because the hammermill shredder at the Facility has the potential to emit 25 tons or more of VOM per year.

22. Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a), provides, in pertinent part, as follows:

Every owner or operator of an emission unit subject to this Subpart shall comply with the requirements of subsection (a), (b), (c), (d), or (e) below.

(a) Emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit, . . .

(Board Note: For the purpose of this provision, an emission unit is any part or activity at a source of a type that by itself is subject to control requirements in other Subparts of this Part or 40 CFR 60, incorporated by reference in Section 218.112, e.g., a coating line, a printing line, a process unit, a wastewater system, or other equipment, or is otherwise any part or activity at a source.)

23. Section 211.4370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4370, provides the following definition:

“Owner or operator” means any person who owns, operates, leases, controls, or supervises a source, an emission unit or air pollution control equipment.”

24. Sims is an “owner or operator” as that term is defined by Section 211.4370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4370.

25. Section 211.1950 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.1950, provides the following definition:

“Emission unit” means any part or activity at a stationary source that emits or has the potential to emit any air pollutant.”

26. Section 211.6370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.6370, provides the following definition:

“Stationary source” means any building, structure, facility or installation that emits or may emit any air pollutant.

27. Section 211.370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.370, provides the following definition:

“Air pollutant” means an air pollution agent or combination of such agents, including any physical, chemical, biological, radioactive (including source material, special nuclear material, and byproduct material) substance or matter which is emitted into or otherwise enters the atmosphere. Such term includes any precursors to the formation of any air pollutant, to the extent that the relevant statute or rule has identified such precursor or precursors for particular purpose for which the term “air pollutant” is used.

28. Sims’ Facility is a “stationary source,” where Sims operates its hammermill shredder, which is an “emission unit” capable of emitting VOM, which is an “air pollutant” as those terms are defined in Sections 211.6370, 211.1950, and 211.370, respectively, of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.6370, 211.1950, and 211.370.

29. As the owner or operator of an emission unit subject to Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a), Sims was required to demonstrate an overall reduction in uncontrolled VOM emissions of at least 81 percent from its shredding operations at the time of the rule’s effectiveness or applicability to Sims’ Facility.

30. By failing to demonstrate that its shredding operations have achieved an overall reduction in uncontrolled VOM emissions of at least 81 percent, Sims violated and continues to violate Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a).

31. By violating Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill.

Adm. Code 218.986(a), Sims thereby violated Section 9(a) of the Act, 415 ILCS 5/9(a)(2020).

32. Violations of the pertinent environmental statutes and regulations will continue unless and until this Court grants equitable relief in the form of preliminary, and after trial, a permanent injunctive relief.

WHEREFORE, Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Court enter a preliminary and, after a trial, permanent injunction in favor of Plaintiff against Defendant, METAL MANAGEMENT MIDWEST, INC.:

1. Finding that Defendant violated Section 9(a) of the Act, 415 ILCS 5/9(a)(2020), and Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a);

2. Enjoining Defendant from any further violations of Section 9(a) of the Act, 415 ILCS 5/9(a)(2020), and Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a);

3. Ordering Defendant to undertake all necessary corrective action that will result in a final and permanent abatement of the violations of Section 9(a) of the Act, 415 ILCS 5/9(a)(2020), and Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a);

4. Assessing against Defendant a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and pertinent regulations, with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of each violation;

5. Ordering Defendant to pay all costs of this action, including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

6. Granting such other relief as this Court deems appropriate and just.

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. KWAME RAOUL,
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

/s/ Stephen J. Sylvester
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Public Comments on Metal Management Midwest, Inc. Application for a Large Recycling Permit

John Pinion <jpinion@rka-inc.com>

Sat 2/26/2022 5:37 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (6 MB)

2020-05-06 RKA Eval Shredder VOM Test SIMS South Paulina and RI.pdf;

[Warning: External email]



Dear Mayor Lightfoot and Chicago Dept. of Public Health:

The air dispersion modeling conducted as part of the air quality assessment should be revised and resubmitted since the data shredder emission rates used in the model are inaccurate. Emission rates were not clearly identified in the modeling report; however, the report references emission rates based on site specific emission testing performed at the South Paulina facility. Review of this testing, and testing performed at another SIMS metal shredder in Rhode Island using the same test procedures, demonstrated that the reported emission rates from these tests were unreliable and significantly underestimated actual emission rates by not accurately measuring capture efficiency of the shredder during the testing. IEPA rejected these test results when they were used as the basis of emission estimates included in a FESOP application and a subsequent construction permit application.

Attached to this e-mail is a technical evaluation of the South Paulina and Rhode Island facility emission testing which describes how the testing performed resulted in emission factors that significantly underestimated actual emissions. This evaluation was submitted to USEPA Region 2 and IEPA. USEPA Region 2 ultimately rejected the results of the Rhode Island test and did not consider them when developing recommended metal shredder emission factors.

Metals Management Midwest should be required to update emission estimates using emission factors from other shredder emission tests that have been validated by USEPA Region II. Any modeling performed using these flawed emissions data does not provide an accurate estimates of future emission rates and corresponding predictions of off-site impacts. The modeling report should be rejected and the City Department of Public Health should require revised emission estimates based on valid emission factors that have been accepted by IEPA as part of their permitting process.

Metals Management Midwest also used the flawed emission factors to negotiate annual metal processing rates as part of an Administrative Consent Order from the USEPA. The annual throughput limits were set to ensure that total VOM emissions would remain below the applicable major source threshold of 25 tpy. However, as demonstrated in the attached evaluation, the emission rates relied upon significantly underestimate actual emissions and we believe that Metals Management Midwest's actual emissions at the identified maximum annual throughput rate exceed the major source thresholds.

If you have any questions, please do not hesitate to contact me.

Regards,
John Pinion

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**Evaluation of Shredder VOM Emissions Testing
Results - SIMS South Paulina, Chicago, Illinois
and SIMS Johnston, Rhode Island**

May 6, 2020

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**Prepared by:
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Evaluation of Shredder VOM Emissions Testing Results - SIMS South Paulina, Chicago, Illinois and SIMS Johnston, Rhode Island

The following comments are provided by RK & Associates, Inc. (RKA) regarding scrap metal shredder air permitting and emission testing activities conducted in September 2019 at the Sims Metal Management Midwest, Inc. (SIMS) South Paulina facility (IEPA Site ID No.: 031600FFO), located in Cook County at 2500 South Paulina Street in Chicago, Illinois.

These comments address the selection of the scrap metal shredder Volatile Organic Material (VOM) emission factor used as a basis to set allowable scrap metal processing rates and corresponding emission limits at SIMS South Paulina Chicago and East Chicago, Indiana facilities.

Based on an email between SIMS legal counsel and USEPA legal counsel, SIMS and USEPA have agreed on an emission factor for the SIMS South Paulina facility that is not contained in the actual test report and appears to be the same emission factor derived from testing conducted at a similar uncontrolled shredding facility at the SIMS Johnston, Rhode Island facility (SIMS Rhode Island) in September 2017.

We believe that the emission factors from both the SIMS Rhode Island and South Paulina emission tests significantly underestimate actual shredder VOM, Particulate Matter (PM), metal, and HAP emissions.

Testing at these facilities relied on the installation of temporary enclosures and induced draft fans located at the bottom of the shredder. These enclosures were intended to prevent emissions from escaping the front/infeed of the shredder (shredder inlet) by capturing shredder emissions and pulling them downward through the shredder and routing them through a temporary duct where sampling could be performed. Observations by USEPA inspectors present during the testing at both facilities identified significant amounts of uncaptured VOM emissions escaping the front/infeed of the shredder. Uncaptured emissions were not accounted for in the reported VOM emission factors from these tests.

Emissions testing that is designed to “capture emissions” for the purpose of establishing a VOM emission factor should be invalidated when there are significant unquantifiable amounts of uncaptured emissions. In fact, USEPA should require testing to be repeated incorporating methods that will accurately quantify uncaptured emissions. If site-specific testing cannot be successfully performed, USEPA should require these facilities to use a reliable VOM emission factor from testing performed at a similar facility.

Given the high levels of uncaptured emissions, theoretical adjustments to account for unquantified amounts of uncaptured VOM emissions are neither credible nor reliable and should not be used to determine compliance with applicable VOM control requirements.

At the SIMS Rhode Island facility, USEPA observers noted bluish gray smoke escaping the front/infeed of the shredder with an opacity of 20% continuously during the test with peaks as high as 50% opacity. These observations by USEPA, and potential impacts to the measured VOM emission factor were not addressed, in any way, in the test report.

At the SIMS South Paulina test, USEPA observers used a Forward Looking Infrared (FLIR) camera to periodically monitor for the presence of uncaptured VOM emissions escaping from the shredder inlet. FLIR images presented in this document show significant amounts of uncaptured VOM escaping the front/infeed of the shredder. Again, these USEPA observations and the potential impacts to the measured VOM emission factor were not addressed, in any way, in the test report.

The protocol documents for these tests, approved by USEPA, did not include the use of EPA approved test methods or any other measurements or observations to identify the presence of uncaptured VOM at the shredder inlet. After the documented failure of the September 2017 emission testing at SIMS Rhode Island, USEPA should have required that the protocol for the proposed September 2019 emission testing at SIMS South Paulina include the measurement of uncaptured VOM emissions. The South Paulina test protocol (Page 1-4) stated that *“Furthermore, the presence of any visible emission will be noted during the test period of the shredder infeed.”* Despite this statement, the test report did not address the presence of visible emissions from the shredder infeed.

Based on the above, use of the reported VOM emission factors from the SIMS Rhode Island and SIMS South Paulina emissions testing will significantly underestimate actual VOM emissions. This will result in these facilities operating out of compliance with applicable VOM control requirements and prevent the accurate assessment of impacts to local air quality.

Discussion of Shredder Operations

GII, LLC (d/b/a General Iron), also located in Cook County at 1909 N. Clifton Ave. in Chicago, Illinois, conducted shredder emissions testing in November 2019. VOM emissions testing was performed at a shredder feed rate of 444 tph with 50% ELVs. Three one-hour test runs were performed at the inlet of the RTO using USEPA Methods 1-4 and Method 25a to determine an uncontrolled VOM emission factor, in units of pounds of VOM per ton of metal shredded (lb VOM/ton). The three individual test runs reported VOM emission factors of 0.5028, 0.4560 and 0.5788 lb/ton, with an average value of 0.5119 lb/ton. The VOM emission factors from the three test runs were consistent, which indicates that the test results provide a reliable emission factor.

Based on the following similarities, the uncontrolled VOM emission factors from SIMS South Paulina and General Iron should be in reasonable agreement. SIMS South Paulina and General Iron both:

- use identical hammermill shredder technology and operating procedures;
- process the same general scrap metal stream generated in the Chicago region;
- receive End-of-Life Vehicles (ELVs) from many of the same suppliers; and

- measured uncontrolled VOM emissions using USEPA Method 25A while shredding material that consisted of 50% by weight general scrap metal and 50% by weight ELVs.

However, the recent VOM emissions testing conducted at the SIMS South Paulina facility and General Iron's facility resulted in unexpectedly disparate VOM emission factors.

- General Iron's uncontrolled VOM emission factor was 0.5119 lb VOM/ton of metal shredded.
- SIMS South Paulina's uncontrolled VOM emission factor was just 0.09 lb VOM/ton of metal shredded, which is less than 17.6% of General Iron's VOM emission factor.

SIMS Rhode Island also uses the same hammermill shredder technology and operating procedures, and measured VOM emissions using USEPA Method 25A while processing 50% general scrap metal and 50% ELVs. However, SIMS Rhode Island reported an uncontrolled VOM emission factor of just 0.117 lb VOM/ton of metal shredded, which is less than 22.9% of General Iron's VOM emission factor.

The General Iron emission factor is almost 5.7 times greater than SIMS South Paulina's emission factor and 4.4 times greater than SIMS Rhode Island's emission factor. Given the similarities between these three facilities, the uncontrolled VOM emission factors should be directly comparable.

General Iron representatives submitted Freedom of Information Act (FOIA) requests to USEPA Region 1 and Region 5 asking for copies of the SIMS Rhode Island and South Paulina test protocols, site inspection reports, test reports, digital images, videos and any related correspondence between SIMS and its consultants and USEPA. Based on a review of the documents, RKA could only identify a single factor to account for this variation in measured emission factors; that being that General Iron used an emissions capture hood located over the front/infeed of the shredder with a very high emission capture efficiency, while SIMS Rhode Island and South Paulina used a temporary enclosure and induced draft fan located at the bottom of the shredders where overall capture efficiency was not evaluated. These temporary enclosures were intended to draw emissions downward through the hammermill section of the shredder and discharge them through a temporary stack where testing could be performed. It is clearly evident from our review of the USEPA Site Inspection Reports that the temporary enclosures failed to adequately capture VOM emissions from the front/infeed of the shredders.

USEPA Site Inspection Reports that were written by Agency observers on site during testing at both SIMS facilities and videos taken by the Agency observers clearly identify significant amounts of uncaptured emissions, including VOM emissions observed with a FLIR camera, emitted from the front/infeed of the shredders. These uncaptured emissions were not included, or otherwise accounted for, in the reported test results or reported VOM emission factors. In fact, the results of these FOIA requests did not produce any document in which the effectiveness of the temporary enclosures was quantified or an overall shredder VOM capture efficiency was determined.

The presence of significant amounts of uncaptured VOM emissions from the front/infeed of the shredder demonstrates, without question, that the temporary enclosures were not effective in capturing shredder emissions and therefore, the reported VOM emission factors underreport actual emissions.

The test protocols were approved, tests were performed, and test reports accepted without any attempt to evaluate the effectiveness of the temporary enclosures and the obvious potential impacts on reported emission factors. Even after the failed testing performed in September 2017 at the SIMS Rhode Island facility, USEPA allowed the same testing strategy to be used in September 2019 at the SIMS South Paulina facility, without requiring an evaluation of the effectiveness of the temporary enclosure to capture shredder emissions. Without this evaluation, is it simply not possible to determine what portion of total shredder VOM emissions are represented by the reported VOM emission factor.

It is likely that SIMS facility representatives, their testing consultant, and testing subcontractors were all aware of USEPA's FLIR images that confirmed the presence of uncaptured VOM emissions being emitted from the front/infeed of the shredder during the tests. The FLIR images are included with the Agency test reports. However, despite this knowledge, the SIMS test report failed to even acknowledge the presence of uncaptured VOM emissions from the front/infeed of the shredder.

The information provided herein demonstrates that the shredder VOM emission factor agreed to by SIMS and USEPA to represent the SIMS South Paulina facility is fundamentally flawed and significantly underestimates actual VOM emissions from the SIMS South Paulina shredder.

As described herein, a temporary enclosure at the bottom of a hammermill shredder is not capable of accurately measuring total shredder emissions. The most accurate method of capturing total shredder emissions is using an emissions capture hood located at the front/infeed of the shredder. This is the method utilized by General Iron. Due to logistical, safety and cost considerations, it may not be technically or economically feasible at all shredding facilities to temporarily install an emission capture hood above the front/infeed of the shredder for purposes of testing.

In the absence of reliable site-specific emission factors, USEPA requires that published emission factors or emission factors from a similar facility be used for purposes of permitting and compliance demonstration. There is publicly available VOM emission test data from other scrap metal shredders in the United States that have permanently installed emission capture systems that include a hood located at the front/infeed of the shredder. One of these facilities is General Iron. The reported VOM emission factors from these facilities are substantially more accurate than factors derived from use of a temporary enclosure located at the bottom of a shredder (such as SIMS Rhode Island and South Paulina), which failed to capture the most significant portion of VOM emissions that were observed escaping from the front/infeed of the shredder. Given the absence of a reliable site-specific VOM emission factor from SIMS Rhode Island or South Paulina, USEPA should require the use of more accurate VOM emission factors from a similar facility, such as General Iron, which has measured VOM emission factors from processing 80% general scrap metal and 20% ELVs (May 2018) as well as from processing 50% general scrap metal and 50% ELVs (November 2019).

Currently, the annual shredder throughput at SIMS South Paulina is limited to 344,000 tpy under an Administrative Consent Order with USEPA dated December 18, 2018 (ACO). The application of General Iron's uncontrolled shredder VOM emission factor to SIMS South Paulina's permitted annual shredder throughput of 344,000 tpy would increase estimated shredder VOM emissions from 21.76 tpy to over 88.05 tpy, which means that the SIMS South Paulina facility has been operating as a major source of VOM emissions without the required emission controls. This also means that SIMS South Paulina has been operating out of compliance with 35 IAC 218 Subpart TT, which requires a reduction of at least 81% in overall VOM emissions.

SIMS South Paulina has submitted a request to increase its throughput to 371,900 tpy using the flawed emission factor, which is currently pending with the Illinois EPA. When applying this increased throughput, even a minor increase in the VOM emission factor 0.117 lb VOM/ton to 0.130 lb VOM/ton (equivalent to the difference between 75% and 67% capture efficiency), would trigger VOM emission control requirements of 35 IAC 218 Subpart TT, requiring a reduction of at least 81% in overall VOM emissions. In fact, when applying the General Iron VOM emission factor to the requested SIMS South Paulina shredder throughput, actual VOM emissions would approach 95 tpy requiring the annual throughput be reduced to just 97,675 tpy to avoid triggering VOM emission control requirements under 35 IAC 218 Subpart TT. Given the deficiencies of the SIMS Rhode Island and South Paulina VOM emissions tests, the likelihood that SIMS South Paulina is operating out of compliance with Subpart TT is significant and should not be ignored.

We understand that SIMS has also relied on the flawed VOM emission factor (which is the same as the agreed upon VOM emission factor for South Paulina) to permit another one of its shredders in East Chicago, Indiana and may use the factor for other facilities as well. Currently, the permitted annual shredder throughput at the SIMS East Chicago facility is 330,000 tpy. When applying the General Iron VOM emission factor to SIMS East Chicago, the annual shredder throughput would need to be limited to just 75,425 tpy to avoid triggering the Best Available Control Technology (BACT) requirements of the Indiana rule at 326 IAC 8-1-6. Given the deficiencies of the SIMS South Paulina and Rhode Island VOM emissions tests, the likelihood that SIMS East Chicago will be operating out of compliance with 326 IAC 8-1-6 is significant and should not be ignored.

The use of inaccurate emission factors by one or more metal shredders also results in fundamental inequities in the regulation of shredder emissions. The failure to acknowledge and characterize uncaptured emissions in published emission factors from SIMS' shredders at Rhode Island and South Paulina is intentionally misleading to environmental regulators who rely on this information to determine regulatory applicability, emission control requirements and impacts on local air quality.

USEPA should reconsider its decision to approve a VOM emission factor from flawed emissions testing for use at SIMS South Paulina, SIMS East Chicago, or any other similar facilities. As a result of USEPA's decision, SIMS is continuing to operate its facilities on South Paulina in Chicago and East Chicago, Indiana without any VOM controls.

Additional details related to the above information are presented below.

Description of General Iron and SIMS Metal Shredders

The shredders at General Iron, SIMS Rhode Island, and SIMS South Paulina have the capacity to process approximately 500, 400 and 200 tons per hour, respectively. All three facilities have recently performed emissions testing while feeding approximately 50% by weight general scrap metal and 50% by weight ELVs.

The General Iron and SIMS South Paulina facilities are both located in Chicago less than five miles apart (see Figure 1) and process the same scrap metal stream generated in the Chicago region. Each facility also receives ELVs from the same region, and in many cases, from some of the same ELV suppliers.

All three metal shredders are hammermill shredders equipped with water injection to minimize the potential for deflagrations. Scrap metal entering the hammermill section of the shredder is violently and instantly torn into small pieces, significantly raising the temperature of the shredded metal. Water is injected into the high temperature zone and immediately flashes to steam lowering the temperature of the shredded metal. The rapid expansion of steam fills the void space in the hammermill, replacing oxygen in ambient air to minimize the potential for deflagrations. Shredded material is funneled downward through the hammermill section, greatly restricting downward flow of exhaust gases and steam, before being discharged from the bottom of the shredder.

Figure 1 – Location of General Iron and SIMS South Paulina

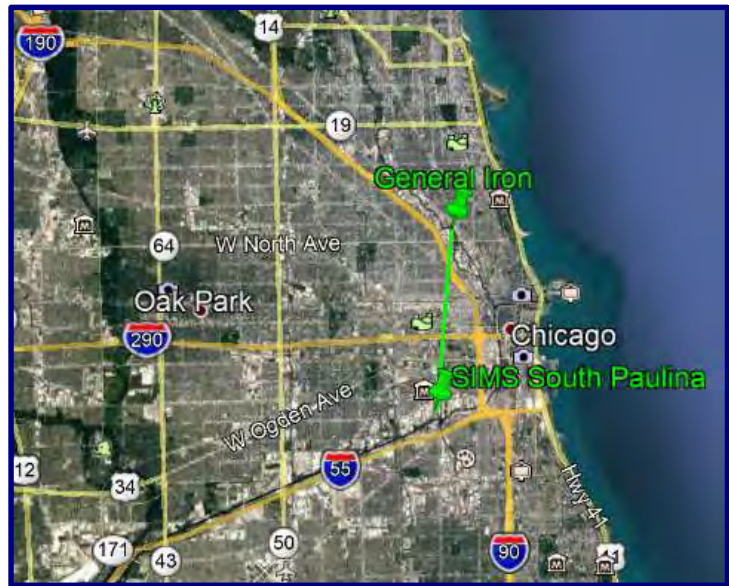


Figure 2 – Typical Uncontrolled Exhaust from Front/Infeed of the Hammermill Shredder at SIMS South Paulina



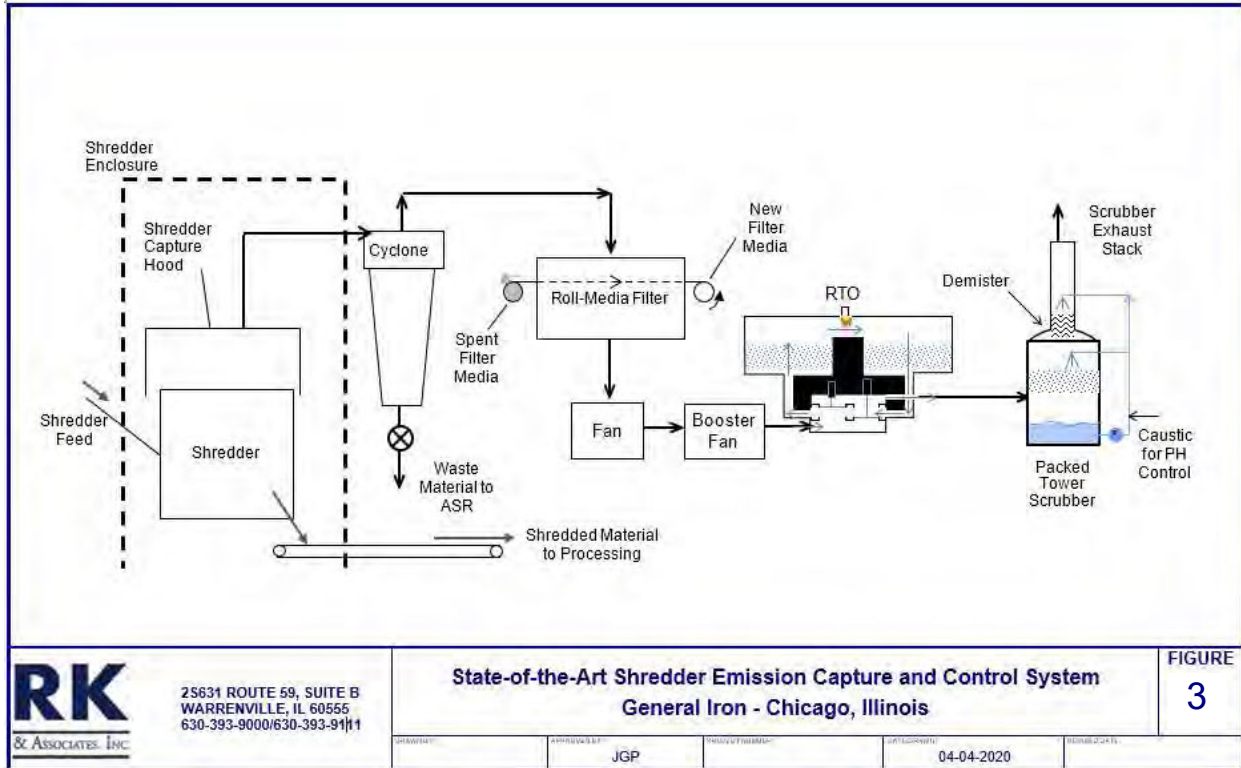
Paulina and SIMS Rhode Island. Figure 2 is a photograph of the steam plume discharged from the infeed opening of the SIMS South Paulina shredder.

Based on the above, the most reliable way to capture shredder emissions is using a hood located over the front/infeed of the shredder equipped with a fan with enough capacity to capture the steam generated by the shredder. Due to safety and cost considerations, the temporary installation of this type of emissions capture system is typically not feasible.

The front/infeed of a hammermill shredder is open to the atmosphere to allow scrap metal to enter the shredder. The size of the shredder infeed opening is much larger than the shredded metal discharge opening and is much closer to the point of steam generation. The combination of the larger size of the shredder infeed opening, the proximity of the shredder infeed opening to the point of steam generation, the rapid rate of expansion of water to steam, buoyancy of hot steam (hot air/steam rises), and the restriction to downward flow causes the steam (and shredder exhaust) to follow the path of least resistance discharging upward through the infeed opening to the atmosphere. This is evidenced by the steam plume observed being discharged from uncontrolled hammermill shredders, such as the shredders at SIMS South

Metal Shredder Emissions Capture and Control System

General Iron is the only shredder in Wisconsin, Illinois and Indiana and one of only a few shredders in the United States to utilize state-of-the-art VOM capture and control technology (such as the one illustrated in Figure 3).



In stark contrast to General Iron, the SIMS East Chicago and SIMS South Paulina shredders have no emissions capture or control equipment. As a result, the permitted VOM emissions from General Iron are significantly lower than the permitted VOM emissions from SIMS South Paulina, even though the capacity of the General Iron shredder is larger as shown in Table 1.

Table 1 – Comparison of VOM Emissions at General Iron and SIMS South Paulina and East Chicago

Facility	Shredder Capacity (tph)	Permitted Annual Shredder Throughput (tpy)	VOM Emission Factor (lb/ton)	VOM Control Efficiency (%)	VOM Emissions (tpy)
General Iron Chicago, IL	500	1,000,000	0.5119	99%	2.56
SIMS East Chicago, IN	112	330,000	0.1170	0%	19.31
SIMS South Paulina Chicago, IL	200	344,000	0.1170	0%	20.12

Even though the shredder at SIMS South Paulina is much smaller than the shredder at General Iron, VOM emissions from SIMS South Paulina are significantly larger due to the lack of VOM controls.

General Iron’s shredder is equipped with a shredder emissions capture hood located over the front/infeed of the shredder. An induced draft fan pulls approximately 60,000 acfm of ambient air into the hood from around the front/infeed of the shredder. The induced draft fan pulls air from the capture hood through a cyclone to remove relatively large material entrained in the air flow and then through a roll-media filter for control of PM and associated metals. A second induced draft fan located at the inlet of the RTO boosts the pressure of the exhaust gas forcing the air through a regenerative thermal oxidizer (RTO), which demonstrated 99% destruction of VOM during testing performed in November of 2019, and finally through a packed tower scrubber to control acid gases that may be generated in the RTO.

Based on the hammermill shredder design features described above, using a hood located above the front/infeed of the shredder is the most effective way to capture shredder emissions. The location of the hood, combined with the large volume of ambient air drawn into the hood, results in a very high emission capture efficiency. The capture efficiency of General Iron’s emission capture system, although not directly measured, was estimated to be greater than 90% based on observations of the shredder hood by IEPA’s stack testing expert and USEPA representatives present during recent emission testing.

At General Iron, the vast majority of shredder VOM, PM, metals, and HAPs are removed and destroyed by the emission capture and control system. Exhaust gases from uncontrolled shredders, like those at SIMS Rhode Island and SIMS South Paulina, contain significant quantities of VOM, PM, metal and HAP emissions.

Application of General Iron’s more accurate uncontrolled VOM emission factor to the permitted annual shredder throughput at SIMS South Paulina and SIMS East Chicago, Indiana facilities would result in **actual VOM emissions of up to 95 tpy**, as shown in Table 2.

Table 2 – Potential Actual Uncontrolled VOM Emissions Using General Iron’s VOM Emission Factor

Facility	Source of Shredder Annual Throughput Limit	Annual Shredder Throughput (tpy)	Uncontrolled VOM Emission Factor (lb/ton)	VOM Control Efficiency (%)	VOM Emissions (tpy)
SIMS South Paulina Chicago, Illinois	Current Limit pursuant to ACO	344,000	0.5119	0%	88.05
	Proposed FESOP Limit	371,900	0.5119	0%	95.19
SIMS East Chicago, Indiana	Operating Permit Limit	330,000	0.5119	0%	84.46

Uncontrolled Shredder VOM Emission Factors

All three facilities (General Iron, SIMS Rhode Island and SIMS South Paulina) conducted emissions testing while processing 50% by weight general scrap metal and 50% by weight ELVs. All three facilities require ELV suppliers to drain fluids prior to delivering ELVs. The test protocols and test reports for the SIMS facilities do not describe any further processing of ELVs prior to shredding, although the USEPA Site Inspection Reports from the SIMS Rhode Island testing described that gas tanks were removed from ELVs prior to shredding, flattened, and subsequently processed through the shredder. The report did not specify if the gas tanks were shredded during the VOM testing or at another time. Each of these facilities also used USEPA Method 25A to measure the concentration of Total Hydrocarbons (THC) in the exhaust stream. At all three facilities, THC was reported as VOM.

Given the similarities in shredder design, operating practices, waste stream characteristics and USEPA test methods used, VOM emission factors from all three facilities are expected to be reasonably consistent. This is especially true at the General Iron and SIMS South Paulina facilities because the shredder feed stream processed during recent emissions testing came from the same Chicago regional market.

During the SIMS Rhode Island VOM emission test, USEPA Inspection Reports identified that ELVs received had been drained of fluids and facility employees removed and flattened gas tanks from ELVs prior to shredding. The inspection reports did not specify if the flattened tanks were shredded during the VOM emission test or at another time. This practice was acknowledged in the SIMS East Chicago, Indiana operating permit issued by IDEM, which included the following condition [Condition D.1.1] to limit VOC emissions:

The Permittee shall drain and remove (to the extent possible) VOC and VHAP containing fluids from vehicles, appliances, industrial machinery, and other metal scrap received by the Permittee prior to shredding; or the Permittee shall document that inspections have been performed to confirm the non-existence of VOC and VHAP containing fluids. Fluids

shall include, but are not limited to, gasoline, motor oil, antifreeze, transmission oil, brake oil, power steering fluid, hydraulic fluid, and differential fluid.

This practice reduces the measured uncontrolled VOM emissions from the shredder even though it does not similarly reduce overall facility wide emissions because VOCs from the headspace of the gas tanks are still released on site.

To document compliance with the above requirement, Conditions D.1.7 (a)(2)&(3) of the IDEM operating permit requires the facility to maintain the following records.

Records that VOC and VHAP containing fluids have been drained and removed (to the extent practicable) from vehicles, appliances, industrial machinery, and other scrap metal received by the Permittee prior to shredding; and

If the Permittee did not drain and remove VOC and VHAP containing fluids onsite, records of the inspections performed to confirm the non-existence of VOC and VHAP containing fluids in vehicles, appliances, industrial machinery, and other metal scrap received by the Permittee prior to shredding.

Any facility relying on the invalid SIMS Rhode Island VOM emission factor should the above requirements incorporated into their permits.

General Iron's experience in the Chicago region is that gas tanks are not removed from ELVs prior be delivered to a scrap metal recycling facility. Because there is no evidence that ELV gas tanks were shredded during the SIMS Rhode Island VOC emissions tests; therefore, any facility that relies on the SIMS Rhode Island VOM emission factor should not be allowed to shred ELV gas tanks.

There are gross disparities in the uncontrolled shredder VOM emission factors from these facilities as shown in Table 3 below and as illustrated in Figure 4.

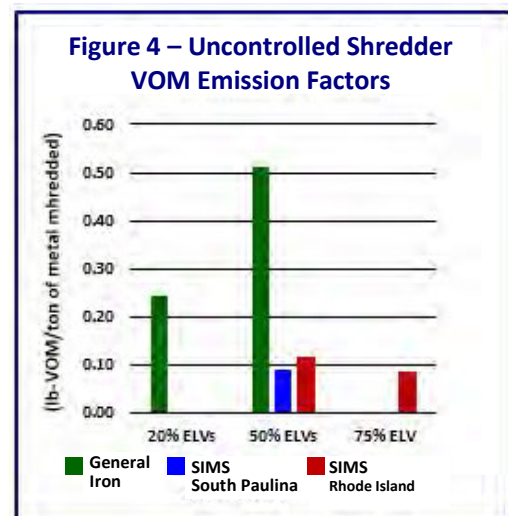
Table 3 – Summary of Shredder VOM Emission Testing

Parameter		General Iron Chicago, Illinois		SIMS South Paulina Chicago, Illinois	SIMS Johnston Rhode Island	
Shredder Technology		hammermill with water injection				
Date of VOM Testing		Jun. 2018	Nov. 2019	Sept. 2019	Sept. 2017	
Material Processed During VOM Emission Testing	General Scrap Metal (wt.%)	80%	50%	50%	50%	25%
	End of Life Vehicles (wt %)	20%	50%	50%	50%	75%
Shredder Feed Rate During Testing (tons/hr)		390	444	198	355	351
USEPA Test Method		25A (as propane) reported as VOM				
Shredder Emission Capture Device		Capture hood located over the top of the shredder		Temporary enclosure constructed around the shredded metal discharge at the bottom of the shredder		
Air Flow Through Capture Device		60,800	56,478	47,116	14,060	13,866
Estimated Shredder Emission Capture Efficiency		> 90%	> 90%	Not Evaluated or Reported ^(a)	Not Evaluated or Reported	Not Evaluated or Reported
Uncontrolled VOM Emission Factor (lb VOM/ton of metal shredded)		0.2430	0.5119	0.09 (17.6% of General Iron 11/19 test)	0.117 (22.9% of General Iron 11/19 test)	0.0893 ^(b)

- a. Capture efficiency for the temporary enclosure reported by Mostardi Platt in the facility emission testing report discussed below.
- b. Reported VOM emission factor for processing 75% ELVs is approximately 24% lower than the VOM emission factor for processing 50% ELVs. This is contrary to the anticipated trend of increasing VOM emission factors with increasing percent of ELVs processed.

The air flow rate through the temporary enclosure at the SIMS Rhode Island facility is significantly lower than the South Paulina facility even through the shredder throughput at the Rhode Island facility was almost twice the throughput at South Paulina. This further indicates a poor capture efficiency of the temporary enclosure at SIMS Rhode Island.

Like the SIMS Rhode Island test report, the SIMS South Paulina test report failed to acknowledge or attempt to quantify the presence of uncaptured emissions escaping the front/infeed of the shredder. In fact, the only reference to capture efficiency in the Mostardi Platt test report was identified in a footnote (***) to the table appearing at the bottom of Page 1 of the report describing the *VOC Test Results*:



*** Mostardi Platt estimated the capture efficiency for the September 20 test to be at least 98%. After USEPA identified capture efficiency concerns with a test run on 9/5/19, MMMI [SIMS] conducted a thorough review of the temporary enclosure (TE) installed for the emissions test and identified an opening along the foundation wall on the south side of the shredder. MMMI applied additional sheeting around that area, effectively sealing off the opening. MMMI also removed the screen on the duct work which MMMI identified as restricting the emissions flow rate by collecting debris on the screen mesh. In response, MMMI installed a container (pod) after the emissions sampling points, using water misters to contain debris within the pod. These corrective measures resulted in substantially improved capture efficiency compared with the 9/5/19 test run, as observed through the use of FLIR Systems camera.¹*

In the first sentence of the above footnote, it states that Mostardi Platt estimated capture efficiency for the September 20 test to be at least 98%. However, the test protocol did not describe any capture efficiencies to be measured by Mostardi Platt and the test report did not include any field measurements related to capture efficiency of the temporary enclosure or overall capture efficiency of the shredder.

As described in the footnote, the referenced capture efficiency can only be referring to the capture efficiency of the temporary enclosure at the bottom of the shredder and not the overall capture efficiency of the shredder. The temporary enclosure, however, failed to capture the overwhelming majority of VOM emissions that escaped the front/infeed of the shredder, as evidenced by observations included in the USEPA Region 5 Site Inspection Report and accompanying FLIR videos. There is no documentation that these uncaptured emissions were accounted for in the reported capture efficiency or the reported VOM emission factor.

The SIMS South Paulina test report does not even identify that uncaptured VOM emissions were observed escaping from the front/infeed of the shredder during testing. Visual observations are not a reliable or accurate method of estimating uncaptured emissions of the magnitude described in the USEPA Site Inspection Report and shown in the accompanying FLIR videos. The reported emission factor grossly underestimates the uncontrolled VOM emissions making it impossible to reasonably evaluate local air quality impacts from VOM and other affected pollutants. Further, USEPA's acceptance of this flawed emission factor will undoubtedly result in its use by multiple other facilities that will likewise be underreporting actual VOM emissions.

The SIMS Rhode Island and SIMS South Paulina test reports do not mention the presence of uncaptured VOM emissions from the front/infeed of the shredders and do not address the differences in emission factors between SIMS facilities and General Iron. The reason for the differences in these uncontrolled VOM emissions factors is that the SIMS Rhode Island and South Paulina tests did not identify and account for uncaptured VOM emissions from the front (infeed) of the shredder, which is where the overwhelming

¹ Metal Shredder Emission Testing Report; Metal Management Midwest, Inc., Metal Shredder Facility, 2500 S. Paulina Street Chicago, Illinois; Testing Date September 20, 2019; by Mostardi Platt; Page 2 of 145.

majority of the emissions are released, even when a temporary enclosure is used at the bottom of the shredder.

SIMS Rhode Island Shredder VOM Emissions Test

RKA reviewed SIMS Rhode Island's emission test protocol, emission test report, and the associated USEPA Site Inspection Reports, which described the observations made by USEPA Region 1 inspectors that were present during testing performed in September 2017.

SIMS test strategy at their Rhode Island facility relied on the installation of a temporary enclosure around the shredder discharge conveyor at the bottom of the shredder. The enclosure was equipped with an induced draft fan in an attempt to draw shredder exhaust downward through the hammermill section of the shredder, through the temporary enclosure, and then discharge emissions to a temporary stack where emissions testing was performed.

The success of this testing strategy relies primarily on the ability of the fan to pull emissions downward through the hammermill section of the shredder while providing sufficient negative draft at the front/infeed of the shredder to minimize uncaptured emissions from escaping the front/infeed of the shredder.

Based on the design and operation of a hammermill shredder, an enclosure located at the bottom of a hammermill shredder is not able to create enough draft at the front/infeed of the shredder to prevent significant amounts of uncaptured emissions from escaping the front/infeed of the shredder. Observations documented in USEPA inspection reports confirm this statement.

The USEPA Site Inspection Reports demonstrate that the test clearly failed to capture a significant portion of shredder VOM, PM and metal emissions escaping from the front/infeed of the shredder.

Mr. Rapp noted bluish gray smoke emanating from the shredder. He and Mr. Mohamoud estimated opacity of approximately 40% for many minutes and perhaps as much as 50% at times. They noted an opacity of approximately 20% continuously.²

The protocol approved by USEPA called for the enclosure to be equipped with a 30,000 cfm fan; however, the actual capacity of the fan used was only 14,800 cfm. USEPA acknowledged this discrepancy but agreed to allow the testing to be performed. The following statement confirms that a smaller fan was not adequate:

It appears as if the 15,000 scfm fan on the front side of the shredder was not sufficient to pull enough air to capture all of the exhaust coming off the shredder.³

² October 19, 2017 Inspection of Sims Metal Management, Johnston RI written by Ms. Christine Sansevero of USEPA Region 1 observations during the September 2017 shredder emission tests, page 7 of 10.

³ October 19, 2017 Inspection of Sims Metal Management, Johnston RI written by Ms. Christine Sansevero of USEPA Region 1 Agency observations during the September 2017 shredder emission tests, page 5 of 10.

These observations clearly show that the Rhode Island testing strategy failed to adequately capture shredder emissions. The emission test report published by SIMS did not attempt to quantify the uncaptured emissions and failed to even acknowledge the copious amounts of uncaptured emissions escaping from the front/infeed of the shredder. The report also failed to acknowledge that the reported emission factor represents only a small portion of total shredder emissions that were captured by the temporary enclosure and do not represent total shredder emissions. Shredders using these emission factors will be significantly underreporting total actual emissions.

Despite the fact that the Rhode Island test was required by USEPA Region 1 as part of a Section 114 Information Request, to the best of our knowledge, USEPA Region 1 did not formally question or comment on the accuracy or adequacy of the SIMS Rhode Island test.

Flawed SIMS Rhode Island Shredder VOM Emission Test Being Used to Permit East Chicago, Indiana and South Paulina Facilities

In addition to using the reported shredder VOM emission factor from the Rhode Island testing to permit SIMS Rhode Island, SIMS also used this emission factor to set permit limits for shredder throughput and VOM emissions for its shredder in East Chicago, Indiana. During the public notice period for the SIMS East Chicago air permit, RKA submitted detailed comments, dated August 2, 2019, to the Indiana Department of Environmental Management (IDEM) highlighting the problems with the Rhode Island test results.

In response to these comments, IDEM stated that because the SIMS Rhode Island testing was performed under a protocol approved by USEPA and the results of the test were not questioned by USEPA, they would be accepted and relied upon for permitting the SIMS East Chicago facility. In addition, IDEM noted that the East Chicago permit required that the shredder emission rates be revised, if necessary, based on the result of USEPA-required testing to be performed at the SIMS South Paulina facility and that IDEM would review the test protocol for the South Paulina test.

SIMS also used the Rhode Island VOM emission factor to define shredder VOM emissions and set shredder throughput limits in the initial January 2019 FESOP application for SIMS South Paulina submitted to IEPA. RKA submitted a copy of our earlier comments on the Rhode Island emission test to USEPA Region 5, and to IEPA on August 30, 2019. A copy of these comments is presented in Attachment B of this correspondence.

SIMS South Paulina submitted a Supplement to its initial FESOP application to IEPA on January 31, 2020, primarily for the purpose of incorporating an updated shredder VOM emission factor as required by the ACO. This Supplement included a copy of an e-mail from Ms. Nidhi O'Meara, an attorney with USEPA's Office of Regional Counsel for Region 5, to Mr. Mark LaRose, an attorney representing SIMS. In this email, Ms. O'Meara stated:

“Region 5, EPA, has received and carefully reviewed the stack test report for the hammer mill metal shredder at the Paulina Street facility, dated October 18, 2019.

After extensive discussions regarding the stack test parameters and possible variability of these parameters (which would impact the VOM emission factor), based on the October 18, 2009 stack test results and the variability factors, it is reasonable to conclude and therefore EPA and MMMI agree that the emission factor for the MMMI shredder is 0.117 pounds of VOM per ton of shredded material. This emission factor is based off of shredding 50% end-of-life vehicles during the stack testing.”

The above e-mail clearly references the South Paulina stack test, but does not identify what “variability factors” were discussed or how those factors were used to adjust the VOM emission factor of 0.09 lb/ton identified in the South Paulina stack test report to the agreed upon VOM emission factor of 0.117 lb/ton.

Based on the information presented in this document, theoretical adjustments to account for unquantified amounts of uncaptured VOM emissions are neither credible nor reliable and should not be used to determine compliance with applicable VOM control requirements.

In the Supplement to the South Paulina FESOP application, SIMS addresses the above referenced ACO requirement by stating:

“Emissions testing for the hammermill shredder at the Paulina Street Facility was timely conducted on September 20, 2019 (the Stack Test) in accordance with Paragraph 33 of the ACO. On January 17, 2020, USEPA and MMMI [SIMS] came to an agreement that the hammermill shredder emission factor per the stack test be 0.117 pounds of Volatile Organic Material (VOM) per ton of shredded material (lb VOM/ton), as seen in Attachment C. MMMI has used this 0.117 lb VOM/ton emission factor and has revised the hammermill shredder VOM emission calculations accordingly. The revised calculations are included in Attachment C. Note that SIMS facility-wide potential-to-emit (PTE) VOM at the Paulina Street Facility remains less than 25 tons per year.”

The Supplement, submitted to IEPA in support of its FESOP application (and also submitted to USEPA Region 5 pursuant to the ACO), also did not identify how the “agreed upon” VOM emission factor was derived from the South Paulina test results, nor did the Supplement include any portion of the South Paulina test report as supporting information.

The lack of transparency on the origin of the agreed upon VOM emission factor is concerning , particularly with respect to emission testing required by an ACO for the purpose of identifying a site-specific VOM emission factor. Given the significant disparities in the reported VOM emission factors from General Iron and SIMS South Paulina, IEPA should not accept the agreed upon VOM emission factor for SIMS South Paulina.

In fact, the agreed upon South Paulina VOM emission factor of 0.117 lb/ton (at 50% ELVs) is coincidentally identical to the shredder VOM emission factor reported from the SIMS Rhode Island facility. The ACO for SIMS South Paulina (Paragraph 36.a.) required that SIMS submit a FESOP application that “...*must request to use the VOM emission factor calculated as a result of Emissions Testing for the hammermill shredder at the Paulina Street facility.*”

As we have previously identified to USEPA, IEPA and IDEM, the Rhode Island emission testing results are highly suspect because of the gross amount of uncaptured (and unquantified) VOM emissions identified by USEPA Region 1 observers present during the test. The Rhode Island test report did not even acknowledge that these uncaptured emissions were present and no apparent adjustments to the measured VOM emission factor were made to account for uncaptured emissions.

As described herein, review of the Rhode Island shredder VOM test results point to deficiencies in the ability of the temporary enclosure at the bottom of the shredder to adequately capture total shredder VOM emissions. This same deficiency was also demonstrated during the South Paulina facility shredder emissions testing as evidenced by the unquantified amount of uncaptured VOM emissions documented by USEPA Region 5 observers present during testing.

The reported capture efficiency of the shredder emissions control system used at General Iron was determined by direct visual observation of the front/infeed of the shredder (where the overwhelming majority of emissions are released) by experienced IEPA and USEPA representatives who estimated the capture efficiency to be at least 90%; a level at which a visual observation may be used to reasonably estimate capture efficiency. This is especially true for a shredder equipped with VOM emission controls where a small amount of uncaptured emissions is not likely to trigger additional control or negatively impact compliance with applicable air quality standards.

Regardless of whether the agreed upon emission factor was derived from VOM emission testing at the SIMS South Paulina facility or the SIMS Rhode Island facility, the reported test results from both of these facilities failed to account for the significant portion of uncaptured shredder emissions observed during testing. Visual observations are not a reliable or accurate method of estimating uncaptured emissions of the magnitude described in the USEPA Site Inspection Report and shown in the accompanying FLIR videos. In the absence of emission controls, even a small error in assumed capture efficiency can trigger the regulatory requirement for VOM controls and cause exceedances of applicable air quality standards.

Because the emission testing at SIMS Rhode Island and SIMS South Paulina did not account for uncaptured VOM emissions, the reported emission factors do not represent total shredder VOM emissions and should be deemed invalid. The significant disparities in measured VOM emission factors between General Iron and SIMS South Paulina support this conclusion.

SIMS South Paulina Shredder Emissions Testing

SIMS South Paulina was also required to conduct an emissions test of its South Paulina shredder pursuant to its USEPA ACO. SIMS relied on the same failed test strategy used at its Rhode Island facility to perform shredder VOM emissions testing at South Paulina. Not surprisingly, the VOM emission factor derived from the testing was astonishingly low (0.09 lb/ton) and, as discussed above, was not even reported to IEPA or directly used to supplement the FESOP application for that facility.

RKA received and reviewed the following documents via Freedom of Information Act (FOIA) requests made to USEPA Region 5 and IEPA. The documents are listed in chronological order.

- A. January 2019 Federally Enforceable State Operating Permit Application for SIMS Metal Management Midwest, Inc. South Paulina Facility submitted to the IEPA.
- B. May 5, 2019 Shredder Emission Testing Protocol prepared by Trinity Consultants on behalf of SIMS South Paulina submitted to USEPA Region 5. This document describes the proposed VOM, PM and Metal emissions testing of the shredder utilizing a temporary enclosure installed at the bottom of the shredder.
- C. October 2, 2019 Clean Air Act Inspection Report written by Kenneth Ruffatto of USEPA Region 5 documenting observations made during a site inspection performed on September 5, 2019, with digital images and videos (including FLIR videos) captured during the inspection.
- D. October 8, 2019 Clean Air Act Inspection Report written by Vicky Mei of USEPA Region 5 documenting observations made during a site inspection performed on September 19, 2019, with digital images and videos (including FLIR videos) captured during the inspection.
- E. October 8, 2019 Clean Air Act Inspection Report written by Vicky Mei of USEPA Region 5 documenting the observations made during a site inspection performed on September 20, 2019, to witness shredder emission testing, with digital images and videos (including FLIR videos) captured during the inspection.
- F. October 18, 2019 Metal Shredder Emissions Testing Report prepared by Mostardi Platt for testing performed on September 20, 2019.
- G. January 31, 2020 Supplement to the Federally Enforceable State Operating Permit for the SIMS South Paulina facility submitted to IEPA.

SIMS South Paulina constructed a temporary enclosure at the bottom of the shredder that essentially enclosed an under mill oscillating (UMO) conveyor that transfers shredded scrap metal to a downstream take away conveyor. An induced draft fan was used to draw approximately 45,000 acfm of air through the enclosure and exhaust it through a discharge stack. Testing was performed in exhaust ductwork

downstream of the fan. The failed objective of the enclosure and fan was to pull air down through the shredder so that VOM generated by the shredder would be captured for testing.

On August 30, 2019, RKA submitted comments highlighting the identified problems with the SIMS Rhode Island shredder emission test protocol to USEPA Region 5 (see Attachment B to this correspondence). These comments included a suggestion that the protocol for the then-pending South Paulina shredder emissions test be modified to include a procedure to identify uncaptured VOM emissions from the front/infeed of the shredder. However, the SIMS South Paulina test was performed in September 2019 without inclusion of procedures to identify or quantify uncaptured VOM emissions from the front/infeed of the shredder.

As described below, the South Paulina test was also unsuccessful due to the presence of an unquantified amount of uncontrolled VOM emissions from the front/infeed of the shredder. USEPA inspectors used a FLIR camera to observe the front/infeed of the shredder during the South Paulina shredder emissions test and noted that visible emissions and VOM emissions were observed during the test.

“Visible emissions and emissions imaged via the FLIR camera were seen during all three runs.”⁴

During Run #2, significantly more emissions were uncaptured, as seen via FLIR camera, (see Videos #13-21 of Appendix A).”³

“Videos captured during Run #3 showed sporadic spikes in emissions imaged via the FLIR camera.”³

These references in USEPA Site Inspection Reports to multiple FLIR images identifying uncaptured VOM emissions from the front/infeed of the shredder clearly indicate that the temporary enclosure was not successful in capturing VOM emissions from the front/infeed of the shredder. Emission factors derived from this test will significantly underreport actual VOM emissions.

Figures 5, 6, and 7 below are FLIR images from videos taken by a USEPA Region 5 observer on September 20, 2019, during Test Runs 1, 2 and 3 respectively at SIMS South Paulina. These images show uncaptured emissions from the front/infeed of the shredder which were not accounted for in the reported test results. Review of the USEPA Site Inspection Report show that a total of 34 videos were recorded during the emission test. The majority of these videos include FLIR imagery that identify uncaptured emissions escaping from the front/infeed of the shredder during testing.

Figure 5 is an image from 1:54 (minutes and seconds into the video) of video MOV_2568 taken during Test Run 1. The video was recorded from a location just south of the auto shredder residue discharge pile viewing in a northwesterly direction toward the shredder. The image shows a large plume of uncaptured emissions discharged from the front/infeed of the shredder.

⁴ September 20, 2019 Inspection of MMMI South Paulina written by Ms Vicky Mei of USEPA Region 5 documenting Agency observations during the September 2019 shredder emission tests, page 3 of 7.

Figure 5 – Uncaptured Emissions from Front/infeed of Shredder During Run 1

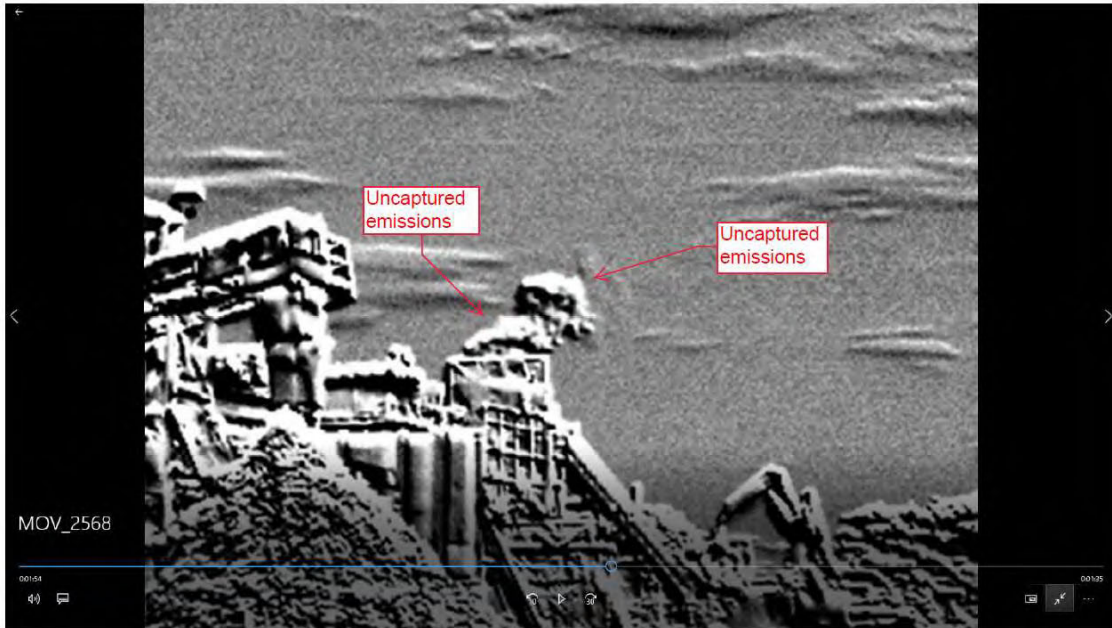


Figure 6 is an image from 0:35 of video MOV_2572 taken during Test Run 2. The video was recorded from a location southwest of the shredder viewing in a northeasterly direction toward the front/infeed of the shredder. The image shows a large plume of unaptured emissions discharged from the front/infeed of the shredder.

Figure 6 – Uncaptured Emissions from Front/infeed of Shredder During Run 2

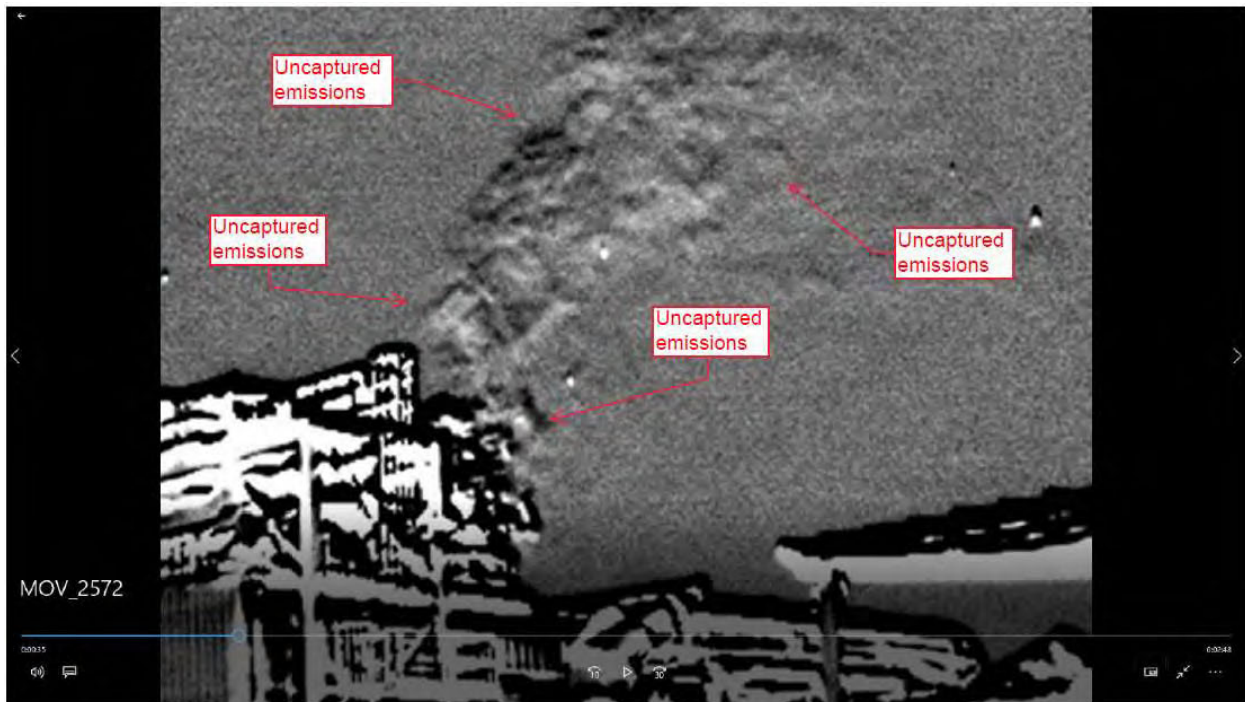
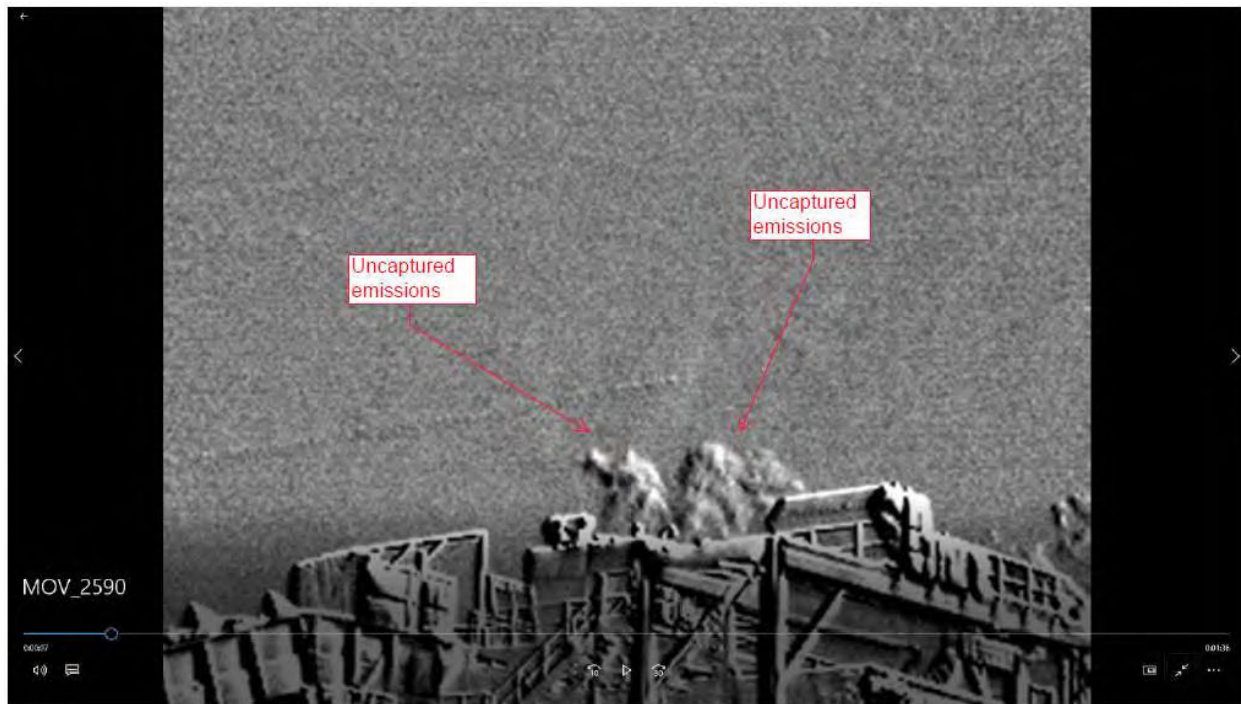


Figure 7 is an image from 0:07 of video MOV_2590 taken during Test Run 3. The video was recorded from a location northwest of the shredder viewing in a southeasterly direction toward the front/infeed of the shredder. The image shows a large plume of uncaptured emissions discharged from the front/infeed of the shredder.

The FLIR images from the September 20, 2019 emissions testing show numerous examples of similar plumes of uncaptured emissions escaping the front/infeed of the shredder throughout the testing periods, clearly demonstrating that a temporary enclosure located at the bottom of the shredder is not capable of adequately capturing VOM emissions. The Mostardi Platt test report identified a capture efficiency of 98% but there was no documentation on how this value was determined. Based on our review of the FLIR videos, the referenced capture efficiency does not refer to total shredder emissions but only the small portion of total VOM measured from the UMO conveyor enclosure. Without including test methods and procedures to evaluate overall shredder emissions capture efficiency as part of a test protocol, the resulting VOM emission factors are unreliable and significantly underestimate actual shredder VOM emissions.

Figure 7 – Uncaptured Emissions from Front/infeed of Shredder During Run 3



Based on the proposed South Paulina annual shredder throughput, even a small increase from the identified South Paulina VOM emission factor would result in an increase in potential VOM emissions that would trigger the control requirements of 35 IAC 218 Subpart TT. **Using General Iron's more accurate uncontrolled VOM emission factor and SIMS South Paulina's requested annual shredder throughput, actual VOM emissions from SIMS South Paulina will approach 95 tpy.**

Detailed comments on the SIMS South Paulina test report are presented in Attachment A to this correspondence.

Conclusions

The information provided herein supports the following conclusions regarding VOM emissions testing at General Iron, SIMS Rhode Island, and SIMS South Paulina:

- All three facilities use the same hammermill shredder technology with water injection.
- Hammermill shredders are designed to exhaust steam and emissions to the atmosphere through the front/infeed of the shredder.
- All three facilities conducted testing while processing the same percentage of general scrap metal and ELVs and the materials processed by General Iron and SIMS South Paulina were essentially the same.
- All three facilities used the same USEPA Test Methods to measure VOM concentration and exhaust gas flow rates.
- General Iron is the only facility in Wisconsin, Illinois or Indiana and one of only a few facilities in the United States that uses a state-of-the-art shredder emissions capture and control system.
- SIMS Rhode Island and SIMS South Paulina are not equipped with emissions capture or control systems.
- The preferred method to capture emissions from a hammermill shredder is to use a capture hood located over the front/infeed of the shredder. General Iron is the only one of these three facilities that used a capture hood located over the front/infeed of the shredder to measure shredder emissions.
- Information in USEPA Site Inspection Reports from the SIMS Rhode Island and SIMS South Paulina VOM emissions testing events in September 2017 and September 2019, respectively, clearly demonstrate that the use of a temporary enclosure located at the bottom of a hammermill shredder was not adequate to prevent significant amounts of uncaptured VOM emissions from escaping the front/infeed of the shredder.
- There was no attempt to identify or quantify uncaptured VOM emissions escaping the front/infeed of the shredder during recent emissions testing at SIMS Rhode Island or SIMS South Paulina and the resulting VOM emission factors only represent a small unquantified portion of total shredder VOM emissions.
- Given the similarities between these three facilities, the uncontrolled VOM emission factors should be reasonably consistent; however, this was not the case. The General Iron uncontrolled

VOM emission factor was 4.4 times greater than the reported SIMS Rhode Island emission factor and 5.7 times greater than the reported SIMS South Paulina emission factor.

- Given the similarities between these three facilities, the only apparent cause of the significant disparities in VOM emission factors is that the temporary enclosures used by SIMS Rhode Island and SIMS South Paulina did not adequately capture shredder VOM emissions.
- The use of uncontrolled VOM emission factors from SIMS Rhode Island and SIMS South Paulina significantly underestimate shredder emissions.
- Facilities that rely on VOM emission factors from testing at SIMS Rhode Island or SIMS South Paulina may not be in compliance with applicable requirements for control of VOM emissions.
- By relying on the flawed emission factor, the SIMS South Paulina facility is operating out of compliance with Illinois rule 35 IAC 218, Subpart TT, which requires 81% control of VOM emissions.
- By relying on the flawed emission factor, the SIMS East Chicago facility will be operating out of compliance with Indiana rule 326 IAC 8-1-6, which requires a Best Available Control Technology (BACT) analysis for the reduction of VOM emissions.
- If the actual VOM emission factor for SIMS South Paulina is just 11.5% higher than reported, actual annual VOM emissions pursuant to its FESOP application will trigger the requirement to control 81% of VOM emissions pursuant to 35 IAC 218 Subpart TT.
- If the more accurate General Iron VOM emission factor were applied to the SIMS South Paulina facility, the permitted shredder throughput would need to be drastically reduced, to just 97,675 tons per year (tpy) to avoid the requirement to install VOM emissions controls.
- Using General Iron's more accurate VOM emission factor, the actual VOM emissions from the SIMS South Paulina and SIMS East Chicago Indiana facilities will approach **95 and 85 tpy, respectively**.
- The use of VOM, metals, and HAP emission factors that do not account for gross amounts of uncaptured emissions makes it impossible to accurately assess local air quality impacts and may lead to exceedance of applicable air quality standards at SIMS South Paulina, SIMS East Chicago, and any other shredder that uses these factors.
- The reported VOM emission factors from the recent SIMS Rhode Island and SIMS South Paulina testing should not be approved by USEPA or state regulatory agencies for use in permitting or compliance demonstration at other hammermill shredding facilities.
- In the absence of credible site-specific emission factors, USEPA requires the use of other published emission factors, preferably from credible testing performed at a similar facility operated under similar conditions, such as the emission factor from General Iron.

- SIMS South Paulina should be required to use the November 2019 uncontrolled VOM emission factor demonstrated at General Iron (while feeding 50% ELVs) unless testing at South Paulina is repeated and includes methods and procedures to satisfactorily characterize uncaptured VOM emissions from the front/infeed of the shredder.
- The failure to acknowledge uncaptured VOM emissions from the front/infeed of the shredder in the test reports from SIMS Rhode Island and SIMS South Paulina is intentionally misleading to regulatory personnel and results in fundamental inequities in the regulation of hammermill shredders emissions and resulting air quality impacts.



**Evaluation of Shredder VOM Emissions Testing Results -
SIMS South Paulina, Chicago, Illinois and
SIMS Johnston, Rhode Island**

May 6, 2020

ATTACHMENT A

**RKA Detailed Comments on USEPA Site Inspection Reports from
Shredder VOM Emissions Testing
SIMS South Paulina – Chicago, Illinois
September 20, 2019**

ATTACHMENT A

RKA Detailed Comments on USEPA Site Inspection Reports from Shredder VOM Emissions Testing at SIMS South Paulina – Chicago, Illinois September 20, 2019

The following comments are provided regarding the following USEPA Site Inspection Reports written by Vicky Mei of USEPA Region 5 documenting observed conditions from emissions testing performed on September 20, 2019 at SIMS South Paulina. The inspection report also includes numerous videos and photographs taken during testing.

October 8, 2019 Clean Air Act Inspection Report written by Vicky Mei of USEPA Region 5 documenting the results of a site inspection performed on September 20, 2019, to witness shredder emission testing.

This above Site Inspection Report identifies 4 digital photos, and 34 FLIR videos.

Pg 3 of 7

Tour Information – Data Collected and Observations:

“Visible emissions and emissions imaged via the FLIR camera were seen during all three runs.”

It is assumed that FLIR images identify VOM.

It is also assumed that the FLIR images refer to the top [front/infeed] of the shredder, although it is not clearly stated in the comment. The titles of a number of the FLIR videos do indicate VOM emissions were seen at the “*top of mill.*”

The above statement in the USEPA Inspection Report indicates that the UMO conveyor enclosure **was not effective at capturing VOM emissions generated by the shredder.**

This also indicates that the reported 98% capture efficiency identified in the Mostardi Platt Test Report could only have been the local capture efficiency of the UMO conveyor enclosure and **not** the overall capture efficiency of VOM generated by the shredder.

“A significant spike in THC concentration occurred near the end of Run #1, as seen in Video 12 (see Appendix A).”

This statement does not indicate what caused the observed spike in THC concentration. These spikes at the end of Run #1 and then the presence of significantly more uncaptured emissions at the beginning of Run #2 (visible from viewing videos) indicate that SIMS may have fed higher VOM-containing material (i.e. higher percentage of ELVs) between test runs.

THC may refer to the concentration of THC measured in the UMO conveyor exhaust duct, but Video 12 is titled “*End of sorter chute; emissions seen; during near the end of Run #1 and may be during the 1,000+ ppm THC spike.*”

ATTACHMENT A

RKA Detailed Comments on USEPA Site Inspection Reports from Shredder VOM Emissions Testing at SIMS South Paulina – Chicago, Illinois September 20, 2019

The above statement in the USEPA Inspection Report indicates that the UMO conveyor enclosure **was not effective at capturing VOM emissions generated by the shredder.**

The statement also indicates that the reported 98% capture efficiency identified in the Mostardi Platt Test Report could only have been the local capture efficiency of the UMO conveyor enclosure and **not** the overall capture efficiency of VOM generated by the shredder.

There were 34 FLIR videos identified in the inspection report.

“During Run #2, significantly more emissions were uncaptured, as seen via FLIR camera, (see Videos #13-21 of Appendix A).”

With the exception of Video #16, the titles of Videos 13 – 21 all include the words “Top of mill,” and the words “significant amounts of emissions seen” or “emissions seen.”

This statement in the USEPA Inspection Report indicates that the UMO conveyor enclosure **was not effective at capturing VOM emissions generated by the shredder.**

This also indicates that the reported 98% capture efficiency identified in the Mostardi Platt Test Report could only have been the local capture efficiency of the UMO conveyor enclosure and **not** the overall capture efficiency of VOM generated by the shredder.

“Videos captured during Run #3 showed sporadic spikes in emissions imaged via the FLIR camera.”

The title of Videos #33 and #34 both include the words “emissions seen.”

This clearly indicates that the UMO conveyor enclosure **was not successful at capturing VOM emissions generated by the shredder.**

This also indicates that the reported 98% capture efficiency identified in the Mostardi Platt Test Report could only have been the local capture efficiency of the UMO conveyor enclosure and **not** the overall capture efficiency of VOM generated by the shredder.



**Evaluation of Shredder VOM Emissions Testing Results -
SIMS South Paulina, Chicago, Illinois and
SIMS Johnston, Rhode Island**

May 6, 2020

ATTACHMENT B

**RKA Comments to USEPA Region 5
Proposed Metal Shredder Emissions Testing
Scheduled for the Week of September 2, 2019
Sims Metal Management Midwest – 2500 S Paulina – Chicago, Illinois
IEPA ID No.: 03100FFO**



August 30, 2019

Mr. Nathan Frank
Chief Air Enforcement and Compliance Assurance Section (IL-IN)
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

e-mailed to
nathan.frank@epa.gov

**Comments on Proposed Metal Shredder Emission Testing
Scheduled for the Week of September 2, 2019
Sims Metal Management Midwest – 2500 S Paulina – Chicago, Illinois
IEPA ID No.: 03100FFO**

Dear Mr. Frank:

The following comments were included in an August 2, 2019, letter sent to Ms. Kendra Sutherland of the Indiana Department of Environmental Management (IDEM) in response to the Notice of 30-Day Period for Public Comment on the Preliminary Findings Regarding a New Source Review and Minor Source Operating Permit (MSOP) for Sims Metal Management (SMM) in East Chicago (Lake County), Indiana.

The draft IDEM MSOP and accompanying Technical Support Document (TSD) state that demonstration of compliance with permitted VOC emission limits at the East Chicago facility will rely on metal shredder VOC emission test data from a similar SMM metal shredder at its South Paulina facility in Chicago, Illinois. The TSD identifies that the VOC emissions factor used to limit PTE below the level at which BACT and TBACT requirements would apply, prior to testing at the South Paulina facility, was taken from shredder VOC emissions testing performed at the SMM Johnston, Rhode Island facility in September 2017. Neither the East Chicago, Rhode Island, or South Paulina shredders are equipped with volatile organic compound (VOC) control devices. Metal shredder VOC emission control measures include installation of regenerative thermal oxidizers or similar VOC control technology and/or limiting the quantity and quality of miscellaneous scrap metal and end of life vehicles (ELVs) processed.

As you may be aware, SMM's South Paulina facility is constructing a temporary total enclosure for the purpose of measuring shredder emissions as required by Paragraph 33 of Administrative Consent Order EPA-5-18-113(a)-IL-09. It is our understanding that the emission testing of the metal shredder at South Paulina will be performed during the first week in September 2019, and that a protocol for testing was to be submitted to USEPA no later than 60 days prior to testing.

A. Temporary Total Enclosure Criteria Must be Met

In the absence of VOC control technology, the SMM's South Paulina and East Chicago shredders (and probably others) will rely on VOC emission factors measured by use of a temporary total enclosure. The performance of a temporary total enclosure can significantly impact the accuracy of a measured VOC emission factor. The application of a temporary total enclosure for a metal shredder does not allow for measurement of the actual percent of capture achieved, but only whether or not the enclosure meets specified design and operating criteria. Compliance with these criteria assumes that the enclosure achieves 100% capture of VOC emissions. Failure to adequately and accurately document compliance with these design and operating criteria will result in an unreliable VOC emission factor that may significantly under represent actual VOC emissions.

The potential deficiencies in the application of a temporary total enclosure to a large metal shredder are highlighted in USEPA Site Inspections Reports from a September 2017 shredder emission test at another SMM facility in Johnston Rhode Island (see Attachments A and B). Attachment C to this correspondence presents photos and sketches of the temporary enclosure constructed at the Johnston Rhode Island facility that were included in the Clean Air test report.

The enclosure appears to have been only a partial enclosure constructed over the discharge of the shredder. The information in Attachment C indicates that there was no enclosure provided to capture emissions from the top of the shredder. The attached USEPA Site Inspection Reports state that significant amounts of bluish smoke and opacity were observed exiting from the top of the shredder indicating that the partial enclosure failed to capture a significant amount of shredder emissions. This may have been due to the facility's installation of a 15,000 cfm enclosure exhaust fan, which was only 50% of the capacity (30,000 cfm) initially proposed to the Agency. The Rhode Island shredder testing should have been considered to be a failure due to the presence of significant uncaptured emissions at the top of the shredder. In addition, the test report, a publicly available document, does not specifically identify that the reported VOC emission factor does not represent total shredder emissions. The Rhode Island emission factor has been cited as justification for estimated VOC emissions presented in a permit application for the SMM East Chicago Indiana shredder (and possibly others).

If the temporary enclosure proposed for the South Paulina emission test is similar to the enclosure provided in Rhode Island and does not provide for adequate capture of emissions from the top of the shredder, it is likely to result in unreliable emission data. A significant portion of the water injected into a shredder is flashed to steam due to high temperatures inside the shredder. The rapid rate of expansion of water to steam indicates that adequate capture of emissions at the top of the shredder cannot be achieved without the use of a collection hood over the top of the shredder.

Based on USEPA Site Inspection Reports in Attachments A and B, the proposed testing at the South Paulina facility must clearly demonstrate that emissions from the top of the shredder are adequately captured throughout the duration of the sample collection periods. Failure to provide this demonstration will render the test results meaningless.

B. Raw Materials Must Be a Representative Mix

In order for an emission factor to be applicable to operations at similar facilities, or even future operations at the same facility at which the factor was developed, the equipment operating conditions and raw materials processed must be consistent with those from the cited emission test. The SMM Rhode Island test report did not identify the metrics used by SMM to characterize the miscellaneous scrap metal and condition of ELVs processed during the test, without which, severely limits the applicability of the measured VOC emission factor to other facilities. The application of the SMM Rhode Island VOM emission factor to other facilities, especially in the absence of any other required testing at those other facilities, should not be considered representative without adequate characterization of miscellaneous scrap and condition of ELVs processed.

In the case of scrap metal shredders, the quality of the miscellaneous scrap and the condition of the ELVs processed have the biggest impact on VOC emissions. It is well understood by the metal shredding industry that shredder VOC emission rates are heavily influenced by the number and rate of vehicles shredded and the amount of volatile and VHAP fluids remaining in the vehicles when they are shredded. This factor becomes even more important when a shredder is not equipped with a high-efficiency VOC control device.

Therefore, it is imperative that the test documentation demonstrate that that the mix of the scrap processed during an emission test is representative of the mix of scrap typically received and processed. Gas tanks should not be removed from ELVs prior to shredding (it is our experience that in the Chicago market gas tanks are typically not removed from vehicles prior delivery to a recycling facility). The materials shredded during the emissions test should not be “cherry picked” clean material or stripped out appliances not containing fluids or VOC-containing material (i.e. greases, oils and etc.). At the conclusion of the testing, an authorized facility representative should verify that there were no special steps taken to sort or prepare the materials shredded during the emission test that are not consistent with normal operating practices. This is particularly important for the industry because other shredding facilities will cite the South Paulina test results in emission calculations used for compliance demonstrations and permitting.

C. USEPA Observations of the SMM Rhode Island Shredder Emission Testing

To highlight the above issues, the following comments are provided in Site Inspection Reports prepared by USEPA Region I representatives when witnessing the 2017 evaluation of a temporary total enclosure and subsequent VOC emission test of the SMM metal shredder in Johnston, Rhode Island. The comments presented below identify USEPA observations that likely had a significant impact on the accuracy of the reported VOC emission factor relied upon by IDEM. These observations and limitations were not included in SMM’s test report and thereby were not likely considered by IDEM in the preparation and issuance of the draft MSOP and Technical Support Document for the SMM East Chicago facility.

USEPA Inspection Reports from the SMM Rhode Island Shredder Emission Testing

- **October 19, 2017 inspection report written by Ms. Christine Sansevero, a USEPA Region I Senior Enforcement Coordinator in the Air Technical Unit (Attachment A).**

Preparation of Vehicles Prior to Shredding

- + On Page 4 of 10 it states that SMM confirmed that auto suppliers do the depolluting of the vehicles and that SMM does a spot check. The term ‘depolluting’ is not defined. Does this term mean that fluids are removed from vehicles or does it mean the engine, transmissions, gas tanks, and other fluid reservoirs are removed prior shredding?

On page 6 of 10 of Ms. Sansevero’s report, she stated that trucks arriving during testing to deliver autos and light iron were described by SMM as *normal shipments* and that Mr. Rapp of USEPA observed that delivered autos were either crushed cubes or flattened and that “*Some were just chassis or shells without engines.*” There is no data in the test report that identifies the condition of the autos prior to shredding.

On Page 8 of 10, during Runs 2 and 3 conducted on September 18, 2017, Ms. Sansevero wrote that “*Mr. Osbahr (from USEPA) noted that SMM was removing the gas tanks from the autos and then driving over the gas tanks to flatten them. Ms. Sansevero asked about the removal of the gas tanks. During a close out conference, Ms. Sansevero stated that when asked about the removal of the gas tanks, SMM representatives explained that removing the air from the tanks helps minimize what they call “incidents” or fires in the shredder. They further explained that the tanks are shredded after they have been flattened.*”

Neither the SMM Rhode Island test report or the USEPA inspection reports describe how vehicles were depolluted, or what spot checks were performed on the vehicles stockpiled for processing during the emission tests. The test report also does not identify how many of the vehicles shredded during emission testing had engines, transmissions and fluid reservoirs removed or when the removed gas tanks were shredded (during the test or after).

It is not standard practice in the Chicago and NW Indiana markets to remove gas tanks before shredding vehicles. During the SMM South Paulina emission testing, the gas tanks should be left in place and shredded with the vehicles to be representative of normal operating practices.

Performance of the Temporary Enclosure

- + On Page 5 of 10, the report states that during Test Run 1 on September 15, 2017, *“Mr. Rapp and Ms. Sansevero observed a great deal of visible grayish smoke at the entrance to the shredder. It was not captured by the rubber curtains and seemed as if it was being pushed out of the partial enclosure. It appears as if the 15,000 scfm fan on the front side of the shredder was not sufficient to pull enough air to capture all of the exhaust coming off the shredder.”*

With respect to the above statement, Ms. Sansevero added the following footnote: *“During discussion regarding the testing order, SMM requested that it be allowed to proceed with testing without a Method 204 enclosure. SMM was concerned that it would be difficult, expensive, and create some safety challenges if it were to construct a Method 204 enclosure around the shredder. After much debate, EPA agreed to SMM request to construct a partial enclosure. SMM agreed to meet the face velocity requirements of Method 204. SMM had originally indicated that the fan used during the testing would be a 30,000 scfm fan. However, the test protocol, described a 15,000 scfm. EPA inquired about this change. SMM responded that the 15,000 scfm fan would be sufficient for maintaining a face velocity of 200 feet per minute [sic].”*

On Page 7 of 10, Ms. Sansevero stated that during Run 2 (also on September 15, 2017), *“Mr. Rapp noted bluish gray smoke emanating from the shredder. He and Mr. Mohamoud (also from USEPA) estimated opacity of approximately 40% for many minutes and perhaps as much as 50% at times. They noted an opacity of approximately 20% continuously.”*

Opacity, (i.e., emissions observed escaping the capture system) would also include VOCs, which were not accounted for in the reported test results.

The SMM Rhode Island test report describes that a temporary enclosure (TE) was used as a means of quantifying emissions from the shredder system. The test report (on Page 4), described the TE as follows:

“Rigid walls could not be used because the structure had to allow for a possible energy release. The TE was constructed consistent with the Test Protocol. Consistent with the Test Protocol and equation 204-3 from USEPA Method 204, CleanAir estimated the facial velocity of the TE prior to testing by measuring gaps between the rubber sheets on the north, west, and south sides of the TE. Clean Air also measured gaps between the TE and the UMO on the north, east, and south sides, as well as between the TE and the outfeed conveyor on the west side of the TE. CleanAir’s diagrams are available in Appendix J. CleanAir then divided the maximum blower rating of 15,000 scfm by the total natural draft openings (NDOs). This resulted in a calculated facial velocity greater than 200 fpm. Prior to

beginning the tests, CleanAir used a Shortridge analyzer and hand-held smoke generator to measure flow rates and direction of flow at accessible locations.”

“The pressure drop across the TE was monitored and recorded on the TO-15 data sheets during each test run. The sample line used for the pressure drop measurements became clogged during Run 3. This was not discovered until the start of Run 5; therefore, the pressure drops recorded during Runs 3 and 4 yielded non representative and low biased readings. There was an extended delay during Run 5 while the pressure drop sample line was cleared. The average pressure drop reading presented in Table 1-1 only includes Runs 1, 2, 5, and 6. The pressure drop across the TE was found to be >0.007” H₂O, the minimum required to meet EPA Method 204 criteria.”

The observation of continuous bluish gray smoke emanating from the shredder at an opacity of 20% or greater, and not being captured by the TE, are certainly not consistent with the statements in the test report that seem to indicate that the TE met Method 204 requirements. In fact, the test report does not provide results of any velocity tests performed across the Natural Draft Openings (NDO) or the TE.

Photos and sketches included in the test report show that the temporary enclosure was only constructed to enclose the discharge of the shredder. The information in Attachment C indicates that there was no enclosure provided to capture emissions from the top of the shredder. However; as described by USEPA observers, this enclosure failed to capture a significant portion of shredder emissions that were observed exiting the top of the shredder. This may have been due to the facility’s installation of an enclosure exhaust fan with a capacity of only 15,000 cfm, which is just half of the fan capacity initially proposed by the facility.

It is apparent from USEPA’s written site inspection reports that the published SMM Rhode Island shredder VOC emission factor does not represent 100% of VOC emissions generated from the shredder, and in fact, underestimates the actual VOC emissions.

- **December 6, 2017, Stack Emission Testing Observations written by Mr. William Osbahr, Stack Testing Coordinator (EIA), USEPA (Attachment B).**

Performance of the Temporary Enclosure

- + On Pages 2 and 3 of his report, Mr. Osbahr identifies multiple deficiencies of the TE testing and documentation. These deficiencies included NDO dimensions



that were not accurately measured and the failure to have the proper instrument on site to make face velocity measurements through the NDOs.

On Page 3 of the report, Mr. Osbahr stated that Mr. Rapp, Ms. Sansevero, and Mr. Mohamoud observed opacity coming from the east end NDO.

The above observations also indicate that the reported SMM Rhode Island shredder VOC emission rates were not representative of total VOC emissions generated from the shredder.

Based on the above, we respectfully request that the following items be verified during the testing and that documentation be included in the test report for the SMM South Paulina facility.

- Documentation that the mix of scrap processed during the test accurately represents the scrap processed during normal operation, particularly with respect to ELVs and appliances as described herein.
- The test report should include detailed drawings of the temporary total enclosure identifying the location and dimensions of each natural draft opening and a detailed description of how certification of compliance with applicable criteria with USEPA Method 204 were performed during the VOC emission testing.
- The test report must include documentation that VOC and particulate emissions from the top of the shredder are adequately captured by the temporary enclosure so that test results will reflect total shredder VOC emission rates.

If you have any questions please don't hesitate to call me at 630-393-9000 or e-mail me at jpinion@rka-inc.com.

Yours very truly,
RK & Associates

A handwritten signature in black ink, appearing to read "John G. Pinion".

John G. Pinion
Principal Engineer

cc: Kevin Mattison – IEPA – Des Planes, Illinois – via email



**Comments on
Proposed Metal Shredder Emission Testing
Sims Metal Management Midwest
2500 S Paulina – Chicago, Illinois**

August 30, 2019

ATTACHMENT A

**USEPA Region I Inspection Report
Sims Metal Management, Johnston RI
Written by Christine Sansevero,
Senior Enforcement Coordinator, Air Technical Unit,
Dated October 19, 2017**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

Drafted Date: 09/22/2017
Finalized Date: 10/19/2017

SUBJECT: Inspection of Sims Metal Management, Johnston RI
FROM: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit *CMS 10/19/17*
THRU: Steve Rapp, Unit Chief, Air Technical Unit *SAR 10/19/17*
TO: File

I Facility Information

- A. Facility Name: Sims Metal Management
- B. Facility Location: 15 Green Earth Avenue, Johnston, RI
- C. Facility Mailing Address: Same
- D. Facility Contact: Scott Jacobs, Regional Safety Director
- E. ICIS Air: #4400740070

II Background Information

- A. Date of inspection: September 2017 (6th, 15th, 18th, 20th)
- B. US EPA Representative(s): Multiple Day Inspection (see summary chart below)
- C. RIDEM Representative(s): None
- D. Federally Enforceable Regulations:
Rhode Island Air Pollution Control Regulations as applicable including
Regulation 9, Air Pollution Permitting

III Purpose of Inspection

The purpose of the visit was to observe potential to emit testing that EPA ordered SMM to conduct. SMM operates a 7000 hp metal shredder to recover metal from scrap light iron and automobiles. EPA is requiring SMM to test emissions from this shredder to quantify emissions of VOC and other pollutants.

IV. Facility Description

A. Facility History:

Sims Metal Management (SMM) owns and operates a 9.5-acre metal processing facility on a Green Earth Avenue in Johnston, Rhode Island that collects and processes ferrous and non-ferrous scrap metals. The facility started construction in October 2012 and went into operation in October 2013. SMM employs 23 people and owns five trucks and several hundred roll offs.

EPA first visited the site on September 5, 2014 to conduct an inspection. At that time, the top of the shredder was open to the air and partial segments of sheet metal existed on only two sides. The shredder was running that day, and the inspectors observed significant opacity and physical pieces of shredded material emanating from the shredder (see photos in the file). EPA issued a 114 testing order to SMM for its Johnston and North Haven locations in April 2015. In September and October 2015, EPA received several complaints about visible emissions coming from SMM's shredder in Johnston. EPA again visited the site in Johnston on October 14, 2016 to conduct an inspection. SMM had added sheet metal segments to surround three sides of the shredder as well as the top. (See photos in file). There is a large gap between the sheet metal on sides and the sheet metal on the top. SMM also has added rubber curtains on the inlet and outlet of the shredder. The curtains do not come all the way to the sheet metal. There is gap between them and the sheet metal. This configuration constitutes a partial enclosure around the shredder.

B. Number of Employees and Working Hours

The facility operates one shift a day, five days per week, 52 weeks per year. This shift is typically 12 hours per day from 6 am to 6 pm.

C. Process Description

SMM collects ferrous and non-ferrous metals from various different sources such as municipalities, manufacturers, small business and the public. Processing of the scrap materials begins with the loading and conveying of the feed materials into an electrically operated 7,000 horsepower (HP) shredder¹. The shredded material is then conveyed through various separating mechanisms. Magnetic separators are used to separate the shredded metals. Recovered scrap metals are sold to end-users, such as manufacturers, mills, foundries, secondary smelters, and metal brokers. There is a non-magnetic metal fraction from the waste material ("fluff") which is generally transported to SMM's facility in North Haven, Connecticut for further processing.

V. Stack Testing Site Visit

The EPA team visited the site on September 6, September 15, September 18, and September 20. The following table summarize the purpose of the visits as well as the EPA attendees:

¹ The prior shredder, which had a 9,000 HP electric motor, failed in April 2017 and was replaced by the current 7,000 HP shredder in May 2017.

Date	Purpose	EPA Attendees
September 6, 2017	Pre-Test Meeting	Christine Sansevero Abdi Mohamoud Bill Osbahr Steve Rapp Tom Olivier
September 15, 2017	Stack Testing – Day 1 (Runs 1 and 2)	Christine Sansevero Abdi Mohamoud Bill Osbahr Steve Rapp Tom Olivier
September 18, 2017	Stack Testing – Day 2 (Runs 3 and 4)	Christine Sansevero Abdi Mohamoud Bill Osbahr
September 20, 2017	Stack Testing – Day 3 (Runs 5 and 6)	Abdi Mohamoud Bill Osbahr

September 6 – Pre-Test Meeting

The following people from the SMM team attended the pre-test meeting:

Scott Jacobs	SMM	Regional Safety Director
John Sartori	SMM	General Manager
Mr. Brian Sackett	SMM	National Shredder Director
Craig Cunningham	SMM	
Rich Trzupek	Trinity Consultants	
Kristine Davies	Trinity Consultants	
Jon Schaefer	Robinson & Cole	

EPA and SMM officials met in the conference room to discuss the stack testing that was to take place on September 15, 18 and 20. Mr. Trzupek explained that the natural draft opening was achieving a flow of 250 ft/min prior to the modifications the stack test consultant made to the partial enclosure around the shredder. The stack test team had not yet performed flow testing with fan, but they would do so the day before the testing along with cyclonics.

The 10 HP fan is a variable drive fan and you can see the amperage on the cubical. SMM will use a hot wire anemometer and record the amperage every 10 minutes during the test. Mr. Trzupek explained that they can measure pressure drop (“delta P”) when the shredder was off. At Mr. Osbahr’s request, Mr. Trzupek agreed to install a ¼ inch line to measure delta P from inside the enclosure to ambient. This would allow for measurement of delta P when the shredder was on.

The group then walked over to the shredder to observe the partial enclosure, fan, and sample locations. Mr. Osbahr noted that the sample ports need to be in the same plane. SMM agreed to move one of the sample ports prior to testing. Mr. Trzupek confirmed that the day before the testing there would be smoke tubes, delta P measurement and

cyclonics measurement. Mr. Rapp took a number of photos of the sampling location and surroundings.

The group returned to the conference room for further discussion. Mr. Trzupsek confirmed that he would fill out the table that EPA provided to help organize the results of the stack testing. He also explained that the stack test consultant, Clean Air, would be using the lab "Enthalpy" to analyze PM, Metals, and TO-15 results.

Mr. Rapp asked some questions about how the shredded materials would be stockpiled for testing. Mr. Schaefer explained that it is SMM's typical procedure to use its certified truck scale to weigh loads of light iron and autos as they arrive on site. SMM would continue this procedure for the stack testing and set aside sufficient light iron and autos to conduct the stack testing. Mr. Schaefer explained that the piles are segregated for light iron and autos and he explained that SMM planned to have 315 tons of light iron and 315 tons of autos for each one hour run. SMM would also have approximately 10 tons light iron and 10 tons of autos in reserve in the event that more light iron or autos were needed. Mr. Schaefer explained that the loader had the ability to weigh light iron and autos in the field. Mr. Rapp and Mr. Osbahr requested that SMM prepare a written summary of how it would prepare the piles and document their associated weights. In particular, EPA asked SMM to explain how it would ensure that sufficient material would be available for testing as well as how it would account for any excess material after each test run was completed. Mr. Shafer agreed to provide a written summary.

SMM confirmed that its suppliers do the depolluting of the vehicles and SMM does a spot check.

Mr. Osbahr inquired about the leak checks that were required by Method 5 and Method 29. Mr. Trzupsek confirmed that a leak check would be performed at the end of each run. Mr. Osbahr explained that if they don't pass the leak check at the end of the run, they may need to redo that run.

Mr. Osbahr indicated that he would need to be on the stack test platform and at the stack test trailer during testing. Mr. Rapp asked if there would be a place on-site where some members of the EPA team could safely observe the testing. Mr. Jacobs indicated that the inspector shed would be a possible location. SMM would confirm and get back to the EPA team.

September 15 – Stack testing – Day 1

Arrival

The EPA team arrived on site at approximately 7:45 am. Mr. Osbahr and Mr. Bobbs came separately and were already on site when the rest of the EPA team arrived. After checking-in at the main building, the team was escorted to the shredder. Mr. Osbahr explained that each run would take place over 60 minutes. The stack test team, Clean Air Engineering, would conduct a port change at 30 minutes to allow for sampling along a horizontal as well as a vertical traverse (as required by Method 1). The stack

test team would also conduct a leak check at the 30-minute mark. Mr. Osbahr also explained that the first stack test run would be 50% autos / 50% light iron. The second run would be 75% autos / 25% light iron.

The following individuals were part of Clean Air Engineering's Stack Test Team:

Colleen Merringer	Sample Train Technician
Christian Young	Sample Train Technician
Bill Ansell	Project Lead
Eric Doak	Sample Recovery Technician

Day 1 - Run 1

Ms. Sansevero and Mr. Rapp were then escorted to the inspector shed by Mr. Sackett and Ms. Davies. Mr. Olivier and Mr. Mohamoud stayed back in the maintenance building behind the shredder, but were able to observe the testing from the front side of the shredder. Ms. Sansevero set up the video camera (a Sony Handy Cam #S98971) to record the runs. From the inspector shed, the EPA inspectors had a clear view of the conveyor belt. The EPA inspectors could also see the two cranes with grappling hooks. One was located on the side of the conveyor where autos were stockpiled and the other was located on the side of the conveyor where light iron was stockpiled. The EPA inspectors could see the crane that was moving the light iron onto the conveyor more clearly than they could see the one that was moving the autos.

According to Mr. Sackett, the conveyor had been pre-loaded with light iron and autos from the pre-weighed piles. Ms. Sansevero took two sample videos just to check to see if the camera was working. The shredder started at 9:01 am and Ms. Sansevero started filming. Mr. Rapp began to tally the number of grapples of autos and light iron in his field book. About five minutes later, Mr. Rapp and Ms. Sansevero observed a great deal of visible grayish smoke at the entrance to the shredder. It was not captured by the rubber curtains and seemed as if it was being pushed out of the partial enclosure. It appeared as if the 15,000 scfm fan on the front side of the shredder was not sufficient to pull enough air to capture all of the exhaust coming off the shredder².

Ms. Davies was informed by Mr. Trzupsek via text message that the stack test sampling began at 9:14 am. The stack test team needed to conduct moisture sampling before it could begin the stack test run. Moisture sampling cannot take place until the shredder reaches normal operating conditions, hence the 13-minute delay. The shredder and the

² During the discussion regarding the testing order, SMM requested that it be allowed to proceed with testing without a Method 204 enclosure. SMM was concerned that it would be difficult, expensive, and create some safety challenges if it were to construct a Method 204 enclosure around the shredder. After much debate, EPA agreed to SMM's request to construct a partial enclosure. SMM agreed to meet the face velocity requirements of Method 204. SMM had originally indicated the fan used during the testing would be a 30,000 scfm fan. However, the test protocol, described a 15,000 scfm. EPA inquired about this change. SMM responded that the 15,000 scfm fan would be sufficient for maintaining a face velocity of 200 feet per second.

sampling stopped at 9:44 am. The stack test team had completed the first half of Run 1. The shredder started again at 10:01 am. Sampling started at 10:04 am. SMM had to add the pre-weighed extra piles of both light iron and autos to the pile to ensure that there would be enough material to complete the second half of the run. The shredder and the sampling stopped at 10:34 am. The stack test team had completed the first half of Run 2.

Trucks arrived during the testing delivering autos and light iron. Mr. Sackett indicated these were just normal shipments. Mr. Rapp noted that the autos were either crushed cubes or flattened. Some were just chassis or shells without engines.

At the end of the run, Ms. Sansevero inquired about the remaining material on the conveyor belt. She explained that material would need to be weighed along with the left over light iron and autos to determine the total input to the shredder during the run. SMM then ran the conveyor backwards and the material was removed from the conveyor and weighed along with the other pre-weighed material that had not be processed. Mr. Sackett indicated that the loader scale would be used to weigh the unprocessed material.

After the first run was complete, the EPA team and the SMM team came together for a brief discussion at the shredder, near the sampling locations. Mr. Osbahr explained that it was likely they would only need to conduct the moisture testing once, on the first run. He also explained that on subsequent runs, the shredder would run for 3 minutes prior to the start of sampling. Ms. Sansevero explained that it would be important to have accurate total weights of material shredded. Ms. Sansevero went over the need to account for the various piles (starting piles, supplemental piles, material on the conveyor, and left over piles, etc.) with Mr. Schaefer. Mr. Schaefer indicated that SMM would weigh all of this material and provide the weights to EPA.

Day 1 – Run 2

The second run was ready to begin around noon. Ms. Sansevero, Mr. Rapp, Mr. Olivier, Mr. Mohamoud, and Mr. Bobbs all returned to the inspector shed to observe the second run. Mr. Schaefer, Mr. Sackett, and Ms. Davies were also present. Mr. Bobbs brought the Forward Looking Infrared (FLIR) camera to take FLIR video from this vantage point.

The shredder started at 12:18 pm. Ms. Sansevero began filming with the video camera. Mr. Bobbs began filming with the FLIR camera and was able to see the presence of hydrocarbons. Mr. Bobbs showed several representatives from SMM his screen on the FLIR camera.

Sampling began at 12:21 pm. The shredder and sampling stopped at 12:51 pm. Ms. Sansevero stopped the camera and checked its settings. She noticed the date and time were not correct. The time was correct but was set for PM instead of AM. She adjusted the camera to the proper date and time. Ms. Sansevero began filming with the video camera. The shredder started for the second half of Run 2 at 1:03 pm. Sampling began at 1:06 pm. The shredder and the sampling stopped at 1:36pm.

Mr. Rapp noted bluish grey smoke emanating from the shredder. He and Mr. Mohamoud estimated opacity of approximately 40% for many minutes and perhaps as much as 50% at times. They noted an opacity of approximately 20% continuously.

The following table summarizes the sampling times for both runs:

Date	Type of Run (Autos/Light Iron)	Run #	Start of Video / Start of Shredder	Start of Sampling	Stop of Shredder / Stop of Sampling	Stop of Video
9/15/17	50/50	Run-1 1 st half	9:01 am*	9:14 am	9:44 am	9:51 am
9/15/17	50/50	Run-1 2 nd half	10:01 am*	10:04 am	10:34 am	10:36 am
9/15/17	75/25	Run-2 1 st half	12:18 pm*	12:21 pm	12:51 pm	12:52 pm
9/15/17	75/25	Run-2 2 nd half	1:03 pm	1:06 pm	1:36 pm	1:36 pm

*note the time stamp on the camera was not set properly for these runs. The time was 12 hours off.

The following table summarizes the number of grapples of autos and light iron that Mr. Rapp noted in his field book for both runs:

Date	Type of Run (Autos/Light Iron)	Run #	# Grapples of Autos	# Grapples of Light Iron
9/15/17	50/50	Run-1	179	200
9/15/17	75/25	Run-2	190	94

Throughout the day, Mr. Rapp took a number of photos of the site including the left over piles of light iron and autos.

September 18 – Stack testing – Day 2

Arrival

Ms. Sansevero and Mr. Mohamoud arrived on site at approximately 7:30 am. Mr. Osbahr arrived shortly thereafter. The EPA team checked in at the main building. Ms. Sansevero inquired about the weights from the first day of stack testing. Mr. Schaefer provided a summary sheet with all the weights as well as copies of the weight tickets. He explained that he planned to send an email with a description of the packet as well as electronic copies the packet. The SMM representatives then escorted the EPA team to the shredder.

Day 2 - Run 3 and Run 4

Ms. Sansevero set up the video camera again to record each of the stack test runs. Note that on the second half of Run 3, the camera battery failed. Ms. Sansevero also noted the number of grapples of autos and light iron for each run.

The following table summarizes the sampling times for both runs:

Date	Type of Run (Autos/Light Iron)	Run #	Start of Video / Start of Shredder	Start of Sampling	Stop of Shredder / Stop of Sampling	Stop of Video
9/18/17	50/50	Run-3 1 st half	8:36 am	8:39 am	9:09 am	9:11 am
9/18/17	50/50	Run-3 2 nd half	9:18 am	9:23 am	9:53 am	9:53 am**
9/18/17	75/25	Run-4 1 st half	11:12 am	11:14 am	11:44 am	11:45 am
9/18/17	75/25	Run-4 2 nd half	12:01 pm	12:03 pm	12:33 pm	12:33 pm

**note, the battery on the video camera failed at some point during the run.

The following table summarizes the number of grapples of autos and light iron that Ms. Sansevero noted in her field book for both runs:

Date	Type of Run (Autos/Light Iron)	Run #	# Grapples of Autos	# Grapples of Light Iron
9/18/17	50/50	Run-3 1 st half	81	97
9/18/17	50/50	Run-3 2 nd half	67	120
<i>Total:</i>			<i>148</i>	<i>217</i>
9/18/17	75/25	Run-4 1 st half	111	36
9/18/17	75/25	Run-4 2 nd half	86	72
<i>Total:</i>			<i>197</i>	<i>108</i>

Ms. Sansevero also took a number of photos of the left over light iron and auto piles.

Mr. Osbahr noted that SMM was removing the gas tanks from the autos and then driving over the gas tanks to flatten them.

After the stack testing was complete, the group returned to the main building for a brief close out conference.

Ms. Sansevero asked about the removal of the gas tanks. SMM representatives explained that removing the air from the tanks helps minimize what they call

“incidents” or fires in the shredder. They further explained that the tanks are shredded after they have been flattened.

Mr. Osbahr reported that the glass sample line broke when it was removed during the second half of Run 4. He noted that there were quite a few hairs/fibers on the nozzle and that anything that breaks the plane of the nozzle is PM. If PM is on the nozzle it is not being measured, biasing PM and metals results low. Mr. Osbahr showed the group the photo he took of the nozzle. The SMM representatives indicated that the cyclone would normally pull the PM from the shredder but that the partial enclosure that was constructed for the testing modifies the effect of the cyclone.

September 20 – Stack testing – Day 3

Mr. Mohamoud and Mr. Osbahr were on-site for the stack testing. Mr. Mohamoud used the Sony Handy Cam #S98971 to record Run 5, and a Cannon Power Shot #S98752 to record Run 6. Mr. Mohamoud also took some still photos of the left over piles of autos and light iron.

Mr. Mohamoud was not able to record the full length of each run. The following table summarizes Mr. Mohamoud’s video log:

Date	Type of Run (Autos/ Light Iron)	Run #	Start of Video	Stop of Video
9/20/17	50/50	Run-5 1 st half	11:07 am	11:34 am
9/20/17	50/50	Run-5 2 nd half	11:47 am	12:21 pm
9/20/17	75/25	Run-6 1 st half	1:44 pm	2:15 pm
9/20/17	75/25	Run-6 2 nd half	2:56 pm	3:34 pm

Mr. Osbahr recorded the start and stop times of the sampling:

Date	Type of Run (Autos/ Light Iron)	Run #	Start of Sampling	Stop of Sampling
9/20/17	50/50	Run-5 1 st half	11:10 am	11:34 am
9/20/17	50/50	Run-5 2 nd half	11:50 am	12:20 pm
9/20/17	75/25	Run-6 1 st half	1:44 pm	2:15 pm
9/20/17	75/25	Run-6 2 nd half	3:03 pm	3:33 pm

The following table summarizes the number of grapples of autos and light iron that Ms. Mohamoud noted in his field book:

Date	Type of Run (Autos/Light Iron)	Run #	# Grapples of Autos	# Grapples of Light Iron
9/20/17	50/50	Run-5 1 st half	86	68
9/20/17	50/50	Run-5 2 nd half	100	86
<i>Total:</i>			<i>186</i>	<i>154</i>
9/20/17	75/25	Run-6 1 st half	107	96
9/20/17	75/25	Run-6 2 nd half	57	23
<i>Total:</i>			<i>164</i>	<i>119</i>

Mr. Osbahr called Ms. Sansevero after the testing on Day 3 was complete. He reported that Run 6 had failed the leak check. This would adversely affect the PM and metals data from that run. The hydrocarbon data appeared to be acceptable, but the PM and metals data were not. Given this, Ms. Sansevero, Mr. Rapp and Mr. Osbahr decided it was not necessary for SMM to conduct another run. However, the PM and metals data for Day 3, Run 6 (75% autos / 25% light iron), would not be averaged with the results from the other runs.



**Comments on
Proposed Metal Shredder Emission Testing
Sims Metal Management Midwest
2500 S Paulina – Chicago, Illinois**

August 30, 2019

ATTACHMENT B

**USEPA Region I Inspection Report
Sims Metal Management, Johnston RI
Written by William Osbahr
Stack Testing Coordinator (EIA)
Dated December 6, 2017**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England Regional Laboratory
Office of Environmental Measurement and Evaluation
11 Technology Drive, North Chelmsford, MA 01863**

Report Memorandum

Date: 12/6/17
Subject: Stack Emission Testing Observations – SMM
From: William Osbahr, Stack Testing Coordinator (EIA)
Through: Jerry Keefe, Team Leader (EIA)
To: Christine Sansevero, Senior Enforcement Coordinator Inspector (OES)

Facility Information

- A. Facility Name: Sims Metal Management
- B. Facility Location: 15-17 Green Earth Drive Johnston, RI 02919
- C. Facility Contact: Joseph Caruso, Operations Manager
- D. ICIS-Air #: RI0000004400740070

Background Information

- A. Date of inspection: 9/6/17, 9/15/17, 9/18/17, 9/20/17
- B. US EPA Representative(s): William Osbahr, Abdi Mohamoud, (9/6, 9/15, 9/18, 9/20), Christine Sansevero (9/6, 9/15, 9/18) Nicholas Bobbs (9/6, 9/15), Steve Rapp (9/6, 9/15), Tom Olivier (9/6, 9/15)
- C. Federally Enforceable Requirements Investigated:
 - Rhode Island Regulation 9

Attendees

Scott Jacobs	SMM	Regional Safety Director
John Sartori	SMM	General Manager
Brian Sackett	SMM	National Shredder Director
Rich Trzupke	Trinity Consultants	
Kristine Davies	Trinity Consultants	
Jon Schaefer	Robinson & Cole	
William Ansell	CAE	Stack Test Lead
Eric Doak	CAE	Sample Recovery Tech
Colleen Merringer	CAE	Sample Train Tech
Christian Young	CAE	Sample Train Tech

*Conan W/O
12/6/17
EIA* *JK
12/6/17
EIA*

Test Observation Notes

The purpose of the visit was to observe potential to emit testing that EPA ordered to conduct. SMM operates a 7000 hp metal shredder to recover metal from scrap light iron and automobiles. EPA is requiring SMM to test emissions from this shredder to quantify emissions of VOC and other pollutants.

During the September 6, 2017 pre-test visit, Rich Trzupsek agreed to supply the following for the emissions test:

1. A sketch of the enclosure and its Natural Draft Openings (NDOs) with dimensions;
2. A table including NDO to Enclosure Area Ratio (NEAR) calculation;
3. Hot wire anemometer monitoring data for all NDOs or assorted openings in the enclosure;
4. Enclosure fan amperage recording data;
5. Cyclonic flows; and
6. Change in Pressure (Delta P) monitoring of the enclosure pressure vs ambient pressure.

Sketch and Dimensions of the Enclosure

On September 14, 2017, Mr. Osbahr was informed by Mr. Bill Ansell, Clean Air Engineering (CAE) project manager that a full sketch of the enclosure had not been completed. He informed Mr. Osbahr that several enclosure and NDO dimensions were still not accurately measured and NEAR calculations were not fully and properly confirmed. For example, Mr. Ansell stated that for an entry slot on the east side of the enclosure he only was "informed by SMM" that the approximate dimensions were 7' by 2'. Accordingly, he used these approximate dimensions in his "draft" calculation spreadsheet. Mr. Osbahr stated that SMM and/or CAE would need to provide a full sketch after proper measurements were documented.¹

No Hot Wire Anemometer

Also, on September 14, 2017, Mr Osbahr was informed by Mr. Trzupsek and Mr. Ansell that no Hot Wire Anemometer (HWA) was onsite for the emissions test. Mr. Ansell stated that CAE had not planned to actually measure face velocity at the NDO locations for this test effort. Mr. Osbahr informed both Mr. Ansell and Mr. Trzupsek that this had been discussed during the pre-test visit and that EPA, SMM, and Trinity had agreed to this approach. In addition, Mr. Osbahr reminded Mr. Ansell and Mr. Trzupsek that the need for a HWA at this event was again discussed when the three had spoken on the phone after the pre-test meeting.

Mr. Ansell stated that he would use a Shortridge analyzer to measure the Delta P of the enclosure. He stated that he could use it as a velocity measurement device at some of the enclosure locations. Mr. Osbahr explained that while the Shortridge has the capability to measure velocities, it does not measure SMM's NDO faces as well as a HWA would. Mr. Osbahr stated that it would not be as effective or versatile as an HWA for enclosure review. A HWA has an articulating and telescoping head, which is needed for measuring such a large enclosure. In addition, Mr. Osbahr stated that the Shortridge would not be able to measure face velocities of the NDO on the east side of the enclosure. That location was inaccessible. Due to the large size of this NDO, it is critical to verify velocity and direction of flow. The Shortridge would not be an effective tool for this analysis.

¹ Note that to date, EPA does not have a copy of this sketch with enclosure measurements.

Mr. Osbahr noted that the east side NDO would not be able to be viewed directly during the emissions test from the test platform and trailer area. Mr. Osbahr was informed that the east end NDO was approximately 2' by 7'. Mr. Osbahr noted that this critical NDO could not be evaluated with an air flow velocity device or visually from the test platform during the actual test. Without properly demonstrating velocities, there would be the potential for the East end NDO emissions to go undetected.

On September 14, 2017 Mr. Ansell performed a few face velocity measurements on cracks in the enclosure curtains. The Shortridge read 220-460 fpm. These measurements were only on the west and south west corner of the enclosure flaps which were easily accessible. Shortridge velocity readings were taken at the bottom of the west end of the enclosure in the area where SMM had extended their flap covers down a few inches lower since tightening up the enclosure. Shortridge readings were taken at a few of the vertical cracks that exist between the gaps of the hanging enclosure flaps. Full access to other locations was not available. The Shortridge analyzer used by Mr. Ansell was not versatile enough to access other gap locations. This resulted in a very limited enclosure verification prior to the emissions test. This is contrary to what had been proposed by SMM and Trinity during the September 6, 2017, pre-test meeting, as well at the subsequent conference call.

On the first day of testing, Mr. Rapp, Ms. Sansevero, and Mr. Mohamoud were on site to observe the testing. They observed the testing from the operator's shed on the conveyor side of the shredder building. From there, they were able to see opacity coming from the East end NDO. Mr. Bobbs was able to take FLIR video as well. However, EPA is not able to quantify these emissions.

Broken Glass Nozzles for Method 5/29 Sample Train

On September 15, 2017, at 12:55, during Run #2, stack technician Mr. Christian Young removed the sample probe after the first half of the 60-minute sample run. He completed a leak check to verify integrity of the sample train. At that point, it passed leak check requirements under the standard and was witnessed by Mr. Osbahr. When moving the probe to the other sample port, Mr. Young accidentally hit the glass nozzle tip into the stack flange and it shattered. Mr. Osbahr allowed the stack test team to immediately replace the broken nozzle with one of the same size (Nozzle diameter was .200 in diameter). After passing a pre run leak check, testing resumed. The sample train passed the post run leak check. The lack of recovery of the nozzle from the first half of the run could bias the PM and Metals result lower.

After the run was completed, Mr. Osbahr observed that the second .200 in dia nozzle had chips and nicks in it. Mr. Osbahr required CAE to change out this nozzle. CAE consequently needed to switch to a .210 in diameter series nozzle set. Isokinetics were not adversely effected as demonstrated later in the test series.

On September 18, 2017, at the end of Run #4, CAE technicians removed the Method 5/29 sample train and again plunged the glass nozzle into the outside flange breaking the nozzle. Mr. Osbahr allowed the leak check to be performed from the glass liner back through the impingers. The remaining sample train passed the leak check requirements. Again, in this instance, the effect of such event could bias the Metals and PM emissions collection lower due to lost sample matter not recovered in the nozzle.

On September 20, 2017, during Run #6, CAE failed the final leak check for the Method 5/29 sample train. This called in to question the metals and PM data that were collected during that run. However, the T015 and Method 25A data from Run #6 were acceptable. Mr. Osbahr contacted Ms. Sansevero and Mr. Rapp by cell phone. They agreed that, given the leak check failure, EPA would reject the run for Metals and PM and it would not be included in the 3 run average. Mr. Osbahr informed SMM, Trinity, and CAE representatives of this decision.

Air Bag Canister Combusting on the Ground

On September 15, Mr. Osbahr witnessed SMM employee use a water cannon to extinguish a burning air bag canister on the ground near the final shredded metal stock area.

Enclosure Exhaust Stack Plume

Throughout the 3 days of testing Mr. Osbahr notice frequent high steam and particulate laden streams emanating from the stack exhaust. Mr. Osbahr took photographic videos camera of emissions emanating from the enclosure during assorted runs. Mr. Bobbs took FLIR videos. Both sets of videos and all photos will be retained on the EPA Q Drive under Air Enforcement Secure Photo/Video File section.

Enclosure Exhaust Outlet Screen Status

On the afternoon of September 18, 2017, Mr. Osbahr was informed by CAE technicians that an exhaust screen at the outlet of the enclosure blower motor had been removed by SMM prior to that day's testing. Mr. Osbahr questioned Mr. Joseph Caruso, operating manager regarding the screen removal. Mr. Caruso stated that Trinity or CAE had informed SMM that flows had dropped down after a period of time on September 15, 2017. SMM made a decision on September 16, 2017, over the weekend, to remove the screen. This would avoid any flow restriction due to a clogged screen. Mr. Osbahr reviewed draft CAE data for flow runs and saw that the flow had dropped off from the pretest flow rates as listed below. Flow rates likely dropped off as a result of PM collecting on the screen, which would cause a restriction. Note that fan amperage was recorded throughout the 3 days of testing and amperage was reasonably steady. See approximate flow in table below:

Date	Run	Flow Rate (ACFM) ²
9/14/17	Prelim	13.7
9/15/17	1	13.3
9/15/17	2	11.75
9/16/17	*****	Exhaust screen taken out on Saturday 9/16/17
9/18/17	4	14.1
9/18/17	4	14.8

Delta Pressure issues in enclosure

On September 15, 2017, at the start of the test, Mr. Osbahr informed Mr. Trzupek and the CAE crew of Mr. Ansell, Mr. Young and Ms. Colleen Merringer that throughout the test they should pay close

² Draft data for reference only.

attention to the enclosure Delta P. Mr. Osbahr explained that any changes in Delta P in the enclosure could be an indication of lost capture efficiency, ineffective enclosure operations, fan problems or possible pressure monitoring issues.

On September 20, 2017, at 9:03 am, just five minutes into the start of Run #5, Mr. Osbahr noted an extremely low Delta P reading from the Shortridge analyzer. Readings were fluctuating from low to positive Delta P. Mr. Osbahr immediately requested CAE halt the run and determine if there were issues with the enclosure or the monitor. SMM and CAE performed diagnosis on the pressure line leading from the enclosure. That line appeared to be clogged inside the enclosure. A repair was made to the line. The clogged portion of the ¼ line was cut out of the system. As a precaution, a Nalgene bottle shroud with multiple ¼ in holes in it was installed over the Delta P sample inlet location. It was installed to protect the inlet from future particulate matter contamination and possible condensate clogging due to the constant presence of steam. Test run #5 resumed at 11:10 am. Note, that the total time for Run #5 consists of the first 5 minutes from 8:58 am through 9:03 am (prior to the Delta P issue) plus the run times from 11:10 through 3:33 pm.

As Run #5 continued, Mr. Osbahr noted fluctuations in the Delta P. Testing occurred during a strong rainy northeast wind, due to the effects of Tropical storm Jose off the coast of RI. Mr. Osbahr noted that wind fluctuations caused the flexible enclosure panels to waft in and out. Such conditions cause an increase area of NDO's that exist at the bottom of the flaps as well as gaps between the flaps. Increase in NDO gaps cause a decrease in Delta P and can reduce overall capture efficiency for the NDO. This can result in an increase in emissions from all NDO locations of the enclosure.

PM/Metals Sampling Observations

At the end of the first run, before performing train leak checks, Mr. Young removed particulate matter from the external PM/Metals sample nozzle tip area. He did so immediately after he removed the sample from the port, before allowing proper discussion with EPA on the matter. There was a substantial amount of fabric fibers and other particulate matter that had accumulated at the nozzle tip during the sampling run. He did not recover this portion of the sample for analysis. It is unclear as to whether the material removed from the nozzle should be included in the sample catch analysis. Some of the external catch could be clogged outside the nozzle break plane, while some of the clog could have been inside the nozzle break plane. It was not possible to determine with accuracy how much PM/Metals were contained in the clog discarded by CAE. It is also not possible to determine how much more PM/Metals would have reached the sample catch if the nozzle had not been covered with the discarded fibrous material during the run. The accumulation of fibrous material could serve as an external filter at the nozzle entrance point. This might impede the ability of some PM/Metals to be captured and included in the overall emissions calculation. This fibrous material is characteristic of this high PM sample stream. The duct for the enclosure was an extremely moist and high PM laden stream. The screen exhaust screen clogging issue mentioned in this document are further evidence of the extreme amount of PM seen during the enclosure operations.

For all subsequent runs, to keep consistency, Mr. Osbahr allowed the removal of the external clog of material in each run. It should be noted that this could result in a lower bias in the overall PM/Metals

emissions results for the test period. Mr. Osbahr discussed the impact that the discarded clog of PM/Metals might have on emissions estimates at the closing interview with SMM and Trinity. Mr. Trzupek stated that the PM/Metals results could likely have been much higher in the captured stream due to the enclosure capturing and conveying PM/Metals that would normally have left the shredder area and settled on the ground of the SMM property. Mr. Osbahr stated that the discarding of the sample clog could result in a low PM/Metals bias.

It is also important to note that SMM has no particulate controls for this captured stream. SMM does not have a scrubber, cyclone, filter baghouse or any other sort of PM control on the duct leaving the enclosure. This was an atypically wet, steam laden, particulate laden sample stream that had no prior emissions measurements performed.

At the start of PM/Metals testing, Mr. Osbahr informed the complete crew of CAE that they should watch any gradual or immediate changes in their vacuum pressures of the sampling train to be aware of plugging in the sample lines or even the flow pitot tubes. Vacuum readings during the test runs did not indicate sample line restrictions that would be cause for stopping any of the sampling runs. However, that does not quantify or diminish in any way the effect of the discarded clog that existed at the end of each run.

Flow Measurement

As mentioned in this document, the SMM sample stream is extremely wet and steam laden. During the sample runs Mr. Osbahr recommended that CAE use compressed air to blow out the pitot tubes frequently during the run to keep the pitot lines clear and allow for accurate readings. SMM ran a compressed air line up to the stack platform. Ms. Merringer was able to continually blow out the pitot lines with compressed air. Throughout the test, no pitot leak checks failed during QA checks at the end of the runs.



**Comments on
Proposed Metal Shredder Emission Testing
Sims Metal Management Midwest
2500 S Paulina – Chicago, Illinois**

August 30, 2019

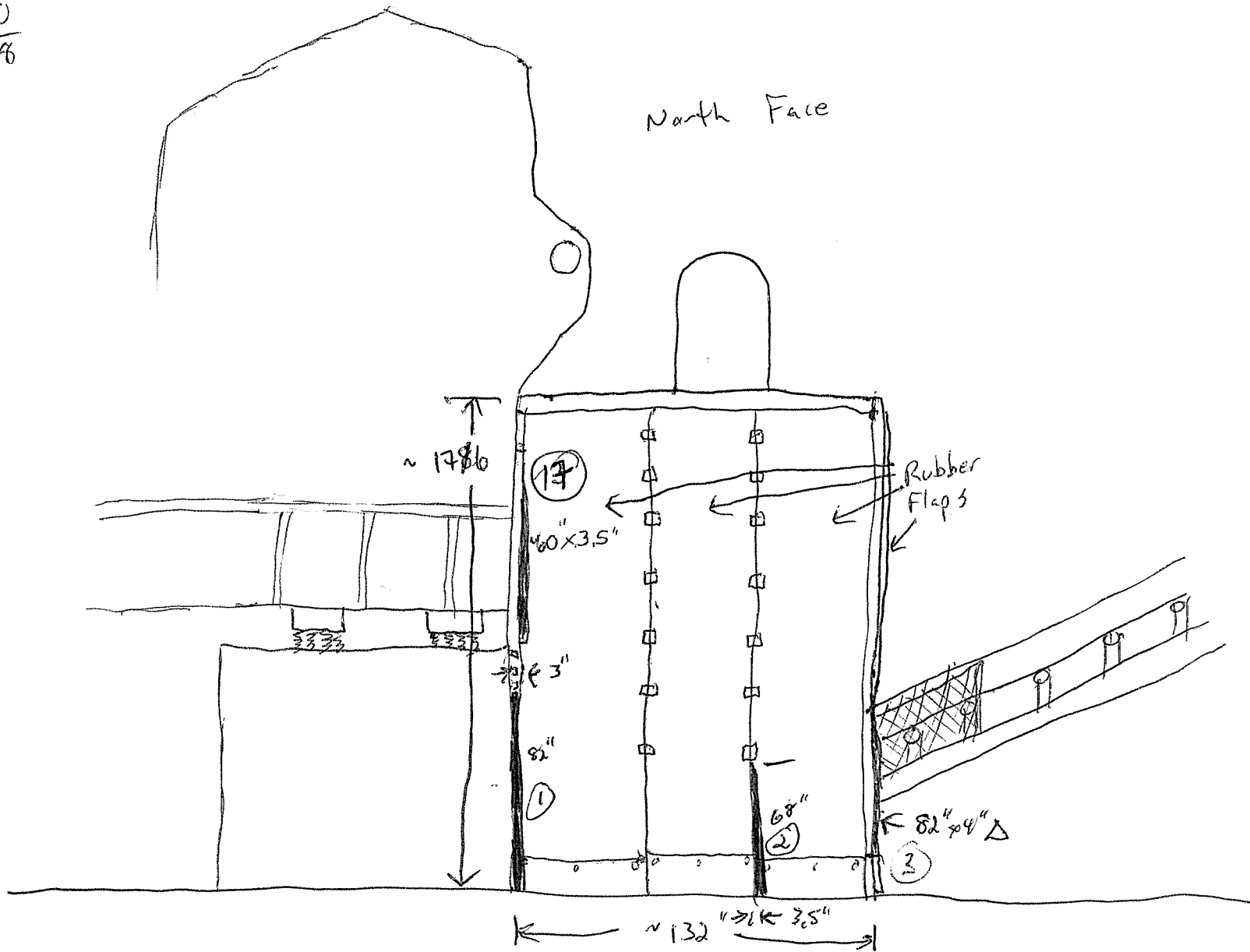
ATTACHMENT C

**Appendix J – Enclosure Drawings and Pictures
from the
CleanAir Report on Metal Shredder Emission Testing
SMM New England Corporation
December 4, 2018**

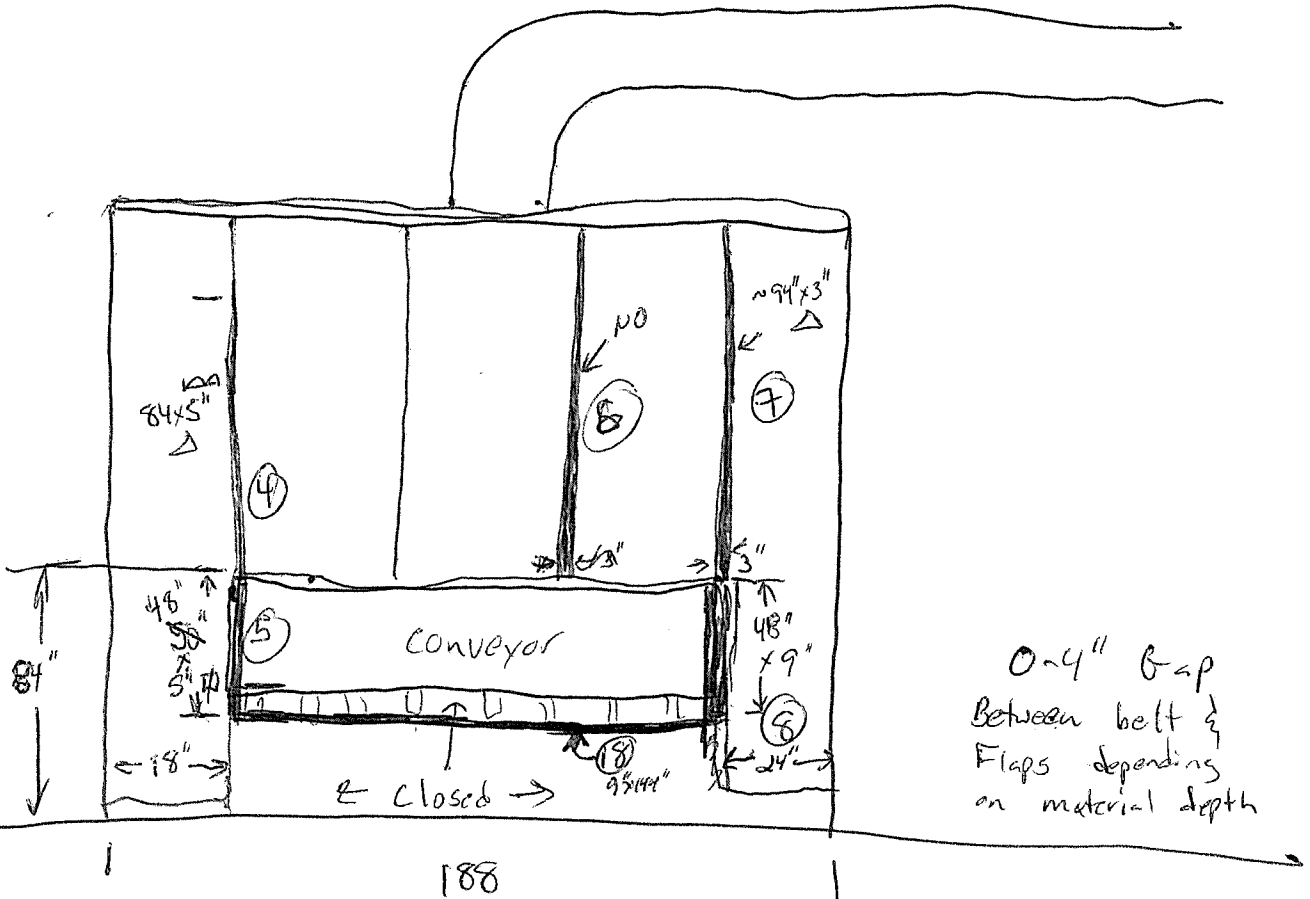
APPENDIX J: ENCLOSURE DRAWINGS AND PICTURES

238
60
178

North Face

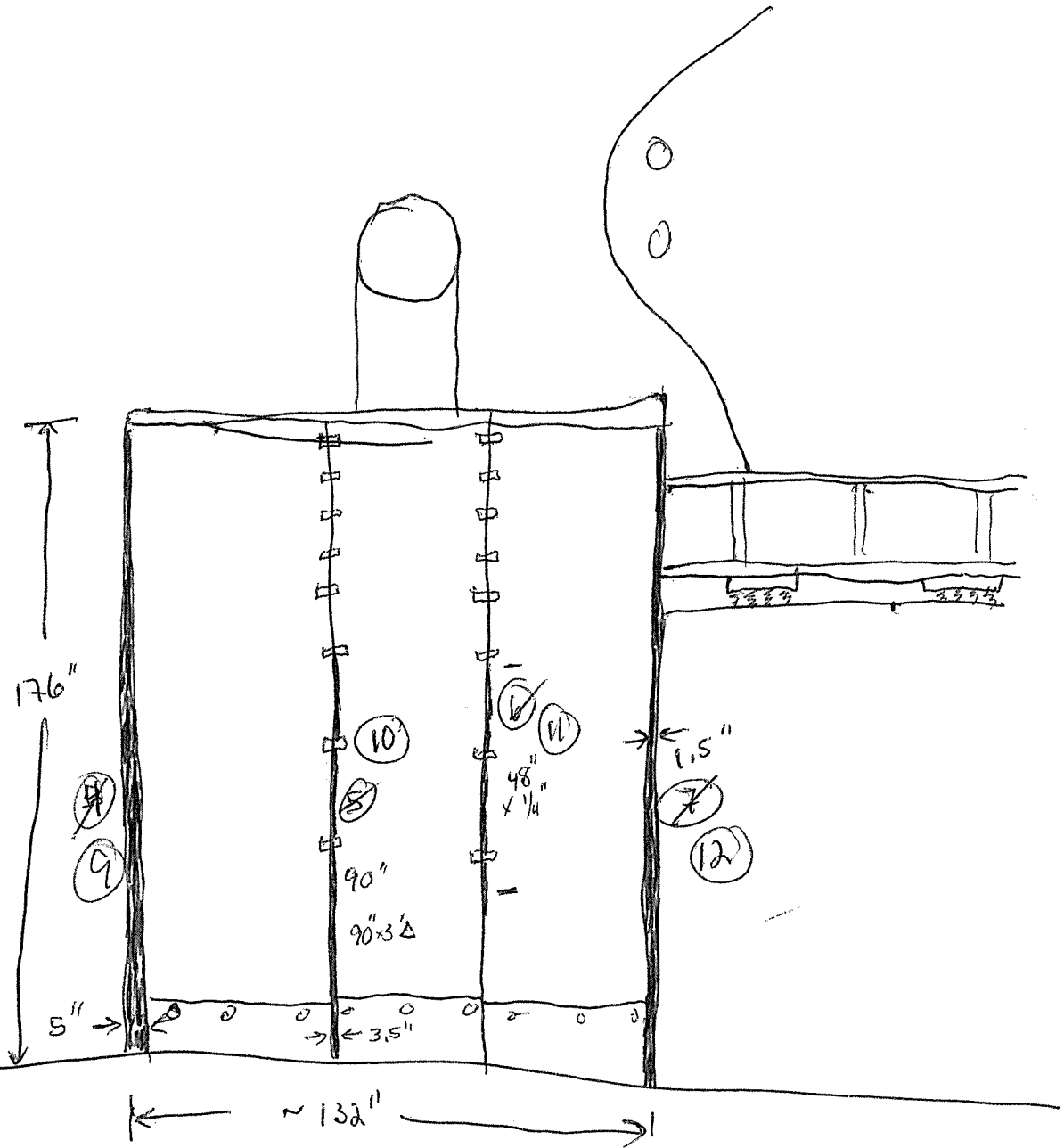


West Face
 Conveyor side



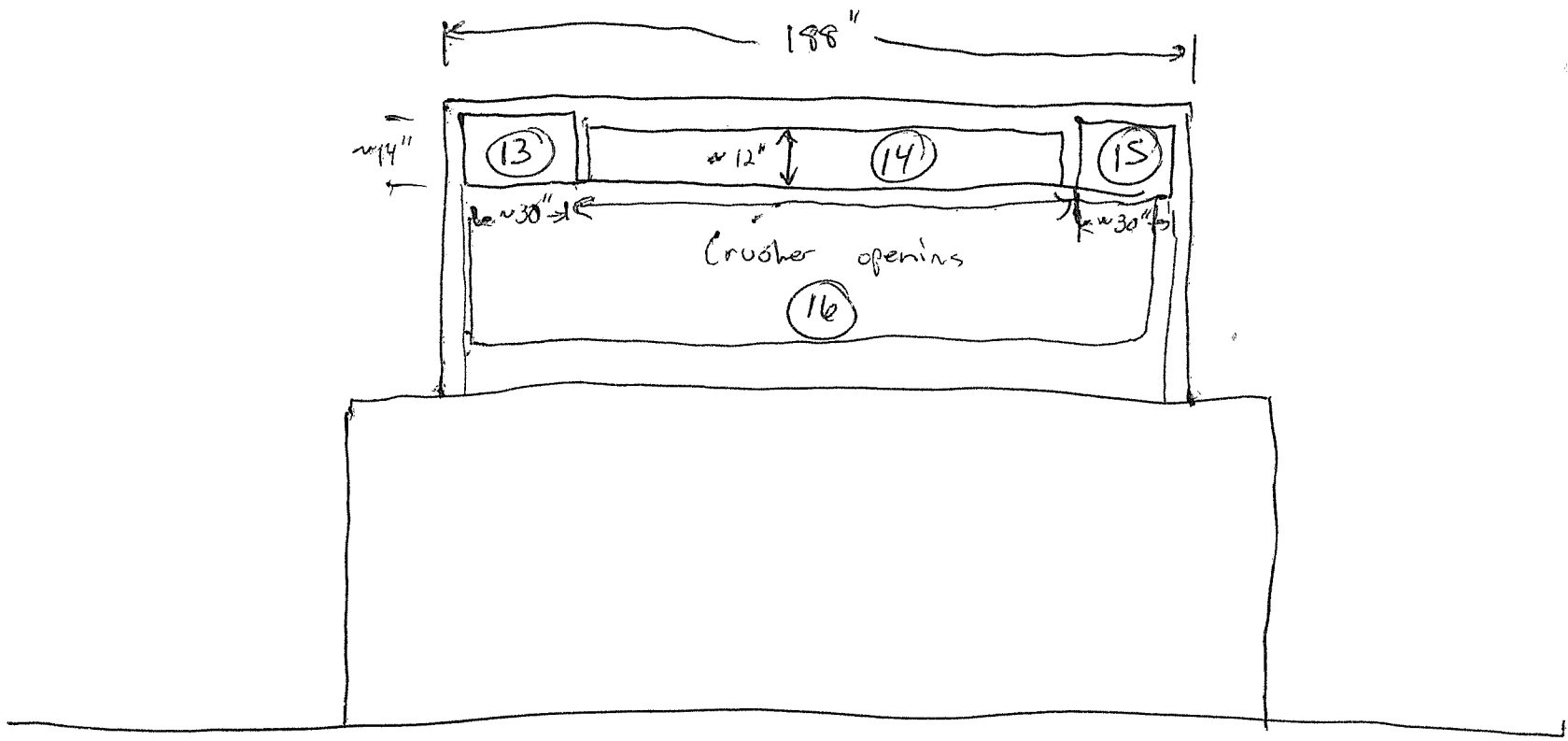
178
 34
 94

South side



J-5

J-6





C-6



C-201

4
DANGER
DO NOT ENTER
UNLESS YOU
ARE A QUALIFIED
PERSONNEL

C-7







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EPA and Rhode Island Scrap Metal Facility Resolve Clean Air Act Claims

October 16, 2020

Contact Information

David Deegan (deegan.dave@epa.gov)

(617) 918-1017

PROVIDENCE - The U.S. Environmental Protection Agency (EPA) and SMM New England Corporation ("SMM," aka, Sims Metal Management) a major scrap metals recycler in Johnston, Rhode Island, have reached a settlement resolving administrative penalty claims that the company allegedly violated the federal Clean Air Act.

Under the settlement, SMM will come into compliance with state and federal clean air requirements and will pay \$250,000 in penalties.

"This case is an excellent example of the benefits of state and federal collaboration. Rhode Island and EPA worked together to help ensure cleaner, healthier air for citizens in and around Johnston, R.I.," **said Dennis Deziel, Regional Administrator of EPA's Region 1 office.** "These settlements send a strong message that all facilities are required to comply with the Clean Air Act and state permitting regulations to control harmful air emissions."



EPA, in concert with Rhode Island's Attorney General and the R.I. Dept. of Environmental Management (RIDEM), alleged that SMM constructed a new major source of volatile organic compound (VOC) emissions without securing a permit and without installing required emission controls. This is a violation of the State of Rhode Island's clean air "state implementation plan," the mechanism under which states and EPA ensure that air quality attains national health-based standards. In Rhode Island's related action, the Rhode Island Superior Court finalized a consent judgment in September 2020 under which SMM will pay a separate penalty to the State and will take all steps necessary to come into compliance with air permitting and air pollution control requirements.

"The EPA's action today acknowledges that the Rhode Island negotiated settlement protects Rhode Islanders and appropriately resolves all of the clean air violations at this facility," **said R.I. Attorney General Peter F. Neronha**. "We continue to be grateful for the support EPA provided to the State to help enforce this law, which is so vital to public health and our environment."

"RIDEM is pleased with the settlement reached in this important case, and that our collective efforts with the Attorney General and the U.S. Environmental Protection Agency will result in the company coming into compliance with Rhode Island's Clean Air Act," **said DEM Director Janet Coit**. "Our coordinated, federal-state partnership ensures that Johnston residents will have cleaner air to breathe and delivers a good outcome for Rhode Islanders."

The metal shredder that SMM owns and operates at its Johnston location shreds end-of-life automobiles, appliances and other light gauge recyclable metal-bearing materials. This electrically operated, 7,000 horsepower shredder generates enough heat to melt or burn the plastics, paints, and oils in the scrap metal materials, causing harmful air emissions of VOCs, particulate matter, and toxic air contaminants.

More Information: EPA Clean Air Enforcement: <https://www.epa.gov/enforcement/air-enforcement> <<https://epa.gov/enforcement/air-enforcement>>

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Press Releases

State Requires Johnston Metal Shredding Company to Reduce Air Pollution and Pay Largest Penalty Ever Assessed for Clean Air Act Violations

The Attorney General and RIDEM bring enforcement action to resolve longstanding Clean Air Act violations by SMM New England Corporation - complaint and consent judgment filed in RI Superior Court

PROVIDENCE, RI – Attorney General Peter F. Neronha, Rhode Island Department of Environmental Management (RIDEM) Director Janet Coit, and Environmental Protection Agency Region 1 (EPA) announced today that Rhode Island has reached a settlement in a significant enforcement action against SMM New England Corporation, d/b/a SIMS Metal Management (SMMNEC), a metal shredding facility in Johnston, Rhode Island, for violations of the Clean Air Act. Under the terms of a consent judgment filed in Providence County Superior Court today, SMMNEC has agreed to install equipment to control the release of pollution that may be linked to cancer and severe respiratory illnesses and will pay the largest penalty ever assessed by the State of Rhode Island for violations of the Rhode Island Clean Air Act.

"For too long, SMMNEC has not met its obligation to the people of Rhode Island to protect public health and the environment and keep harmful pollutants out of the air we breathe. SMMNEC's operations in Johnston put Rhode Islanders at risk with uncontrolled emissions of dangerous, airborne substances," said Attorney General Neronha.

"Today, with the filing of a complaint against SMMNEC and the entry of a consent judgment, this will change," Attorney General Neronha added. "Under the terms of the consent judgment, SMMNEC's obligations are clear – it must change the way it does business and comply with the Clean Air Act. It must install state-of-the-art controls and pay meaningful penalties. This Office, together with our partners at RIDEM and the EPA, will hold SMMNEC accountable to these obligations."

Further, the State's complaint alleges that SMMNEC has been operating the shredder without the necessary permits and emission controls since 2013.

The SMMNEC metal shredder in Johnston shreds end-of-life automobiles, appliances and other light gauge recyclable metal-bearing materials. This electronically operated, 7,000 horsepower shredder generates enough heat to melt or burn the plastics, paints, surfactants, and oils in the scrap metal materials, which causes harmful emissions of volatile organic compounds (VOCs), particulate matter (PM), and toxic air contaminants (TACs). The shredder temporarily ceased operating due to the COVID-19 pandemic.

Today's consent judgment is the result of a significant and coordinated effort by the Attorney General, RIDEM, and EPA Region 1 to bring the shredder into compliance with Rhode Island law.

"DEM is pleased with the settlement reached in this important case, and that our collective efforts with the Attorney General and the Environmental Protection Agency will result in the company coming into compliance with Rhode Island's Clean Air Act," said DEM Director Janet Coit. "This negotiated settlement would not have been possible without the company's cooperation and its commitment to take responsibility for its actions. By avoiding costly and protracted litigation and negotiating an agreement that results in payment of substantial penalties and completion of supplemental environmental projects to improve air quality, we have ensured a good outcome for Rhode Islanders."

"The U.S. Environmental Protection Agency applauds the hard work and close coordination it took to achieve this important consent judgment, and we are impressed that it has resulted in the largest Clean Air Act penalty in Rhode Island history," said Dennis Deziel, Regional Administrator of EPA's Region 1 office. "This legal action will result in significant air quality improvements in Johnston. This is good news that will help ensure cleaner, healthier air for citizens in this area."

Payment of penalty to directly benefit affected communities

Under the consent judgment, SMMNEC will pay a total penalty of \$875,000 to the State and, if it does not meet the conditions set forth in the consent judgment, an additional \$1,125,000 in penalties. The penalty is divided into three parts: a cash payment, Supplemental Environmental Projects (SEPs) in affected communities, and a suspended portion.

The cash portion of the penalty requires SMMNEC to pay \$550,000 in penalties to the State over 18 months. The SEP portion of the penalty requires SMMNEC to pay \$325,000 to fund projects in Johnston and Providence: \$200,000 to fund a project aimed at offsetting air pollution issues in the Town of Johnston and \$125,000 to address air pollution issues in the Port of Providence, where Sims Metal Management owns and operates another facility.

SMMNEC to install technology to reduce harmful emissions

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To correct the identified deficiencies and meet its obligations under the Rhode Island Consent Judgment, SMMNEC is required to install state-of-the-art emission control technology to stop further air pollution, including an air pollutant enclosure system to limit the amount of emissions that can escape while the shredder is operating. The emission controls required in today's consent judgment are consistent with what has been required in similar facilities across the country, including in California, Massachusetts, Minnesota, and Illinois.

Additionally, SMMNEC has agreed that upon restarting the shredder, it will immediately implement interim controls to limit further exposure to pollutants in the surrounding area until the new emission control system becomes fully operational.

Importantly, under the consent judgment, SMMNEC has agreed to file a complete permit application with RIDEM within 90 days. In addition, the company is required to install particulate matter and VOC emission control technology within specified timeframes or be required to pay suspended penalties.

"The bottom line is, we are not requiring that SMMNEC do anything beyond what they should be doing," said Attorney General Neronha. "Enforcing compliance with Rhode Island's environmental laws isn't anti-business. It preserves Rhode Islanders' health, protects the state's natural beauty – one of our greatest assets – and levels the playing field for those businesses that do make the necessary investments in pollution control technology and follow the rules."

History

The investigation and resolution of this matter are the result of a coordinated enforcement effort by the Rhode Island Office of Attorney General, RIDEM, and EPA Region 1.


In 2018, EPA Region 1 initiated the first action against SMMNEC by issuing a Notice of Violation alleging violations of the Clean Air Act and citing SMMNEC for its failure to obtain a major source permit and a Title V Operating Permit.

In 2019, RIDEM conducted independent inspections and found additional violations for Air Pollution Control Regulations 1, 5, and 7 (Visible Emissions, Fugitive Dust, and Emissions of Air Contaminants Detrimental to Person or Property, respectively). RIDEM issued a Notice of Intent to Enforce on August 9, 2019, which cited SMMNEC for the violations of the state's Air Pollution Control Regulations.

Also in August of 2019, the Attorney General issued SMMNEC a 60-Day Notice Letter notifying the company that legal action would be forthcoming if SMMNEC did not agree to voluntarily resolve the violations. Since that time, the Attorney General, RIDEM and the EPA have been working diligently to craft a favorable resolution for the State while avoiding years of protracted litigation.

Related links

 [Complaint \(http://www.riag.ri.gov/documents/SMMNEC_COMPLAINT_FINAL.pdf\)](http://www.riag.ri.gov/documents/SMMNEC_COMPLAINT_FINAL.pdf)

 [Consent Judgment](http://www.riag.ri.gov/documents/SMMNEC_CONSENT_JUDGMENT_FINAL.pdf)

(http://www.riag.ri.gov/documents/SMMNEC_CONSENT_JUDGMENT_FINAL.pdf)

Department or agency: Office of the Attorney General

Online: <http://www.riag.ri.gov/> (<http://www.riag.ri.gov/>)

Release date: 08-12-2020

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Public Comments on Metal Management Midwest, Inc. Application for a Large Recycling Permit

John Pinion <jpinion@rka-inc.com>

Sat 2/26/2022 5:53 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (2 MB)

2021-12 SIMS IEPA Construction Permit Application.pdf;

[Warning: External email]



Dear Mayor Lightfoot and Chicago Dept. of Public Health:

In an effort to protect the people of Pilsen and ensure fairness and equity, CDPH should request that the permit application address the same questions that were asked of RMG for the Southside Recycling facility including, but not limited to, the following:

1. Air dispersion modeling should include detailed accounting and modeling of emissions from all processes, vehicle travel over paved and unpaved surfaces, material storage and staging piles, non-road diesel engines, and torch or plasma cutting. The air quality assessment should also include a percent-silt and metals analysis for all unpaved surfaces and stockpiles.
2. Address whether post-processed ASR ("auto fluff") is treated prior to disposal. Should treatment of the post-processed ASR ("auto fluff") become necessary or desired, the application process should be described including where the process would be conducted, the stabilizing-chemical name(s) and their application quantities, personal protective equipment ("PPE") requirements, and copies of all SDSs.
3. Drawings should be provided of the shredder and shredder emissions capture hood in plan, elevation, and isometric views, that make clear any and all openings where emissions may escape without treatment. Calculations should be provided on the estimated capture efficiency of the shredder exhaust capture system, including sizing calculations for all fans, blowers, ducting systems, and hood. The shredder emissions capture hood is referenced in a permit application submitted to Illinois EPA.

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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December 17, 2021

Mr. Bill Marr
Manager, Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

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STATE OF ILLINOIS

DEC 20 2021

Environmental Protection Agency
BUREAU OF AIR

Re: *Metal Management Midwest, Inc. Chicago Illinois Plant (ID No. 031600FFO)*
Construction Permit Application: Hammermill Shredder Control Train

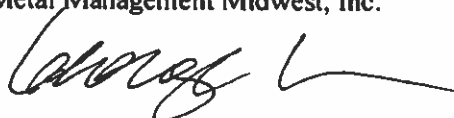
Dear Mr. Marr:

Metal Management Midwest, Inc. (Metal Management) is submitting the attached construction permit application for its scrap metal processing facility located at 2500 S. Paulina Street in Chicago. Metal Management is submitting the construction permit application seeking approval to construct and install a PM, VOM, HCl, and HF control train on the Hammermill Shredder consisting of the following components that will be operated in series: a cyclone, a venturi scrubber, a VRTO, and a DSI scrubber equipped with a sorbent collection fabric filter baghouse.

Additionally, Metal Management is requesting that the construction permit application be processed on an expedited basis.

If you have any questions pertaining to the enclosed construction permit application, please feel free to contact me at (773) 650-6440.

Sincerely,
Metal Management Midwest, Inc.



George Malamis
General Manager, Midwest Region

IEPA
Division of Records Management
Releasable

JAN 03 2022

Reviewer: MDB

1 773 650 6440

2500 S. Paulina St.
Chicago, IL 60608
United States

www.simsmm.com



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STATE OF ILLINOIS

DEC 20 2021

Environmental Protection Agency
BUREAU OF AIR

CONSTRUCTION PERMIT APPLICATION

Paulina Facility

Metal Management Midwest, Inc. / Chicago, Illinois

Prepared By:

TRINITY CONSULTANTS
1801 S Meyers Road
Suite 350
Oakbrook Terrace, IL 60181
(630) 495-1470

December 2021

Project 211401.0119

Trinity
Consultants 

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1. INTRODUCTION

Metal Management Midwest, Inc. (Metal Management) owns and operates the scrap metal processing facility located at 2500 S. Paulina Street in Chicago (Paulina Facility). The Paulina Facility consists of a Hammermill Shredder and a Metal Recovery Plant (MRP), as well as a number of small, permit-exempt emission units and activities such as storage tanks, combustion units, torch cutting activities, and an oil-water separator. The facility currently operates under Lifetime Operating Permit (LOP) No. 91040059 dated May 17, 2012 and Construction Permit No. 91040059 for the MRP, dated August 14, 2018. However, a Federally Enforceable State Operating Permit (FESOP) application was submitted for the Paulina Facility in January 2019 but has not yet been issued.

With this application, Metal Management is seeking approval to construct and install a particulate matter (PM), Volatile Organic Material (VOM), Hydrogen Chloride (HCl), and Hydrogen Fluoride (HF) control train on the Hammermill Shredder consisting of the following components that will be operated in series: a cyclone, a venturi scrubber, a natural gas-fired valveless regenerative thermal oxidizer (VRTO), and a dry sorbent injection (DSI) scrubber equipped with a sorbent collection fabric filter baghouse.

A process flow diagram is included in Figure 1-1. A site map showing the locations of proposed control equipment is included in Figure 1-2. Section 2 provides a process description and Section 3 explains the calculation methodology and shows the controlled and uncontrolled emissions from the Hammermill Shredder. These emissions are calculated based on the current throughput limit of 371,900 ton per year for the Hammermill Shredder.¹ As discussed in section 4, this modification will not trigger Nonattainment New Source Review (NA NSR), or Prevention of Significant Deterioration (PSD) permitting. Other potential federal and state regulatory requirements are also discussed in Section 4 of this application. The necessary permit application forms are included in Appendix A and detailed emission calculations are included in Appendix B.

¹ This limitation was based on approved testing in conjunction with US EPA on September 20, 2019 as required in Paragraphs 33 and 36 of the Administrative Consent Order (ACO) and included in Sims supplemental FESOP application.

Figure 1-1. Process Flow Diagram

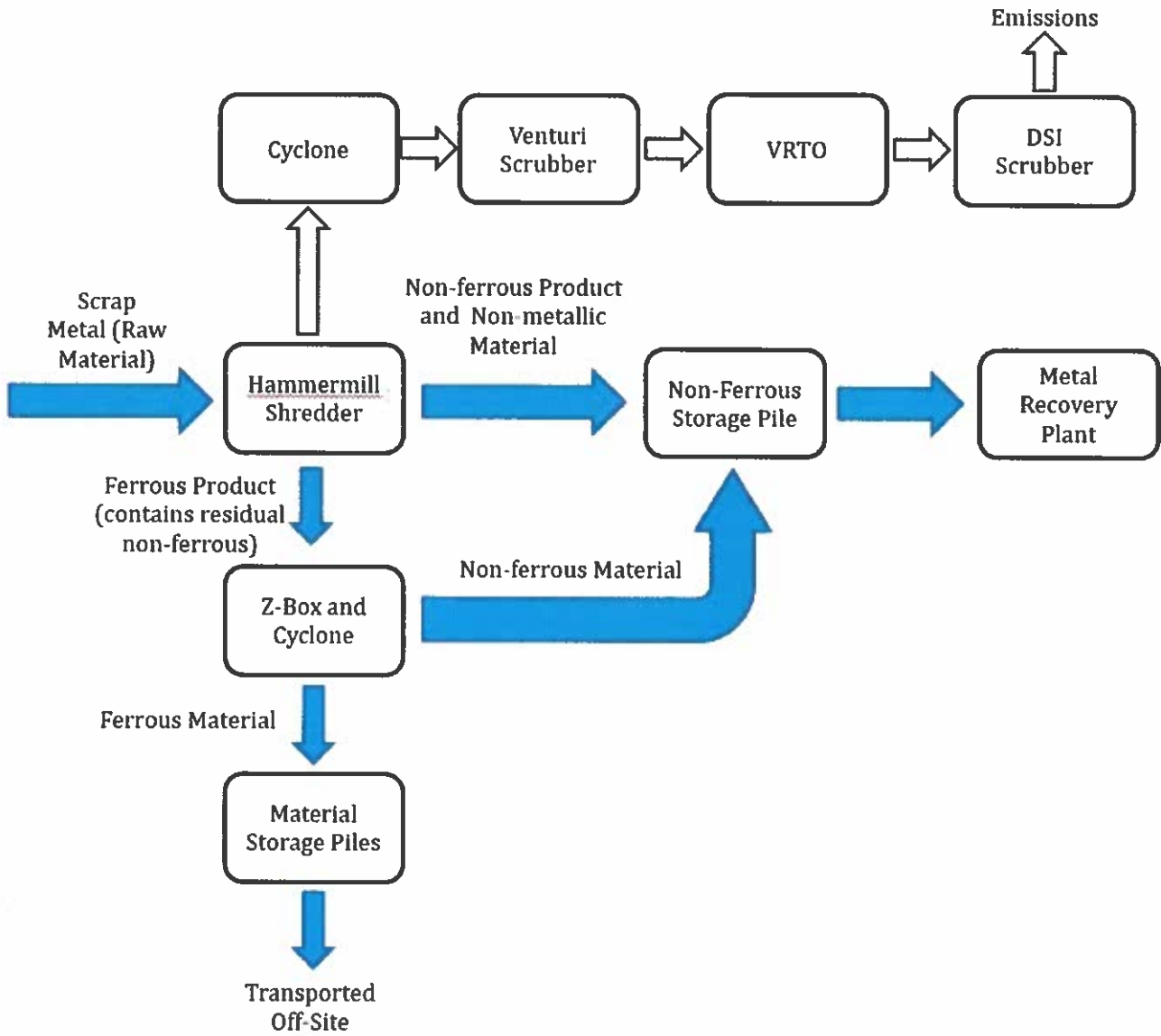
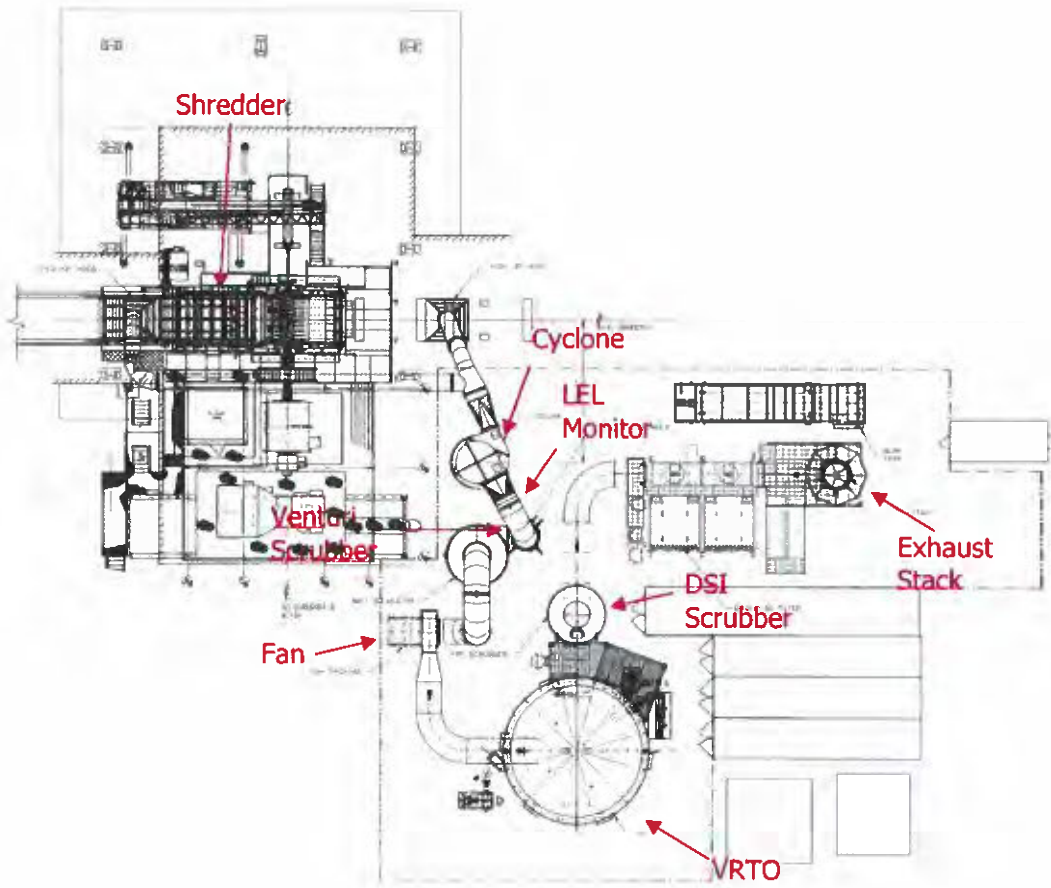


Figure 1-2. Proposed Control Equipment Locations



*Final drawings may differ slightly

2. PROCESS DESCRIPTION

Metal Management processes scrap metal at the Paulina Facility in two areas; the Shredding Plant and the Metal Recovery Plant (MRP).

The shredding plant consists of a Hammermill Shredder used to shred or crush scrap metal into smaller pieces. Materials processed and stored at the shredder are brought into the yard via truck and are unloaded and inspected per site procedures. Material is then fed onto an infeed conveyor to the shredder. A steel drum houses the horizontal rotating shaft on which the hammermill is mounted. When material emerges from the hammermill shredder, magnets are used to separate ferrous metal from the remaining materials (nonferrous, or NF). The NF is further processed at the MRP.

The ferrous metal then goes through the closed-loop Z-Box air separator (Z-Box) to clean the ferrous material and remove residual nonferrous material. The Z-Box allows ferrous material to drop through an air current that lifts nonferrous and nonmetallic materials to a cyclone. Air curtains, an air knife, and negative air pressure are used to prevent emissions from escaping the Z-Box. Ferrous material from the Z-Box is loaded on to trucks and transported off-site. The cyclone utilizes a rotating air lock to drop collected material out of the cyclone and onto a conveyor. Material discharged from the cyclone is conveyed to the NF pile for additional separation of non-ferrous metals at the adjacent MRP.

The shredder plant utilizes a Water System (water mist applicator) which incidentally reduces fugitive dust from the Hammermill Shredder and downstream material separation and conveyor transfer points. The Hammermill Shredder water system has a flow-control valve which takes input signals from the amount of amperage the shredder motor is drawing. The amperage of the Hammermill Shredder motor system thus determines the amount of atomized water applied. Compressed air serves to atomize water as it enters the Hammermill Shredder and moisten material. Application of water spray at the Hammermill Shredder introduces sufficient moisture to keep material damp on the discharge end of the Hammermill Shredder.

With this application, the facility is seeking approval to construct and install a PM, VOM, HCl, and HF control train on the Hammermill Shredder consisting of the following components that will be operated in series: a cyclone, a venturi scrubber, a natural gas-fired valveless regenerative thermal oxidizer (VRTO), and a DSI scrubber equipped with a sorbent collection fabric filter baghouse. A fixed enclosure will be constructed to collect PM, VOM, HCl, and HF emissions. The enclosure will encompass the in-feed chute to the Hammermill Shredder and the under-mill oscillator discharge from the Hammermill Shredder. An operation and maintenance plan will be developed for submission and approval by Illinois EPA to ensure that the capture efficiencies are maintained within the structure.

Sims will continuously monitor the Lower Explosive Limit (LEL) of the gas stream between the cyclone and the venturi scrubber. The monitor will be interlocked to the VRTO with a bypass damper set to activate at no more than 25% of the LEL. For safety purposes, the interlock will both shut down the VRTO and activate the bypass damper when tripped. Additionally, when tripped, the interlock will shut down the mill and the infeed conveyor, shutting down the Hammermill Shredder until the issue is resolved. The rotor will continue to spin due to the angular momentum, but emissions will not be generated once the mill processes the material that was in the mill when the interlock tripped. The LEL monitor will be maintained to prevent clogging.

3. EMISSION CALCULATIONS

This section documents the calculation methods used to determine emissions from the Hammermill Shredder located at the Paulina Facility. Detailed emissions calculations, including assumptions, are included in Appendix B. Sims is requesting an additional limitation on the VRTO requiring emissions to be controlled to either 98% or <20 ppmv (as methane) at the outlet, whichever is more restrictive.

HAP emission factors for the Hammermill Shredder were based on recent testing at a similar facility, as included in the 'Clean Air Report'. In instances where the Clean Air Report did not detect organic HAPs, for conservatism in the HAP emissions calculation, organic HAPs identified in the Institute of Scrap Recycling Industries (ISRI) Title V Applicability Workbook (the ISRI Workbook) were included. These emission factors are listed in the attached calculations (Appendix B).

VRTO combustion emissions were calculated based on the natural gas emission factors listed in AP-42, Section 1.4, *Natural Gas Combustion*. The exception is for CO emissions from the VRTO, which reflects combustion emissions from both natural gas and any residual organic material in the hammermill exhaust. Table 3-1 below lists the emissions for the shredder as well as emissions from natural gas combustion in the VRTO.

PM emissions from the sorbent collection fabric filter baghouse associated with the DSI scrubber were calculated based on the PM emission factors listed in AP-42 Section 11.17, *Lime Manufacturing*. Emissions are based on the estimated quantity of fresh lime scrubbant required for the DSI scrubber per year.

Table 3-1. Proposed Shredder Emissions with Control Train

Unit	Emissions (tpy)						Individual HAP (HCI/HF)
	NO _x	CO	SO ₂	PM	VOM	Total HAP	
Hammermill Processing Emissions	--	--	--	0.11	2.18	1.42	0.70
VRTO Combustion	6.36	16.56	0.04	0.48	0.35	0.12	--
Lime Storage Silo	--	--	--	1.58E-03	--	--	--
Hammermill Shredder Emissions	6.36	16.56	0.04	0.59	2.53	1.54	0.70

Table 3-2 below summarizes the emission changes at the Hammermill Shredder with the proposed installation of the PM and VOM control train.

Table 3-2. Current vs Proposed Shredder Emissions

Contaminant	Actual Emissions* (tpy)	Proposed Emissions (tpy)	Emission Changes (tpy)
NO _x	--	6.36	6.36
CO	--	16.56	16.56
SO ₂	--	0.04	0.04
PM/PM ₁₀ /PM _{2.5}	10.62	0.59	-10.03
VOM	21.68	2.53	-19.15
Total HAP	0.30	1.54	1.24
Individual HAP	0.02	0.70	0.67

*12-month rolling emissions from June 2020 to May 2021.

4. REGULATORY APPLICABILITY

This section documents the regulatory applicability associated with the Hammermill Shredder at the Paulina Facility.

4.1 Federal Air Regulations

4.1.1 Prevention of Significant Deterioration (PSD)

The Paulina Facility is located in Cook County, which is designated as “in attainment” for SO₂, NO₂, CO, PM₁₀, and PM_{2.5} per 40 CFR 81.314. The Paulina Facility is not a major source with respect to PSD, and this project will not cause the facility to change status. As such, the proposed project does not trigger PSD review.

4.1.2 Nonattainment New Source Review (NA NSR)

The Paulina Facility is located in Cook County which is designated as a ‘serious’ nonattainment area for the 2008 8-hour ozone standard and a ‘marginal’ nonattainment area for the 2015 8-hour ozone standard. The Paulina Facility is not a major source with respect to NA NSR, and the project will not cause the facility to change status. As such, the proposed project does not trigger NA NSR.

4.1.3 40 CFR 60, Subpart LL – Standards of Performance for Metallic Mineral Processing Plants

40 CFR 60 Subpart LL applies to various material handling, screening, crushing, loading, and storage facilities at metallic minerals processing plants. Metallic minerals processing plants are defined in 40 CFR 60.381 as “any combination of equipment that products metallic mineral concentrates from ore.” The Paulina Facility does not produce metallic mineral concentrates (or any materials) from ore. Therefore, this regulation does not apply.

4.1.4 40 CFR 63, Subpart BBBB – Gasoline Distribution Bulk Terminals and Bulk Plants

40 CFR 63, Subpart BBBB regulates gasoline distribution bulk terminals and bulk plants located at Area Sources of HAP. No activities at the Paulina Facility would be deemed to constitute those of a gasoline distribution bulk terminal or bulk plant, as per 40 CFR 63.11100, even if small amounts of gasoline are collected and/or temporarily stored at the Paulina Facility. Therefore, this regulation does not apply.

4.1.5 40 CFR 63, Subpart CCCCC – Gasoline Dispensing Facilities

40 CFR 63, Subpart CCCCC regulates gasoline dispensing facilities located at Area Sources of HAP. No activities at the Paulina Facility would be deemed to constitute those of a gasoline dispensing facility, as per 40 CFR 63.11132². Therefore, this regulation does not apply.

² “Gasoline dispensing facility (GDF) means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.”

4.1.6 40 CFR 63, Subpart GGGGGG – Primary Nonferrous Metals Area Sources— Zinc, Cadmium, and Beryllium

40 CFR 63 Subpart GGGGGG applies to primary zinc or beryllium production facilities that are area sources of Hazardous Air Pollutant (HAP) emissions. The Paulina Facility engages in no primary zinc or beryllium production of any kind, including from zinc or beryllium ores as defined in 40 CFR 63.11167. Therefore, this regulation does not apply.

4.1.7 40 CFR 63, Subpart TTTTTT – Secondary Nonferrous Metals Processing Area Sources

40 CFR 63 Subpart TTTTTT applies to secondary nonferrous metals processing facilities that are area sources of HAP emissions. 40 CFR 63.11472 defines a secondary nonferrous metals processing facility as “a brass and bronze ingot making, secondary magnesium processing, or secondary zinc processing plant that uses furnace melting operations to melt post-consumer nonferrous metal scrap to make products including bars, ingots, blocks, or metal powders.” The Paulina Facility engages in no such nonferrous metals processing or any other furnace or other melting operations. Therefore, this regulation does not apply.

4.1.8 40 CFR 63, Subpart XXXXXX – Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

40 CFR 63 Subpart XXXXXX applies to area sources of HAP emissions that are primarily engaged in electrical/electronic equipment finishing operations, fabricated metal products, fabricated plate works, fabricated structural metal manufacturing, heating equipment, industrial machinery and equipment finishing operations, primary metal products manufacturing, and valves and pipe fittings. The Paulina Facility neither does nor would engage in any finishing or fabricating operations, primary metal products manufacturing or any valve or pipe fitting operations. Therefore, this regulation does not apply.

4.2 State Regulatory Applicability

4.2.1 35 IAC Part 207, Vehicle Scrappage Activities

The vehicle scrappage activities rule is applicable to vehicle scrappage activities in the State of Illinois that are conducted to receive Creditable Emissions Reductions (CERs). Although the Paulina Facility performs vehicle scrappage activities, Metal Management does not operate to receive CERs. Therefore, 35 IAC 207 does not apply to the Paulina Facility.

4.2.2 35 IAC 212 – Visible and Particulate Matter Emissions

4.2.2.1 35 IAC 212 Subpart B – Visible Emissions

35 IAC 212.123 regulates visible emissions from all emission units not covered under 35 IAC 212.122.³ The shredder as well as the proposed cyclone, venturi scrubber, VRTO, and DSI scrubber are subject to the requirements 35 IAC 212.123. The shredder and associated control devices will continue to operate in compliance with the opacity limitations of 35 IAC 201.123.

³ 35 IAC 212.122 regulates visible particulate matter emissions from fuel combustion units burning liquid or solid fuels.

4.2.2.2 35 IAC 212 Subpart K – Fugitive Particulate Matter

35 IAC Section 212.301 regulates emissions 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 source. The shredder and associated control devices will continue to be in compliance with the requirements of 35 IAC 212.301.

35 IAC Section 212.307 requires that all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods. The proposed control devices will be in compliance with the requirements of 35 IAC 212.307, as applicable.

4.2.2.3 35 IAC 212 Subpart L – Process Emission Sources

35 IAC 212.321 regulates PM emissions from process emission units for which construction or modification commenced on or after April 14, 1972. As specified by this section, no person shall cause or allow the emission of particulate matter into the atmosphere in any one-hour period from any emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units, exceeds the allowable emission rates specified in 35 IAC 212.321(c). The proposed cyclone and venturi scrubber will reduce PM emissions from the shredder. As such, the shredder will continue to be in compliance with 35 IAC 212.321.

4.2.3 35 IAC 214 – Sulfur Limitations

35 IAC 214.301 sets a limit of 2,000 parts per million (ppm) sulfur dioxide (SO₂) emissions from process emission sources. The proposed VRTO will comply with the sulfur dioxide requirement of 35 IAC 214.301.

4.2.4 35 IAC 218 – Organic Material Emission Standards and Limitation for the Chicago Area

4.2.4.1 35 IAC 218 Subpart G – Use of Organic Material

Pursuant to 35 IAC 218.301, no emission unit may release organic emissions over 8 lb/hr in the Chicago ozone nonattainment area, unless a control device is used to reduce hydrocarbons by at least 85% per 35 IAC 218.302(a), except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: if no odor nuisance exists the limitation of 35 IAC 218 Subpart G applies only to photochemically reactive material.

It is unreasonable to expect photochemically reactive material to be present in any significant quantity in the End-of-Life Vehicles (ELVs) and light iron that Sims processes at the Chicago yard. Broadly speaking, commonly used organic compounds can be divided into two categories: 1) petrochemicals that are mostly, but not entirely, derived from natural sources like crude oil and natural gas and 2) manufactured chemicals (specialty chemicals that typically can trace their lineage to petrochemicals but that go through chemical processes to create compounds not typically found in nature in significant quantities). Examples of the first category include diesel fuel, lubricants, metalworking fluids, motor oil, etc. Examples of the second include classes of compounds like ketones, esters, ethers, alcohols and aldehydes. These compounds are synthesized in order to make other compounds (e.g., esters are commonly used in the manufacture of surfactants used in cleaning products) or they are synthesized for a particular purpose (e.g., acetone is a ketone manufactured for use as a paint remover and nail polish remover).

The vast majority of organic material contained in the feed to the Hammermill Shredder consists of simple petrochemicals like residual diesel, gasoline, lubricants, metal working fluid etc. that may remain in or on feedstock and that do not fall into Category 1, 2 or 3 classes of compounds included in the definition of photochemically reactive material. Accordingly, it is reasonable to exclude Category 1, 2 and 3 classes of compounds when considering 8 lb/hr rule applicability.

Even though it is believed that control is therefore not required to comply with Subpart G, Sims will nevertheless control emissions as though it was required to do so. The proposed VRTO will have a control efficiency of at least 90%. The proposed capture systems will be designed to meet the requirements of a Permanent Total Enclosure (PTE)⁴ which defines capture efficiency as 100%. Therefore, the overall control efficiency will be at least $90 \times 100/100 = 90\%$ which will meet the 85% control required in 35 IAC 218.302(a).

4.2.4.2 35 IAC 218 Subpart TT – Other Emission Units

The proposed VRTO will have a control efficiency of at least 90%. The proposed capture systems will be designed to meet the requirements of a PTE which defines capture efficiency as 100%. Therefore, the overall control efficiency will be at least $90 \times 100/100 = 90\%$ which is greater than the 81% control required in 35 IAC 218.986(a).

4.2.4.3 35 IAC 218 Subpart UU – Recordkeeping and Reporting

As noted in 4.2.4.2 above, the Hammermill Shredder is subject to the requirements of 35 IAC 218 Subpart TT. As such, the Hammermill Shredder must comply with the requirements of 35 IAC 218 Subpart UU. The Hammermill Shredder will comply with the recordkeeping, reporting, and testing requirements of 35 IAC 218 Subpart UU.

⁴ Reference Method 204, 40 CFR Part 51, Appendix M

APPENDIX A. CONSTRUCTION PERMIT APPLICATION FORMS

Fee Determination for Construction Permit Application (197-FEE)

Construction Permit Application for a Proposed Project at a CAAPP Source (199-CAAPP)

Process Emission Unit Data and Information (220-CAAPP): Shredder

Air Pollution Control Equipment Data and Information (260-CAAPP): Cyclone, Venturi Scrubber, VRTO,
DSI Scrubber

Supplemental Form Air Pollution Control Equipment Afterburner (260B-CAAPP): VRTO

Supplemental Form Air Pollution Control Equipment Cyclone (260D-CAAPP): Cyclone

Supplemental Form Air Pollution Control Equipment Cyclone (260H-CAAPP): Venturi Scrubber

Supplemental Form Air Pollution Control Equipment Cyclone (260H-CAAPP): DSI Scrubber



Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19506 • Springfield • Illinois • 62794-9506

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY			
ID Number:	<u>031600FFO</u>	Permit #:	<u>21120017</u>
<input type="checkbox"/> Complete	<input checked="" type="checkbox"/> Incomplete	Date Complete:	_____
Check Number:	_____	Account Name:	_____

This form is to be used to supply fee information that must accompany all construction permit applications. This application must include payment in full to be deemed complete. Make check or money order payable to the Illinois Environmental Protection Agency, Division of Air Pollution Control- Permit Section at the above address. Do NOT send cash. Refer to instructions (197-INST) for assistance.

RECEIVED
STATE OF ILLINOIS
DEC 20 2021

Source Information

- Source Name: Metal Management Midwest, Inc.
- Project Name: Shredder Control Device Installation
- Contact Name: Debbie Hays
- Source ID #: (if applicable) 031600FFO
- Contact Phone #: 773-254-1200

Fee Determination

6. The boxes below are automatically calculated.

Section 1 Subtotal	<u>\$0.00</u>	+	Section 2, 3 or 4 Subtotal	<u>\$500.00</u>	=	<u>\$500.00</u>
						Grand Total

Section 1: Status of Source/Purpose of Submittal

7. Your application will fall under only one of the following five categories described below. Check the box that applies. Proceed to applicable sections. For purposes of this form:

- Major Source** is a source that is required to obtain a CAAPP permit
- Synthetic Minor Source** is a source that has taken limits on potential to emit in a permit to avoid CAAPP permit requirements (e.g., FESOP).
- Non-Major Source** is a source that is not a major or synthetic minor source.

- Existing source without status change or with status change from synthetic minor to major source or vice versa. Proceed to Section 2.
- Existing non-major source that will become synthetic minor to major source. Proceed to Section 4.
- New major or synthetic minor source. Proceed to Section 4. \$0
- New non-major source. Proceed to Section 3. Section 1 Subtotal
- AGENCY ERROR. If this is a timely request to correct an issued permit that involves only an agency error and if the request is received within the deadline for a permit appeal to the Pollution Control Board. Skip Sections 2, 3 and 4. Proceed directly to Section 5.

This agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 ET SEQ. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Section 2: Special Case Filing Fee

8. **Filing Fee.** If the application only addresses one or more of the following, check the appropriate boxes, skip Sections 3 and 4 and proceed directly to Section 5. Otherwise, proceed to Section 3 or 4 as appropriate.

- Addition or replacement of control devices on permitted units.
- Pilot projects/trial burns by a permitted unit \$500
- Land remediation projects
- Revisions related to methodology or timing for emission testing
- Minor administrative-type change to a permit

Section 3: Fees for Current or Projected Non-Major Sources

- 9. This application consists of a single new emission unit or no more than two modified emission units. (\$500 fee) 9. _____
- 10. This application consists of more than one new emission unit or more than two modified units. (\$1,000 fee) 10. _____
- 11. This application consists of a new source or emission unit subject to Section 39.2 of the Act (i.e., Local Siting Review); a commercial incinerator or a municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or an emission unit designated as a complex source by agency rulemaking. (\$15,000 fee) 11. _____
- 12. A public hearing is held (see instructions). (\$10,000 fee) 12. _____
- 13. Section 3 subtotal. (lines 9 through 12 - entered on page 1) 13. _____

Section 4: Fees for Current or Projected Major or Synthetic Minor Sources

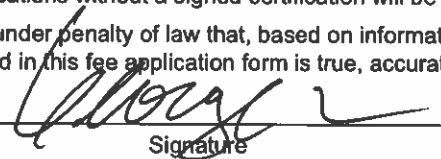
Application contains modified emission units only	14. For the first modified emission unit, enter \$2,000.	14. _____
	15. Number of additional modified emission units = _____ x \$1,000.	15. _____
	16. Line 14 plus line 15, or \$5,000, whichever is less.	16. _____
Application contains new and/or modified emission units	17. For the first new emission unit, enter \$4,000.	17. _____
	18. Number of additional new and/or modified emission units = _____ x \$1,000.	18. _____
	19. Line 17 plus line 18, or \$10,000, whichever is less.	19. _____
Application contains netting exercise	20. Number of individual pollutants that rely on a netting exercise or contemporaneous emissions decrease to avoid application of PSD or nonattainment area NSR = _____ x \$3,000.	20. _____
Additional Supplemental Fees	21. If the new source or emission unit is subject to Section 39.2 of the Act (i.e. siting); a commercial incinerator or other municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or one or more other emission units designated as a complex source by Agency rulemaking, enter \$25,000.	21. _____
	22. If the source is a new major source subject to PSD, enter \$12,000.	22. _____
	23. If the project is a major modification subject to PSD, enter \$6,000.	23. _____
	24. If this is a new major source subject to nonattainment area (NAA) NSR, enter \$20,000.	24. _____
	25. If this is a major modification subject to NAA NSR, enter \$25,000.	25. _____
	26. If the application involves a determination of MACT for a pollutant and the project is not subject to BACT or LAER for the related pollutant under PSD or NSR (e.g., VOM for organic HAP), enter \$5,000 per unit for which a determination is requested or otherwise required. _____ x \$5,000.	26. _____
	27. If a public hearing is held (see instructions), enter \$10,000.	27. _____
28. Section 4 subtotal (line 16 and lines 19 through 28) to be entered on page 1		28. _____

Section 5: Certification

NOTE: Applications without a signed certification will be deemed incomplete.

29. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the information contained in this fee application form is true, accurate and complete.

by:


 Signature
George Malamis
 Typed or Printed Name of Signatory

General Manager - Midwest
 Title of Signatory
12-17-2021
 Date

DEC 20 2021

Environmental Protection Agency
BUREAU OF AIR



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Construction Permit Application For a FESOP Source (FORM APC628)	For Illinois EPA use only
	BOA ID No.: 031600 FFO
	Application No.: 21120017
	Date Received: 12-20-2021

This form is to be used to supply information to obtain a construction permit for a proposed project involving a Federally Enforceable State Operating Permit (FESOP) or Synthetic Minor source, including construction of a new FESOP source. Other necessary information must accompany this form as discussed in the "General Instructions For Permit Applications," Form APC-201.

Proposed Project	
1. Working Name of Proposed Project: Shredder Control Device Installation	
2. Is the project occurring at a source that already has a permit from the Bureau of Air (BOA)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If Yes, provide BOA ID Number: 031600FFO	
3. Does this application request a revision to an existing construction permit issued by the BOA? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, provide Permit Number: _____	
4. Does this application request that the new/modified emission units be incorporated into an existing FESOP issued by the BOA? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, provide Permit Number: _____	

Source Information		
5. Source name:* Metal Management Midwest, Inc.		
6. Source street address:* 2500 South Paulina Street		
7. City: Chicago	8. County: Cook	9. Zip code: 60608
ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.		
10. Is the source located within city limits? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, provide Township Name: _____		
11. Description of source and product(s) produced: Metals Recycling	12. Primary Classification Code of source: SIC: 5093 _____ or NAICS: _____	
13. Latitude (DD:MM:SS.SSSS): 41:50:54.5238	14. Longitude (DD:MM:SS.SSSS): -87:40:03.921	

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Applicant Information	
15. Who is the applicant? <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator	16. All correspondence to: (check one) <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator <input type="checkbox"/> Source
17. Applicant's FEIN: 36-2582686	18. Attention name and/or title for written correspondence: Debbie Hays

Owner Information*		
19. Name: Metal Management Midwest, Inc. d/b/a Sims Metal Management		
20. Address: 2500 South Paulina Street		
21. City: Chicago	22. State: IL	23. Zip code: 60608

* If this information different than previous information, then complete Form 272-CAAPP for a Request for Ownership Change for CAAPP Permit for an initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Operator Information (If Different from Owner)*		
24. Name Metal Management Midwest, Inc. d/b/a Sims Metal Management		
25. Address: 2500 South Paulina Street		
26. City: Chicago	27. State: IL	28. Zip code: 60608

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Technical Contacts for Application	
29. Preferred technical contact: (check one) <input checked="" type="checkbox"/> Applicant's contact <input type="checkbox"/> Consultant	
30. Applicant's technical contact person for application: Debbie Hays	
31. Contact person's telephone number (773) 254-1200	32. Contact person's email address: debbie.hays@simsmm.com
33. Applicant's consultant for application: Trinity Consultants	
34. Consultant's telephone number: (847) 809-7864	35. Consultant's email address: RTzuppek@trinityconsultants.com

Review Of Contents of the Application	
36. Is the emission unit covered by this application already constructed? If "yes", provide the date construction was completed:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Note: The Illinois EPA is unable to issue a construction permit for a emission unit that has already been constructed.	
37. Does the application include a narrative description of the proposed project?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
38. Does the application contain a list or summary that clearly identifies the emission units and air pollution control equipment that are part of the project?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
39. Does the application include process flow diagram(s) for the project showing new and modified emission units and control equipment and related existing equipment and their relationships?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
40. If the project is at a source that has not previously received a permit from the BOA, does the application include a source description, plot plan and site map?	<input type="checkbox"/> Yes <input type="checkbox"/> No

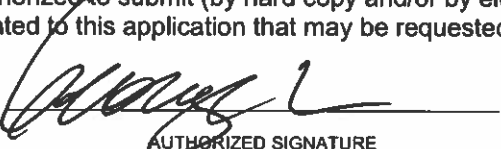
Review Of Contents of the Application (continued)

41. Does the application include relevant information for the proposed project as requested on Illinois EPA, BOA application forms (or otherwise contain all the relevant information)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
42. Does the application identify and address all applicable or potentially applicable emissions standards, including: a. State emission standards (35 IAC Chapter I, Subtitle B); b. Federal New Source Performance Standards (40 CFR Part 60); c. Federal standards for HAPs (40 CFR Parts 61 and 63)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
43. Does the application address whether the proposed project or the source could be a major project for Prevention of Significant Deterioration (PSD), 40 CFR 52.21?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
44. Does the application address for which pollutant(s) the proposed project or the source could be a major project for PSD, 40 CFR 52.21?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
45. Does the application address whether the proposed project or the source could be a major project for "Nonattainment New Source Review," (NA NSR), 35 IAC Part 203?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
46. Does the application address for which pollutant(s) the proposed project or the source could be a major project for NA NSR, 35 IAC Part 203?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
47. Does the application address whether the proposed project or the source could potentially be subject to federal Maximum Achievable Control Technology (MACT) standard under 40 CFR Part 63 for Hazardous Air Pollutants (HAP) and identify the standard that could be applicable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Source not major <input type="checkbox"/> Project not major <input type="checkbox"/>
48. Does the application identify the HAP(s) from the proposed project or the source that would trigger the applicability of a MACT standard under 40 CFR Part 63?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
49. Does the application include a summary of the current and the future potential emissions of the source after the proposed project has been completed for each criteria air pollutant and/or HAP (tons/year)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Applicability of PSD, NA NSR or 40 CFR 63 not applicable to the source's emissions.
50. Does the application include a summary of the requested permitted annual emissions of the proposed project for the new and modified emission units (tons/year)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Project does not involve an increase in emissions from new or modified emission units.
51. Does the application include a summary of the requested permitted production, throughput, fuel, or raw material usage limits that correspond to the annual emissions limits of the proposed project for the new and modified emission units?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Project does not involve an increase in emissions from new or modified emission units.
52. Does the application include sample calculations or methodology for the emission estimations and the requested emission limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
53. Does the application address the relationships with and implications of the proposed project for the source's FESOP?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A* *FESOP not yet issued.
54. If the application contains information that is considered a TRADE SECRET, has such information been properly marked and claimed and other requirements to perfect such a claim been satisfied in accordance with 35 IAC Part 130?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A* * No information in the application is claimed to be a TRADE SECRET

Note: "Claimed information will not be legally protected from disclosure to the public if it is not properly claimed or does not qualify as trade secret information.

Review Of Contents of the Application (continued)	
55. If the source is located in a county other than Cook County, are two separate copies of this application being submitted?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
56. If the source is located in Cook County, are three separate copies of this application being submitted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
57. Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, for the emission units and control equipment for which a permit for construction or modification is being sought?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
58. Does the application include a check in the proper amount for payment of the Construction permit fee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Note: Answering "No" to Items 36 through 58 may result in the application being deemed incomplete.

Signature Block
Pursuant to 35 IAC 201.159, all applications and supplements thereto shall be signed by the owner and operator of the source, or their authorized agent, and shall be accompanied by evidence of authority to sign the application. Applications without a signed certification will be deemed incomplete.
<p>59. Authorized Signature:</p> <p>I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete and that I am a responsible official for the source, as defined by Section 39.5(1) of the Environmental Protection Act. In addition, the technical contact person identified above is authorized to submit (by hard copy and/or by electronic copy) any supplemental information related to this application that may be requested by the Illinois EPA.</p> <p>BY: <u></u> <u>General Manager-Midwest</u> <small>AUTHORIZED SIGNATURE</small> <small>TITLE OF SIGNATORY</small></p> <p><u>George Malamis</u> <u>12 17 2021</u> <small>TYPED OR PRINTED NAME OF SIGNATORY</small> <small>DATE</small></p>



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
 P.O. BOX 19506
 SPRINGFIELD, ILLINOIS 62794-9506

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Revision #: _____
 Date: ____ / ____ / ____
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 Source Designation: _____

PROCESS EMISSION UNIT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	EMISSION POINT #:
	DATE:

SOURCE INFORMATION	
1) SOURCE NAME: Metal Management Midwest, Inc.	
2) DATE FORM PREPARED: December 2021	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF EMISSION UNIT: Hammermill Shredder	
5) NAME OF PROCESS: Automobile Shredder	
6) DESCRIPTION OF PROCESS: Hammermill Shredder	
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: Automobile Shredder	
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT:	
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN): Newell Corp.	
10) MODEL NUMBER (IF KNOWN): 98 X 104	11) SERIAL NUMBER (IF KNOWN):
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR): 2012
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? YES NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

Proposed controls for the shredder include a cyclone, venturi scrubber for particulate control. Additionally, a VRTO is being proposed for VOM control and a DSI scrubber for HCl and HF control.

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? YES NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

Planned maintenance (1 hour for every hour of operation) and mechanical availability limit the Hammermill operation.

OPERATING INFORMATION				
18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.				
19a) MAXIMUM OPERATING HOURS	HOURS/DAY: 10	DAYS/WEEK:	WEEKS/YEAR:	
b) TYPICAL OPERATING HOURS	HOURS/DAY: 10	DAYS/WEEK: 6	WEEKS/YEAR: 52	
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25	SEP-NOV(%): 25

MATERIAL USAGE INFORMATION				
21a) RAW MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
Automobile, appliances, sheet metal	400,000	371,900	380,000	371,900

21b) PRODUCTS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
Shredder Ferrous	280,000		266,000	
Shredder Residue				
Non-Ferrous	120,000		114,000	

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR

FUEL USAGE DATA		
22a) MAXIMUM FIRING RATE (MILLION BTU/HR): N/A	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):
d) FUEL TYPE: <input type="checkbox"/> NATURAL GAS <input type="checkbox"/> FUEL OIL: GRADE NUMBER _____ <input type="checkbox"/> COAL <input type="checkbox"/> OTHER _____ IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.		
e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %, NA FOR NATURAL GAS):	
g) TYPICAL ASH CONTENT (WT %, NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):	
23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? <input type="checkbox"/> YES <input type="checkbox"/> NO IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:		

APPLICABLE RULES

<p>24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(i)(4), 3.5 LBS/GAL):</p>	<p>EMISSION STANDARD(S)</p>	<p>REQUIREMENT(S)</p>
<p>See Application Narrative</p>		
<p>25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:</p>	<p>RECORDKEEPING RULE(S)</p>	<p>REQUIREMENT(S)</p>
<p>See Application Narrative</p>		
<p>26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:</p>	<p>REPORTING RULE(S)</p>	<p>REQUIREMENT(S)</p>
<p>See Application Narrative</p>		
<p>27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:</p>	<p>MONITORING RULE(S)</p>	<p>REQUIREMENT(S)</p>
<p>See Application Narrative</p>		
<p>28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :</p>	<p>TESTING RULE(S)</p>	<p>REQUIREMENT(S)</p>
<p>See Application Narrative</p>		

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE?

YES NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?

YES NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

N/A

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Periodic maintenance inspections, maintain records that demonstrate compliance i.e. maintenance records, throughput, water usage, differential air pressure, monthly/annual emissions.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Mat. Thrput.	ton/mo & tpy	Weight	Daily
Diff. Pressure	in. H2O	Pressure Gauge	Continuous
RTO Temp.	F	Thermocouple	Continuous
Emissions	ton/mo & tpy	Calculated	Up to daily
Inspections	Periodic obs.	Periodic observations	Up to daily

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Material	Production Logs	Plant Manager	SHEC Director
Diff. Pressure	Electronic	Plant Manager	SHEC Director
RTO Temp.	Electronic	Plant Manager	SHEC Director
Emissions	Spreadsheets	SHEC Director	SHEC Director
Inspections	Logs	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO
 IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO
 IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure drop across cyclone and venturi scrubbers
 VRTO combustion chamber temperature
 Pressure drop across DSI scrubber

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

Pressure drop across cyclone and venturi scrubbers
 VRTO combustion chamber temperature
 Pressure drop across DSI scrubber

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

Differential Pressure - Inlet and outlet of cyclone and venturi scrubber
 Combustion chamber temperature - combustion chamber
 Differential Pressure - Inlet and outlet of DSI scrubber

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

YES NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

YES NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION?

YES NO

IF NO, EXPLAIN:

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
9/2019	25A	Mostardi Platt	210 tph	0.117 lb/ton

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY.

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Annual Emissions	AER	May 1st, annually

(37)EMISSION INFORMATION

REGULATED AIR POLLUTANT	<input type="checkbox"/> ¹ ACTUAL EMISSION RATE <input type="checkbox"/> ¹ UNCONTROLLED EMISSION RATE		ALLOWABLE BY RULE EMISSION RATE				PERMITTED EMISSION RATE		
	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	³ OTHER TERMS	⁴ DM	⁵ RATE (UNITS)	APPLICABLE RULES	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:					()			
	TYPICAL:					()			
LEAD	MAXIMUM:					()			
	TYPICAL:					()			
NITROGEN OXIDES (NOx)	MAXIMUM:					()			
	TYPICAL:					()			
PARTICULATE MATTER (PART)	MAXIMUM:					()			
	TYPICAL:					()			
PARTICULATE MATTER ≤ 10 MICROMETERS (PM10)	MAXIMUM:					()			
	TYPICAL:					()			
SULFUR DIOXIDE (SO2)	MAXIMUM:					()			
	TYPICAL:					()			
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:					()			
	TYPICAL:					()			
OTHER, SPECIFY:	MAXIMUM:					()			
	TYPICAL:					()			
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		6.0 (LBS/HR)	212.321	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		5.5 (LBS/HR)	212.321		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

¹CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED. OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.

²PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.

³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)

⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)

⁵RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

NAME OF HAP EMITTED	2CAS NUMBER	1 ACTUAL EMISSION RATE 1 UNCONTROLLED EMISSION RATE				ALLOWABLE BY RULE	
		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4DM	5 RATE OR STANDARD	APPLICABLE RULE
EXAMPLE: Benzene	71432	10.0 8.0	1.2 0.8			99% by wt control device leak-tight trucks	CFR 61 61.302(b),(d)

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.
 1 PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
 2 CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GRIDSCF, ETC.).
 4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
 5 RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT:

See 260 CAAPP for DSI Scrubber for exhaust point information

40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

42) DISCHARGE HEIGHT ABOVE GRADE (FT):

43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

49a) LATITUDE:	b) LONGITUDE:	
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
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AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION	
1) SOURCE NAME: Hammermill Shredder Plant	
2) DATE FORM PREPARED: 12/01/21	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Cyclone	
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Cyclone	
6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN): Hammermills International	
7) MODEL NUMBER (IF KNOWN): Custom Built	8) SERIAL NUMBER (IF KNOWN): Custom Built
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Hammermill Shredder	

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION?

YES NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

260d-CAAPP (Cyclone)

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION?

YES NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)

Refer to application narrative

EMISSION STANDARD(S)

REQUIREMENT(S)

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

RECORDKEEPING RULE(S)

REQUIREMENT(S)

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

REPORTING RULE(S)

REQUIREMENT(S)

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

MONITORING RULE(S)

REQUIREMENT(S)

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)

Refer to application narrative

TESTING RULE(S)

REQUIREMENT(S)

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COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?

YES NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Performace testing to measure PM emissions at the exhaust of the control train.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Ongoing compliance will be demonstrated through monitoring of required parameters.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Pressure drop	in. of water	Pressure gauge	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Pressure drop	Operator Log	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure Drop

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Pressure drop

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Inlet and outlet of the cyclone

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? YES NO
 IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? YES NO
 IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION? YES NO
 IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

The shredder will be enclosed, emissions will be routed to the cyclone, the venturi scrubber, the VRTO, and then the DSI Scrubber.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION?

YES NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i	PM	100%	100%	99%	99%	99%	99%
ii							
iii							

99% PM control efficiency represents combined control efficiency for cyclone and venturi scrubber.

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

	EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE:	Permanent Total Enclosure (Method 204)	N/A
CONTROL:	Manufacturer Guarantee	N/A
OVERALL:	Manufacturer Guarantee	N/A

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i					
ii					
iii					

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(31) EMISSION INFORMATION

REGULATED AIR POLLUTANT	1 ACTUAL EMISSION RATE						ALLOWABLE BY RULE EMISSION RATE			2 PERMITTED EMISSION RATE	
	MAXIMUM:	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	3 OTHER TERMS	4 DM	5 RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	TYPICAL:						()				
LEAD	MAXIMUM:						()				
	TYPICAL:						()				
NITROGEN OXIDES (NOx)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER (PART)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						()				
	TYPICAL:						()				
SULFUR DIOXIDE (SO2)	MAXIMUM:						()				
	TYPICAL:						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						()				
	TYPICAL:						()				
OTHER, SPECIFY:	MAXIMUM:						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

¹ PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).

² PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.

³ PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)

⁴ DM - DETERMINATION METHOD: 1) STACK TEST; 2) MATERIAL BALANCE; 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS); 4) ENGINEERING ESTIMATE; 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)

⁵ RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE

APPLICATION PAGE

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260-CAAPP

(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		1 ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	2 CAS NUMBER	POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE: Benzene	71432	10.0	1.2		2	98% by wt control device leak-tight trucks	CFR 61 61.302(b),(d)
		8.0	0.8		2		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).

2 CAS - CHEMICAL ABSTRACT SERVICE NUMBER.

3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GRVDSF, ETC.).

4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).

5 RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

Vents to Venturi Scrubber, then VRTO, then DSI Scrubber

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

38) EXIT GAS FLOW RATE

a) MAXIMUM (ACFM):

b) TYPICAL (ACFM):

39) EXIT GAS TEMPERATURE

a) MAXIMUM (°F):

b) TYPICAL (°F):

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME

FLOW DIAGRAM DESIGNATION

a)

b)

c)

d)

e)

f)

g)

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:

b) LONGITUDE:

45) UTM ZONE:

b) UTM VERTICAL (KM):

c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
 P.O. BOX 19506
 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
 Date: ____ / ____ / ____
 Page _____ of _____
 Source Designation: _____

AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION	
1) SOURCE NAME: Hammermill Shredder Plant	
2) DATE FORM PREPARED: 12/01/21	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Venturi Scrubber	
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Venturi Scrubber	
6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN): Hammermills International	
7) MODEL NUMBER (IF KNOWN): Custom Built	8) SERIAL NUMBER (IF KNOWN): Custom Built
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE _____

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FOR APPLICANT'S USE

11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Hammermill Shredder	
Cyclone	

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION? YES NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

260h-CAAPP (Venturi Scrubber)

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION? YES NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)

Refer to application narrative

EMISSION STANDARD(S)

REQUIREMENT(S)

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

RECORDKEEPING RULE(S)

REQUIREMENT(S)

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

REPORTING RULE(S)

REQUIREMENT(S)

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

MONITORING RULE(S)

REQUIREMENT(S)

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)

Refer to application narrative

TESTING RULE(S)

REQUIREMENT(S)

APPLICATION PAGE

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COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? YES NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Performace testing to measure PM emissions at the exhaust of the control train.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Ongoing compliance will be demonstrated through monitoring of required parameters.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Pressure drop	in. of water	Pressure gauge	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Pressure drop	Operator Log	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure Drop

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Pressure Drop

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Inlet and outlet of the venturi scrubber

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? YES NO
 IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? YES NO
 IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION? YES NO
 IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):
 The shredder will be enclosed, emissions will be routed to the cyclone, the venturi scrubber, the VRTO, and then the DSI Scrubber.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION?

YES NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i	PM	100%	100%	99%	99%	99%	99%
ii							
iii							

99% PM control efficiency represents combined control efficiency for cyclone and venturi scrubber.

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE: Permanent Total Enclosure (Method 204)	N/A
CONTROL: Manufacturer Guarantee	N/A
OVERALL: Manufacturer Guarantee	N/A

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i					
ii					
iii					

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(3) EMISSION INFORMATION

REGULATED AIR POLLUTANT	1 ACTUAL EMISSION RATE						ALLOWABLE BY RULE EMISSION RATE			2 PERMITTED EMISSION RATE	
	MAXIMUM:	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	3 OTHER TERMS	4 DM	5 RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						()				
	TYPICAL:						()				
LEAD	MAXIMUM:						()				
	TYPICAL:						()				
NITROGEN OXIDES (NOx)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER (PART)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						()				
	TYPICAL:						()				
SULFUR DIOXIDE (SO2)	MAXIMUM:						()				
	TYPICAL:						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						()				
	TYPICAL:						()				
OTHER, SPECIFY:	MAXIMUM:						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

- 1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
- 2 PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
- 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
- 4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
- 5 RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		1 ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	2 CAS NUMBER	POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE: Benzene	71432	10.0	1.2			98% by wt control device leak-tight trucks	CFR 61 61.302(b),(d)
		8.0	0.8				

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
 2 CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
 4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
 5 RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

Vents to VRTO, then DSI Scrubber

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

38) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
39) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	
f)	
g)	

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:	b) LONGITUDE:	
45) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
 P.O. BOX 19506
 SPRINGFIELD, ILLINOIS 62794-9506

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Revision #: _____
 Date: ____ / ____ / ____
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 Source Designation: _____

AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION	
1) SOURCE NAME: Hammermill Shredder Plant	
2) DATE FORM PREPARED: 12/01/21	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Valveless Regenerative Thermal Oxidizer	
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: VRTO	
6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN): Zenvirotech	
7) MODEL NUMBER (IF KNOWN): Custom Built	8) SERIAL NUMBER (IF KNOWN): Custom Built
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Hammermill Shredder	
Cyclone	
Venturi Scrubber	

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION?

YES

NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

260b-CAAPP (VRTO)

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION?

YES

NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)

Refer to application narrative

EMISSION STANDARD(S)

REQUIREMENT(S)

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

RECORDKEEPING RULE(S)

REQUIREMENT(S)

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

REPORTING RULE(S)

REQUIREMENT(S)

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

MONITORING RULE(S)

REQUIREMENT(S)

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

TESTING RULE(S)

REQUIREMENT(S)

COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? YES NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Stack testing for VOM control efficiency will be performed to demonstrate compliance with VOM emission limits.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Ongoing compliance will be demonstrated through monitoring of required parameters.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Combustion temp	deg F	Thermocouple	Continuous
LEL	% of LEL	Flammability Monitor	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Combustion tem	Electronic	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Combustion chamber temperature
Flammability Monitor

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Combustion chamber temperature
% LEL

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Combustion chamber
The flammability monitor will be placed in ductwork between the cyclone and the venturi scrubber

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

YES

NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

The LEL monitor will not be equipped with a recording device.

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

YES

NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION?

YES

NO

IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

The shredder will be enclosed, emissions will be routed to the cyclone, the venturi scrubber, the VRTO, and then the DSI Scrubber.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION? YES NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i	VOM	100%	100%	90%	98%	90%	98%
ii							
iii							

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE: Permanent Total Enclosure (Method 204)	N/A
CONTROL: Manufacturer Guarantee	N/A
OVERALL: Manufacturer Guarantee	N/A

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i					
ii					
iii					

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(3) EMISSION INFORMATION

REGULATED AIR POLLUTANT	1 ACTUAL EMISSION RATE						ALLOWABLE BY RULE EMISSION RATE			2 PERMITTED EMISSION RATE	
	MAXIMUM:	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	3 OTHER TERMS	4 DM	5 RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						()				
	TYPICAL:						()				
LEAD	MAXIMUM:						()				
	TYPICAL:						()				
NITROGEN OXIDES (NOx)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER (PART)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER ≤ 10 MICROMETERS (PM10)	MAXIMUM:						()				
	TYPICAL:						()				
SULFUR DIOXIDE (SO2)	MAXIMUM:						()				
	TYPICAL:						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						()				
	TYPICAL:						()				
OTHER, SPECIFY:	MAXIMUM:						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

- 1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
- 2 PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
- 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
- 4 DM - DETERMINATION METHOD: 1) STACK TEST. 2) MATERIAL BALANCE. 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS). 4) ENGINEERING ESTIMATE. 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
- 5 RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE

(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		1 ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	2 CAS NUMBER	POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE:	71432	10.0	1.2		2	98% by wt control device	CFR 61
Benzene		8.0	0.8		2	leak-tight trucks	61.302(b),(d)

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

¹ PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
² CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
³ PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
⁴ DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
⁵ RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

Vents to DSI Scrubber

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

38) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
39) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	
f)	
g)	

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:	b) LONGITUDE:	
45) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
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AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION	
1) SOURCE NAME: Hammermill Shredder Plant	
2) DATE FORM PREPARED: 12/01/21	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: DSI Scrubber with Dry Sorbent Fabric Filter Baghouse	
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: DSI Scrubber	
6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN): Zenvirotech	
7) MODEL NUMBER (IF KNOWN): Custom Built	8) SERIAL NUMBER (IF KNOWN): Custom Built
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Hammemill Shredder	
Cyclone	
Venturi Scrubber	
VRTO	

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION? YES NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

260h-CAAPP (DSI Scrubber)

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION? YES NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)

Refer to application narrative

EMISSION STANDARD(S)

REQUIREMENT(S)

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

RECORDKEEPING RULE(S)

REQUIREMENT(S)

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

REPORTING RULE(S)

REQUIREMENT(S)

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

MONITORING RULE(S)

REQUIREMENT(S)

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)

Refer to application narrative

TESTING RULE(S)

REQUIREMENT(S)

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COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?



YES



NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Stack testing for HCl and HF control efficiency of the DSI scrubber.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Ongoing compliance will be demonstrated through monitoring of required parameters.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Pressure Drop	in. of water	Pressure Gauge	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Pressure drop	Operator Log	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure Drop across scrubber
 The DSI Scrubber is equipped with a sorbent collection fabric filter baghouse. This baghouse will include a bag leak detection system (BLDS) which will monitor and alarm (as needed) for abnormal operations/malfunctions within the baghouse.

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Pressure Drop across scrubber
 Bag Leak Detection System

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Inlet and outlet of the scrubber
 Baghouse

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

YES NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

The BLDS is not equipped with a recording device. The pressure drop across the DSI scrubber will be recorded.

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

YES NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION?

YES NO

IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

The shredder will be enclosed, emissions will be routed to the cyclone, the venturi scrubber, the VRTO, and then the DSI Scrubber.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION? YES NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i	HCl/HF	100%	100%	90%	90%	90%	90%
ii							
iii							

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE: Permanent Total Enclosure (Method 204)	N/A
CONTROL: Manufacturer Guarantee	N/A
OVERALL: Manufacturer Guarantee	N/A

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i					
ii					
iii					

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(31) EMISSION INFORMATION

REGULATED AIR POLLUTANT	1 ACTUAL EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			2 PERMITTED EMISSION RATE	
	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	3 OTHER TERMS	4 DM	5 RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:					()				
	TYPICAL:					()				
LEAD	MAXIMUM:					()				
	TYPICAL:					()				
NITROGEN OXIDES (NOx)	MAXIMUM:					()				
	TYPICAL:					()				
PARTICULATE MATTER (PART)	MAXIMUM:					()				
	TYPICAL:					()				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:					()				
	TYPICAL:					()				
SULFUR DIOXIDE (SO2)	MAXIMUM:					()				
	TYPICAL:					()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:					()				
	TYPICAL:					()				
OTHER, SPECIFY:	MAXIMUM:					()				
	TYPICAL:					()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF	1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF	4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
 2 PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
 4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
 5 RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		1 ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	2 CAS NUMBER	POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE:	71432	10.0	1.2			98% by wt control device	CFR 61
Benzene		8.0	0.8			leak-tight trucks	61.302(b),(d)

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

¹ PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).

² CAS - CHEMICAL ABSTRACT SERVICE NUMBER.

³ PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).

⁴ DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).

⁵ RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

Stack

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

~115

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

60

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

6

38) EXIT GAS FLOW RATE

a) MAXIMUM (ACFM):

110,066

b) TYPICAL (ACFM):

82,257

39) EXIT GAS TEMPERATURE

a) MAXIMUM (°F):

300

b) TYPICAL (°F):

250

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

Vertical

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME

FLOW DIAGRAM DESIGNATION

a) Hammermill Shredder
b) Cyclone
c) Venturi Scrubber
d) VRTO
e) DSI Scrubber
f)
g)

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

100

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:

b) LONGITUDE:

45) UTM ZONE:

b) UTM VERTICAL (KM):

c) UTM HORIZONTAL (KM):

13) COMBUSTION CHAMBER CROSS SECTIONAL AREA (SQURE FEET):

V: 6500 ft3

14) INLET EMISSION STREAM PARAMETERS:

	MAX	TYPICAL
PRESSURE (mmHG):	Ambient	Ambient
HEAT CONTENT (BTU/SCF):	<10 BTU/scf	<5 BTU/scf
OXYGEN CONTENT (%):	Ambient	Ambient
MOISTURE CONTENT (%):	Ambient	Ambient
ARE HALOGENATED ORGANICS PRESENT?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
ARE PARTICULATES PRESENT?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
ARE METALS PRESENT?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

15) AFTERBURNER OPERATING PARAMETERS:

	DURING MAXIMUM OPERATION OF FEEDING UNIT(S)	DURING TYPICAL OPERATION OF FEEDING UNIT(S)
COMBUSTION CHAMBER TEMPERATURE (DEGREES FAHRENHEIT):	1500	1500
INLET GAS TEMPERATURE (DEGREES FAHRENHEIT):	Ambient	Ambient
INLET FLOW RATE (SCFM):	75,000	60,000
EFFICIENCY (VOM REDUCTION):	90 (%)	98 (%)
EFFICIENCY (OTHER; SPECIFY CONTAMINANT: _____):	(%)	(%)

16) FOR THERMAL AFTERBURNERS, IS THE COMBUSTION CHAMBER TEMPERATURE CONTINUOUSLY MONITORED AND RECORDED? YES NO

17) FOR CATALYTIC AFTERBURNERS, IS THE TEMPERATURE RISE ACROSS THE CATALYST BED CONTINUOUSLY MONITORED AND RECORDED? YES NO

18) IS THE VOM CONCENTRATION OF EXHAUST MONITORED AND RECORDED? YES NO

19) IS THE OPERATION OF THE AFTERBURNER DISCONTINUED DURING THE NON-OZONE SEASON (SEPTEMBER 1 TO MAY 31)? YES NO



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Date:	____ / ____ / ____
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SUPPLEMENTAL FORM AIR POLLUTION CONTROL CYCLONE (260D)	FOR AGENCY USE ONLY
	ID NUMBER: _____
	CONTROL EQUIPMENT #: _____
	DATE: _____

DATA AND INFORMATION		
1) FLOW DIAGRAM DESIGNATION OF CYCLONE: Cyclone		
2) TYPE OF CYCLONE (CHECK ONE): <input checked="" type="checkbox"/> SIMPLE <input type="checkbox"/> MULTIPLE; NUMBER OF CYCLONES IN EACH: _____ <input type="checkbox"/> WET		
3) FEED METHOD: <input checked="" type="checkbox"/> TANGENTIAL <input type="checkbox"/> AXIAL		
4a) INLET EMISSION STREAM PARAMETERS:		
PARTICULATE INLET LOADING(GRAINS/SCF):	MAX ~0.5	TYPICAL ~0.5
b) MEAN PARTICLE DIAMETER (MICRONS): ~20		
5) CYCLONE OPERATING PARAMETERS:		
	DURING MAXIMUM OPERATION OF FEEDING UNIT(S)	DURING TYPICAL OPERATION OF FEEDING UNIT(S)
INLET FLOW RATE (SCFM):	75,000	60,000
INLET GAS TEMPERATURE (DEGREES F°):	Ambient	Ambient
EFFICIENCY (PM REDUCTION):	99 (%)	99 (%)
EFFICIENCY (PM10 REDUCTION):	99 (%)	99 (%)

99% PM control efficiency represents combined control efficiency for cyclone and venturi scrubber.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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Revision #: _____
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SUPPLEMENTAL FORM AIR POLLUTION CONTROL EQUIPMENT SCRUBBER (260H)	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

NOTE: FOR PACKED COLUMN SCRUBBERS, FORM 260G SHOULD BE COMPLETED RATHER THAN FORM 260H

DATA AND INFORMATION		
1) FLOW DIAGRAM DESIGNATION OF SCRUBBER: Venturi Scrubber		
2) TYPE OF SCRUBBER: Venturi Scrubber		
3) TYPE OF SCRUBBANT USED: Water		
4) IS SCRUBBANT RECYCLED BACK INTO CONTROL SYSTEM? IF YES, DESCRIBE METHOD BY WHICH SCRUBBANT SATURATION IS AVOIDED AND THE DESIRED CONTROL EFFICIENCY IS MAINTAINED: Sampling of scrubber liquid <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
5) TYPICAL PRESSURE DROP (INCHES H ₂ O): ~25		
6) SCRUBBER OPERATING PARAMETERS:		
	DURING MAXIMUM OPERATION OF FEEDING UNIT(S)	DURING TYPICAL OPERATION OF FEEDING UNIT(S)
INLET GAS TEMPERATURE (DEGREES F*):	Ambient	Ambient
INLET GAS FLOW RATE (SCFM):	75,000	60,000
SCRUBBANT RATE (GAL/MIN):	500	500
EFFICIENCY (PM REDUCTION):	99 (%)	99 (%)
EFFICIENCY (OTHER; SPECIFY REGULATED AIR POLLUTANT: _____):	(%)	(%)

99% PM control efficiency represents combined control efficiency for cyclone and venturi scrubber.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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SUPPLEMENTAL FORM AIR POLLUTION CONTROL EQUIPMENT SCRUBBER (260H)	FOR AGENCY USE ONLY
	ID NUMBER: _____
	CONTROL EQUIPMENT #: _____
DATE: _____	

NOTE: FOR PACKED COLUMN SCRUBBERS, FORM 260G SHOULD BE COMPLETED RATHER THAN FORM 260H

DATA AND INFORMATION		
1) FLOW DIAGRAM DESIGNATION OF SCRUBBER: DSI Scrubber with Dry Sorbent Fabric Filter Baghouse		
2) TYPE OF SCRUBBER: Dry Sorbent Injection		
3) TYPE OF SCRUBBANT USED: Hydrated Lime (Ca(OH) ₂)		
4) IS SCRUBBANT RECYCLED BACK INTO CONTROL SYSTEM? IF YES, DESCRIBE METHOD BY WHICH SCRUBBANT SATURATION IS AVOIDED AND THE DESIRED CONTROL EFFICIENCY IS MAINTAINED: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO The hydrated lime is collected in the dry sorbent fabric filter baghouse. Suitable material will be recycled back to the lime storage silo while unsuitable material will not be recycled.		
5) TYPICAL PRESSURE DROP (INCHES H ₂ O): 8 to 9.5 inches water column		
6) SCRUBBER OPERATING PARAMETERS:		
	DURING MAXIMUM OPERATION OF FEEDING UNIT(S)	DURING TYPICAL OPERATION OF FEEDING UNIT(S)
INLET GAS TEMPERATURE (DEGREES F°):	300	250
INLET GAS FLOW RATE (SCFM):	75,000	60,000
SCRUBBANT RATE (GAL/MIN):	1,400 lb/hr	1,120 lb/hr
EFFICIENCY (PM REDUCTION):	N/A (%)	N/A (%)
EFFICIENCY (OTHER; SPECIFY REGULATED AIR POLLUTANT: HCl/HF):	90 (%)	90 (%)

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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APPENDIX B. EMISSION CALCULATIONS

**Table 1: Hammermill Shredder Potential-To-Emit Calculations
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Unit	Emissions (ton/year)						
	NO _x	CO	SO ₂	PM/PM ₁₀ /PM _{2.5}	VOM	Total HAP	Individual HAP (HCl/HF) ¹
Hammer Mill Shredder	--	--	--	0.11	2.18	1.42	0.70
VRTO Combustion	6.36	16.56	0.04	0.48	0.35	0.12	--
Lime Storage Silo	--	--	--	1.58E-03	--	--	--
Shredder Emissions	6.36	16.56	0.04	0.59	2.53	1.54	0.70

¹ The highest emitted HAP from the shredder is HCl and HF (each have the potential to emit 0.70 tpy). The highest emitted HAP from natural gas combustion in the VRTO is hexane, however its emissions are less than HCl/HF from the shredder, so its emissions are not presented here.

**Table 2: Particulate Matter Potential-To-Emit Calculations for Hammermill Shredder
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Plant Component	Maximum Throughput (tons/yr)	PM Emission Factor (lbs/ton)	Potential Annual Emission (lbs/yr)	Potential Annual Emission (tons/yr)	PM Capture & Control Efficiency of cyclone and venturi scrubber	Controlled Annual Emission (tons/yr)
Hammermill	371,900	(1) 0.0573	(2) 21,310	10.65	99%	0.11

NOTES:

- (1) Per Paragraph 36.b of the ACO, the quantity of ELVs and other recyclable metallic material fed into the hammermill shredder must be no more than 50% ELVs by weight.
- (2) Emission factor per Condition 4 of Lifetime Operating Permit 91040059

**Table 3: Volatile Organic Material Potential-To-Emit Calculations for Hammermill Shredder Post Control Implementation
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Annual Shredder Throughput Limit ¹		Shredder VOM Emission Factor ² lb VOM/net ton	Potential to Emit VOM at Paulina Shredder		VRTO VOM Capture and Control Efficiency 90%	VOM Controlled Emissions from RTO ton/year
net tons/year	gross tons/year		lb/year	ton/year		
371,900	332,054	0.117	43,512	21.76		2.18

1. Per Paragraph 36.b of the Administrative Consent Order (ACO), the quantity of end of life vehicles (ELVs) and other recyclable metallic material fed into the hammermill shredder must be no more than 50% ELVs by weight.
2. The emission factor used in this table of the construction permit application is as certified by the testing contractor Mostardi Platt, following implementation of a USEPA approved testing protocol. Upon installation of the control train described in this application, the facility will engage in another emissions test and emissions factor determination.

**Table 4: Hazardous Air Pollutant Potential-To-Emit Calculations for Shredder
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Compound	Potential Emissions			Controlled Emissions	
	lb/ton	lb/hour	ton/year	lb/hour	ton/year
Mercury ¹	5.40E-06	0.001	1.00E-03	1.08E-05	1.00E-05
Beryllium ¹	1.57E-07	3.13E-05	2.91E-05	3.13E-07	2.91E-07
Phosphorus ¹	1.97E-04	0.039	3.66E-02	3.94E-04	3.66E-04
Chromium ¹	9.60E-06	1.92E-03	1.78E-03	1.92E-05	1.78E-05
Cobalt ¹	1.38E-06	2.76E-04	2.56E-04	2.76E-06	2.56E-06
Nickel ¹	8.59E-06	1.72E-03	1.60E-03	1.72E-05	1.60E-05
Arsenic ¹	2.89E-06	5.78E-04	5.37E-04	5.78E-06	5.37E-06
Selenium ¹	1.52E-06	3.03E-04	2.82E-04	3.03E-06	2.82E-06
Cadmium ¹	1.14E-06	2.28E-04	2.12E-04	2.28E-06	2.12E-06
Antimony ¹	3.21E-06	6.42E-04	5.97E-04	6.42E-06	5.97E-06
Lead ^{1,2}	4.19E-05	8.38E-03	7.80E-03	8.38E-05	7.80E-05
Methylene Chloride ³	6.00E-05	0.01	0.01	1.20E-03	1.12E-03
1,1,1-Trichloroethane ³	2.00E-04	0.04	0.04	4.00E-03	3.72E-03
Benzene ³	4.00E-04	0.08	0.07	8.00E-03	7.44E-03
Tetrachloroethene (PCE) ³	2.67E-06	5.33E-04	4.96E-04	5.33E-05	4.96E-05
Trichloroethene (TCE) ³	6.67E-05	0.01	0.01	1.33E-03	1.24E-03
Toluene ³	3.33E-04	0.07	0.06	6.67E-03	6.20E-03
Ethylbenzene ³	6.67E-05	0.01	0.01	1.33E-03	1.24E-03
Styrene ³	1.33E-05	0.003	0.002	2.67E-04	2.48E-04
o-Xylene ³	6.67E-05	0.01	0.01	1.33E-03	1.24E-03
m,p-Xylene ³	1.33E-04	0.03	0.02	2.67E-03	2.48E-03
Hydrogen Chloride ⁴	3.75E-02	7.50	6.97	7.50E-01	0.70
Hydrogen Fluoride ⁴	3.75E-02	7.50	6.97	7.50E-01	0.70

¹ Emission factors based on 9/20/2019 source testing at Paulina Street Facility.

² Lead is conservatively assumed to be lead compounds rather than elemental lead

³ Emission rates, as presented in ISRI Title V Applicability Workbook, Table D-11.F (As seen in Appendix E).

⁴ HCl and HF emissions based on manufacturer guarantee of maximum 15 lb/hr combined entering DSI Scrubber.

⁵ Per Paragraph 36.b of the ACO, the quantity of ELVs and other recyclable metallic material fed into the hammermill shredder must be no more than 50% ELVs by weight.

**Table 5: RTO Combustion Potential-To-Emit Calculations for Shredder
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Input

Heat input ¹	14.8	MMBtu/hour
Hours of operation	8760	hours/year
Natural Gas Heat Content ²	1020	BTU/scf

¹ Estimated VRTO burner size.

² Natural gas heat content per AP-42 Section 1.4, Table 1.4-1, footnote a.

Potential Criteria Emissions for VRTO Combustion

Pollutant	Emission Factor ¹ (lb/MMscf)	Uncontrolled emissions	
		(lb/hr)	(tpy)
PM ²	7.60	0.11	0.48
PM ₁₀ ²	7.60	0.11	0.48
PM _{2.5} ²	7.60	0.11	0.48
VOM	5.50	7.98E-02	0.35
CO ³	84.00	3.78	16.56
NO _x	100.00	1.45	6.36
SO ₂	0.60	8.71E-03	3.81E-02

¹ Emission factors for natural gas combustion from AP-42 Section 1.4, Tables 1.4-1 and 1.4-2 (July, 1998)

² PM10 and PM2.5 emissions are assumed to be equal to total PM emissions.

³ CO emissions (lb/hr and tpy) reflect combustion in VRTO of both natural gas from VRTO burners and any residual organic material in the hammermill exhaust, calculated on the hypothetical basis of 1% VOM (10,000 ppmv) in the gas stream entering the VRTO: 750 scf VOM/min x 60 min/hr x 0.000084 lbs CO/scf VOM = 3.78 lbs/hr. Emissions testing indicates that the average VOM concentration in the gas stream entering the VRTO will typically be much less, near 100 ppmv.

Potential HAP Emissions for VRTO Combustion

Pollutant	AP-42 Emission Factor ¹ (lb/MMscf)	Uncontrolled emissions	
		(lb/hr)	(tpy)
2-Methylnaphthalene	2.40E-05	3.48E-07	1.53E-06
3-Methylchloanthrene	1.80E-06	2.61E-08	1.14E-07
7,12-Dimethylbenz(a)(anthracene)	1.60E-05	2.32E-07	1.02E-06
Acenaphthene	1.80E-06	2.61E-08	1.14E-07
Acenaphthylene	1.80E-06	2.61E-08	1.14E-07
Anthracene	2.40E-06	3.48E-08	1.53E-07
Benz(a)anthracene	1.80E-06	2.61E-08	1.14E-07
Benzene	2.10E-03	3.05E-05	1.33E-04
Benzo(a)pyrene	1.20E-06	1.74E-08	7.63E-08
Benz(b)fluoranthene	1.80E-06	2.61E-08	1.14E-07
Benzo(g,h,i)perylene	1.20E-06	1.74E-08	7.63E-08
Benzo(k)fluoranthene	1.80E-06	2.61E-08	1.14E-07
Chrysene	1.80E-06	2.61E-08	1.14E-07
Dibenzo(a,h)anthracene	1.20E-06	1.74E-08	7.63E-08
Dichlorobenzene	1.20E-03	1.74E-05	7.63E-05
Fluoranthene	3.00E-06	4.35E-08	1.91E-07
Fluorene	2.80E-06	4.06E-08	1.78E-07
Formaldehyde	7.50E-02	1.09E-03	4.77E-03
Hexane	1.80E+00	2.61E-02	1.14E-01
Indeno(1,2,3-cd)pyrene	1.80E-06	2.61E-08	1.14E-07
Naphthalene	6.10E-04	8.85E-06	3.88E-05
Phenanthrene	1.70E-05	2.47E-07	1.08E-06
Pyrene	5.00E-06	7.25E-08	3.18E-07
Toluene	3.40E-03	4.93E-05	2.16E-04
Arsenic	2.00E-04	2.90E-06	1.27E-05
Beryllium	1.20E-05	1.74E-07	7.63E-07
Cadmium	1.10E-03	1.60E-05	6.99E-05
Chromium	1.40E-03	2.03E-05	8.90E-05
Cobalt	8.40E-05	1.22E-06	5.34E-06
Manganese	3.80E-04	5.51E-06	2.42E-05
Mercury	2.60E-04	3.77E-06	1.65E-05
Nickel	2.10E-03	3.05E-05	1.33E-04
Selenium	2.40E-05	3.48E-07	1.53E-06

¹ Emission factors for natural gas combustion from AP-42 Section 1.4, Tables 1.4-3 and 1.4-4 (July, 1998)

**Table 6: PM Potential-To-Emit Calculations for Lime Storage Silo
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Annual Lime Storage Throughput ¹	Silo PM Emission Factor ²	Potential to Emit PM at Lime Storage Silo		Lime Storage Silo PM Control Efficiency	VOM Controlled Emissions from RTO ton/year
		lb/year	ton/year		
96	3.300	317	0.16	99%	0.0016

1. Annual lime storage throughput based on an estimated maximum lime replacement of 8 tons per month.

2. PM emission factor per AP-42 Section 11.17, *Lime Manufacturing*, Table 11.17-4 for product transfer and conveying. A 50% safety factor is included.

FW: Public Comments on Metal Management Midwest, Inc. Application for a Large Recycling Permit

John Pinion <jpinion@rka-inc.com>

Mon 2/28/2022 5:04 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (2 MB)

Complaint for Injunctive Relief IL vs Metal Management Midwest.pdf;

[Warning: External email]



Dear Mayor Lightfoot and Chicago Dept. of Public Health:

The permit application for Sims is deficient since it does not include any information about the emission controls required by the Illinois Attorney General in the lawsuit filed against Sims and the permit application submitted to Illinois EPA both of which are attached. Also, the application from Sims is not a permit renewal. The permit Sims had, which expired last November, was for a Class IVB Permit (also attached). The application that Sims submitted to the City is for a Large Recycling Facility Permit, not a Class IVB Permit. The City should not allow Sims to keep operating when they are obviously a large recycling facility, all without even having a permit for a Class IVB Permit. Sims should not be allowed to continue operating when their permit expired over 3 months ago, especially when Condition 1 of that permit states that "The Permittee shall comply with all applicable local, state, and federal laws, regulations and standards regarding the construction, operation, maintenance, and closure of the subject Facility, including but not limited to those regulations and standards concerning noise, vibrations, and particulate emissions." The lawsuit from the Illinois Attorney General demonstrates that Sims is not even in compliance with their expired Class IVB Permit. The LRF permit should be denied based on Sims' poor compliance history.

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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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

PEOPLE OF THE STATE OF ILLINOIS,)
ex rel. KWAME RAOUL, Attorney General)
of the State of Illinois,)
)
Plaintiff,)
)
v.)
)
METAL MANAGEMENT MIDWEST, INC.,)
d/b/a SIMS METAL MANAGEMENT, an)
Illinois corporation,)
)
Defendant.)

15213756

No. 2021CH05279

COMPLAINT FOR INJUNCTIVE RELIEF AND CIVIL PENALTIES

Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), complains of Defendant, METAL MANAGEMENT MIDWEST, INC., d/b/a SIMS METAL MANAGEMENT, as follows:

COUNT I

FAILURE TO DEMONSTRATE OVERALL REDUCTION IN UNCONTROLLED EMISSIONS OF AT LEAST 81 PERCENT

1. This Count is brought on behalf of the People of the State of Illinois, *ex rel.* Kwame Raoul, Attorney General of the State of Illinois, against Defendant, METAL MANAGEMENT MIDWEST, INC., d/b/a SIMS METAL MANAGEMENT (“Sims”), on his own motion and at the request of the Illinois EPA, pursuant to Section 42(d) and (e) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/42(d) and (e) (2020).

2. The Illinois EPA is an administrative agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2020), and charged, *inter alia*,

FILED DATE: 10/15/2021 8:30 AM 2021CH05279

with the duty of enforcing the Act.

3. At all times relevant to this Complaint, Defendant Sims was and is an Illinois corporation in good standing.

4. At all times relevant to this Complaint, Sims owned and operated and continues to own and operate a metal shredding and recycling facility at 2500 South Paulina Street, Chicago, Illinois (“Facility”). The Facility is located in a community the Illinois EPA has designated as an environmental justice area.

5. Sims receives, stores, recycles, and ships ferrous and non-ferrous recyclable metallic materials at the Facility, including end-of-life vehicles (“ELV”), major appliances, and other post-consumer sheet metal and metal clips.

6. ELVs and other metallic materials are processed through a hammermill shredder at the Facility.

7. The hammermill shredder at the Facility, through the shredding process, emits and/or has the potential to emit volatile organic material (“VOM”) into the environment.

8. On December 18, 2018, Sims and the United States Environmental Protection Agency entered into an Administrative Consent Order (“Administrative Consent Order”).

9. On January 22, 2019, or a date better known to Sims, Sims submitted an application for a Federally Enforceable State Operating Permit (“FESOP”) to the Illinois EPA, as required by the Administrative Consent Order.

10. On May 13 to 14, 2021, or on dates better known to Sims, Sims initiated a proof-of-concept emissions capture test on the hammermill shredder at the Facility as part of Sims’ FESOP application. The purpose of the test was to evaluate Sims’ capability for meeting applicable testing methodologies to demonstrate, consistent with the requirements of the Administrative

Consent Order, that the shredder operations did not possess the potential to emit 25 tons or more of VOM per year, and therefore avoid emission control requirements set forth in the current Illinois Pollution Control Board (“Board”) regulations at 35 Ill. Adm. Code Part 218, Subpart TT.

11. The results of the proof-of-concept emissions capture test revealed that the hammermill shredder at the Facility was achieving less than 50 percent estimated capture efficiency, which was below the level needed to show that the Facility operates below the potential to emit threshold in the Board’s Part 218, Subpart TT regulations.

12. Sims’ operation of the Facility is subject to the Act and the rules and regulations promulgated by the Board and the Illinois EPA. The Board’s regulations for air pollution are found in Title 35, Subtitle B, Chapter I of the Illinois Administrative Code (“Board Air Pollution Regulations”).

13. Section 9(a) of the Act, 415 ILCS 5/9(a) (2020), provides as follows:

No person shall:

- (a) Cause or 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, or so as to violate regulations or standards adopted by the Board under this Act.

14. Section 3.315 of the Act, 415 ILCS 5/3.315 (2020), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

15. Sims, a corporation, is a “person” as that term is defined by Section 3.315 of the Act, 415 ILCS 5/3.315 (2020).

16. Section 3.165 of the Act, 415 ILCS 5/3.165 (2020), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

17. VOM is a “contaminant” as that term is defined by Section 3.165 of the Act, 415 ILCS 5/3.165 (2020).

18. Section 218.980(b) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.980(b), provides, in pertinent part, as follows:

b) Potential to emit:

1) A source is subject to this Subpart if it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from emission units, other than furnaces at glass container manufacturing sources and VOM leaks from components, that are:

A) Not regulated by Subparts B, E, F, H, Q, R, S, T, (excluding Section 218.486 of this Part), V, X, Y, Z, or BB of this Part, or

B) Not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.

c) If a source ceases to fulfill the criteria of subsections (a) and/or (b) of this Section, the requirements of this Subpart shall continue to apply to an emission unit which was ever subject to the control requirements of Section 218.986 of this Part.

19. Section 211.4970 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4970, provides the following definition:

“Potential to emit (PTE)” means 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.

20. The hammermill shredder at the Facility has the potential to emit 25 tons or more of VOM per year.

21. Sims is subject to the control requirements of Section 218.986 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986, because the hammermill shredder at the Facility has the potential to emit 25 tons or more of VOM per year.

22. Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a), provides, in pertinent part, as follows:

Every owner or operator of an emission unit subject to this Subpart shall comply with the requirements of subsection (a), (b), (c), (d), or (e) below.

(a) Emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit, . . .

(Board Note: For the purpose of this provision, an emission unit is any part or activity at a source of a type that by itself is subject to control requirements in other Subparts of this Part or 40 CFR 60, incorporated by reference in Section 218.112, e.g., a coating line, a printing line, a process unit, a wastewater system, or other equipment, or is otherwise any part or activity at a source.)

23. Section 211.4370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4370, provides the following definition:

“Owner or operator” means any person who owns, operates, leases, controls, or supervises a source, an emission unit or air pollution control equipment.”

24. Sims is an “owner or operator” as that term is defined by Section 211.4370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4370.

25. Section 211.1950 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.1950, provides the following definition:

“Emission unit” means any part or activity at a stationary source that emits or has the potential to emit any air pollutant.”

26. Section 211.6370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.6370, provides the following definition:

“Stationary source” means any building, structure, facility or installation that emits or may emit any air pollutant.

27. Section 211.370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.370, provides the following definition:

“Air pollutant” means an air pollution agent or combination of such agents, including any physical, chemical, biological, radioactive (including source material, special nuclear material, and byproduct material) substance or matter which is emitted into or otherwise enters the atmosphere. Such term includes any precursors to the formation of any air pollutant, to the extent that the relevant statute or rule has identified such precursor or precursors for particular purpose for which the term “air pollutant” is used.

28. Sims’ Facility is a “stationary source,” where Sims operates its hammermill shredder, which is an “emission unit” capable of emitting VOM, which is an “air pollutant” as those terms are defined in Sections 211.6370, 211.1950, and 211.370, respectively, of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.6370, 211.1950, and 211.370.

29. As the owner or operator of an emission unit subject to Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a), Sims was required to demonstrate an overall reduction in uncontrolled VOM emissions of at least 81 percent from its shredding operations at the time of the rule’s effectiveness or applicability to Sims’ Facility.

30. By failing to demonstrate that its shredding operations have achieved an overall reduction in uncontrolled VOM emissions of at least 81 percent, Sims violated and continues to violate Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a).

31. By violating Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill.

Adm. Code 218.986(a), Sims thereby violated Section 9(a) of the Act, 415 ILCS 5/9(a)(2020).

32. Violations of the pertinent environmental statutes and regulations will continue unless and until this Court grants equitable relief in the form of preliminary, and after trial, a permanent injunctive relief.

WHEREFORE, Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Court enter a preliminary and, after a trial, permanent injunction in favor of Plaintiff against Defendant, METAL MANAGEMENT MIDWEST, INC.:

1. Finding that Defendant violated Section 9(a) of the Act, 415 ILCS 5/9(a)(2020), and Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a);

2. Enjoining Defendant from any further violations of Section 9(a) of the Act, 415 ILCS 5/9(a)(2020), and Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a);

3. Ordering Defendant to undertake all necessary corrective action that will result in a final and permanent abatement of the violations of Section 9(a) of the Act, 415 ILCS 5/9(a)(2020), and Section 218.986(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.986(a);

4. Assessing against Defendant a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and pertinent regulations, with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of each violation;

5. Ordering Defendant to pay all costs of this action, including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

6. Granting such other relief as this Court deems appropriate and just.

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. KWAME RAOUL,
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

/s/ Stephen J. Sylvester
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

Of Counsel:

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December 17, 2021

Mr. Bill Marr
Manager, Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

RECEIVED
STATE OF ILLINOIS

DEC 20 2021

Environmental Protection Agency
BUREAU OF AIR

Re: *Metal Management Midwest, Inc. Chicago Illinois Plant (ID No. 031600FFO)*
Construction Permit Application: Hammermill Shredder Control Train

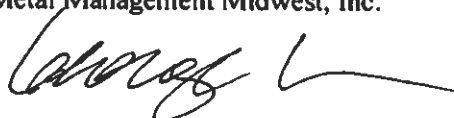
Dear Mr. Marr:

Metal Management Midwest, Inc. (Metal Management) is submitting the attached construction permit application for its scrap metal processing facility located at 2500 S. Paulina Street in Chicago. Metal Management is submitting the construction permit application seeking approval to construct and install a PM, VOM, HCl, and HF control train on the Hammermill Shredder consisting of the following components that will be operated in series: a cyclone, a venturi scrubber, a VRTO, and a DSI scrubber equipped with a sorbent collection fabric filter baghouse.

Additionally, Metal Management is requesting that the construction permit application be processed on an expedited basis.

If you have any questions pertaining to the enclosed construction permit application, please feel free to contact me at (773) 650-6440.

Sincerely,
Metal Management Midwest, Inc.



George Malamis
General Manager, Midwest Region

IEPA
Division of Records Management
Releasable

JAN 03 2022

Reviewer: MDB

1 773 650 6440

2500 S. Paulina St.
Chicago, IL 60608
United States

www.simsmm.com



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STATE OF ILLINOIS

DEC 20 2021

Environmental Protection Agency
BUREAU OF AIR

CONSTRUCTION PERMIT APPLICATION

Paulina Facility

Metal Management Midwest, Inc. / Chicago, Illinois

Prepared By:

TRINITY CONSULTANTS
1801 S Meyers Road
Suite 350
Oakbrook Terrace, IL 60181
(630) 495-1470

December 2021

Project 211401.0119

Trinity
Consultants 

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1. INTRODUCTION

Metal Management Midwest, Inc. (Metal Management) owns and operates the scrap metal processing facility located at 2500 S. Paulina Street in Chicago (Paulina Facility). The Paulina Facility consists of a Hammermill Shredder and a Metal Recovery Plant (MRP), as well as a number of small, permit-exempt emission units and activities such as storage tanks, combustion units, torch cutting activities, and an oil-water separator. The facility currently operates under Lifetime Operating Permit (LOP) No. 91040059 dated May 17, 2012 and Construction Permit No. 91040059 for the MRP, dated August 14, 2018. However, a Federally Enforceable State Operating Permit (FESOP) application was submitted for the Paulina Facility in January 2019 but has not yet been issued.

With this application, Metal Management is seeking approval to construct and install a particulate matter (PM), Volatile Organic Material (VOM), Hydrogen Chloride (HCl), and Hydrogen Fluoride (HF) control train on the Hammermill Shredder consisting of the following components that will be operated in series: a cyclone, a venturi scrubber, a natural gas-fired valveless regenerative thermal oxidizer (VRTO), and a dry sorbent injection (DSI) scrubber equipped with a sorbent collection fabric filter baghouse.

A process flow diagram is included in Figure 1-1. A site map showing the locations of proposed control equipment is included in Figure 1-2. Section 2 provides a process description and Section 3 explains the calculation methodology and shows the controlled and uncontrolled emissions from the Hammermill Shredder. These emissions are calculated based on the current throughput limit of 371,900 ton per year for the Hammermill Shredder.¹ As discussed in section 4, this modification will not trigger Nonattainment New Source Review (NA NSR), or Prevention of Significant Deterioration (PSD) permitting. Other potential federal and state regulatory requirements are also discussed in Section 4 of this application. The necessary permit application forms are included in Appendix A and detailed emission calculations are included in Appendix B.

¹ This limitation was based on approved testing in conjunction with US EPA on September 20, 2019 as required in Paragraphs 33 and 36 of the Administrative Consent Order (ACO) and included in Sims supplemental FESOP application.

Figure 1-1. Process Flow Diagram

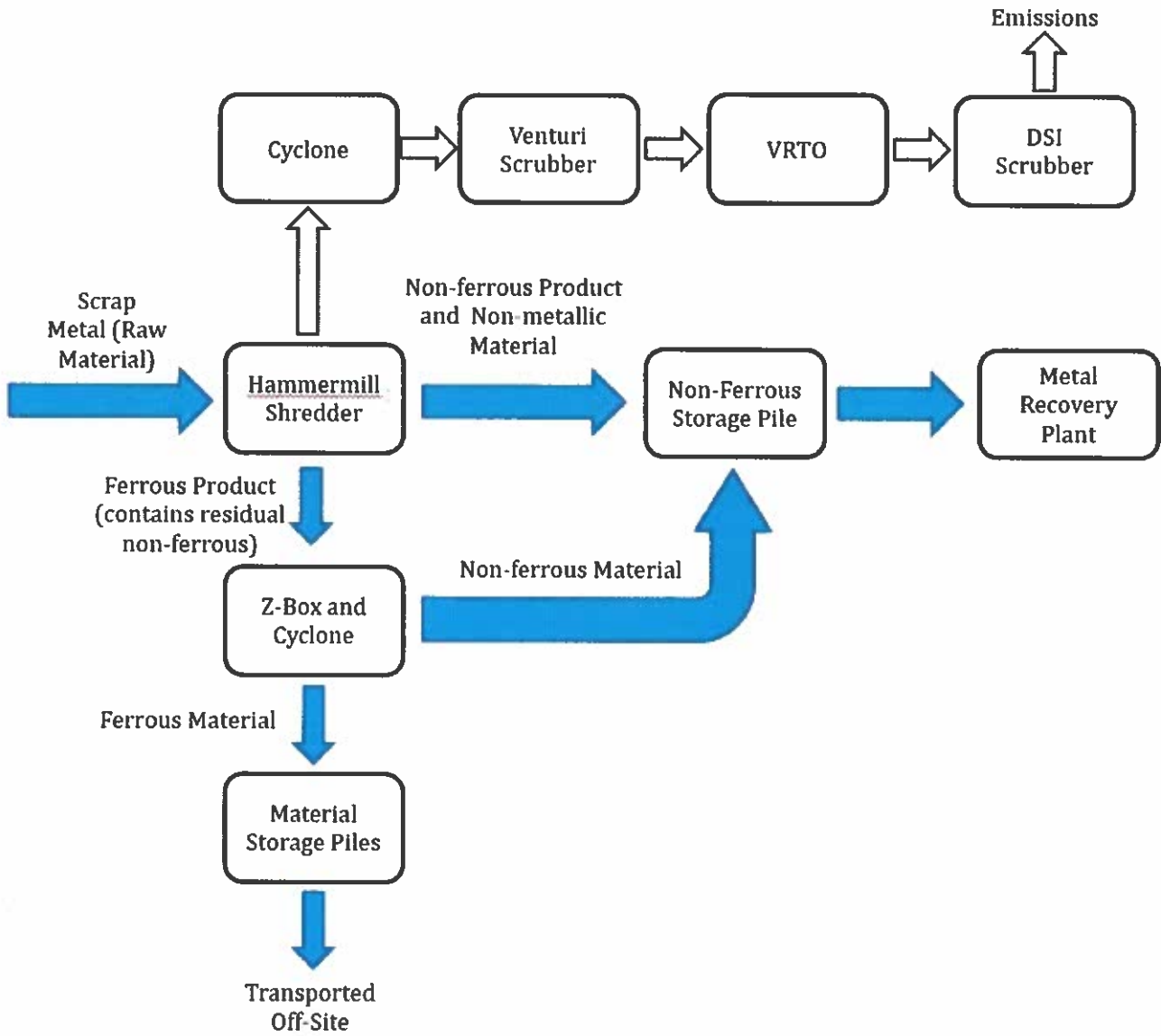
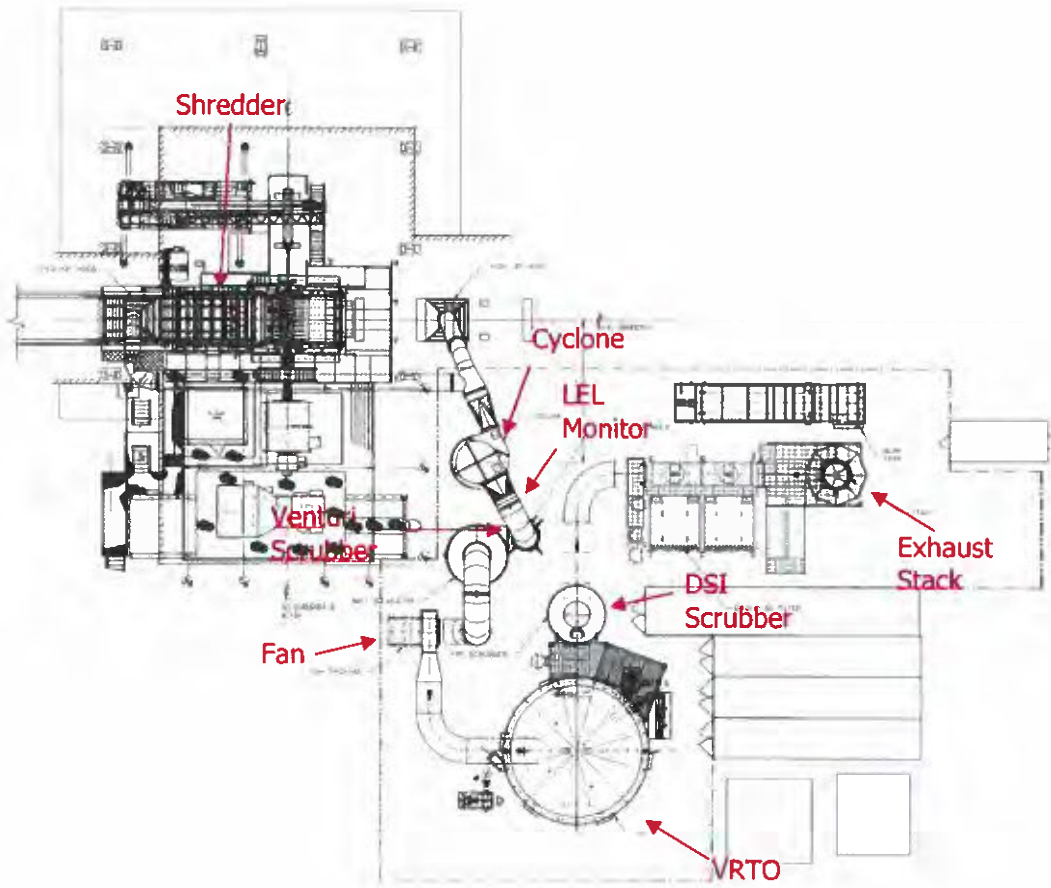


Figure 1-2. Proposed Control Equipment Locations



*Final drawings may differ slightly

2. PROCESS DESCRIPTION

Metal Management processes scrap metal at the Paulina Facility in two areas; the Shredding Plant and the Metal Recovery Plant (MRP).

The shredding plant consists of a Hammermill Shredder used to shred or crush scrap metal into smaller pieces. Materials processed and stored at the shredder are brought into the yard via truck and are unloaded and inspected per site procedures. Material is then fed onto an infeed conveyor to the shredder. A steel drum houses the horizontal rotating shaft on which the hammermill is mounted. When material emerges from the hammermill shredder, magnets are used to separate ferrous metal from the remaining materials (nonferrous, or NF). The NF is further processed at the MRP.

The ferrous metal then goes through the closed-loop Z-Box air separator (Z-Box) to clean the ferrous material and remove residual nonferrous material. The Z-Box allows ferrous material to drop through an air current that lifts nonferrous and nonmetallic materials to a cyclone. Air curtains, an air knife, and negative air pressure are used to prevent emissions from escaping the Z-Box. Ferrous material from the Z-Box is loaded on to trucks and transported off-site. The cyclone utilizes a rotating air lock to drop collected material out of the cyclone and onto a conveyor. Material discharged from the cyclone is conveyed to the NF pile for additional separation of non-ferrous metals at the adjacent MRP.

The shredder plant utilizes a Water System (water mist applicator) which incidentally reduces fugitive dust from the Hammermill Shredder and downstream material separation and conveyor transfer points. The Hammermill Shredder water system has a flow-control valve which takes input signals from the amount of amperage the shredder motor is drawing. The amperage of the Hammermill Shredder motor system thus determines the amount of atomized water applied. Compressed air serves to atomize water as it enters the Hammermill Shredder and moisten material. Application of water spray at the Hammermill Shredder introduces sufficient moisture to keep material damp on the discharge end of the Hammermill Shredder.

With this application, the facility is seeking approval to construct and install a PM, VOM, HCl, and HF control train on the Hammermill Shredder consisting of the following components that will be operated in series: a cyclone, a venturi scrubber, a natural gas-fired valveless regenerative thermal oxidizer (VRTO), and a DSI scrubber equipped with a sorbent collection fabric filter baghouse. A fixed enclosure will be constructed to collect PM, VOM, HCl, and HF emissions. The enclosure will encompass the in-feed chute to the Hammermill Shredder and the under-mill oscillator discharge from the Hammermill Shredder. An operation and maintenance plan will be developed for submission and approval by Illinois EPA to ensure that the capture efficiencies are maintained within the structure.

Sims will continuously monitor the Lower Explosive Limit (LEL) of the gas stream between the cyclone and the venturi scrubber. The monitor will be interlocked to the VRTO with a bypass damper set to activate at no more than 25% of the LEL. For safety purposes, the interlock will both shut down the VRTO and activate the bypass damper when tripped. Additionally, when tripped, the interlock will shut down the mill and the infeed conveyor, shutting down the Hammermill Shredder until the issue is resolved. The rotor will continue to spin due to the angular momentum, but emissions will not be generated once the mill processes the material that was in the mill when the interlock tripped. The LEL monitor will be maintained to prevent clogging.

3. EMISSION CALCULATIONS

This section documents the calculation methods used to determine emissions from the Hammermill Shredder located at the Paulina Facility. Detailed emissions calculations, including assumptions, are included in Appendix B. Sims is requesting an additional limitation on the VRTO requiring emissions to be controlled to either 98% or <20 ppmv (as methane) at the outlet, whichever is more restrictive.

HAP emission factors for the Hammermill Shredder were based on recent testing at a similar facility, as included in the 'Clean Air Report'. In instances where the Clean Air Report did not detect organic HAPs, for conservatism in the HAP emissions calculation, organic HAPs identified in the Institute of Scrap Recycling Industries (ISRI) Title V Applicability Workbook (the ISRI Workbook) were included. These emission factors are listed in the attached calculations (Appendix B).

VRTO combustion emissions were calculated based on the natural gas emission factors listed in AP-42, Section 1.4, *Natural Gas Combustion*. The exception is for CO emissions from the VRTO, which reflects combustion emissions from both natural gas and any residual organic material in the hammermill exhaust. Table 3-1 below lists the emissions for the shredder as well as emissions from natural gas combustion in the VRTO.

PM emissions from the sorbent collection fabric filter baghouse associated with the DSI scrubber were calculated based on the PM emission factors listed in AP-42 Section 11.17, *Lime Manufacturing*. Emissions are based on the estimated quantity of fresh lime scrubbant required for the DSI scrubber per year.

Table 3-1. Proposed Shredder Emissions with Control Train

Unit	Emissions (tpy)						Individual HAP (HCI/HF)
	NO _x	CO	SO ₂	PM	VOM	Total HAP	
Hammermill Processing Emissions	--	--	--	0.11	2.18	1.42	0.70
VRTO Combustion	6.36	16.56	0.04	0.48	0.35	0.12	--
Lime Storage Silo	--	--	--	1.58E-03	--	--	--
Hammermill Shredder Emissions	6.36	16.56	0.04	0.59	2.53	1.54	0.70

Table 3-2 below summarizes the emission changes at the Hammermill Shredder with the proposed installation of the PM and VOM control train.

Table 3-2. Current vs Proposed Shredder Emissions

Contaminant	Actual Emissions* (tpy)	Proposed Emissions (tpy)	Emission Changes (tpy)
NO _x	--	6.36	6.36
CO	--	16.56	16.56
SO ₂	--	0.04	0.04
PM/PM ₁₀ /PM _{2.5}	10.62	0.59	-10.03
VOM	21.68	2.53	-19.15
Total HAP	0.30	1.54	1.24
Individual HAP	0.02	0.70	0.67

*12-month rolling emissions from June 2020 to May 2021.

4. REGULATORY APPLICABILITY

This section documents the regulatory applicability associated with the Hammermill Shredder at the Paulina Facility.

4.1 Federal Air Regulations

4.1.1 Prevention of Significant Deterioration (PSD)

The Paulina Facility is located in Cook County, which is designated as “in attainment” for SO₂, NO₂, CO, PM₁₀, and PM_{2.5} per 40 CFR 81.314. The Paulina Facility is not a major source with respect to PSD, and this project will not cause the facility to change status. As such, the proposed project does not trigger PSD review.

4.1.2 Nonattainment New Source Review (NA NSR)

The Paulina Facility is located in Cook County which is designated as a ‘serious’ nonattainment area for the 2008 8-hour ozone standard and a ‘marginal’ nonattainment area for the 2015 8-hour ozone standard. The Paulina Facility is not a major source with respect to NA NSR, and the project will not cause the facility to change status. As such, the proposed project does not trigger NA NSR.

4.1.3 40 CFR 60, Subpart LL – Standards of Performance for Metallic Mineral Processing Plants

40 CFR 60 Subpart LL applies to various material handling, screening, crushing, loading, and storage facilities at metallic minerals processing plants. Metallic minerals processing plants are defined in 40 CFR 60.381 as “any combination of equipment that products metallic mineral concentrates from ore.” The Paulina Facility does not produce metallic mineral concentrates (or any materials) from ore. Therefore, this regulation does not apply.

4.1.4 40 CFR 63, Subpart BBBB – Gasoline Distribution Bulk Terminals and Bulk Plants

40 CFR 63, Subpart BBBB regulates gasoline distribution bulk terminals and bulk plants located at Area Sources of HAP. No activities at the Paulina Facility would be deemed to constitute those of a gasoline distribution bulk terminal or bulk plant, as per 40 CFR 63.11100, even if small amounts of gasoline are collected and/or temporarily stored at the Paulina Facility. Therefore, this regulation does not apply.

4.1.5 40 CFR 63, Subpart CCCCC – Gasoline Dispensing Facilities

40 CFR 63, Subpart CCCCC regulates gasoline dispensing facilities located at Area Sources of HAP. No activities at the Paulina Facility would be deemed to constitute those of a gasoline dispensing facility, as per 40 CFR 63.11132². Therefore, this regulation does not apply.

² “Gasoline dispensing facility (GDF) means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.”

4.1.6 40 CFR 63, Subpart GGGGGG – Primary Nonferrous Metals Area Sources— Zinc, Cadmium, and Beryllium

40 CFR 63 Subpart GGGGGG applies to primary zinc or beryllium production facilities that are area sources of Hazardous Air Pollutant (HAP) emissions. The Paulina Facility engages in no primary zinc or beryllium production of any kind, including from zinc or beryllium ores as defined in 40 CFR 63.11167. Therefore, this regulation does not apply.

4.1.7 40 CFR 63, Subpart TTTTTT – Secondary Nonferrous Metals Processing Area Sources

40 CFR 63 Subpart TTTTTT applies to secondary nonferrous metals processing facilities that are area sources of HAP emissions. 40 CFR 63.11472 defines a secondary nonferrous metals processing facility as “a brass and bronze ingot making, secondary magnesium processing, or secondary zinc processing plant that uses furnace melting operations to melt post-consumer nonferrous metal scrap to make products including bars, ingots, blocks, or metal powders.” The Paulina Facility engages in no such nonferrous metals processing or any other furnace or other melting operations. Therefore, this regulation does not apply.

4.1.8 40 CFR 63, Subpart XXXXXX – Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

40 CFR 63 Subpart XXXXXX applies to area sources of HAP emissions that are primarily engaged in electrical/electronic equipment finishing operations, fabricated metal products, fabricated plate works, fabricated structural metal manufacturing, heating equipment, industrial machinery and equipment finishing operations, primary metal products manufacturing, and valves and pipe fittings. The Paulina Facility neither does nor would engage in any finishing or fabricating operations, primary metal products manufacturing or any valve or pipe fitting operations. Therefore, this regulation does not apply.

4.2 State Regulatory Applicability

4.2.1 35 IAC Part 207, Vehicle Scrappage Activities

The vehicle scrappage activities rule is applicable to vehicle scrappage activities in the State of Illinois that are conducted to receive Creditable Emissions Reductions (CERs). Although the Paulina Facility performs vehicle scrappage activities, Metal Management does not operate to receive CERs. Therefore, 35 IAC 207 does not apply to the Paulina Facility.

4.2.2 35 IAC 212 – Visible and Particulate Matter Emissions

4.2.2.1 35 IAC 212 Subpart B – Visible Emissions

35 IAC 212.123 regulates visible emissions from all emission units not covered under 35 IAC 212.122.³ The shredder as well as the proposed cyclone, venturi scrubber, VRTO, and DSI scrubber are subject to the requirements 35 IAC 212.123. The shredder and associated control devices will continue to operate in compliance with the opacity limitations of 35 IAC 201.123.

³ 35 IAC 212.122 regulates visible particulate matter emissions from fuel combustion units burning liquid or solid fuels.

4.2.2.2 35 IAC 212 Subpart K – Fugitive Particulate Matter

35 IAC Section 212.301 regulates emissions 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 source. The shredder and associated control devices will continue to be in compliance with the requirements of 35 IAC 212.301.

35 IAC Section 212.307 requires that all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods. The proposed control devices will be in compliance with the requirements of 35 IAC 212.307, as applicable.

4.2.2.3 35 IAC 212 Subpart L – Process Emission Sources

35 IAC 212.321 regulates PM emissions from process emission units for which construction or modification commenced on or after April 14, 1972. As specified by this section, no person shall cause or allow the emission of particulate matter into the atmosphere in any one-hour period from any emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units, exceeds the allowable emission rates specified in 35 IAC 212.321(c). The proposed cyclone and venturi scrubber will reduce PM emissions from the shredder. As such, the shredder will continue to be in compliance with 35 IAC 212.321.

4.2.3 35 IAC 214 – Sulfur Limitations

35 IAC 214.301 sets a limit of 2,000 parts per million (ppm) sulfur dioxide (SO₂) emissions from process emission sources. The proposed VRTO will comply with the sulfur dioxide requirement of 35 IAC 214.301.

4.2.4 35 IAC 218 – Organic Material Emission Standards and Limitation for the Chicago Area

4.2.4.1 35 IAC 218 Subpart G – Use of Organic Material

Pursuant to 35 IAC 218.301, no emission unit may release organic emissions over 8 lb/hr in the Chicago ozone nonattainment area, unless a control device is used to reduce hydrocarbons by at least 85% per 35 IAC 218.302(a), except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: if no odor nuisance exists the limitation of 35 IAC 218 Subpart G applies only to photochemically reactive material.

It is unreasonable to expect photochemically reactive material to be present in any significant quantity in the End-of-Life Vehicles (ELVs) and light iron that Sims processes at the Chicago yard. Broadly speaking, commonly used organic compounds can be divided into two categories: 1) petrochemicals that are mostly, but not entirely, derived from natural sources like crude oil and natural gas and 2) manufactured chemicals (specialty chemicals that typically can trace their lineage to petrochemicals but that go through chemical processes to create compounds not typically found in nature in significant quantities). Examples of the first category include diesel fuel, lubricants, metalworking fluids, motor oil, etc. Examples of the second include classes of compounds like ketones, esters, ethers, alcohols and aldehydes. These compounds are synthesized in order to make other compounds (e.g., esters are commonly used in the manufacture of surfactants used in cleaning products) or they are synthesized for a particular purpose (e.g., acetone is a ketone manufactured for use as a paint remover and nail polish remover).

The vast majority of organic material contained in the feed to the Hammermill Shredder consists of simple petrochemicals like residual diesel, gasoline, lubricants, metal working fluid etc. that may remain in or on feedstock and that do not fall into Category 1, 2 or 3 classes of compounds included in the definition of photochemically reactive material. Accordingly, it is reasonable to exclude Category 1, 2 and 3 classes of compounds when considering 8 lb/hr rule applicability.

Even though it is believed that control is therefore not required to comply with Subpart G, Sims will nevertheless control emissions as though it was required to do so. The proposed VRTO will have a control efficiency of at least 90%. The proposed capture systems will be designed to meet the requirements of a Permanent Total Enclosure (PTE)⁴ which defines capture efficiency as 100%. Therefore, the overall control efficiency will be at least $90 \times 100/100 = 90\%$ which will meet the 85% control required in 35 IAC 218.302(a).

4.2.4.2 35 IAC 218 Subpart TT – Other Emission Units

The proposed VRTO will have a control efficiency of at least 90%. The proposed capture systems will be designed to meet the requirements of a PTE which defines capture efficiency as 100%. Therefore, the overall control efficiency will be at least $90 \times 100/100 = 90\%$ which is greater than the 81% control required in 35 IAC 218.986(a).

4.2.4.3 35 IAC 218 Subpart UU – Recordkeeping and Reporting

As noted in 4.2.4.2 above, the Hammermill Shredder is subject to the requirements of 35 IAC 218 Subpart TT. As such, the Hammermill Shredder must comply with the requirements of 35 IAC 218 Subpart UU. The Hammermill Shredder will comply with the recordkeeping, reporting, and testing requirements of 35 IAC 218 Subpart UU.

⁴ Reference Method 204, 40 CFR Part 51, Appendix M

APPENDIX A. CONSTRUCTION PERMIT APPLICATION FORMS

Fee Determination for Construction Permit Application (197-FEE)

Construction Permit Application for a Proposed Project at a CAAPP Source (199-CAAPP)

Process Emission Unit Data and Information (220-CAAPP): Shredder

Air Pollution Control Equipment Data and Information (260-CAAPP): Cyclone, Venturi Scrubber, VRTO,
DSI Scrubber

Supplemental Form Air Pollution Control Equipment Afterburner (260B-CAAPP): VRTO

Supplemental Form Air Pollution Control Equipment Cyclone (260D-CAAPP): Cyclone

Supplemental Form Air Pollution Control Equipment Cyclone (260H-CAAPP): Venturi Scrubber

Supplemental Form Air Pollution Control Equipment Cyclone (260H-CAAPP): DSI Scrubber



Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19506 • Springfield • Illinois • 62794-9506

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY			
ID Number:	<u>031600FFO</u>	Permit #:	<u>21120017</u>
<input type="checkbox"/> Complete	<input checked="" type="checkbox"/> Incomplete	Date Complete:	_____
Check Number:	_____	Account Name:	_____

This form is to be used to supply fee information that must accompany all construction permit applications. This application must include payment in full to be deemed complete. Make check or money order payable to the Illinois Environmental Protection Agency, Division of Air Pollution Control- Permit Section at the above address. Do NOT send cash. Refer to instructions (197-INST) for assistance.

RECEIVED
STATE OF ILLINOIS
DEC 20 2021

Source Information

- Source Name: Metal Management Midwest, Inc.
- Project Name: Shredder Control Device Installation
- Contact Name: Debbie Hays
- Source ID #: (if applicable) 031600FFO
- Contact Phone #: 773-254-1200

Fee Determination

6. The boxes below are automatically calculated.

Section 1 Subtotal	<u>\$0.00</u>	+	Section 2, 3 or 4 Subtotal	<u>\$500.00</u>	=	<u>\$500.00</u>
						Grand Total

Section 1: Status of Source/Purpose of Submittal

7. Your application will fall under only one of the following five categories described below. Check the box that applies. Proceed to applicable sections. For purposes of this form:

- Major Source** is a source that is required to obtain a CAAPP permit
- Synthetic Minor Source** is a source that has taken limits on potential to emit in a permit to avoid CAAPP permit requirements (e.g., FESOP).
- Non-Major Source** is a source that is not a major or synthetic minor source.

- Existing source without status change or with status change from synthetic minor to major source or vice versa. Proceed to Section 2.
- Existing non-major source that will become synthetic minor to major source. Proceed to Section 4.
- New major or synthetic minor source. Proceed to Section 4. \$0
- New non-major source. Proceed to Section 3. Section 1 Subtotal
- AGENCY ERROR. If this is a timely request to correct an issued permit that involves only an agency error and if the request is received within the deadline for a permit appeal to the Pollution Control Board. Skip Sections 2, 3 and 4. Proceed directly to Section 5.

This agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 ET SEQ. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Section 2: Special Case Filing Fee

8. **Filing Fee.** If the application only addresses one or more of the following, check the appropriate boxes, skip Sections 3 and 4 and proceed directly to Section 5. Otherwise, proceed to Section 3 or 4 as appropriate.

- Addition or replacement of control devices on permitted units.
- Pilot projects/trial burns by a permitted unit \$500
- Land remediation projects
- Revisions related to methodology or timing for emission testing
- Minor administrative-type change to a permit

Section 3: Fees for Current or Projected Non-Major Sources

- 9. This application consists of a single new emission unit or no more than two modified emission units. (\$500 fee) 9. _____
- 10. This application consists of more than one new emission unit or more than two modified units. (\$1,000 fee) 10. _____
- 11. This application consists of a new source or emission unit subject to Section 39.2 of the Act (i.e., Local Siting Review); a commercial incinerator or a municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or an emission unit designated as a complex source by agency rulemaking. (\$15,000 fee) 11. _____
- 12. A public hearing is held (see instructions). (\$10,000 fee) 12. _____
- 13. Section 3 subtotal. (lines 9 through 12 - entered on page 1) 13. _____

Section 4: Fees for Current or Projected Major or Synthetic Minor Sources

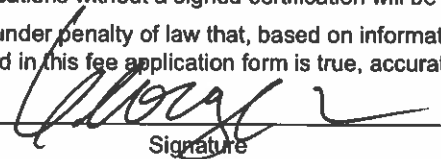
Application contains modified emission units only	14. For the first modified emission unit, enter \$2,000.	14. _____
	15. Number of additional modified emission units = _____ x \$1,000.	15. _____
	16. Line 14 plus line 15, or \$5,000, whichever is less.	16. _____
Application contains new and/or modified emission units	17. For the first new emission unit, enter \$4,000.	17. _____
	18. Number of additional new and/or modified emission units = _____ x \$1,000.	18. _____
	19. Line 17 plus line 18, or \$10,000, whichever is less.	19. _____
Application contains netting exercise	20. Number of individual pollutants that rely on a netting exercise or contemporaneous emissions decrease to avoid application of PSD or nonattainment area NSR = _____ x \$3,000.	20. _____
Additional Supplemental Fees	21. If the new source or emission unit is subject to Section 39.2 of the Act (i.e. siting); a commercial incinerator or other municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or one or more other emission units designated as a complex source by Agency rulemaking, enter \$25,000.	21. _____
	22. If the source is a new major source subject to PSD, enter \$12,000.	22. _____
	23. If the project is a major modification subject to PSD, enter \$6,000.	23. _____
	24. If this is a new major source subject to nonattainment area (NAA) NSR, enter \$20,000.	24. _____
	25. If this is a major modification subject to NAA NSR, enter \$25,000.	25. _____
	26. If the application involves a determination of MACT for a pollutant and the project is not subject to BACT or LAER for the related pollutant under PSD or NSR (e.g., VOM for organic HAP), enter \$5,000 per unit for which a determination is requested or otherwise required. _____ x \$5,000.	26. _____
	27. If a public hearing is held (see instructions), enter \$10,000.	27. _____
28. Section 4 subtotal (line 16 and lines 19 through 28) to be entered on page 1		28. _____

Section 5: Certification

NOTE: Applications without a signed certification will be deemed incomplete.

29. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the information contained in this fee application form is true, accurate and complete.

by:


 Signature
 George Malamis
 Typed or Printed Name of Signatory

General Manager - Midwest
 Title of Signatory
 12-17-2021
 Date

DEC 20 2021

Environmental Protection Agency
BUREAU OF AIR



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Construction Permit Application For a FESOP Source (FORM APC628)	For Illinois EPA use only
	BOA ID No.: 031600 FFO
	Application No.: 21120017
	Date Received: 12-20-2021

This form is to be used to supply information to obtain a construction permit for a proposed project involving a Federally Enforceable State Operating Permit (FESOP) or Synthetic Minor source, including construction of a new FESOP source. Other necessary information must accompany this form as discussed in the "General Instructions For Permit Applications," Form APC-201.

Proposed Project	
1. Working Name of Proposed Project: Shredder Control Device Installation	
2. Is the project occurring at a source that already has a permit from the Bureau of Air (BOA)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If Yes, provide BOA ID Number: 031600FFO	
3. Does this application request a revision to an existing construction permit issued by the BOA? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, provide Permit Number: _____	
4. Does this application request that the new/modified emission units be incorporated into an existing FESOP issued by the BOA? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, provide Permit Number: _____	

Source Information		
5. Source name:*		
Metal Management Midwest, Inc.		
6. Source street address:*		
2500 South Paulina Street		
7. City:	8. County:	9. Zip code:
Chicago	Cook	60608
ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.		
10. Is the source located within city limits? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, provide Township Name: _____		
11. Description of source and product(s) produced: Metals Recycling		12. Primary Classification Code of source: SIC: 5093 _____ or NAICS: _____
13. Latitude (DD:MM:SS.SSSS): 41:50:54.5238		14. Longitude (DD:MM:SS.SSSS): -87:40:03.921

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Applicant Information	
15. Who is the applicant? <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator	16. All correspondence to: (check one) <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator <input type="checkbox"/> Source
17. Applicant's FEIN: 36-2582686	18. Attention name and/or title for written correspondence: Debbie Hays

Owner Information*		
19. Name: Metal Management Midwest, Inc. d/b/a Sims Metal Management		
20. Address: 2500 South Paulina Street		
21. City: Chicago	22. State: IL	23. Zip code: 60608

* If this information different than previous information, then complete Form 272-CAAPP for a Request for Ownership Change for CAAPP Permit for an initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Operator Information (If Different from Owner)*		
24. Name Metal Management Midwest, Inc. d/b/a Sims Metal Management		
25. Address: 2500 South Paulina Street		
26. City: Chicago	27. State: IL	28. Zip code: 60608

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Technical Contacts for Application	
29. Preferred technical contact: (check one) <input checked="" type="checkbox"/> Applicant's contact <input type="checkbox"/> Consultant	
30. Applicant's technical contact person for application: Debbie Hays	
31. Contact person's telephone number (773) 254-1200	32. Contact person's email address: debbie.hays@simsmm.com
33. Applicant's consultant for application: Trinity Consultants	
34. Consultant's telephone number: (847) 809-7864	35. Consultant's email address: RTzuppek@trinityconsultants.com

Review Of Contents of the Application	
36. Is the emission unit covered by this application already constructed? If "yes", provide the date construction was completed:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Note: The Illinois EPA is unable to issue a construction permit for a emission unit that has already been constructed.	
37. Does the application include a narrative description of the proposed project?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
38. Does the application contain a list or summary that clearly identifies the emission units and air pollution control equipment that are part of the project?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
39. Does the application include process flow diagram(s) for the project showing new and modified emission units and control equipment and related existing equipment and their relationships?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
40. If the project is at a source that has not previously received a permit from the BOA, does the application include a source description, plot plan and site map?	<input type="checkbox"/> Yes <input type="checkbox"/> No

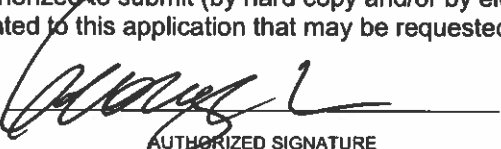
Review Of Contents of the Application (continued)

41. Does the application include relevant information for the proposed project as requested on Illinois EPA, BOA application forms (or otherwise contain all the relevant information)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
42. Does the application identify and address all applicable or potentially applicable emissions standards, including: a. State emission standards (35 IAC Chapter I, Subtitle B); b. Federal New Source Performance Standards (40 CFR Part 60); c. Federal standards for HAPs (40 CFR Parts 61 and 63)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
43. Does the application address whether the proposed project or the source could be a major project for Prevention of Significant Deterioration (PSD), 40 CFR 52.21?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
44. Does the application address for which pollutant(s) the proposed project or the source could be a major project for PSD, 40 CFR 52.21?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
45. Does the application address whether the proposed project or the source could be a major project for "Nonattainment New Source Review," (NA NSR), 35 IAC Part 203?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
46. Does the application address for which pollutant(s) the proposed project or the source could be a major project for NA NSR, 35 IAC Part 203?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
47. Does the application address whether the proposed project or the source could potentially be subject to federal Maximum Achievable Control Technology (MACT) standard under 40 CFR Part 63 for Hazardous Air Pollutants (HAP) and identify the standard that could be applicable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Source not major <input type="checkbox"/> Project not major <input type="checkbox"/>
48. Does the application identify the HAP(s) from the proposed project or the source that would trigger the applicability of a MACT standard under 40 CFR Part 63?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
49. Does the application include a summary of the current and the future potential emissions of the source after the proposed project has been completed for each criteria air pollutant and/or HAP (tons/year)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Applicability of PSD, NA NSR or 40 CFR 63 not applicable to the source's emissions.
50. Does the application include a summary of the requested permitted annual emissions of the proposed project for the new and modified emission units (tons/year)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Project does not involve an increase in emissions from new or modified emission units.
51. Does the application include a summary of the requested permitted production, throughput, fuel, or raw material usage limits that correspond to the annual emissions limits of the proposed project for the new and modified emission units?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Project does not involve an increase in emissions from new or modified emission units.
52. Does the application include sample calculations or methodology for the emission estimations and the requested emission limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
53. Does the application address the relationships with and implications of the proposed project for the source's FESOP?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A* *FESOP not yet issued.
54. If the application contains information that is considered a TRADE SECRET, has such information been properly marked and claimed and other requirements to perfect such a claim been satisfied in accordance with 35 IAC Part 130?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A* * No information in the application is claimed to be a TRADE SECRET

Note: "Claimed information will not be legally protected from disclosure to the public if it is not properly claimed or does not qualify as trade secret information.

Review Of Contents of the Application (continued)	
55. If the source is located in a county other than Cook County, are two separate copies of this application being submitted?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
56. If the source is located in Cook County, are three separate copies of this application being submitted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
57. Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, for the emission units and control equipment for which a permit for construction or modification is being sought?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
58. Does the application include a check in the proper amount for payment of the Construction permit fee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Note: Answering "No" to Items 36 through 58 may result in the application being deemed incomplete.

Signature Block
Pursuant to 35 IAC 201.159, all applications and supplements thereto shall be signed by the owner and operator of the source, or their authorized agent, and shall be accompanied by evidence of authority to sign the application. Applications without a signed certification will be deemed incomplete.
<p>59. Authorized Signature:</p> <p>I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete and that I am a responsible official for the source, as defined by Section 39.5(1) of the Environmental Protection Act. In addition, the technical contact person identified above is authorized to submit (by hard copy and/or by electronic copy) any supplemental information related to this application that may be requested by the Illinois EPA.</p> <p>BY: <u></u> <u>General Manager-Midwest</u> <small>AUTHORIZED SIGNATURE</small> <small>TITLE OF SIGNATORY</small></p> <p><u>George Malamis</u> <u>12 17 2021</u> <small>TYPED OR PRINTED NAME OF SIGNATORY</small> <small>DATE</small></p>



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
 P.O. BOX 19506
 SPRINGFIELD, ILLINOIS 62794-9506

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Revision #: _____
 Date: ____ / ____ / ____
 Page ____ of ____
 Source Designation: _____

PROCESS EMISSION UNIT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	EMISSION POINT #:
	DATE:

SOURCE INFORMATION	
1) SOURCE NAME: Metal Management Midwest, Inc.	
2) DATE FORM PREPARED: December 2021	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF EMISSION UNIT: Hammermill Shredder	
5) NAME OF PROCESS: Automobile Shredder	
6) DESCRIPTION OF PROCESS: Hammermill Shredder	
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: Automobile Shredder	
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT:	
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN): Newell Corp.	
10) MODEL NUMBER (IF KNOWN): 98 X 104	11) SERIAL NUMBER (IF KNOWN):
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR): 2012
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? YES NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

Proposed controls for the shredder include a cyclone, venturi scrubber for particulate control. Additionally, a VRTO is being proposed for VOM control and a DSI scrubber for HCl and HF control.

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? YES NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

Planned maintenance (1 hour for every hour of operation) and mechanical availability limit the Hammermill operation.

OPERATING INFORMATION				
18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.				
19a) MAXIMUM OPERATING HOURS	HOURS/DAY: 10	DAYS/WEEK:	WEEKS/YEAR:	
b) TYPICAL OPERATING HOURS	HOURS/DAY: 10	DAYS/WEEK: 6	WEEKS/YEAR: 52	
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25	SEP-NOV(%): 25

MATERIAL USAGE INFORMATION				
21a) RAW MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
Automobile, appliances, sheet metal	400,000	371,900	380,000	371,900

21b) PRODUCTS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
Shredder Ferrous	280,000		266,000	
Shredder Residue				
Non-Ferrous	120,000		114,000	

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR

FUEL USAGE DATA		
22a) MAXIMUM FIRING RATE (MILLION BTU/HR): N/A	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):
d) FUEL TYPE: <input type="checkbox"/> NATURAL GAS <input type="checkbox"/> FUEL OIL: GRADE NUMBER _____ <input type="checkbox"/> COAL <input type="checkbox"/> OTHER _____ IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.		
e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %, NA FOR NATURAL GAS):	
g) TYPICAL ASH CONTENT (WT %, NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):	
23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? <input type="checkbox"/> YES <input type="checkbox"/> NO IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:		

APPLICABLE RULES

24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(i)(4), 3.5 LBS/GAL):

REGULATED AIR POLLUTANT(S)

EMISSION STANDARD(S)

REQUIREMENT(S)

See Application Narrative

25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

RECORDKEEPING RULE(S)

REQUIREMENT(S)

See Application Narrative

26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

REPORTING RULE(S)

REQUIREMENT(S)

See Application Narrative

27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

MONITORING RULE(S)

REQUIREMENT(S)

See Application Narrative

28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)

TESTING RULE(S)

REQUIREMENT(S)

See Application Narrative

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE?

YES NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?

YES NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

N/A

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Periodic maintenance inspections, maintain records that demonstrate compliance i.e. maintenance records, throughput, water usage, differential air pressure, monthly/annual emissions.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Mat. Thrput.	ton/mo & tpy	Weight	Daily
Diff. Pressure	in. H2O	Pressure Gauge	Continuous
RTO Temp.	F	Thermocouple	Continuous
Emissions	ton/mo & tpy	Calculated	Up to daily
Inspections	Periodic obs.	Periodic observations	Up to daily

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Material	Production Logs	Plant Manager	SHEC Director
Diff. Pressure	Electronic	Plant Manager	SHEC Director
RTO Temp.	Electronic	Plant Manager	SHEC Director
Emissions	Spreadsheets	SHEC Director	SHEC Director
Inspections	Logs	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO
 IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO
 IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure drop across cyclone and venturi scrubbers
 VRTO combustion chamber temperature
 Pressure drop across DSI scrubber

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

Pressure drop across cyclone and venturi scrubbers
 VRTO combustion chamber temperature
 Pressure drop across DSI scrubber

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

Differential Pressure - Inlet and outlet of cyclone and venturi scrubber
 Combustion chamber temperature - combustion chamber
 Differential Pressure - Inlet and outlet of DSI scrubber

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

YES NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

YES NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION?

YES NO

IF NO, EXPLAIN:

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
9/2019	25A	Mostardi Platt	210 tph	0.117 lb/ton

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY.

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Annual Emissions	AER	May 1st, annually

(37)EMISSION INFORMATION

REGULATED AIR POLLUTANT	<input type="checkbox"/> ¹ ACTUAL EMISSION RATE <input type="checkbox"/> ¹ UNCONTROLLED EMISSION RATE		ALLOWABLE BY RULE EMISSION RATE				PERMITTED EMISSION RATE		
	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	³ OTHER TERMS	⁴ DM	5RATE (UNITS)	APPLICABLE RULES	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:					()			
	TYPICAL:					()			
LEAD	MAXIMUM:					()			
	TYPICAL:					()			
NITROGEN OXIDES (NOx)	MAXIMUM:					()			
	TYPICAL:					()			
PARTICULATE MATTER (PART)	MAXIMUM:					()			
	TYPICAL:					()			
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:					()			
	TYPICAL:					()			
SULFUR DIOXIDE (SO2)	MAXIMUM:					()			
	TYPICAL:					()			
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:					()			
	TYPICAL:					()			
OTHER, SPECIFY:	MAXIMUM:					()			
	TYPICAL:					()			
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		6.0 (LBS/HR)	212.321	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		5.5 (LBS/HR)	212.321		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

¹CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED. OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.

²PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.

³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)

⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)

⁵RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

NAME OF HAP EMITTED	CAS NUMBER	1 ACTUAL EMISSION RATE 1 UNCONTROLLED EMISSION RATE				ALLOWABLE BY RULE	
		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
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		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE:	71432	MAXIMUM:	10.0	1.2			CFR 61
<i>Benzene</i>		TYPICAL:	8.0	0.8	2		61.302(b),(d)

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.
 1 PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
 2 CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GRIDSCF, ETC.).
 4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
 5 RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT:

See 260 CAAPP for DSI Scrubber for exhaust point information

40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

42) DISCHARGE HEIGHT ABOVE GRADE (FT):

43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

49a) LATITUDE:	b) LONGITUDE:	
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



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AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION	
1) SOURCE NAME: Hammermill Shredder Plant	
2) DATE FORM PREPARED: 12/01/21	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Cyclone	
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Cyclone	
6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN): Hammermills International	
7) MODEL NUMBER (IF KNOWN): Custom Built	8) SERIAL NUMBER (IF KNOWN): Custom Built
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Hammermill Shredder	

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION?

YES NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

260d-CAAPP (Cyclone)

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION?

YES NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)

Refer to application narrative

EMISSION STANDARD(S)

REQUIREMENT(S)

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

RECORDKEEPING RULE(S)

REQUIREMENT(S)

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

REPORTING RULE(S)

REQUIREMENT(S)

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

MONITORING RULE(S)

REQUIREMENT(S)

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)

Refer to application narrative

TESTING RULE(S)

REQUIREMENT(S)

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COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?



YES



NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Performace testing to measure PM emissions at the exhaust of the control train.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Ongoing compliance will be demonstrated through monitoring of required parameters.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Pressure drop	in. of water	Pressure gauge	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Pressure drop	Operator Log	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure Drop

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Pressure drop

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Inlet and outlet of the cyclone

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? YES NO
 IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? YES NO
 IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION? YES NO
 IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

The shredder will be enclosed, emissions will be routed to the cyclone, the venturi scrubber, the VRTO, and then the DSI Scrubber.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION?

YES NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
	(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i PM	100%	100%	99%	99%	99%	99%
ii						
iii						

99% PM control efficiency represents combined control efficiency for cyclone and venturi scrubber.

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE: Permanent Total Enclosure (Method 204)	N/A
CONTROL: Manufacturer Guarantee	N/A
OVERALL: Manufacturer Guarantee	N/A

c) REQUIRED PERFORMANCE:

REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i				
ii				
iii				

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(31) EMISSION INFORMATION

REGULATED AIR POLLUTANT	1 ACTUAL EMISSION RATE						ALLOWABLE BY RULE EMISSION RATE			2 PERMITTED EMISSION RATE	
	MAXIMUM:	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	3 OTHER TERMS	4 DM	5 RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	TYPICAL:						()				
LEAD	MAXIMUM:						()				
	TYPICAL:						()				
NITROGEN OXIDES (NOx)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER (PART)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						()				
	TYPICAL:						()				
SULFUR DIOXIDE (SO2)	MAXIMUM:						()				
	TYPICAL:						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						()				
	TYPICAL:						()				
OTHER, SPECIFY:	MAXIMUM:						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

¹ PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).

² PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.

³ PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)

⁴ DM - DETERMINATION METHOD: 1) STACK TEST; 2) MATERIAL BALANCE; 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS); 4) ENGINEERING ESTIMATE; 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)

⁵ RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE

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(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		1 ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	2 CAS NUMBER	POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE:	71432	10.0	1.2		2	98% by wt control device	CFR 61
Benzene		8.0	0.8		2	leak-tight trucks	61.302(b), (d)

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

1) PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
2) CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
3) PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
4) DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
5) RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

Vents to Venturi Scrubber, then VRTO, then DSI Scrubber

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

38) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
------------------------	--------------------	--------------------

39) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):
--------------------------	------------------	------------------

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	
f)	
g)	

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:	b) LONGITUDE:
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45) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
 P.O. BOX 19506
 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
 Date: ____ / ____ / ____
 Page _____ of _____
 Source Designation: _____

AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION	
1) SOURCE NAME: Hammermill Shredder Plant	
2) DATE FORM PREPARED: 12/01/21	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Venturi Scrubber	
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Venturi Scrubber	
6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN): Hammermills International	
7) MODEL NUMBER (IF KNOWN): Custom Built	8) SERIAL NUMBER (IF KNOWN): Custom Built
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE _____

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FOR APPLICANT'S USE

11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Hammermill Shredder	
Cyclone	

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION? YES NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

260h-CAAPP (Venturi Scrubber)

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION? YES NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)

Refer to application narrative

EMISSION STANDARD(S)

REQUIREMENT(S)

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

RECORDKEEPING RULE(S)

REQUIREMENT(S)

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

REPORTING RULE(S)

REQUIREMENT(S)

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

MONITORING RULE(S)

REQUIREMENT(S)

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)

Refer to application narrative

TESTING RULE(S)

REQUIREMENT(S)

COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? YES NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Performace testing to measure PM emissions at the exhaust of the control train.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Ongoing compliance will be demonstrated through monitoring of required parameters.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Pressure drop	in. of water	Pressure gauge	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Pressure drop	Operator Log	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure Drop

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Pressure Drop

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Inlet and outlet of the venturi scrubber

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE? YES NO
 IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS? YES NO
 IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION? YES NO
 IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):
 The shredder will be enclosed, emissions will be routed to the cyclone, the venturi scrubber, the VRTO, and then the DSI Scrubber.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION?

YES NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i	PM	100%	100%	99%	99%	99%	99%
ii							
iii							

99% PM control efficiency represents combined control efficiency for cyclone and venturi scrubber.

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE: Permanent Total Enclosure (Method 204)	N/A
CONTROL: Manufacturer Guarantee	N/A
OVERALL: Manufacturer Guarantee	N/A

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i					
ii					
iii					

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(3) EMISSION INFORMATION

REGULATED AIR POLLUTANT	1 ACTUAL EMISSION RATE						ALLOWABLE BY RULE EMISSION RATE			2 PERMITTED EMISSION RATE	
	MAXIMUM:	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	3 OTHER TERMS	4 DM	5 RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						()				
	TYPICAL:						()				
LEAD	MAXIMUM:						()				
	TYPICAL:						()				
NITROGEN OXIDES (NOx)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER (PART)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER ≤ 10 MICROMETERS (PM10)	MAXIMUM:						()				
	TYPICAL:						()				
SULFUR DIOXIDE (SO2)	MAXIMUM:						()				
	TYPICAL:						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						()				
	TYPICAL:						()				
OTHER, SPECIFY:	MAXIMUM:						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
 2 PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
 4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
 5 RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		1 ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	2 CAS NUMBER	POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE:	71432	10.0	1.2		2	98% by wt control device	CFR 61
Benzene		8.0	0.8		2	leak-tight trucks	61.302(b),(d)

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
 2 CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
 4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
 5 RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

Vents to VRTO, then DSI Scrubber

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

38) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
39) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	
f)	
g)	

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:	b) LONGITUDE:	
45) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
 P.O. BOX 19506
 SPRINGFIELD, ILLINOIS 62794-9506

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Revision #: _____
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 Source Designation: _____

AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION	
1) SOURCE NAME: Hammermill Shredder Plant	
2) DATE FORM PREPARED: 12/01/21	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: Valveless Regenerative Thermal Oxidizer	
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: VRTO	
6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN): Zenvirotech	
7) MODEL NUMBER (IF KNOWN): Custom Built	8) SERIAL NUMBER (IF KNOWN): Custom Built
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Hammermill Shredder	
Cyclone	
Venturi Scrubber	

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION?

YES

NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

260b-CAAPP (VRTO)

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION?

YES

NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)

Refer to application narrative

EMISSION STANDARD(S)

REQUIREMENT(S)

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

RECORDKEEPING RULE(S)

REQUIREMENT(S)

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

REPORTING RULE(S)

REQUIREMENT(S)

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

MONITORING RULE(S)

REQUIREMENT(S)

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

TESTING RULE(S)

REQUIREMENT(S)

COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? YES NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Stack testing for VOM control efficiency will be performed to demonstrate compliance with VOM emission limits.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Ongoing compliance will be demonstrated through monitoring of required parameters.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Combustion temp	deg F	Thermocouple	Continuous
LEL	% of LEL	Flammability Monitor	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Combustion tem	Electronic	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Combustion chamber temperature
Flammability Monitor

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Combustion chamber temperature
% LEL

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Combustion chamber
The flammability monitor will be placed in ductwork between the cyclone and the venturi scrubber

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

YES NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

The LEL monitor will not be equipped with a recording device.

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

YES NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION?

YES NO

IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

The shredder will be enclosed, emissions will be routed to the cyclone, the venturi scrubber, the VRTO, and then the DSI Scrubber.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION? YES NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i	VOM	100%	100%	90%	98%	90%	98%
ii							
iii							

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE: Permanent Total Enclosure (Method 204)	N/A
CONTROL: Manufacturer Guarantee	N/A
OVERALL: Manufacturer Guarantee	N/A

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i					
ii					
iii					

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(3) EMISSION INFORMATION

REGULATED AIR POLLUTANT	1 ACTUAL EMISSION RATE						2 PERMITTED EMISSION RATE			
	MAXIMUM:	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	TYPICAL:					()				
	MAXIMUM:					()				
LEAD	TYPICAL:					()				
	MAXIMUM:					()				
NITROGEN OXIDES (NOx)	TYPICAL:					()				
	MAXIMUM:					()				
PARTICULATE MATTER (PART)	TYPICAL:					()				
	MAXIMUM:					()				
PARTICULATE MATTER ≤ 10 MICROMETERS (PM10)	TYPICAL:					()				
	MAXIMUM:					()				
SULFUR DIOXIDE (SO2)	TYPICAL:					()				
	MAXIMUM:					()				
VOLATILE ORGANIC MATERIAL (VOM)	TYPICAL:					()				
	MAXIMUM:					()				
OTHER, SPECIFY:	TYPICAL:					()				
	MAXIMUM:					()				
EXAMPLE: PARTICULATE MATTER	TYPICAL:	4.00	14.4	0.24 GR/DSCF	4	5.5 (LBS/HR)	212.321	19.80	5.5 LBS/HR	22
	MAXIMUM:	5.00	21.9	0.3 GR/DSCF	1	6.0 (LBS/HR)	212.321	26.28	6.0 LBS/HR	22

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

- 1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
- 2 PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
- 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
- 4 DM - DETERMINATION METHOD: 1) STACK TEST. 2) MATERIAL BALANCE. 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS). 4) ENGINEERING ESTIMATE. 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
- 5 RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE

(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		1 ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	2 CAS NUMBER	POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE: Benzene	71432	10.0	1.2		2	98% by wt control device leak-tight trucks	CFR 61 61.302(b),(d)
		8.0	0.8		2		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

- 1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
- 2 CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
- 3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
- 4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
- 5 RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

Vents to DSI Scrubber

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

38) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
39) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME	FLOW DIAGRAM DESIGNATION
a)	
b)	
c)	
d)	
e)	
f)	
g)	

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:	b) LONGITUDE:	
45) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 DIVISION OF AIR POLLUTION CONTROL – PERMIT SECTION
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 SPRINGFIELD, ILLINOIS 62794-9506

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 Source Designation: _____

AIR POLLUTION CONTROL EQUIPMENT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

THIS FORM MUST BE COMPLETED FOR EACH AIR POLLUTION CONTROL EQUIPMENT. COMPLETE AND PROVIDE THIS FORM IN ADDITION TO THE APPLICABLE ADDENDUM FORM 260-A THROUGH 260-K. A SEPARATE FORM MUST BE COMPLETED FOR EACH MODE OF OPERATION OF AIR POLLUTION CONTROL EQUIPMENT FOR WHICH A PERMIT IS BEING SOUGHT.

SOURCE INFORMATION	
1) SOURCE NAME: Hammermill Shredder Plant	
2) DATE FORM PREPARED: 12/01/21	3) SOURCE ID NO. (IF KNOWN): 031600FFO

GENERAL INFORMATION	
4) NAME OF AIR POLLUTION CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: DSI Scrubber with Dry Sorbent Fabric Filter Baghouse	
5) FLOW DIAGRAM DESIGNATION OF CONTROL EQUIPMENT AND/OR CONTROL SYSTEM: DSI Scrubber	
6) MANUFACTURER OF CONTROL EQUIPMENT (IF KNOWN): Zenvirotech	
7) MODEL NUMBER (IF KNOWN): Custom Built	8) SERIAL NUMBER (IF KNOWN): Custom Built
9) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EQUIPMENT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR):
	b) OPERATION (MONTH/YEAR):
	c) LATEST MODIFICATION (MONTH/YEAR):
10) BRIEFLY DESCRIBE MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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11) LIST ALL EMISSION UNITS AND OTHER CONTROL EQUIPMENT DUCTING EMISSIONS TO THIS CONTROL EQUIPMENT:

NAME	DESIGNATION OR CODE NUMBER
Hammemill Shredder	
Cyclone	
Venturi Scrubber	
VRTO	

12) DOES THE CONTROL EQUIPMENT HAVE MORE THAN ONE MODE OF OPERATION? YES NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE AIR POLLUTION CONTROL EQUIPMENT FORM 260-CAAPP MUST BE COMPLETED FOR EACH MODE):

13) IDENTIFY ALL ATTACHMENTS TO THIS FORM RELATED TO THIS AIR POLLUTION CONTROL EQUIPMENT (E.G., TECHNICAL DRAWINGS):

260h-CAAPP (DSI Scrubber)

OPERATING SCHEDULE

14) IDENTIFY ANY PERIOD WHEN THE CONTROL EQUIPMENT WILL NOT BE OPERATING DUE TO SCHEDULED MAINTENANCE AND/OR REPAIRS WHEN THE FEEDING EMISSION UNIT(S) TO THIS CONTROL EQUIPMENT IS/ARE IN OPERATION:

N/A

15a) IDENTIFY ANY PERIODS DURING OPERATION OF THE FEEDING EMISSION UNIT(S) WHEN THE CONTROL EQUIPMENT IS/ARE NOT USED:

N/A

b) IS THIS CONTROL EQUIPMENT IN OPERATION AT ALL OTHER TIMES THAT THE FEEDING EMISSION UNIT(S) IS/ARE IN OPERATION? YES NO

IF NO, EXPLAIN AND PROVIDE THE DURATION OF THE CONTROL EQUIPMENT DOWNTIME:

APPLICABLE RULES

16) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.207(b)(1), 81% OVERALL & 90% CONTROL DEVICE EFF.):

REGULATED AIR POLLUTANT(S)

Refer to application narrative

EMISSION STANDARD(S)

REQUIREMENT(S)

17) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

RECORDKEEPING RULE(S)

REQUIREMENT(S)

18) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

REPORTING RULE(S)

REQUIREMENT(S)

19) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

MONITORING RULE(S)

REQUIREMENT(S)

20) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)

Refer to application narrative

TESTING RULE(S)

REQUIREMENT(S)

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COMPLIANCE INFORMATION

21) IS THE CONTROL SYSTEM IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?



YES



NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE – ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

22) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

Stack testing for HCl and HF control efficiency of the DSI scrubber.

23) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

Ongoing compliance will be demonstrated through monitoring of required parameters.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

24a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Pressure Drop	in. of water	Pressure Gauge	Continuous

24b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Pressure drop	Operator Log	Plant Manager	SHEC Director

c) IS COMPLIANCE OF THE CONTROL EQUIPMENT READILY DEMONSTRATED BY REVIEW OF THE RECORDS? YES NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND/OR SUBMITTAL TO THE AGENCY UPON REQUEST? YES NO

IF NO, EXPLAIN:

25a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

Pressure Drop across scrubber

The DSI Scrubber is equipped with a sorbent collection fabric filter baghouse. This baghouse will include a bag leak detection system (BLDS) which will monitor and alarm (as needed) for abnormal operations/malfunctions within the baghouse.

b) WHAT OPERATING PARAMETER(S) IS(ARE) BEING MONITORED (E.G., COMBUSTION CHAMBER TEMPERATURE)?

Pressure Drop across scrubber

Bag Leak Detection System

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., EXIT OF COMBUSTION CHAMBER):

Inlet and outlet of the scrubber

Baghouse

25d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

YES NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

The BLDS is not equipped with a recording device. The pressure drop across the DSI scrubber will be recorded.

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

YES NO

IF NO, EXPLAIN:

f) IS EACH MONITOR OPERATED AT ALL TIMES THE CONTROL EQUIPMENT IS IN OPERATION?

YES NO

IF NO, EXPLAIN:

26) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-1:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
N/A				

27) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY

CAPTURE AND CONTROL

28) DESCRIBE THE CAPTURE SYSTEM USED TO CONTAIN, COLLECT AND TRANSPORT EMISSIONS TO THE CONTROL EQUIPMENT. INCLUDE ALL HOODS, DUCTS, FANS, ETC. ALSO INCLUDE THE METHOD OF CAPTURE USED AT EACH EMISSION POINT. (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 260-2):

The shredder will be enclosed, emissions will be routed to the cyclone, the venturi scrubber, the VRTO, and then the DSI Scrubber.

29) ARE FEATURES OF THE CAPTURE SYSTEM ACCURATELY DEPICTED IN THE FLOW DIAGRAM CONTAINED IN THIS APPLICATION? YES NO

IF NO, A SKETCH SHOWING THE FEATURES OF THE CAPTURE SYSTEM SHOULD BE ATTACHED AND LABELED AS EXHIBIT 260-3:

30) PROVIDE THE ACTUAL (MINIMUM AND TYPICAL) CAPTURE SYSTEM EFFICIENCY, CONTROL EQUIPMENT DESTRUCTION/REMOVAL EFFICIENCY, AND THE OVERALL REDUCTION EFFICIENCY PROVIDED BY THE COMBINATION OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT FOR EACH REGULATED AIR POLLUTANT TO BE CONTROLLED. ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH THESE EFFICIENCIES WERE BASED AND LABEL AS EXHIBIT 260-4:

a) CONTROL PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)		CONTROL EQUIPMENT EFFICIENCY (%)		OVERALL REDUCTION EFFICIENCY (%)	
		(MIN)	(TYP)	(MIN)	(TYP)	(MIN)	(TYP)
i	HCl/HF	100%	100%	90%	90%	90%	90%
ii							
iii							

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

b) METHOD USED TO DETERMINE EACH OF THE ABOVE EFFICIENCIES (E.G., STACK TEST, MATERIAL BALANCE, MANUFACTURER'S GUARANTEE, ETC.) AND THE DATE LAST TESTED, IF APPLICABLE:

EFFICIENCY DETERMINATION METHOD	DATE LAST TESTED
CAPTURE: Permanent Total Enclosure (Method 204)	N/A
CONTROL: Manufacturer Guarantee	N/A
OVERALL: Manufacturer Guarantee	N/A

c) REQUIRED PERFORMANCE:

	REGULATED AIR POLLUTANT	CAPTURE SYSTEM EFFICIENCY (%)	CONTROL EQUIPMENT EFFICIENCY (%)	OVERALL REDUCTION EFFICIENCY (%)	APPLICABLE RULE
i					
ii					
iii					

iv. EXPLAIN ANY OTHER REQUIRED LIMITS ON CONTROL EQUIPMENT PERFORMANCE SUCH AS OUTLET CONCENTRATION, COOLANT TEMPERATURE, ETC.:

(31)EMISSION INFORMATION

REGULATED AIR POLLUTANT	1 ACTUAL EMISSION RATE						ALLOWABLE BY RULE EMISSION RATE			2 PERMITTED EMISSION RATE	
	MAXIMUM:	LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	3 OTHER TERMS	4 DM	5 RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	TYPICAL:						()				
LEAD	MAXIMUM:						()				
	TYPICAL:						()				
NITROGEN OXIDES (NOx)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER (PART)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						()				
	TYPICAL:						()				
SULFUR DIOXIDE (SO2)	MAXIMUM:						()				
	TYPICAL:						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						()				
	TYPICAL:						()				
OTHER, SPECIFY:	MAXIMUM:						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-5.

1 PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).

2 PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.

3 PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)

4 DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)

5 RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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(32) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		1 ACTUAL EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	2 CAS NUMBER	POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	3 OTHER TERMS	4 DM	5 RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
		MAXIMUM:					
		TYPICAL:					
EXAMPLE:							
Benzene	71432	10.0	1.2			98% by wt control device	CFR 61
		8.0	0.8			leak-tight trucks	61.302(b),(d)

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 260-6.

1) PROVIDE CONTROLLED EMISSIONS (E.G., THE EMISSIONS THAT WOULD RESULT AFTER ALL CONTROL AND CAPTURE EFFICIENCIES ARE ACCOUNTED FOR).
 2) CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
 3) PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).
 4) DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).
 5) RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

33) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.

Stack

34) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):

~115

35) DISCHARGE HEIGHT ABOVE GRADE (FT):

60

36) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):

37) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.

6

38) EXIT GAS FLOW RATE

a) MAXIMUM (ACFM):

110,066

b) TYPICAL (ACFM):

82,257

39) EXIT GAS TEMPERATURE

a) MAXIMUM (°F):

300

b) TYPICAL (°F):

250

40) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):

Vertical

41) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:

NAME

FLOW DIAGRAM DESIGNATION

a) Hammermill Shredder
b) Cyclone
c) Venturi Scrubber
d) VRTO
e) DSI Scrubber
f)
g)

42) WHAT PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS ARE BEING DUCTED TO THIS EXHAUST POINT (%)?

100

43) IF THE PERCENTAGE OF THE CONTROL EQUIPMENT EMISSIONS BEING DUCTED TO THE EXHAUST POINT IS NOT 100%, THEN EXPLAIN WHERE THE REMAINING EMISSIONS ARE BEING EXHAUSTED TO:

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

44a) LATITUDE:

b) LONGITUDE:

45) UTM ZONE:

b) UTM VERTICAL (KM):

c) UTM HORIZONTAL (KM):



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SUPPLEMENTAL FORM AIR POLLUTION CONTROL EQUIPMENT AFTERBURNER (260B)	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT#:
DATE:	

DATA AND INFORMATION	
1) FLOW DIAGRAM DESIGNATION OF AFTERBURNER: <p style="text-align: center;">VRTO</p>	
2) FUEL USED IN BURNERS: <input checked="" type="checkbox"/> NATURAL GAS <input type="checkbox"/> FUEL OIL; NUMBER: _____ <input type="checkbox"/> OTHER, SPECIFY: _____	
3) BURNERS PER AFTERBURNER: 1 AT 14.8 (MILLION BTU/HR, EACH)	
4) MINIMUM COMBUSTION CHAMBER TEMPERATURE (DEGREES FAHRENHEIT): <p style="text-align: right;">1500 F</p>	
5) IS A CATALYST USED?: IF YES, CATALYST MATERIAL: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
6) EXPECTED FREQUENCY OF CATALYST REPLACEMENT: <p style="text-align: center;">N/A</p>	7) DATE CATALYST WAS LAST REPLACED (MONTH/YEAR): <p style="text-align: center;">N/A /</p>
8) EXPLAIN DEGRADATION OR PERFORMANCE INDICATOR CRITERIA DETERMINING CATALYST REPLACEMENT: <p style="text-align: center;">N/A</p>	
9a) IS A HEAT EXCHANGER USED?: IF YES, DESCRIBE: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <p style="text-align: center;">Ceramic media</p>	
b) HEAT EXCHANGER SURFACE AREA (FT ²): <p style="text-align: center;">270</p>	c) AVERAGE THERMAL EFFICIENCY (%): <p style="text-align: center;">90%</p>
10) DESCRIBE METHOD OF GAS MIXING USED: <p style="text-align: center;">Fluid dynamics of VRTO design due to cyclonic mixing</p>	
11) RANGE OF RETENTION TIME: <p style="text-align: center;">>0.5 TO (SEC)</p>	12) COMBUSTION CHAMBER LENGTH (FEET): <p style="text-align: center;">V: 6500 ft3</p>

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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13) COMBUSTION CHAMBER CROSS SECTIONAL AREA (SQURE FEET):

V: 6500 ft³

14) INLET EMISSION STREAM PARAMETERS:

	MAX	TYPICAL
PRESSURE (mmHG):	Ambient	Ambient
HEAT CONTENT (BTU/SCF):	<10 BTU/scf	<5 BTU/scf
OXYGEN CONTENT (%):	Ambient	Ambient
MOISTURE CONTENT (%):	Ambient	Ambient
ARE HALOGENATED ORGANICS PRESENT?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
ARE PARTICULATES PRESENT?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
ARE METALS PRESENT?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

15) AFTERBURNER OPERATING PARAMETERS:

	DURING MAXIMUM OPERATION OF FEEDING UNIT(S)	DURING TYPICAL OPERATION OF FEEDING UNIT(S)
COMBUSTION CHAMBER TEMPERATURE (DEGREES FAHRENHEIT):	1500	1500
INLET GAS TEMPERATURE (DEGREES FAHRENHEIT):	Ambient	Ambient
INLET FLOW RATE (SCFM):	75,000	60,000
EFFICIENCY (VOM REDUCTION):	90 (%)	98 (%)
EFFICIENCY (OTHER; SPECIFY CONTAMINANT: _____):	(%)	(%)

16) FOR THERMAL AFTERBURNERS, IS THE COMBUSTION CHAMBER TEMPERATURE CONTINUOUSLY MONITORED AND RECORDED? YES NO

17) FOR CATALYTIC AFTERBURNERS, IS THE TEMPERATURE RISE ACROSS THE CATALYST BED CONTINUOUSLY MONITORED AND RECORDED? YES NO

18) IS THE VOM CONCENTRATION OF EXHAUST MONITORED AND RECORDED? YES NO

19) IS THE OPERATION OF THE AFTERBURNER DISCONTINUED DURING THE NON-OZONE SEASON (SEPTEMBER 1 TO MAY 31)? YES NO



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SUPPLEMENTAL FORM AIR POLLUTION CONTROL CYCLONE (260D)	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
	DATE:

DATA AND INFORMATION		
1) FLOW DIAGRAM DESIGNATION OF CYCLONE: Cyclone		
2) TYPE OF CYCLONE (CHECK ONE): <input checked="" type="checkbox"/> SIMPLE <input type="checkbox"/> MULTIPLE; NUMBER OF CYCLONES IN EACH: _____ <input type="checkbox"/> WET		
3) FEED METHOD: <input checked="" type="checkbox"/> TANGENTIAL <input type="checkbox"/> AXIAL		
4a) INLET EMISSION STREAM PARAMETERS:		
PARTICULATE INLET LOADING(GRAINS/SCF):	MAX ~0.5	TYPICAL ~0.5
b) MEAN PARTICLE DIAMETER (MICRONS): ~20		
5) CYCLONE OPERATING PARAMETERS:		
	DURING MAXIMUM OPERATION OF FEEDING UNIT(S)	DURING TYPICAL OPERATION OF FEEDING UNIT(S)
INLET FLOW RATE (SCFM):	75,000	60,000
INLET GAS TEMPERATURE (DEGREES F°):	Ambient	Ambient
EFFICIENCY (PM REDUCTION):	99 (%)	99 (%)
EFFICIENCY (PM10 REDUCTION):	99 (%)	99 (%)

99% PM control efficiency represents combined control efficiency for cyclone and venturi scrubber.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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SUPPLEMENTAL FORM AIR POLLUTION CONTROL EQUIPMENT SCRUBBER (260H)	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

NOTE: FOR PACKED COLUMN SCRUBBERS, FORM 260G SHOULD BE COMPLETED RATHER THAN FORM 260H

DATA AND INFORMATION		
1) FLOW DIAGRAM DESIGNATION OF SCRUBBER: Venturi Scrubber		
2) TYPE OF SCRUBBER: Venturi Scrubber		
3) TYPE OF SCRUBBANT USED: Water		
4) IS SCRUBBANT RECYCLED BACK INTO CONTROL SYSTEM? IF YES, DESCRIBE METHOD BY WHICH SCRUBBANT SATURATION IS AVOIDED AND THE DESIRED CONTROL EFFICIENCY IS MAINTAINED: Sampling of scrubber liquid <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
5) TYPICAL PRESSURE DROP (INCHES H ₂ O): ~25		
6) SCRUBBER OPERATING PARAMETERS:		
	DURING MAXIMUM OPERATION OF FEEDING UNIT(S)	DURING TYPICAL OPERATION OF FEEDING UNIT(S)
INLET GAS TEMPERATURE (DEGREES F*):	Ambient	Ambient
INLET GAS FLOW RATE (SCFM):	75,000	60,000
SCRUBBANT RATE (GAL/MIN):	500	500
EFFICIENCY (PM REDUCTION):	99 (%)	99 (%)
EFFICIENCY (OTHER; SPECIFY REGULATED AIR POLLUTANT: _____):	(%)	(%)

99% PM control efficiency represents combined control efficiency for cyclone and venturi scrubber.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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SUPPLEMENTAL FORM AIR POLLUTION CONTROL EQUIPMENT SCRUBBER (260H)	FOR AGENCY USE ONLY
	ID NUMBER:
	CONTROL EQUIPMENT #:
DATE:	

NOTE: FOR PACKED COLUMN SCRUBBERS, FORM 260G SHOULD BE COMPLETED RATHER THAN FORM 260H

DATA AND INFORMATION		
1) FLOW DIAGRAM DESIGNATION OF SCRUBBER: DSI Scrubber with Dry Sorbent Fabric Filter Baghouse		
2) TYPE OF SCRUBBER: Dry Sorbent Injection		
3) TYPE OF SCRUBBANT USED: Hydrated Lime (Ca(OH) ₂)		
4) IS SCRUBBANT RECYCLED BACK INTO CONTROL SYSTEM? IF YES, DESCRIBE METHOD BY WHICH SCRUBBANT SATURATION IS AVOIDED AND THE DESIRED CONTROL EFFICIENCY IS MAINTAINED: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO The hydrated lime is collected in the dry sorbent fabric filter baghouse. Suitable material will be recycled back to the lime storage silo while unsuitable material will not be recycled.		
5) TYPICAL PRESSURE DROP (INCHES H ₂ O): 8 to 9.5 inches water column		
6) SCRUBBER OPERATING PARAMETERS:		
	DURING MAXIMUM OPERATION OF FEEDING UNIT(S)	DURING TYPICAL OPERATION OF FEEDING UNIT(S)
INLET GAS TEMPERATURE (DEGREES F°):	300	250
INLET GAS FLOW RATE (SCFM):	75,000	60,000
SCRUBBANT RATE (GAL/MIN):	1,400 lb/hr	1,120 lb/hr
EFFICIENCY (PM REDUCTION):	N/A (%)	N/A (%)
EFFICIENCY (OTHER; SPECIFY REGULATED AIR POLLUTANT: HCl/HF):	90 (%)	90 (%)

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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APPENDIX B. EMISSION CALCULATIONS

**Table 1: Hammermill Shredder Potential-To-Emit Calculations
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Unit	Emissions (ton/year)						
	NO _x	CO	SO ₂	PM/PM ₁₀ /PM _{2.5}	VOM	Total HAP	Individual HAP (HCl/HF) ¹
Hammer Mill Shredder	--	--	--	0.11	2.18	1.42	0.70
VRTO Combustion	6.36	16.56	0.04	0.48	0.35	0.12	--
Lime Storage Silo	--	--	--	1.58E-03	--	--	--
Shredder Emissions	6.36	16.56	0.04	0.59	2.53	1.54	0.70

¹ The highest emitted HAP from the shredder is HCl and HF (each have the potential to emit 0.70 tpy). The highest emitted HAP from natural gas combustion in the VRTO is hexane, however its emissions are less than HCl/HF from the shredder, so its emissions are not presented here.

**Table 2: Particulate Matter Potential-To-Emit Calculations for Hammermill Shredder
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Plant Component	Maximum Throughput (tons/yr)	PM Emission Factor (lbs/ton)	Potential Annual Emission (lbs/yr)	Potential Annual Emission (tons/yr)	PM Capture & Control Efficiency of cyclone and venturi scrubber	Controlled Annual Emission (tons/yr)
Hammermill	371,900	(1) 0.0573	(2) 21,310	10.65	99%	0.11

NOTES:

- (1) Per Paragraph 36.b of the ACO, the quantity of ELVs and other recyclable metallic material fed into the hammermill shredder must be no more than 50% ELVs by weight.
- (2) Emission factor per Condition 4 of Lifetime Operating Permit 91040059

**Table 3: Volatile Organic Material Potential-To-Emit Calculations for Hammermill Shredder Post Control Implementation
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Annual Shredder Throughput Limit ¹		Shredder VOM Emission Factor ² lb VOM/net ton	Potential to Emit VOM at Paulina Shredder		VRTO VOM Capture and Control Efficiency 90%	VOM Controlled Emissions from RTO ton/year
net tons/year	gross tons/year		lb/year	ton/year		
371,900	332,054	0.117	43,512	21.76		2.18

1. Per Paragraph 36.b of the Administrative Consent Order (ACO), the quantity of end of life vehicles (ELVs) and other recyclable metallic material fed into the hammermill shredder must be no more than 50% ELVs by weight.
2. The emission factor used in this table of the construction permit application is as certified by the testing contractor Mostardi Platt, following implementation of a USEPA approved testing protocol. Upon installation of the control train described in this application, the facility will engage in another emissions test and emissions factor determination.

**Table 4: Hazardous Air Pollutant Potential-To-Emit Calculations for Shredder
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Compound	Potential Emissions			Controlled Emissions	
	lb/ton	lb/hour	ton/year	lb/hour	ton/year
Mercury ¹	5.40E-06	0.001	1.00E-03	1.08E-05	1.00E-05
Beryllium ¹	1.57E-07	3.13E-05	2.91E-05	3.13E-07	2.91E-07
Phosphorus ¹	1.97E-04	0.039	3.66E-02	3.94E-04	3.66E-04
Chromium ¹	9.60E-06	1.92E-03	1.78E-03	1.92E-05	1.78E-05
Cobalt ¹	1.38E-06	2.76E-04	2.56E-04	2.76E-06	2.56E-06
Nickel ¹	8.59E-06	1.72E-03	1.60E-03	1.72E-05	1.60E-05
Arsenic ¹	2.89E-06	5.78E-04	5.37E-04	5.78E-06	5.37E-06
Selenium ¹	1.52E-06	3.03E-04	2.82E-04	3.03E-06	2.82E-06
Cadmium ¹	1.14E-06	2.28E-04	2.12E-04	2.28E-06	2.12E-06
Antimony ¹	3.21E-06	6.42E-04	5.97E-04	6.42E-06	5.97E-06
Lead ^{1,2}	4.19E-05	8.38E-03	7.80E-03	8.38E-05	7.80E-05
Methylene Chloride ³	6.00E-05	0.01	0.01	1.20E-03	1.12E-03
1,1,1-Trichloroethane ³	2.00E-04	0.04	0.04	4.00E-03	3.72E-03
Benzene ³	4.00E-04	0.08	0.07	8.00E-03	7.44E-03
Tetrachloroethene (PCE) ³	2.67E-06	5.33E-04	4.96E-04	5.33E-05	4.96E-05
Trichloroethene (TCE) ³	6.67E-05	0.01	0.01	1.33E-03	1.24E-03
Toluene ³	3.33E-04	0.07	0.06	6.67E-03	6.20E-03
Ethylbenzene ³	6.67E-05	0.01	0.01	1.33E-03	1.24E-03
Styrene ³	1.33E-05	0.003	0.002	2.67E-04	2.48E-04
o-Xylene ³	6.67E-05	0.01	0.01	1.33E-03	1.24E-03
m,p-Xylene ³	1.33E-04	0.03	0.02	2.67E-03	2.48E-03
Hydrogen Chloride ⁴	3.75E-02	7.50	6.97	7.50E-01	0.70
Hydrogen Fluoride ⁴	3.75E-02	7.50	6.97	7.50E-01	0.70

¹ Emission factors based on 9/20/2019 source testing at Paulina Street Facility.

² Lead is conservatively assumed to be lead compounds rather than elemental lead

³ Emission rates, as presented in ISRI Title V Applicability Workbook, Table D-11.F (As seen in Appendix E).

⁴ HCl and HF emissions based on manufacturer guarantee of maximum 15 lb/hr combined entering DSI Scrubber.

⁵ Per Paragraph 36.b of the ACO, the quantity of ELVs and other recyclable metallic material fed into the hammermill shredder must be no more than 50% ELVs by weight.

**Table 5: RTO Combustion Potential-To-Emit Calculations for Shredder
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Input

Heat input ¹	14.8	MMBtu/hour
Hours of operation	8760	hours/year
Natural Gas Heat Content ²	1020	BTU/scf

¹ Estimated VRTO burner size.

² Natural gas heat content per AP-42 Section 1.4, Table 1.4-1, footnote a.

Potential Criteria Emissions for VRTO Combustion

Pollutant	Emission Factor ¹ (lb/MMscf)	Uncontrolled emissions	
		(lb/hr)	(tpy)
PM ²	7.60	0.11	0.48
PM ₁₀ ²	7.60	0.11	0.48
PM _{2.5} ²	7.60	0.11	0.48
VOM	5.50	7.98E-02	0.35
CO ³	84.00	3.78	16.56
NO _x	100.00	1.45	6.36
SO ₂	0.60	8.71E-03	3.81E-02

¹ Emission factors for natural gas combustion from AP-42 Section 1.4, Tables 1.4-1 and 1.4-2 (July, 1998)

² PM10 and PM2.5 emissions are assumed to be equal to total PM emissions.

³ CO emissions (lb/hr and tpy) reflect combustion in VRTO of both natural gas from VRTO burners and any residual organic material in the hammermill exhaust, calculated on the hypothetical basis of 1% VOM (10,000 ppmv) in the gas stream entering the VRTO: 750 scf VOM/min x 60 min/hr x 0.000084 lbs CO/scf VOM = 3.78 lbs/hr. Emissions testing indicates that the average VOM concentration in the gas stream entering the VRTO will typically be much less, near 100 ppmv.

Potential HAP Emissions for VRTO Combustion

Pollutant	AP-42 Emission Factor ¹ (lb/MMscf)	Uncontrolled emissions	
		(lb/hr)	(tpy)
2-Methylnaphthalene	2.40E-05	3.48E-07	1.53E-06
3-Methylchloanthrene	1.80E-06	2.61E-08	1.14E-07
7,12-Dimethylbenz(a)(anthracene)	1.60E-05	2.32E-07	1.02E-06
Acenaphthene	1.80E-06	2.61E-08	1.14E-07
Acenaphthylene	1.80E-06	2.61E-08	1.14E-07
Anthracene	2.40E-06	3.48E-08	1.53E-07
Benz(a)anthracene	1.80E-06	2.61E-08	1.14E-07
Benzene	2.10E-03	3.05E-05	1.33E-04
Benzo(a)pyrene	1.20E-06	1.74E-08	7.63E-08
Benz(b)fluoranthene	1.80E-06	2.61E-08	1.14E-07
Benzo(g,h,i)perylene	1.20E-06	1.74E-08	7.63E-08
Benzo(k)fluoranthene	1.80E-06	2.61E-08	1.14E-07
Chrysene	1.80E-06	2.61E-08	1.14E-07
Dibenzo(a,h)anthracene	1.20E-06	1.74E-08	7.63E-08
Dichlorobenzene	1.20E-03	1.74E-05	7.63E-05
Fluoranthene	3.00E-06	4.35E-08	1.91E-07
Fluorene	2.80E-06	4.06E-08	1.78E-07
Formaldehyde	7.50E-02	1.09E-03	4.77E-03
Hexane	1.80E+00	2.61E-02	1.14E-01
Indeno(1,2,3-cd)pyrene	1.80E-06	2.61E-08	1.14E-07
Naphthalene	6.10E-04	8.85E-06	3.88E-05
Phenanthrene	1.70E-05	2.47E-07	1.08E-06
Pyrene	5.00E-06	7.25E-08	3.18E-07
Toluene	3.40E-03	4.93E-05	2.16E-04
Arsenic	2.00E-04	2.90E-06	1.27E-05
Beryllium	1.20E-05	1.74E-07	7.63E-07
Cadmium	1.10E-03	1.60E-05	6.99E-05
Chromium	1.40E-03	2.03E-05	8.90E-05
Cobalt	8.40E-05	1.22E-06	5.34E-06
Manganese	3.80E-04	5.51E-06	2.42E-05
Mercury	2.60E-04	3.77E-06	1.65E-05
Nickel	2.10E-03	3.05E-05	1.33E-04
Selenium	2.40E-05	3.48E-07	1.53E-06

¹ Emission factors for natural gas combustion from AP-42 Section 1.4, Tables 1.4-3 and 1.4-4 (July, 1998)

**Table 6: PM Potential-To-Emit Calculations for Lime Storage Silo
2500 S. Paulina Street, Chicago, IL (Site No. 031600FFO)**

Annual Lime Storage Throughput ¹	Silo PM Emission Factor ²	Potential to Emit PM at Lime Storage Silo		Lime Storage Silo PM Control Efficiency	VOM Controlled Emissions from RTO ton/year
		lb/year	ton/year		
96	3.300	317	0.16	99%	0.0016

1. Annual lime storage throughput based on an estimated maximum lime replacement of 8 tons per month.

2. PM emission factor per AP-42 Section 11.17, *Lime Manufacturing*, Table 11.17-4 for product transfer and conveying. A 50% safety factor is included.



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

November 30, 2018

Ms. Deborah Hays
Metal Management Midwest Inc
2500 S. Paulina
Chicago, Illinois 60608

**Subject: City of Chicago Class IVB Recycling Facility Permit (ENVREC104577)
Metal Management Midwest, Inc – 2500 S Paulina St
Effective date: 11/16/2018 to 11/15/2021**

Dear Ms. Hays,

A permit is hereby granted by the City of Chicago Department of Public Health (“CDPH”) to Metal Management Midwest Inc. dba Sims Metal Management (“the Permittee”) to operate a Class IVB Recycling Facility located within the corporate limits of the City of Chicago at 2500 S Paulina St (“the Facility”).

Please carefully review all conditions outlined in this permit. Incorporated into this permit by reference are the following: 1) the application dated September 10, 2018 (“the Application”); and 2) all other supplemental information submitted as part of this application including drawings, sheets, and specifications. In the event of a conflict with said references, the terms and conditions of this permit shall prevail.

The Permittee shall fully comply with Article XX, Chapter 11-4 of the Municipal Code of Chicago (“[the Ordinance](#)”) and the Recycling Facility Rules and Regulations (“[the Regulations](#)”). The Permittee shall also fully comply with the Standard Conditions outlined in Attachment A and the Special Conditions outlined in Attachment B of this permit.

This permit allows for the operation of the Facility from 11/16/2018 through 11/15/2021 upon which time the permit shall terminate by its own terms. On or before 11/15/2021, the Permittee may apply to the CDPH for a new operating permit for the following year. If a subsequent operating permit is applied for on or before 11/21/2018, this permit shall remain in effect until the CDPH acts on the pending permit application. If you have any questions concerning this permit, please contact me at (312) 745-3136.

Sincerely,

Renante Marante
Environmental Engineer III

ATTACHMENT A STANDARD CONDITONS

1. The Permittee shall comply with all applicable local, State, and Federal laws, regulations and standards regarding the construction, operation, maintenance, and closure of the subject Facility, including but not limited to those regulations and standards concerning noise, vibrations, and particulate emissions.
2. Construction, operation, maintenance, and closure of the Facility shall be in accordance with the plans, drawings, and specifications referenced by this permit and included in these Standard Conditions and the Special Conditions.
3. Any changes, modifications, and additions to the Facility=s permit or the approved plans and documentation shall be submitted to the CDPH for review and approval. Such a request shall be made in writing to the CDPH.
4. Issuance of this permit shall not transfer, assign or otherwise affect any liability to the City of Chicago, the CDPH, their employees, or agents as a result of the construction, operation, maintenance, and closure of this Facility.
5. Issuance of this permit does not relieve the Permittee of any liability with regards to the subject Facility.
6. The CDPH or its authorized representatives may inspect the Facility and the Facility records at any reasonable time to ensure compliance with this permit and all applicable rules, regulations, and standards, as well as all conditions necessary to protect the public health and safety.
7. The CDPH may revoke this permit on the basis of any of the grounds set forth in the City of Chicago, CDPH, Article XX Recycling Facility Permits Rules and Regulations.
8. The Permittee shall notify the CDPH of any notices of violations or administrative, civil or criminal citations received by the Facility or any of its operators relating to any alleged violation of any federal, state, or local laws, regulations, standards, or ordinances in the operation of any junk facility, recycling facility, or any other type of waste or recyclable materials handling facility or site. Such notifications shall be provided by email to EnvWastePermits@cityofchicago.org.
9. The Permittee shall provide the CDPH, if so requested, with copies of all correspondence to or from the IEPA and USEPA pertaining to the Facility, including, but not limited to notices of violation, letters, permit applications, reports, groundwater monitoring reports, and annual reports.
10. The Permittee shall comply with all requirements and conditions set forth in this permit. Should any portion of this permit be declared illegal or non-binding, the conditions of the remainder of the permit shall remain in effect.

ATTACHMENT B SPECIAL CONDITIONS

The following Special Conditions are attached to the operating permit for the Metal Management Midwest Inc Class IVB Recycling Facility located at 2500 S Paulina St:

OPERATING HOURS

1. The Permittee may operate 5:00 a.m. to 10:00 p.m. Monday through Friday, and from 5:00 a.m. and 5 p.m. on Saturdays and Sundays. A written waiver pursuant to Section 8 of the [Regulations](#) is implied in the above operating hours. CDPH will explicitly revoke the implied waiver or otherwise amend the Permittee's operating hours and days of operation should facility operations cause a nuisance to neighborhood uses.

MATERIAL HANDLING

2. The Facility is permitted to accept and handle Type A and C recyclable materials consisting of ferrous metal scrap; non-ferrous material; batteries; propane tanks/ cylinder tanks; end-of-life electronics and appliances; used vehicles; and vehicle parts. The Permittee may also receive packaging materials (e.g. cardboard, wood, plastic, etc.) that are shipped with the above-authorized recyclables.

The Facility is not allowed to receive other recyclable materials not explicitly listed above. The Facility shall not accept hazardous special waste, reactive metals, sealed containers, municipal solid waste, or stolen goods. The Permittee shall not accept charred wire unless it is accompanied by proper documentation stating that the material was obtained from a properly licensed company that uses adequate emission control devices for removing the wire coating.

The Permittee shall inspect all loads entering the Facility for unauthorized wastes. Loads containing waste other than recyclable materials as authorized above shall not be accepted at this Facility. The Permittee shall also inspect materials at the shredder stockpile and in-feed area, for unauthorized or potentially explosive materials.

3. The Permittee shall handle all unauthorized wastes inadvertently admitted into the Facility as follows:
 - a. The Permittee shall separately containerize special waste, including hazardous waste, non-hazardous special waste, and PCB waste, and arrange for the immediate removal of such waste by a waste hauler authorized to accept such wastes for transport to a disposal facility that has obtained all necessary Federal, State, and local authorization.
 - b. The Permittee shall isolate reactive metals upon discovery and place such material in a sealed, waterproof container. The Permittee shall arrange for proper disposal of the reactive metals and shall immediately notify the CDPH.
 - c. The Permittee shall isolate all municipal solid waste and properly store such waste in an enclosed waste receptacle for disposal at a properly permitted facility.
 - d. The Permittee shall isolate all suspected stolen property upon discovery and immediately notify the City of Chicago Police Department ("CPD").

ATTACHMENT B SPECIAL CONDITIONS

- e. After unauthorized waste has been removed from the Facility, the Permittee shall thoroughly clean the affected area in a manner consistent with the type of unauthorized waste managed.
4. The Permittee may accept regulated or prohibited recyclable materials as defined in the Ordinance and the Regulations under the following conditions:
 - a. The regulated or prohibited material is consistent with the types of recyclable materials authorized under Special Condition No. 2;
 - b. The Facility is in compliance with all surveillance requirements specified in 11-4-2640(g) of [the Ordinance](#); and
 - c. The Permittee complies with the documentation requirements set forth in Section 9 of [the Regulations](#).
5. The Facility may receive and process no more than 3,000 tons per day of recyclable materials as specified in Special Condition No. 2. If the Permittee desires additional capacity, the Permittee must submit a revised application to the CDPH for approval. A revised application must demonstrate that the Facility is adequately handling the currently permitted volumes and is sufficiently sized and staffed to accept, store, and process the desired quantity of material.
6. When transporting material to and from the site, the material shall fit entirely within the truck or trailer. Additionally, the truck or trailer shall have its tailgates in place, and the load covered with a tarp as necessary to control dust or loss of material.
7. When transporting material to and from the site, the Permittee shall prevent any fluids or material from spilling into the streets.
8. Material handling at the Facility shall be limited to the classification; baling; crushing; cutting; bundling; shredding; stripping; sorting and depolluting of recyclables. The Permittee is authorized to move materials at the Facility with the aid of vehicles, railcars, skid-steers, fork lifts, and cranes. The Permittee is also authorized to operate the equipment and process areas listed in Table One.

Table One

Equipment Description	Number of Items
SHREDDER	1
AREA, MATERIAL PROCESSING	3
BALER	1
STORAGE ROOM, OTHER	1
AREA, GENERAL CONVEYING	1
AREA, TRUCKING	1
AREA, MAINTENANCE	1
SCREEN, OTHER	2
AIR SEPARATORS	3
SORTERS	8
BULK STORAGE PILE	1
BULK LOADING	1
AREA, STORAGE BIN	10
AREA, GENERAL CONVEYING	3

ATTACHMENT B SPECIAL CONDITIONS

USED VEHICLES

9. The Permittee shall thoroughly drain and separately collect all fluids from incoming used vehicles as soon as possible, including fluids from the engine, fuel tank, transmission, radiator, differential, window washing fluid tank, heater core, and all lines and hoses. The Permittee shall use a liquid drainage system that includes the use of funnels or pumps when transferring or disposing of fluids. Fluids must be stored, labeled and managed according to Federal, State, and Local Codes.

TIRES

10. The Permittee shall comply with the Illinois Environmental Protection Act, [415 ILCS 5/55](#) for purposes of storing used tires. The Permittee shall not allow used tires to accumulate for more than 90 days. If the Facility has 100 or more tires on site at any one time, the facility shall comply with the requirements for tire facilities under Section [4-228-305](#) of the Municipal Code.

REFRIGERANTS

11. If the Facility accepts any small appliance, room air conditioning appliance, motor vehicle air conditioner (MVAC), or MVAC-like appliance, as those terms are defined in [40 CFR Part 82 Subpart F](#), where applicable, the Permittee shall comply with all requirements of [40 CFR Section 82.156\(f\)](#) in connection with any such appliance or item. Specifically, the Permittee shall either:
 - a. Verify that the refrigerant was evacuated from the appliance or item in accordance with [40 CFR Section 82.156\(f\)](#) by:
 - i. Obtaining a written and signed statement from each customer stating that all refrigerant was removed in accordance with EPA standards. This statement must include the name and address of the person who removed the refrigerant and the date the refrigerant was removed; or
 - ii. Maintaining a contract between the Permittee and the customer that specifies that refrigerant will be properly removed before delivery.
 - or
 - b. Recover any remaining refrigerant from the appliance in accordance with [40 CFR Section 82.156\(f\)](#) using EPA-certified refrigerant recovery equipment;
12. The Permittee shall not accept any appliance or item that has been previously vented of CFCs without the proper documentation in Special Condition 11(a) above.

BATTERIES

13. The Permittee shall properly dispose of or recycle all batteries offsite within one calendar year of their receipt at the Facility.
14. Batteries shall be stored inside the building, away from sources of heat, spark, and open flame, and isolated from incompatible materials.

ATTACHMENT B SPECIAL CONDITIONS

15. The Permittee shall store batteries inside a non-conducting, leak proof, and acid-resistant container with no evidence of leakage, spillage, or damage. The Permittee shall take all appropriate measures to prevent the batteries from short circuiting. Such measures shall include, but not be limited to, the covering of terminals or individually wrapping each battery in a plastic bag.
16. The Permittee shall label each battery or battery container with any one of the following phrases: i) Universal Waste Batteries; or ii) Waste Batteries; or iii) Used Batteries.
17. The Permittee shall store car batteries as follows:
 - a. Place car batteries on acid resistant pallets. The Permittee shall only use pallets with no broken or missing boards and free of protruding nails.

Working car batteries intended for resale at the Facility may be stored on racks in accordance with Special Condition No. 27;
 - b. Batteries shall be stacked no more than three layers high. Layers of cardboard, waffle board, or similar materials shall be placed between all battery layers, underneath the bottom layer and over the top layer to prevent puncturing and short circuiting.
18. The Permittee shall handle damaged batteries and conduct the clean-up of released acids as follows:
 - a. Damaged or leaking batteries shall be placed in a structurally sound, acid-resistant, and leak-proof container. Such containers shall be kept closed at all times when not placing or removing batteries.
 - b. Spilled acids shall be neutralized with an appropriate base solution, and disposed of properly.

MERCURY SWITCHES AND SENSORS

19. The Permittee shall remove mercury-containing light switches and anti-lock braking system sensors from vehicles manufactured before 2004 using procedures prescribed in IEPA's Recycling Mercury Vehicle Switches in Illinois ("[IEPA mercury manual](#)") guidance manual, the End of Life Vehicle Solutions ([ELVS](#)) website, or pertinent auto manuals.
 20. The Permittee shall store removed switches in a durable screw top plastic bucket that is structurally sound with no evidence of leakage, spillage, or damage. The Permittee shall affix a "Universal Waste" sticker on the outside of the bucket and mark the month, day, and year of the first switch placed inside it.
 21. The Permittee shall send the mercury switch bucket, whether full or not, to a properly permitted recycler offsite within one year of placing the first switch inside the bucket. Upon shipping of the mercury switch bucket offsite, the Permittee shall complete and sign the [IEPA's mercury switch log form](#) and maintain a copy of said record at the Facility.
 22. The Permittee shall maintain mercury spill kits at areas of the Facility where mercury leaks and spills can occur.
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ATTACHMENT B SPECIAL CONDITIONS

MATERIAL STORAGE

23. The Permittee shall store all materials within the permitted property at all times. At no time shall material be stored on neighboring properties or the public way.
24. The Permittee shall maintain a minimum aisle width of 36 inches, or wider to accommodate workers, equipment, cleaning, and emergency response.
25. The Permittee shall handle and store all recyclable materials that may leak fluids or leave an oily residue on a dedicated, impervious concrete pad. The concrete pad shall be sloped, bermed, or otherwise constructed to minimize storm water run-on and run-off and facilitate the capture and collection of fluids. The Permittee must properly dispose of all liquid waste collected at the Facility.
26. The Permittee shall segregate and store recyclable materials in durable receptacles or enclosures such as drums, boxes, bins, or storage bunkers. The Permittee may store recyclables in cardboard boxes provided they are placed indoors, on pallets or otherwise kept off the ground.
27. The Permittee may store recyclable materials on sturdy racks or shelving provided the stored materials are kept at least 18 inches off the ground and are not leaking.
28. The Permittee shall store newsprint, paper, corrugated paper and cardboard in closed containers.
29. The Permittee shall clearly mark all storage receptacles with the type of recyclable material stored. Letters shall not be less than three inches high, outward facing and not hidden. The Permittee shall not deposit other materials than that specified on the receptacle.
30. The Permittee shall maintain the area surrounding all storage containers in a clean and neat manner. No recyclable materials or waste materials of any kind shall be allowed to accumulate around any receptacle or to overflow from any receptacle.
31. The Permittee may stockpile bulk recyclable materials that require large machinery (such as a backhoe, front-end loader, crane, or grapple) to move or process. The Permittee shall maintain such inventories no taller than 30 feet in height as shown by a pile height marker. Further, such stockpiles shall be set back at least 8 feet away from the public way, as measured from the edge of the stockpile closest to the public way.
32. The Permittee shall maintain a twenty (20) foot setback between any waterway river and any stockpiles, as measured from the edge of the stockpile closest to the waterway.
33. The Permittee shall not allow the discharge of storm water or waste water into the waterway without and in accordance with a valid National Pollutant Discharge and Elimination System (NPDES) permit issued by IEPA.
34. The Permittee may not store recyclable materials at the Facility for a period longer than 90 days except materials ready for shipment offsite as finished product or raw material in the manufacturing of new, reused or reconstituted products.
35. The Permittee shall store all waste materials in such a way as to ensure adequate site safety. Flammable materials shall be stored away from sources of heat, sparks and open flames, and in accordance with applicable fire codes. Incompatible materials shall be segregated or stored

ATTACHMENT B SPECIAL CONDITIONS

away from each other.

36. The Permittee shall ensure that all tanks, drums or other vessels containing liquid materials such as, but not limited to, solvents and petroleum products, are:
- a. Kept in good condition. The Permittee shall immediately replace, repair, or overpack damaged containers;
 - b. Compatible with their contents to avoid reactions or impairment of the container's integrity;
 - c. Kept closed at all times except when adding or removing materials;
 - d. Appropriately labeled in accordance with all local, state, and federal requirements; and
 - e. Are provided with secondary containment complying with all local, state, and federal requirements.

SITE REQUIREMENTS

37. The Facility shall be entirely surrounded by a solid fence eight feet in height that obscure all material stored or kept outdoors at the Facility. Such fencing must be located at least eight feet from all public ways surrounding the property
38. The Permittee shall adequately pave and maintain all material handling areas, driveways, and access/haul roads to prevent migration of contaminants off-site. The acceptable paving material shall include, but not be limited to, asphalt, concrete or gravel. The CDPH reserves the right to require any additional or alternate paving as deemed necessary by CDPH.
39. The Facility shall have a sign, clearly visible to the public, which states the name, address and telephone number of the Permittee, the type of recyclable materials accepted, the types of materials prohibited, and the Facility's operating hours.

HOUSEKEEPING, DUST CONTROL, AND MAINTENANCE

40. The Permittee shall sweep Facility pavements and affected adjacent streets each working day, and on an as-needed basis. Such sweeping shall be performed using a mechanical street sweeper to effectively remove dust and litter.
41. The Permittee shall make a water source available at all times for purposes of Facility cleaning, dust control, and fire safety.
42. The Permittee shall control and suppress dust and other air-borne materials created by Facility activities so that the off-site migration of these materials does not occur. This control and suppression may include, but are not limited to:
- a. Employing watering methods as often as necessary;
 - b. Adequately sheltering dust-emitting activities from the wind or temporarily suspending such activities during high wind conditions; and
 - c. Enclosing and containerizing materials that are susceptible to becoming wind-borne.

ATTACHMENT B SPECIAL CONDITIONS

43. The Permittee shall promptly repair damaged or broken pavements to sustain their integrity, prevent standing water, and minimize the generation of dust and mud. The Permittee shall promptly backfill all potholes and depressions at the Facility with aggregate or suitable fill material. In addition, The Permittee shall resurface worn gravel pavements with fresh aggregate as needed.
44. The Permittee shall place garbage inside a covered container. The Permittee shall not allow such containers to overflow and shall immediately empty or remove and replace them when full.
45. The Permittee shall install and maintain filter inserts in all Facility catch basins and storm water inlets to keep sediments, oily liquids, and floatables from discharging into the City of Chicago sewer system.
46. The Permittee shall promptly contain, and clean-up spilled or leaked fluids. The Permittee shall provide spill response kits in all areas of the Facility where chemical, oil, and fuel spills or leaks of one gallon or more may occur. Such kits shall be fully stocked with appropriate materials such as socks, brooms, adsorbent material, and proper personal protective equipment.
47. The Permittee shall routinely remove oil and grease stains from site pavements, walls, and equipment by steam cleaning, pressure washing, or scrubbing these surfaces clean. Such cleaning shall be conducted at least bi-weekly and as needed.
48. The Permittee shall inspect the Facility for vectors twice per month or retain the services of a vector control specialist to conduct said inspections. The Permittee shall employ vector control measures that may include, but are not limited to, bait stations and traps, as often as necessary.
49. The Permittee shall follow applicable requirements in [Part 722](#) of the Illinois Administrative Code, Title 35 in the management and disposal of potentially hazardous waste such as, but not limited to, spilled battery acids, mercury-containing waste, and spent oils or chemicals.

RECORD KEEPING

50. All logs, receipts, and other documentation required under this permit shall be kept a minimum of three years and shall be made available to the CDPH and the CPD upon request; provided however, that all records and documents pertaining to the acceptance of prohibited and regulated materials, and catalytic converters, shall be kept at the Facility in accordance with the Ordinance and Regulations.
51. The Permittee shall maintain a written record of all vector inspections and vector control installations including date, time and a detailed description of each inspection and any installations or applications to control vectors.
52. The Permittee shall keep a log of liquid waste pickups that documents the dates and the volumes of liquid waste removed and disposed of offsite. Further, the Permittee shall keep all disposal receipts as proof of proper waste disposal.
53. The Permittee shall maintain a log of all vehicles entering and leaving the Facility. This log shall indicate the date, vehicle type, hauling company name if any, and the material type and quantity being transported. The Permittee shall maintain copies of all load ticket receipts.

ATTACHMENT B SPECIAL CONDITIONS

54. The Permittee shall maintain a written log documenting all cleaning and maintenance activities performed at the Facility under the Housekeeping, Dust Control, and Maintenance section of this permit. Such log shall include a description of the cleaning operation or maintenance activity performed, the signature of the employee that performed it, and the date and time the employee started and completed the task.
55. The Permittee shall maintain a written record of all emergencies occurring at the Facility, including the date and time of each incident, along with a detailed description of the emergency. The Permittee shall notify the CDPH each day that the Facility is affected by the emergency. Such notification shall be sent by email to EnvWastePermits@cityofchicago.org.
56. The Permittee shall timely comply with the requirements contained in [Chapter 11-5](#), Reduction and Recycling Program of the Chicago Municipal Code. The Permittee shall submit semi-annual reports to the Department of Streets and Sanitation (“DSS”) Recycling Coordinator, on forms provided by the DSS.

SITE SAFETY

57. The Permittee shall undertake all necessary steps to ensure that the Facility is secure from unauthorized entry, is sufficiently screened from the surrounding area and is adequately lighted after dark.
58. The Permittee shall provide training to all Facility employees on fire prevention, emergency procedures and hazardous material identification and handling procedures.
59. The Permittee shall install and maintain fire suppressant equipment in accordance with the Municipal Code of the City of Chicago.
60. The Permittee shall correct any and all violations identified by the City of Chicago Fire Department inspections. Failure to comply with these actions may result in revocation of this permit.
61. The Permittee shall ensure that non-empty gas cylinders, fuel tanks, or other materials that may cause explosions are not placed inside the shredder.
62. The Permittee shall conduct all torch cutting activities in a designated area located away from flammable material storage areas. Gas cylinders used for cutting or welding purposes shall be stored in an upright position and properly secured to avoid accidental jarring or impact.

PERMITS

63. The Permittee shall maintain an active Certificate of Operation from the CDPH, pursuant to Section [11-4-660](#) of the Code, for all existing regulated equipment or areas requiring an Air Pollution Control (APC) permit. The Permittee shall obtain an [APC Permit](#) from CDPH, pursuant to Section [11-4-620](#) of the Code, for any new regulated equipment or area installed at the Facility.
64. The Permittee shall acquire all necessary permits and approvals for the Facility including but not limited to those required by the CDPH, Department of Business Affairs and Consumer Protection, Zoning Board of Appeals, Metropolitan Water Reclamation District of Greater Chicago and the IEPA. The Permittee shall provide copies of all such permits and approvals to the CDPH upon request.

ATTACHMENT B SPECIAL CONDITIONS

65. The Permittee shall maintain copies of all Facility permits on site at all times and shall make these available for inspection upon request by the CDPH.

CLOSURE

66. If the Permittee permanently closes or ceases operations at the site ("closure"), the Permittee must submit a written closure notification to the CDPH within 30 days of closure. If the permit is not renewed for any reason, or the Permittee ceases operations at the site, the Permittee must clean up, remove and properly dispose of or recycle all material and waste on the site within 30 days of permit expiration or closure. The Permittee must submit disposal and recycling receipts as proof of proper disposal.

VEHICLES

67. Every vehicle used by the Facility for the collection, transportation or disposal of any recyclable material shall display on each side of the vehicle in letters not less than two inches in height, in contrasting color, the name, address, telephone number and permit number of the recycling facility.

VARIANCES

68. In lieu of the street sweeper specified in Special Condition No. 40, the Permittee may utilize a Bobcat with a broom attachment to sweep site pavements. Prior to sweeping, the Permittee shall ensure that site surfaces are adequately wetted to minimize the generation of dust.

69. In lieu of the solid fencing specified in Special Condition No. 37, the Permittee may utilize opaque fencing, at least 8 feet in height, which is so constructed as to contain airborne material created by Facility activities and obscure all material stored or kept within the boundaries thereof, unless said facility operations occur within the confines of an enclosed building.

MISCELLANEOUS

70. Within 60 days from the date of this permit, the Permittee shall provide the following to CDPH:
- a. A copy of the Fugitive Dust Plan recently submitted to and reviewed by to USEPA and IEPA.
 - b. The average and peak number of tons of metal torched or thermally treated at the Facility, broken down by metal type (ferrous, stainless steel, lead, etc.);
 - c. A copy of the Facility's most recent personal air sampling report as required by OSHA to determine worker exposure to contaminants and the level of protection needed. The information should be anonymized and provided as to comply with any applicable HIPAA requirements;
 - d. A copy of the Facility's material screening plan to prevent the acceptance of radioactive or unauthorized materials at the site; and

ATTACHMENT B SPECIAL CONDITIONS

- e. A copy of the Facility's standard operating procedures to prevent fires and shredder explosions at the Facility.

FW: Public Comments on Metal Management Midwest, Inc. Application for a Large Recycling Permit

John Pinion <jpinion@rka-inc.com>

Mon 2/28/2022 5:04 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (654 KB)

MWRD Sewage and Waste Control Ordinance.pdf;

[Warning: External email]



Dear Mayor Lightfoot and Chicago Dept. of Public Health:

After reviewing the Sims application, it doesn't appear that potential discharges of storm water to the Chicago River and/or MWRD have been considered. For instance, there don't appear to be any measures to prevent storm water from going to the river and there is no evidence that storm water discharged to city sewers will be in compliance with MWRD standards. Also, there is no mention in the permit application about retention and/or treatment of storm water prior to discharge.

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
Sent: Saturday, February 26, 2022 5:50 PM
To: envcomments@cityofchicago.org
Subject: Public Comments on Metal Management Midwest, Inc. Application for a Large Recycling Permit



Dear Mayor Lightfoot and Chicago Dept. of Public Health:

In an effort to protect the people of Pilsen and ensure fairness and equity, CDPH should request that the permit application address the same questions that were asked of RMG for the Southside Recycling facility including, but not limited to, the following:

1. Air dispersion modeling should include detailed accounting and modeling of emissions from all processes, vehicle travel over paved and unpaved surfaces, material storage and staging piles, non-road diesel engines, and torch or plasma cutting. The air quality assessment should also include a percent-silt and metals analysis for all unpaved surfaces and stockpiles.
2. Address whether post-processed ASR ("auto fluff") is treated prior to disposal. Should treatment of the post-processed ASR ("auto fluff") become necessary or desired, the application process should be described including where the process would be conducted, the stabilizing-chemical name(s) and their application quantities, personal protective equipment ("PPE") requirements, and copies of all SDSs.
3. Drawings should be provided of the shredder and shredder emissions capture hood in plan, elevation, and isometric views, that make clear any and all openings where emissions may escape without treatment. Calculations should be provided on the estimated capture efficiency of the shredder exhaust capture system, including sizing calculations for all fans, blowers, ducting systems, and hood. The shredder emissions capture hood is referenced in a permit application submitted to Illinois EPA.

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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**METROPOLITAN WATER RECLAMATION DISTRICT
OF
GREATER CHICAGO**



Sewage and Waste Control Ordinance

As Amended

May 20, 2021

**METROPOLITAN WATER RECLAMATION DISTRICT
OF GREATER CHICAGO
100 East Erie Street
Chicago, Illinois 60611
(312) 751-5600**

BOARD OF COMMISSIONERS

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Hon. Barbara J. McGowan, Vice President
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Jacqueline Torres, *Director of Finance/Clerk*
Allison Fore, *Public and Intergovernmental Affairs Officer***

AN ORDINANCE

AN ORDINANCE TO PROVIDE FOR THE ABATEMENT AND PREVENTION OF POLLUTION BY REGULATING AND CONTROLLING THE QUANTITY AND QUALITY OF SEWAGE AND INDUSTRIAL WASTE ADMITTED TO OR DISCHARGED INTO THE SEWERAGE SYSTEMS AND WATERS UNDER THE JURISDICTION OF THE METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO, HEREINAFTER TO BE KNOWN AS “THE SEWAGE AND WASTE CONTROL ORDINANCE” ADOPTED BY THE BOARD OF TRUSTEES OF THE METROPOLITAN SANITARY DISTRICT OF GREATER CHICAGO ON SEPTEMBER 18, 1969; AND AS AMENDED TO AND INCLUDING FEBRUARY 24, 1972; OCTOBER 2, 1975; JANUARY 19, 1978; OCTOBER 12, 1978; NOVEMBER 6, 1980; APRIL 21, 1983; SEPTEMBER 6, 1984; SEPTEMBER 5, 1985; JULY 30, 1987; JANUARY 21, 1988; MARCH 10, 1988; JULY 7, 1988; SEPTEMBER 7, 1989; DECEMBER 6, 1990; SEPTEMBER 5, 1991; SEPTEMBER 24, 1992; JANUARY 28, 1993; MARCH 24, 1994; DECEMBER 22, 1994; NOVEMBER 21, 1996; JULY 9, 1998; JULY 13, 2000; JUNE 21, 2001; SEPTEMBER 20, 2001; NOVEMBER 1, 2001; OCTOBER 3, 2002; NOVEMBER 4, 2004; NOVEMBER 3, 2005; MAY 4, 2006; NOVEMBER 16, 2006; NOVEMBER 1, 2007; NOVEMBER 19, 2009; FEBRUARY 16, 2012; AUGUST 9, 2012; APRIL 9, 2015; and MAY 20, 2021.

BE IT ORDAINED by the Board of Commissioners of the Metropolitan Water Reclamation District of Greater Chicago: That the Sewage and Waste Control Ordinance, originally passed by the Board of Trustees of The Metropolitan Sanitary District of Greater Chicago on September 18, 1969, and as amended, is herewith and now comprehensively amended to read as follows:

ARTICLE I

Purpose

This Ordinance, promulgated by the Metropolitan Water Reclamation District of Greater Chicago, hereinafter called the "District," pursuant to the authority vested in it by the Illinois legislature, has as its purpose the protection of the public health and safety by abating and preventing pollution through the regulation and control of the quantity and quality of sewage, industrial wastes, and other wastes admitted to or discharged into the sewerage systems, sewage treatment facilities, and waters under the jurisdiction of the District.

ARTICLE II

Definitions and Abbreviations

The meaning of the terms used in this Ordinance shall be as follows:

"Administrator" shall mean the Administrator of the United States Environmental Protection Agency.

"Applicable pretreatment standard" means any criteria, limitation or prohibition upon the discharge of any pollutant into a publicly owned treatment works.

"Approval Authority" shall mean the Regional Administrator of the United States Environmental Protection Agency or the Illinois Environmental Protection Agency, if so designated by the Regional Administrator.

"Authorized representative" means an owner or corporate officer of the industrial user authorized to legally bind the user in any and all negotiations and agreements.

"Baseline monitoring report" or "BMR" shall mean a form supplied by the District for reporting by an industrial user on the nature of the industrial user's operations and discharge of pollutants to the water reclamation facilities of the District.

"Biochemical Oxygen Demand (BOD)" means the quantity of dissolved oxygen required for biochemical oxidation of decomposable matter under aerobic conditions in a period of five days at a temperature of 20° C.

"Board of Commissioners" or "Board" means the Board of Commissioners of the Metropolitan Water Reclamation District of Greater Chicago.

"Categorical pretreatment standards" or "CPS" means any effluent limitation or standard applicable to an industrial category promulgated by the USEPA.

"Clean Water Act" means the Federal Water Pollution Control Act as amended by the Clean Water Act of 1977 (Pub. L. 95-217). It establishes responsibilities of Federal, State, and local government, industry and the public to implement National Pretreatment Standards to control pollutants which pass through or interfere with treatment processes in Publicly Owned Treatment Works (POTWs) or which may contaminate sewage sludge.

"Code of Federal Regulations" or "CFR" shall mean the codification of the general and permanent rules published in the **Federal Register** by the executive departments and agencies of the United States Government.

"Combined waste stream formula" shall mean the formulae contained in 40 CFR 403.6(e) for calculating alternative concentration limits or alternative mass limits for determining compliance with categorical pretreatment standards.

"Composite sample" means a representative mixture of a minimum three grab sample aliquots obtained over a period of time.

"Control authority" means the Metropolitan Water Reclamation District of Greater Chicago.

"Control manhole" or "sampling chamber" means a device or structure suitable and appropriate to permit sampling and flow measurement of a wastewater stream to determine compliance with this Ordinance.

"Deficient" means materially lacking information sufficient to determine compliance with applicable standards or requirements, or lacking required authorized representative, Registered Professional Engineer or notary certifications.

"Discharge Authorization" or "DA" means the document issued by the District to a significant industrial user granting permission to discharge process wastewater into the sewerage system of the District.

"Discharge Authorization Request" or "DAR" means the document submitted by a significant industrial user, on forms supplied by the District, requesting permission to discharge process wastewater into the sewerage system of the District.

“Executive Director” means the Executive Director of the Metropolitan Water Reclamation District of Greater Chicago.

“Existing source” shall mean any point source whose operations commenced prior to the date of proposal by the USEPA of any applicable categorical pretreatment standard in the **Federal Register**.

“**Federal Register**” shall mean the publication of the executive departments of the United States Government.

“Flow” means the volumetric measure per unit of time of wastewater, water, industrial waste or other flow.

“Fats, oils and greases (FOG)” means organic polar and non-polar compounds. Polar compounds are derived from animal and/or plant sources that contain multiple carbon chain triglyceride molecules. Organic non-polar fraction of oil and grease (petroleum hydrocarbons) is identified as Silica gel treated n-hexane extractable materials (SGT-HEM) in the pretreatment standards.

“Fundamentally different factors” shall mean factors pertaining to the nature of an industrial user’s operations which are fundamentally different from the factors considered by the USEPA in development of an applicable categorical pretreatment standard.

“Garbage” means solid wastes from the preparation, cooking and dispensing of food, and from the handling, storage or sale of meat, fish, fowl, fruit, or vegetables and condemned food.

“General pretreatment standards” or “GPS” means the standards contained in Appendix B of this Ordinance which are applicable to all discharges into sewerage systems tributary to water reclamation facilities.

“Grab sample” means a single aliquot sample collected over a period not to exceed 15 minutes.

“Hazardous waste” means any industrial waste, production residue, sewage or sludge which is classified as a hazardous waste pursuant to 40 CFR 261.

“Illinois Environmental Protection Agency” or “IEPA” means the Environmental Protection Agency of the state of Illinois.

“Illinois Pollution Control Board” or “IPCB” means the Pollution Control Board of the state of Illinois.

“Incompatible pollutant” shall mean a pollutant or waste characteristic which causes, or has the potential to cause, interference with the operation of a water reclamation facility or which is not amenable to treatment by a water reclamation facility and passes

through such a water reclamation facility and is contained in the discharged final effluent.

“Industrial user” or “IU” means a person who conducts any industrial, manufacturing, agricultural, trade or business process or who conducts the development, recovery or processing of natural resources.

“Industrial waste” means all solid, liquid or gaseous waste resulting from any commercial, industrial, manufacturing, agricultural, trade or business operation or process or from the development, recovery or processing of natural resources.

“Intake water adjustment” shall mean the adjustment of a categorical pretreatment standard to reflect the presence of a pollutant in a user’s intake water.

“Interference” means a discharge which alone or in conjunction with a discharge or discharges from other sources inhibits or disrupts the normal operation of any treatment processes, including sludge processes, use or disposal, which causes a violation of any requirement of a NPDES permit or other permit issued to the District by the IEPA or the USEPA.

“National Pollutant Discharge Elimination System” or “NPDES” means the permit and regulation system governing direct discharges into navigable waters administered by the IEPA and USEPA.

“New source” shall mean any industrial point source of pollutants for which the construction or installation of process facilities or the housing for containing process facilities commenced on or after the date of proposal of regulations in the **Federal Register** of any applicable categorical pretreatment standard for pollutants which applies to said source.

“Ordinance” means the Sewage and Waste Control Ordinance of the Metropolitan Water Reclamation District of Greater Chicago and any rules, regulations and orders adopted by the Board pertaining thereto.

“Other wastes” means all decayed wood, sawdust, shavings, bark, lime, refuse, ashes, garbage, offal, oil, tar, chemicals, and all other substances except sewage and industrial wastes.

“Pass-through” means a discharge which exits the District’s water reclamation facilities into waters in quantities, or concentrations which, alone or in conjunction with a discharge or discharges from other sources, causes a violation of any requirement of a NPDES permit or other permit issued to the District by the IEPA or the USEPA.

“Person” means any individual, partnership, co-partnership, firm, company, corporation, association, joint venture, joint stock company, sole proprietorship, trust, estate, co-partnership, unit of

government, school district, or private corporation organized or existing under the laws of the state of Illinois or any other state or country.

“Pollution” means the discharge of a substance, set forth in Appendices A, B, and C hereto, to any waters, sewer, or other facility under the jurisdiction of the District, in excess of those quantities or strengths permitted by said Appendices A, B, and C hereto or in a manner contrary to that set forth herein. The discharge of any material or substance hereunder in quantities or strengths greater than those permitted under Appendices A, B, and C hereto or contrary to the manner set forth in this Ordinance shall constitute prima facie “pollution” and no further proof of detriment or harm shall be required by the District in any and all enforcement activities undertaken pursuant to the Ordinance.

“Pretreatment” means any method, construction, device, arrangement or appliance appurtenant thereto, installed for the purpose of treating, neutralizing, stabilizing, disinfecting, or disposing of sewage, industrial waste or other wastes prior to the discharge of such sewage, industrial waste or other wastes into the sewerage system under the jurisdiction of the District, or for the recovery of by-products from such sewage, industrial waste or other wastes.

“Pretreatment Standards” means any restriction on quantities, quality, rates, or concentrations of pollutants discharged into a Publicly Owned Treatment Works (POTW).

“Process wastewater” means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, by-product or waste product.

“Production residue” means any liquid, solid, or gas which is residual source material, waste product or production by-product capable of being disposed in the sewerage system under the jurisdiction of the District.

“POTW” means treatment works owned and operated by a public entity, such as the District’s water reclamation facilities.

“Registered Professional Engineer” or “P.E.” means a professional engineer licensed by the Illinois Department of Financial and Professional Regulation to practice that profession.

“Sewage” means water-carried human wastes or a combination of water-carried wastes from residences, business, buildings, institutions and industrial establishments, together with any ground, surface, storm or other waters that may be present.

“Sewerage system” means sewers, intercepting sewers, pipes or conduits, pumping stations, force

mains, constructed drainage ditches, surface water intercepting ditches, and all other constructions, devices and appliances appurtenant thereto used for collecting or conducting sewage, industrial waste or other wastes to a point of treatment or ultimate disposal.

“Significant industrial user” or “SIU” means any person who: (i) is subject to categorical pretreatment standards, or (ii) discharges greater than 25,000 gallons per day of process wastewater to the sewerage system, excluding water-carried human wastes from sanitary conveniences such as toilets, wash bowls, bathtubs, showers and residential laundries, noncontact cooling water, boiler blowdown water, and uncontaminated storm water, or (iii) discharges process wastewater in excess of five percent or more of the average dry weather hydraulic or organic capacity of the receiving water reclamation facilities, or (iv) is designated by the District as having a reasonable potential for adversely affecting the operations of the water reclamation facilities or for violating any standard or requirement of this Ordinance. Upon finding that an IU meeting the above criteria has no reasonable potential for adversely affecting the operations of the District’s water reclamation facilities or for violating any pretreatment standards or requirements, the District may at any time, on its own initiative or in response to a petition from an IU, determine that such IU is not an SIU.

“Significant Noncompliance” means any instance of noncompliance by any person exhibiting any of the following: (i) chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(1); (ii) Technical Review Criteria (TRC) violations (Acute violations), defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(1) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oils, and greases, and 1.2 for all other pollutants except pH); (iii) any violation of an effluent discharge standard or prohibition which causes or contributes to pass-through or interference, the imminent threat of fire, explosion or other damage to the sewerage system, imminent endangerment to human health or the environment or which results in the District exercising its emergency authority to halt such violation; (iv) failure to submit a completed and certified report within 45 calendar days of a report due date; (v) failure to meet, within 90 calendar days after the schedule date, a compliance milestone

date or final compliance date contained in a compliance schedule or Discharge Authorization; (vi) failure to provide access to the industrial user's premises to representatives of the District for the purposes of inspection and sampling; (vii) failure to comply with the spill containment and notification requirements regarding spills, malfunctions, bypasses, and slug loadings contained in Article V, Sections 4 and 15 or this Ordinance; (viii) failure to report any instance of noncompliance of which the person becomes aware by self-monitoring, as required under Article V, Section 8 of this Ordinance; or (ix) non-compliance with any of the terms or conditions of the Ordinance, upon the determination of the Executive Director. "Sludge" means liquid and precipitated or suspended solid material therein contained, generated from the treatment of water, sewage, industrial waste or other wastes.

"Slug Discharge" means any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or non-customary batch Discharge, which has a reasonable potential to cause interference, pass-through, or in any other way to cause a violation of the District's regulations, local limits or Permit conditions.

"Standard Methods" means the most recent edition of Standard Methods for the Examination of Water and Wastewater, published by the American Public Health Association.

"United States Environmental Protection Agency" or "USEPA" means the Environmental Protection Agency of the United States Government and its designated agents.

"Water reclamation facilities" means any method, construction, device, arrangement or appliance appurtenant thereto, installed for the purpose of treating, neutralizing, stabilizing, disinfecting, or disposing of sewage, industrial wastes or other wastes, or for the recovery of by-products from such sewage, industrial waste or other wastes and includes sewers, pipes and other conveyances if they convey wastewater to a POTW.

"Waters" means all accumulations of water, surface and underground, natural or artificial, public or private or parts thereof, which are wholly or partially under the jurisdiction of the District or which flow through the territory of the District.

ARTICLE III

Prohibited Wastes

Section 1. Unlawful Discharges

It shall be unlawful for any person to discharge sewage, industrial wastes, or other wastes of any kind into any waters of the state of Illinois under the jurisdiction of the District, in the absence of a current

and valid National Pollutant Discharge Elimination System Permit issued by the Illinois Environmental Protection Agency, or into any sewerage system under the jurisdiction of the District, which does not conform to the criteria or effluent quality standards established and/or adopted by the District, as set forth in Appendices A, B, and C hereto of this Ordinance.

In addition to the prohibitions indicated in the above paragraph, it shall be unlawful for any significant industrial user, as defined herein, to cause or allow the discharge of process wastewater into the sewerage system under the jurisdiction of the District in violation of the terms and conditions contained in a Discharge Authorization issued to said person pursuant to the provisions of Appendix D of this Ordinance.

Section 2. Waterway Discharge Standards

Effluent quality standards and criteria for discharges into and pollution of waters of the state of Illinois in the absence of a current and valid National Pollutant Discharge Elimination System Permit issued by the Illinois Environmental Protection Agency, enacted by the Illinois Pollution Control Board and adopted by the Board of Commissioners of the District, are contained in Appendix A of this Ordinance.

Section 3. General Pretreatment Standards ("GPS")

General pretreatment standards and criteria for discharges into and pollution of sewerage systems tributary to water reclamation facilities of the District, enacted by the Board of Commissioners of the District, are contained in Appendix B of this Ordinance.

Section 4. Categorical Pretreatment Standards ("CPS")

Categorical pretreatment standards for discharges into and pollution of sewerage systems tributary to publicly owned treatment works, promulgated by the United States Environmental Protection Agency, are adopted by the Board of Commissioners for discharges to sewers under the jurisdiction of the District. Where there is a conflict in the application of general pretreatment standards contained in Appendix B and categorical pretreatment standards listed in Appendix C, the more stringent standard shall apply.

Section 5. New, Increased or Decreased Pollutant or Flow

All persons shall promptly notify the District in advance of any substantial changes in volume or character of pollutants in their wastewater discharge such as new or changed flow volume, new or changed concentrations or mass loadings of pollu-

tants, or a change in the point of entry of a discharge into the sewerage system, if any of which does not conform to the provisions of this Ordinance or a Discharge Authorization issued to said person by the District. Such notification shall be submitted in writing for approval at least 30 days prior to the commencement of the desired change. The date of commencement of the desired change shall in no case be earlier than 30 days following receipt of the request by the District. The District shall respond within 30 days of the date of receipt of the request with approval or denial. No such change in discharge conditions shall take place until the District has granted written approval of the desired change. If the District does not respond within 30 days with a denial or a request for additional information clarifying the request for changes, then the request shall be deemed approved.

Persons subject to the terms of a Discharge Authorization issued by the District under Appendix D of this Ordinance, for which the requested change in discharge conditions constitutes a deviation from any conditions established in the Discharge Authorization issued to said person, shall not commence the desired change until the District has issued a revised or renewed Discharge Authorization.

Any person whose request for change of discharge conditions has been denied by the District, may request a review of the District's determination. Such request must be made in writing to the Director of Monitoring and Research. The request for review must clearly state the reason(s) why such person believes that the District's denial of the requested discharge change should be reviewed.

The Director of Monitoring and Research will inform the Executive Director of all requests for review. The Executive Director shall order that a hearing be held for each request for review. The review hearing shall comply with the hearing procedures of Article VI, Section 3 of this Ordinance and shall be limited in scope to the issues raised in the person's initial request for change of discharge conditions. The final administrative decision on each review will be made by the Board after it receives a report with recommendations from the Review Hearing Officer.

During the pendency of any review requested pursuant to this Section, the person requesting a change of discharge conditions is expressly prohibited from implementing, causing or allowing the proposed change in discharge conditions.

Any pollution control equipment necessary to achieve compliance with the District's standards, as specified in Appendices A, B, and C hereof, must be installed prior to commencement of such change in discharge conditions.

Section 6. Dilution Prohibition

No person shall increase the use of process water or, in any way, dilute or attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the criteria or effluent quality standards set forth in this Ordinance.

Section 7. Dangerous or Threatening Discharge

Notwithstanding any other remedies which the District may have by statute, common law or this Ordinance, when, in the determination of the Executive Director, any person's discharge presents an imminent danger to the public health, welfare or safety, presents or may present an endangerment to the environment, or which threatens to interfere with the operation of the sewerage system or a water reclamation facility under the jurisdiction of the District, the District, acting through the Executive Director, shall apply to the Circuit Court of Cook County for injunctive relief to cease and desist the dangerous or threatening discharge.

Section 8. Uncontrolled or Unregulated Wastes

Each person subject to the terms and conditions of this Ordinance must install and maintain, at its own expense, pretreatment facilities adequate to prevent a violation of the pollutant concentration limits, discharge prohibitions or performance criteria of this Ordinance.

No person shall reintroduce into the sewer system of the District materials which have been removed from the sewer system by catch basins, grease traps, and other pretreatment devices. Physical, chemical or biological agents shall not be introduced into catch basins, grease traps or other pretreatment devices for the purposes of resuspending, dissolving, emulsifying or rendering soluble any pollutants or other materials removed from a wastewater stream by such pretreatment devices and reintroducing these materials into the sewer system.

All new industrial users and existing industrial users wishing to introduce new or increased pollutant flows or changes in the nature or concentration of pollutants discharged to the sewerage system must provide all pretreatment facilities required pursuant to this Ordinance prior to the commencement of discharge.

Section 9. Certification of Wastewater Pretreatment System Operator

No person shall cause or allow the operation of any pretreatment facilities discharging process wastewater into the sewerage system of the District unless the operation of such pretreatment facilities is

under the direct and active field supervision of a person who has been certified by the IEPA as being competent to operate the particular type or size of pretreatment facilities being used or operated.

ARTICLE IV

Monitoring Methods and Facilities

Section 1. Compliance Determination

In order to determine whether or not the sewage, industrial waste or other wastes discharged by any person into any waters or sewerage system conforms to the criteria or water quality standards of the District, the District may use any accepted engineering or scientific practice, method or device which will lead to such a determination. When practicable, all measurements, tests, and analyses of the waters, sewage, and wastes of any kind shall be conducted in accordance with USEPA approved methods or, in the absence thereof, the latest edition of Standard Methods.

Section 2. Control Manhole/Sampling Chamber – Installation and Access Requirements

Each person subject to the terms of this Ordinance who is a significant industrial user shall install and maintain, at its own expense, a control manhole or sampling chamber for each separate discharge conveying process wastewater from its facility to the sewerage system. Each such control manhole or sampling chamber shall have ample room to allow the District to perform inspections, sampling, and flow measurement operations.

Each such control manhole shall be located outside of any buildings or enclosed spaces and as near to the facility site boundary as practical; shall not be obstructed by temporary or permanent construction, manufacturing operations or activities, landscaping, parked vehicles or any other activities of the person; and shall be safely and directly accessible to representatives of the District at all times, without restriction of any kind.

Persons subject to this Ordinance who are not significant industrial users, as defined herein, may also be required to install control manholes or sampling chambers in conformance with the provisions of this section, upon the direction of the District's Executive Director.

Persons subject to this requirement of the Ordinance, who represent that this requirement cannot be reasonably complied with, may set forth said representations in writing to the Executive Director and be given an opportunity to be heard regarding said representations. The Executive Director shall make a determination, in writing to the person, granting leave from this requirement upon proof that compli-

ance cannot be reasonably obtained, or dismissing said representations as unfounded.

Any person whose request for exemption from the requirements of this section has been denied by the District, may request a review of the District's determination by the Board. Such request must be made in writing, to the Director of Monitoring and Research and must be received by the District within 30 days of the date of notification that the request for exemption has been denied. The request for review must clearly state the reason(s) why such person believes that the District's denial of the requested exemption should be reviewed.

The Director of Monitoring and Research will inform the Executive Director of all requests for review. The Executive Director shall order that a hearing be held for each request for review. The review hearing shall comply with the hearing procedures of Article VI, Section 3 of this Ordinance and shall be limited in scope to the issues raised in the person's initial request for exemption from this section. The final administrative decision on each review will be made by the Board after it receives a report with recommendations from the Review Hearing Officer.

If a building or enclosed space contains more than one industrial user, then each significant industrial user therein, shall install and maintain, at its own expense, a control manhole or sampling chamber for each discharge from its facility, which shall comply with all of the requirements set forth herein. All process wastewater flows from the facility shall, at all times, pass through a control manhole installed in conformance with this Ordinance and no process wastewater flows shall be discharged without passing through a control manhole or sampling chamber acceptable to the District. Each such control manhole or sampling chamber shall be accessible to representatives of the District at all times, without restrictions of any kind.

Persons who are required to construct a control manhole or sampling chamber to comply with this section shall submit a proposal to, and receive approval from, the District prior to undertaking construction of said control manhole or sampling chamber. The proposal submitted shall be certified by a Registered Professional Engineer licensed by the state of Illinois.

Section 3. Right of Access

Representatives of the District may, during reasonable hours, enter upon the premises of each person subject to this Ordinance for the purposes of installing, maintaining and inspecting measurement or sampling devices or facilities; for conducting necessary measuring, gauging and sampling operations; for inspecting or examining facilities, premises, installations and processes; for inspection and copy-

ing of records; and for reviewing pretreatment operating procedures and spill prevention and control plans of such person to determine compliance with this Ordinance or an order of the Board of Commissioners adopted pursuant hereto.

For the purpose of this section, reasonable hours are any time when the industrial user is operating any process or equipment, or any time when the facility is discharging industrial waste to the sewerage system of the District.

Areas subject to inspection are limited to those areas with drains or other connections to the sewerage system in which processes, equipment, and operations which result in industrial waste discharges are located, and storage areas containing any raw material, industrial waste, production residue or sludge. The scope of an inspection, including reviewing and copying of records, is limited to determining whether the industrial user is in compliance with all applicable standards and requirements of this Ordinance.

District personnel, when accessing the premises of a person, will observe and comply with all posted safety and health rules and practices applicable at the premises of the person.

Section 4. Monitoring for Public Hazards

Whenever the Executive Director determines that a public safety hazard exists due to the threat of release of pollutants regulated under Appendix B, Section 2(a), 2(b), or 2(e) of this Ordinance, in the discharge from an industrial user to the sewerage system under the jurisdiction of the District, the Executive Director shall require the industrial user to install and maintain suitable devices to detect the presence of the hazardous materials in the discharge and to notify the District immediately, through a reputable, independent alarm service company acceptable to the District, in the event of such hazardous discharge.

Any monitoring device installed pursuant to this section shall be calibrated at least once per week, and the alarm notification system shall be tested at least monthly. Each person required to install and maintain a monitoring device under this section shall maintain a record of the calibration and testing required under this paragraph; and make such records available to District personnel for inspection.

Section 5. Control Manhole / Sampling Chamber -- Access Requirements

This section deleted, effective July 9, 1998.

Section 6. Requirement for Installation of Flow Measurement Devices for Persons Subject to Categorical Pretreatment Standards

Each person subject to this Ordinance who is a significant industrial user subject to categorical pretreatment standards shall provide and maintain, at no cost to the District, adequate regulated wastewater flow measurement devices to determine compliance with federal categorical pretreatment standards, including, where applicable, to determine compliance with the Combined Wastestream Formula, which devices shall be accessible to the District at the time of conducting an inspection of the industrial facility and/or pretreatment device. Alternatives to direct metering shall be acceptable where application of the Combined Wastestream Formula is necessary or where the categorical pretreatment standards are based on production. The means by which such metering or alternative means shall be accomplished shall be submitted in writing in advance by the person to the District for approval.

Section 7. Interfering with District Monitoring Activities

It shall be illegal for any person to tamper with, adjust, relocate, remove or damage any monitoring devices installed by the District. Any such activity will be considered a knowing and willful violation of this Ordinance, the applicable statutes of the State of Illinois and applicable federal pretreatment regulations.

The Executive Director may refer such violation to the Office of State's Attorney or the Office of the United States Attorney, for such action as they deem appropriate.

ARTICLE V

Reporting Requirements

Section 1. Volatile/Hazardous Materials

All persons who, at any time, use, consume, produce or store on their business premises, any volatile/hazardous materials as defined herein, shall annually certify, in writing, to the District, the type and estimated quantities of these materials on forms supplied by the District. The annual certified report is to be signed by an authorized representative of the entity on whose behalf the report is being made. Where a significant change in the type or quantity of materials used, consumed, produced or stored on the business premises occurs after an annual report has been filed, a new report must be filed immediately.

Volatile/hazardous materials are those identified as wastes under the Resource Conservation and Recovery Act and defined by the USEPA at 40 CFR

261 or those pollutants under the Clean Water Act identified as priority pollutants and defined by the USEPA at 40 CFR 403 Appendix B, published in Final Rule at 46 FR 9458, January 28, 1981.

Section 2. Reporting of Production Residue or Sludge

This section deleted, effective July 9, 1998.

Section 3. Facility Categorization

When so directed by the District, each industrial user shall complete and submit to the District a facility classification questionnaire, on forms supplied by the District. The questionnaire shall be submitted to the District within 30 days of such industrial user's receipt of the form.

Section 4. Spill Containment Requirements

Each industrial user notified of applicability of this section based on said user's use or storage of flammable, volatile, explosive or corrosive materials, or has the potential for a slug discharge, shall provide protection from accidental discharge to the sewerage system of prohibited materials or other substances regulated by this Ordinance. Facilities to prevent such discharge shall be provided and maintained at the user's own cost and expense. Additionally, each such industrial user must have detailed plans on file at the District showing facilities and operating procedures to provide this protection.

Plans shall contain all elements required under 40 CFR 403.8(f)(2)(vi) and shall be approved by the District prior to construction of new facilities. Plans and facilities previously approved by the District shall be re-evaluated by the District at least once every two years and must be modified by the industrial user upon a determination by the Director of Monitoring and Research that modifications are necessary. Plans shall be certified by a Registered Professional Engineer licensed by the state of Illinois.

Each industrial user shall immediately notify the District of any changes at its facility affecting the approved plan or the potential for a slug discharge.

Section 5. Reports on Discharges to Surface Waters and to the Sewerage System

Persons operating sewage treatment facilities discharging effluents to waters or operating pretreatment facilities discharging to the sewerage system under the jurisdiction of the District shall submit operating reports and laboratory analyses of discharges as directed by the Executive Director, at intervals specified by the Executive Director. The reports shall cover all activities of the industrial user from the close of the previous reporting period and

must be received at the District not later than 30 calendar days after the end of the reporting period.

Notwithstanding any other non-monetary remedies which the District may have by statute, common law or this Ordinance, any person failing to submit a report or submitting a deficient report to the District, as required hereunder, within the filing period established by the District for such report, shall be assessed a late filing fee, as set forth under Article V, Section 10 of this Ordinance.

Section 6. Reporting on Discharges of Hazardous Wastes to the Sewerage System

Each person subject to the provisions of this Ordinance shall report to the District, on forms supplied by the District, the discharge of hazardous wastes, as defined herein, into the sewerage systems under the jurisdiction of the District. Such reporting shall conform with all applicable terms and conditions of 40 CFR 403.12(p).

Copies of reports filed with the District pursuant to this section shall also be filed with the United States Environmental Protection Agency and the Illinois Environmental Protection Agency, pursuant to 40 CFR 403.12(p).

Section 7. Maintenance of Records

Each person subject to any of the reporting requirements of this Ordinance shall maintain copies of reports and records as required in 40 CFR 403.12(o) resulting from any monitoring activities required by this Ordinance for a minimum of three years and shall make such records available for inspection and/or copying by the District or its representatives. The period of retention shall be extended during the course of any unresolved litigation regarding the person or the District, or at the request of the USEPA, the IEPA or the District. All records pertaining to an incident of noncompliance and the person's actions taken to return to compliance shall be retained for a minimum of three years following the return to compliance resulting from a Cease and Desist Order, Show Cause Board Order or Court Order.

Section 8. Self-Reporting a Violation

Each person subject to this Ordinance must report all violations identified as a result of self-monitoring to the District by telephone, during normal business hours, to the Industrial Waste Division, Enforcement Section (312) 751-3044 within 24 hours of the time the person becomes aware of such violations. For purposes of this reporting requirement, the person will be considered aware of such violations as of the date of the approval and release of the laboratory analyses indicating the violation. Said person must also submit the results of three

days of repeat analyses to the Director of the District's Monitoring and Research Department within 30 days after becoming aware of the violation together with a complete report on all steps taken to resolve the violation. Where the District performs the sampling and analyses in lieu of the industrial user, and if the sampling indicates a violation(s), the District will perform the repeat sampling and analyses unless the District notifies the industrial user of the violation(s) and requires the industrial user to perform the repeat sampling and analyses.

Section 9. Self-Monitoring Reporting Requirements and Submittal of All Self-Monitoring Data

Each person subject to this Ordinance shall notify the District in writing, no less than 14 calendar days prior to any commencement of its self-monitoring program, whether required by this Ordinance or any other District Ordinances, to allow the District to observe the person's sampling techniques, sample preservation, flow measurements, and other sampling protocols. This written notification shall be made on forms provided by the District, submitted to the District's Pretreatment and Cost Recovery Section by one of the following methods: U.S. mail addressed to the Pretreatment and Cost Recovery Section, P. O. Box 10689, Chicago, Illinois 60610; facsimile transmission sent to (312) 751-5960; or as PDF sent via electronic mail to mwrducs@mwrdd.org. Users subject to this Ordinance must submit all self-monitoring discharge analytical data to the Director of the District's Monitoring and Research Department, regardless of whether or not the data so obtained is in addition to the District's minimum reporting requirements. Each significant industrial user who monitors any pollutant more frequently than the District's minimum reporting requirements must submit all self-monitoring discharge analytical data with the Continued Compliance Report which covers the reporting period during which the monitoring was performed, in accordance with Appendix C, Article I, Section 4 of this Ordinance.

Section 10. Late Filing of Reports

Persons required to submit reports by the terms of this Ordinance, including but not limited to Article V, Reporting Requirements; Appendix C, Article I, Reporting Requirements Applicable to Significant Industrial Users and any order of the Executive Director issued pursuant to the terms of this Ordinance, shall submit the required reports by the specified due date. Persons not submitting the reports by the specified due dates shall be subject to late filing fees as follows:

- a. Persons submitting reports up to 15 calendar days following the specified due date shall be assessed \$100.00 for each delinquent report.

- b. Persons submitting reports more than 15 calendar days and up to 45 calendar days following the specified due date shall be assessed \$500.00 for each delinquent report.
- c. Persons submitting reports more than 45 calendar days following the specified due date shall be assessed \$1,000.00 for each delinquent report.

A person may submit required reports following the specified due date together with the late filing fee as specified above. The payment must be in the form of a cashier's check drawn on a United States bank, made payable to the Clerk of the District.

The District shall provide, by Certified Mail, a written notice of the fee assessment which states that the person has 30 days after the receipt of the notice to request a conference with the Monitoring and Research designee to discuss or dispute the appropriateness of the assessed fee. Unless a person objects to paying the fee for filing a report late by timely requesting, in writing to the Director of Monitoring and Research within 30 days of receipt of the late filing fee notice, a conference with a designee of the Executive Director, that person waives his or her right to a conference and the District may impose a lien recorded against the property of the person for the amount of the unpaid fee.

If a person requests a conference and the matter is not resolved at the conference, the person subject to the fee may request an administrative hearing before an impartial hearing officer appointed by the Board under the provisions of Article VI, Section 3 of this Ordinance, to determine the person's liability for and the amount of the fee.

If the hearing officer finds that the late filing fee is owed to the District, the District shall notify the responsible person or persons of the hearing officer's decision. If payment is not made within 30 days after the notice, the District may impose a lien on the property of the person or persons.

Any liens filed under this section shall apply only to the property to which the late filing fee is related. A claim for lien shall be filed in the Office of the Recorder of the county in which the property is located. The filing of a claim for lien by the District does not prevent the District from pursuing other means for collecting a late filing fee. If a claim for lien is filed, the District shall notify the person whose property is subject to the lien.

Section 11. Failure to Report is a Violation

Whenever a person subject to this Ordinance fails to comply with any of the reporting requirements of this Ordinance or with details regarding reporting requirements as directed by the Executive Director, such failure shall be a violation of the Ordinance. If

it is necessary for the District to perform inspections and/or sampling of the person's facility, or prepare a report on behalf of the person, the District shall recover the costs of such activity from the person in the same manner as debts are recoverable at law.

Section 12. Reporting of Batch and/or Intermittent Discharges

Upon written notification from the District of applicability of this paragraph, each person subject to this Ordinance who discharges industrial waste on a batch and/or intermittent basis shall notify the District's Field Surveillance Section, by telephone at (708) 588-4030, between 7:00 a.m. and 3:30 p.m. on normal business days, at least 48 hours prior to each batch or infrequent discharge. The telephone notification shall be used by the District to facilitate inspection and sampling of the person to coincide with periods during which the batch and/or intermittent discharge may occur. No process wastewater may be discharged into the sanitary sewerage system on a batch basis except in conformance with the batch discharge telephone notification procedure.

For the purpose of this section, a batch discharge is defined as a discharge of industrial waste which does not occur continuously during all working shifts of the person. An intermittent discharge is defined as a discharge of industrial waste which originates from an industrial process or activity which is not performed by the person during all working shifts of the person.

Section 13. Submittal of Facility Closure Schedule

Each significant industrial user and each industrial user notified of applicability of this section based on said user's use or storage of flammable, volatile, explosive or corrosive materials, who determines that an industrial facility owned or operated by said person shall cease its operations, shall notify the Director of Monitoring and Research of intent to cease such operations, not less than 30 days prior to the cessation of operations. Such person shall also submit to the District, at that time, a facility closure schedule, which shall identify the dates upon which the person anticipates completion of the lawful removal or disposal of all raw materials, production residues and sludges which contain pollutants regulated under Appendix B or Appendix C of this Ordinance, from the industrial facility and, where applicable, the names of disposal contractors to be used. The District may provide such information as may be submitted under this Section, to the United States Environmental Protection Agency, the Illinois Environmental Protection Agency, or any unit of local government having jurisdiction over the industrial facility.

If such person has submitted a facility closure plan to a federal or state agency and has received approval of such plan from said agency, the person may submit a copy of such facility closure plan to the District in lieu of developing a new facility closure schedule, provided the submitted plan adequately addresses the issues identified in the preceding paragraph.

Section 14. Notification Requirements Regarding a Planned Bypass or Shutdown of Pretreatment Facilities

In the event of a planned shutdown or bypass of pretreatment facilities installed and operated to maintain compliance with the provisions of this Ordinance or a Discharge Authorization issued to a significant industrial user, such user shall notify the Director of the District's Monitoring and Research Department, in writing, at least ten days prior to the beginning of the shutdown or bypass.

Section 15. Notification Requirements Regarding Spills, Malfunctions, Bypasses, and Slug Loadings

Each significant industrial user and each industrial user notified of applicability of this section based on said user's use or storage of flammable, volatile, explosive or corrosive materials, shall immediately notify the District, by telephone, in the event of any of the following occurrences:

- a) a mechanical malfunction of any portion of such person's industrial waste pretreatment system, except in cases where (i) no wastewater is discharged to the sewerage system, (ii) in the best professional judgment of the person's certified wastewater pretreatment system operator, the wastewater discharge flow rate or quality is not affected or remains within the normal operating characteristics of the wastewater pretreatment system, or (iii) if the malfunction itself precludes the discharge of wastewater;
- b) an accidental or deliberate discharge without adequate pretreatment of any chemical, product, production residue or other waste into the sewerage system;
- c) an accidental or deliberate discharge which results in a violation of the criteria or applicable discharge standards of this Ordinance; or
- d) a slug discharge.

Such notification shall be made within one hour of the person's becoming aware of the incident, by telephone, to the Monitoring and Research Department, Industrial Waste Division (312) 751-3044 during normal business hours or to the Systems Dispatcher (312) 787-3575 at all other times. Said noti-

fication shall be confirmed in writing and received by the District within five calendar days explaining the incident and outlining corrective measures to prevent a recurrence.

ARTICLE VI

Administrative Proceedings

Section 1. Cease and Desist Orders

Whenever the Executive Director determines that sewage, industrial wastes, or other wastes are being, have been, or may reasonably be expected to be discharged into any waters or the sewerage system under the jurisdiction of the District, which are not in compliance with the provisions of this Ordinance, or that any person has otherwise acted contrary to the provisions of this Ordinance or to a Discharge Authorization issued to such person under this Ordinance, the Executive Director or his designee shall order such person to cease and desist such action. The Cease and Desist Order may be sent via Certified Mail, Return Receipt Requested, or may be served personally by a representative of the District at the site, on the owner, officer, registered agent or individual designated by permit, or operator of the offending person. The Executive Director or his designee may convene a conciliation meeting with the person so ordered to cease and desist for the purpose of establishing a compliance and reporting schedule for the person to come into compliance with the Ordinance or provisions of the Discharge Authorization.

Section 2. Compliance Reports

During conciliation proceedings, any person may be required to furnish the District with compliance schedules, interim and final compliance reports, sampling and analysis, and such other information as is reasonably necessary to demonstrate compliance with the applicable discharge standards of this Ordinance. All such reports, data, and information shall be executed by an authorized representative of the person and certified as to accuracy and completeness by a Registered Professional Engineer licensed by the state of Illinois. Interim reports shall be required only when the person fails to achieve compliance within 90 days of the receipt of a Cease and Desist Order and shall be submitted no more frequently than once per month.

Compliance Schedules (RD-112) required under this section must be received at the District not later than 15 calendar days after the person's receipt of a Cease and Desist Order issued by the District.

Final Compliance Reports (RD-114) required under this section must be received at the District not later than 15 calendar days after the final compliance date specified in the RD-112 for a given Cease and Desist Order. Persons submitting RD-114 forms

for a Cease and Desist Order pertaining to effluent discharge violations may limit sampling analyses to only the noncomplying pollutants indicated in the Cease and Desist Order.

Representative samples must be obtained at each control manhole/sampling chamber identified in the Cease and Desist Order. Samples must be taken for a minimum of three days within a two-week period for the monitoring of a wastestream with a flow less than 200,000 gallons per day. Where the long-term average flow of a wastestream exceeds 200,000 gallons per day, the user shall take samples for six days within a two-week period. Sample collection shall conform to the requirements of 40 CFR 403.12(g) and all analyses shall be performed in accordance with test procedures established by the United States Environmental Protection Agency in 40 CFR 136.

Notwithstanding any other non-monetary remedies which the District may have by statute, common law or this Ordinance, any person failing to submit a report or submitting a deficient report to the District, as required hereunder, within the filing period established by the District for such report, shall be assessed a late filing fee, as set forth under Article V, Section 10 of this Ordinance.

Section 3. Proceedings for Show Cause / Board Order Compliance

If any person fails or refuses to achieve compliance with this Ordinance within 90 days after notification of a Cease and Desist Order issued pursuant to this Ordinance, the Executive Director may order such person to show cause before the Board of Commissioners of the District or its designee why they have failed or refused to comply with the Cease and Desist Order. In making the determination to order a person to Show Cause why they have failed or refused to comply with the Cease and Desist Order, the Executive Director shall, (i) with respect to the discharge limits contained in Appendix B of this Ordinance, place preponderant weight on monitoring data based on composite samples representative of the discharge of the person, unless the approved analytical method does not allow analysis of composite samples, and (ii) with respect to categorical pretreatment standards contained in Appendix C of this Ordinance, place preponderant weight on monitoring data based on sampling which conforms to sampling requirements specified in the applicable categorical pretreatment standards. A notice shall be served on the offending party, specifying the time and place of a hearing to be held by the Board of Commissioners regarding their failure to achieve compliance, and directing the offending party to show cause before the Board why an order should not be entered directing the offending party to come into compliance. The notice of the hearing shall be served personally

or by Registered or Certified Mail at least ten (10) days before the hearing; service may be had on any agent or officer of a corporation or municipality.

After the Board of Commissioners has reviewed the evidence, it may issue an order to the party responsible for the violation, directing that within a specified time period, the violation be discontinued, and any other such orders as the Board may deem necessary.

The Board shall establish procedures for assessing fines and issuing orders as follows:

- a. In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing on the activities involved and the assessment of civil penalties as shown by the record produced at the hearing.
- b. The Board shall establish a panel of independent hearing officers to conduct all hearings on the issuance of orders and the assessment of civil penalties under this Section. The hearing officers shall be attorneys licensed to practice law in the State of Illinois.
- c. The Board shall promulgate procedural rules governing the proceedings, the issuance of orders and the assessment of civil penalties.
- d. All hearings shall be on the record; and testimony taken must be under oath and recorded stenographically. Transcripts so recorded must be made available to any member of the public or any party to the hearing upon payment of the usual charges for transcripts. At the hearing, the hearing officer may issue, in the name of the Board, notices of hearing requesting the attendance and testimony of witnesses and the production of evidence relevant to any matter involved in the hearing, and may examine witnesses.
- e. The hearing officer shall conduct a full and impartial hearing on the record, with an opportunity for the presentation of evidence and cross-examination of the witnesses. The hearing officer may also recommend, as part of the order of the Board, that the discharge of industrial waste or other waste be discontinued within a specified period of time. After all evidence has been presented, the hearing officer shall issue a Report based upon the preponderance of evidence in the record, which includes finding of fact, conclusions of law, order, and, if violations are proven, recommended civil penalties. Civil penalties shall be assessed at the level of \$1,000.00 to \$2,000.00 per day of violation. Each day's continuation of such violation or failure to

abide by the terms of this Ordinance is a separate offense. A regulatory multiple day average that exceeds acceptable limits constitutes a separate violation.

- f. The Report shall be transmitted to the Board, along with a complete record of the hearing.
- g. The Board shall either approve or disapprove the Report. If the Report is rejected, the Board shall remand the matter to the hearing officer for further proceedings. If the Report is accepted by the Board, it shall constitute the final order of the Board.
- h. The Administrative Review Law of the State of Illinois, and the rules adopted under such law, shall govern all proceedings for judicial review of final orders of the Board issued under this Section.
- i. The civil penalty specified by the Board shall be paid within 35 days after the party on whom it is imposed receives a written copy of the order of the Board, unless the person or persons to whom the order is issued seeks judicial review of the order under Article VI, Section 3, Paragraph h of this Ordinance.
- j. If the respondent seeks judicial review of the order assessing a civil penalty, the respondent shall, within 20 days after the date of the final order of the Board, pay the amount of the civil penalty into an escrow account maintained by the District for that purpose or file a bond guaranteeing payment of the civil penalty if the fines are upheld on review.
- k. Civil penalties not paid by the times specified above shall be delinquent and subject to a lien recorded against the property of the person ordered to pay the penalty. The foregoing provisions for asserting liens against real estate by the District shall be in addition to and not in derogation of any other remedy or right of recovery, in law or equity, that the District may have with respect to the collection or recovery of penalties and charges imposed by the District. Judgment in a civil action brought by the District to recover or collect the charges shall not operate as a release and waiver of the lien upon the real estate for the amount of the judgment. Only satisfaction of the judgment or the filing of a release or satisfaction of lien shall release the lien.

Section 4. Failure to Report is a Violation

Whenever a person subject to this Ordinance fails to comply with any of the reporting requirements of this Ordinance or with details regarding reporting requirements as directed by the Executive Director,

such failure shall be a violation of the Ordinance. If it is necessary for the District to perform inspections and/or sampling of the person's facility, the District may recover the costs of such activity from the person in the same manner as debts are recoverable at law.

Section 5. Penalties

The Board may also order the party responsible for the violation, to pay a civil penalty in an amount specified by the Board which is not less than \$1,000.00 nor more than \$2,000.00 per day for each day on which such person was found in violation. The Board may also order the party responsible for the violation to pay court reporter costs and hearing officer fees in a total amount not exceeding \$3,000.00. Each day's continuance of such violation or failure is a separate offense. Regulatory multiple day averages which exceed acceptable limits shall constitute separate violations.

Section 6. Order to Cease Discharge Upon Violation of Board Order

The Executive Director may order a person to cease the discharge of industrial waste upon a finding by the Executive Director that the final order of the Board, entered after a hearing to Show Cause, has been violated. The Executive Director shall serve the person with a copy of the order either by Certified Mail or personally by serving the owner, officer, registered agent or individual designated in said person's Discharge Authorization. The order of the Executive Director shall also schedule an expedited hearing before a hearing officer designated by the Board for the purpose of determining whether the company has violated the final order of the Board. The Board shall adopt rules of procedure governing expedited hearings. In no event shall the hearing be conducted less than seven days after receipt by the person of the Executive Director's order.

At the conclusion of the expedited hearing, the hearing officer shall prepare a report with his or her findings and recommendations and transmit it to the Board. If the Board, after reviewing the findings and recommendations, and the record produced at the hearings, determines that the person has violated the Board's final order, the Board may authorize the plugging of the sewer. The Executive Director shall give not less than 10 days written notice of the Board's order to the owner, officer, registered agent, or individual designated in said person's Discharge Authorization, as well as the owner of record of the real estate and other parties known to be affected, that the sewer will be plugged. The Administrative Review Law, and the rules adopted under that Law, shall govern all proceedings for the judicial review of final orders of the Board issued under this section.

The foregoing provision for plugging a sewer shall be in addition to and not in derogation of any other remedy, in law or in equity, that the District may have to prevent violation of this Ordinance and orders of the Board.

ARTICLE VII

Court Proceedings

Section 1. Violation of Order to be Considered a Nuisance

A violation of an Order of the Board shall be considered a nuisance. If any person fails to comply with any Order of the Board, the District, acting through the Executive Director, may commence an action or proceeding in the Circuit Court in and for the county in which the District is located or operates facilities for the purpose of having the violation stopped either by mandamus or injunction, or to remedy the violation in any manner provided by law.

Section 2. Penalties

Whoever violates any provisions of this Ordinance or fails to comply with an order of the Board of Commissioners issued in accordance with the provisions of this Ordinance, shall be assessed a civil penalty of not less than \$1,000.00 nor more than \$10,000.00 for each day the violation continues. If, however, the violation occurs before the entry of an order by the Board, the civil penalty may be reduced to not less than \$1,000.00 nor more than \$2,000.00 per day of violation. Each day's continuance of such violation or failure is a separate offense. The penalties provided in this Section, plus interest at the rate set forth in the Interest Act on unpaid penalties imposed by the Board under Article VI, Section 3 of this Ordinance, the reasonable costs to the District of removal or other remedial action caused by discharges in violation of the Metropolitan Water Reclamation District Act or this Ordinance, reasonable attorney's fees, court costs and other expenses of litigation, together with costs for inspection, sampling, analysis, and administration related to the enforcement action against the person, are recoverable by the District in a civil action.

Section 3. Injunctive Relief

In addition to the penalties provided in the foregoing Section, whenever a person violates any provision of this Ordinance or fails to comply with any Order of the Board of Commissioners, the District, acting through the Executive Director, may apply to the Circuit Court of Cook County for the issuance of an injunction restraining the person violating the Ordinance or failing to comply with the Board Order from making any further discharges into the waterways or sewerage system of the District.

Notwithstanding any other remedies which the District may have by statute, common law or this Ordinance, when, in the determination of the Executive Director, any person's discharge presents an imminent danger to the public health, welfare or safety, presents or may present an endangerment to the environment, or which threatens to interfere with the operation of the sewerage system or a water reclamation facility under the jurisdiction of the District, the District, acting through the Executive Director, may apply to the Circuit Court of Cook County for injunctive relief to cease and desist such discharge, without first exhausting administrative procedures.

ARTICLE VIII

Savings Clause

Section 1. Integrity of Ordinance

If the provisions of any paragraph, section or article of this Ordinance are declared unconstitutional or invalid by the final decision of any court of competent jurisdiction, the provisions of the remaining paragraph, sections or articles shall continue in full force and effect.

Section 2. Previous Violations

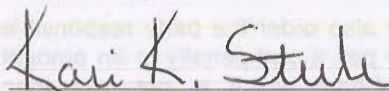
Nothing in this Ordinance shall in any manner or form affect the validity of any enforcement proceedings instituted under the Sewage and Waste Control Ordinance, in effect prior to the date of this amendment. Enforcement proceedings shall be controlled by the Sewage and Waste Control Ordinance, as amended, in effect at the time of the commencement of such enforcement activity.

ARTICLE IX

Effective Date

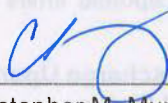
This Ordinance as amended shall be in full force and effect May 20, 2021.

APPROVED:

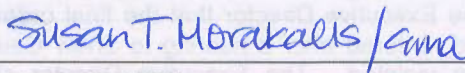


Kari K. Steele
President of the Board of Commissioners of the Metropolitan Water Reclamation District of Greater Chicago

Approved as to form and legality:



Christopher M. Murray
Head Assistant Attorney



Susan T. Morakalis
General Counsel

APPENDIX A
to the
SEWAGE AND WASTE CONTROL
ORDINANCE
DISCHARGES TO AND POLLUTION OF
WATERS

Section 1. General Provisions

a. Dilution

Dilution of the effluent from a treatment works or from any wastewater source is not acceptable as a method of treatment of wastes in order to meet the standards set forth in this Appendix A. Rather, it shall be the obligation of any person discharging contaminants of any kind to the waters of the state to provide the best degree of treatment of wastewater consistent with technological feasibility, economic reasonableness, and sound engineering judgment. In making determinations as to what kind treatment is the "best degree of treatment" within the meaning of this paragraph, any person shall consider the following:

- (1) What degree of waste reduction can be achieved by process change, improved housekeeping, and recovery of individual waste components for reuse; and
- (2) Whether individual process wastewater streams should be segregated or combined.

In any case, measurement of contaminant concentrations to determine compliance with the effluent standards shall be made at the point immediately following the final treatment process and before mixture with other waters, unless another point is designated by the District. If necessary, the concentrations so measured shall be recomputed to exclude the effect of any dilution that is improper under this Appendix A.

b. Background Concentrations

Because the effluent standards in this Appendix A are based upon concentrations achievable with conventional treatment technology that is largely unaffected by ordinary levels of contaminants in intake water, they are absolute standards that must be met without subtracting background concentrations. However, it is not the intent of these regulations to require users to clean up contamination caused essentially by upstream sources or to require treatment when only traces of contaminants are added to the background.

Compliance with the numerical effluent standards is therefore not required when effluent concentrations in excess of the standards result entirely from influent contamination, evaporation, and/or the incidental addition of traces of materials not utilized or produced in the activity that is the source of the waste.

c. Sampling

Except as otherwise specifically provided in this Appendix A, proof of violation of the numerical standards of this Appendix A shall be on the basis of one or more of the following standards:

- (1) No monthly average shall exceed the prescribed numerical standard.
- (2) No daily composite shall exceed two times the prescribed numerical standard.
- (3) No grab sample shall exceed five times the prescribed numerical standard.

d. Terminology

Terms used under Section 1c shall have the following meanings:

- (1) The monthly average shall be the numerical average of all daily composites taken during a calendar month. A monthly average must be based on at least three daily composites.
- (2) A daily composite shall be the numerical average of all grab samples, or the result of analysis of a single sample formed by combining all aliquots taken during a calendar day. A daily composite must be based on at least three grab samples or three aliquots taken at different times.
- (3) A grab sample is a sample taken at a single time. Aliquots of a daily composite are grab samples only if they are analyzed separately.

Section 2. Violation of Water Quality Standards

In addition to the other requirements of this Appendix A, no effluent shall, alone or in combination with other sources, cause a violation of any state water quality standard. When the District finds that a discharge that would comply with effluent standards contained in this Appendix A would cause or is causing a violation of state water quality standards, the District shall take appropriate action to require the discharge to meet whatever effluent limits are necessary to ensure compliance with the state water quality standards. When such a violation is caused by the cumulative effect of more than one source, several sources may be joined in an enforcement

proceeding, and measures for necessary effluent reductions will be determined on the basis of technological feasibility, economic reasonableness, and fairness to all dischargers.

Section 3. Offensive and Threatening Discharges

In addition to the other requirements of this Appendix A, no effluent shall contain untreated sewage constituents, settleable solids, floating debris, visible oil, grease, scum, or sludge solids, or liquids, solids or gases which by reason of their nature or quantity are sufficient to cause fire or explosion or be injurious in any other way to the sewerage system, to human life or to the environment. No effluent shall have a closed cup flashpoint less than 140 degrees Fahrenheit (60 degrees Centigrade) using the test methods specified in 40 CFR 261.21. Color, odor, and turbidity must be reduced to below obvious levels.

Section 4. Deoxygenating Wastes

All effluents containing deoxygenating wastes shall meet the following standards:

- a. No effluent from any source discharging into the Chicago River System or into the Calumet River System shall exceed 20 mg/L of BOD or 25 mg/L of suspended solids.
- b. No effluent from any source discharging into the Des Plaines River System shall exceed 30 mg/L of BOD or 30 mg/L of suspended solids.
- c. No effluent whose dilution ratio is less than five to one shall exceed 10 mg/L of BOD or 12 mg/L of suspended solids.
- d. No effluent whose dilution ratio is less than one to one shall exceed 4 mg/L of BOD or 5 mg/L of suspended solids.

Section 5. Bacteria

No effluent governed by this Appendix A shall exceed 400 fecal coliforms per 100 ml.

Section 6. Phosphorus

No effluent discharged to the Calumet River shall contain more than 1.0 mg/L of phosphorus as P.

Section 7. Lake Michigan

There shall be no discharge of any sewage, industrial wastes or other wastes of any kind into the waters of Lake Michigan unless the discharges are subject to regulation under a current and valid National Pollutant Discharge Elimination System Permit

issued by the Illinois Environmental Protection Agency.

Section 8. Additional Contaminants

The following levels of contaminants shall not be exceeded by any discharge of sewage, industrial wastes or other wastes to waters under the jurisdiction of the District.

Waste or Chemical	Concentration (mg/L)
Arsenic (total).....	0.25
Barium (total).....	2.0
Cadmium (total).....	0.15
Chromium (total hexavalent)*.....	0.1
Chromium (total).....	1.0
Copper (total).....	0.5
Cyanide.....	0.10
Fats, oils and greases**.....	15.0
Fluoride (total).....	15.0
Iron (total).....	2.0
Lead (total).....	0.2
Manganese (total).....	1.0
Mercury (total)***.....	0.0005
Nickel (total).....	1.0
Phenols.....	0.3
Silver.....	0.1
Zinc (total).....	1.0
pH range (must be met at all times).....	6.0 - 9.0

* Discharge of hexavalent chromium shall be subject to the averaging rule of Section 1c of this Appendix, modified as follows: monthly averages shall not exceed 0.1 mg/L; daily composites shall not exceed 0.3 mg/L; and grab samples shall not exceed 1.0 mg/L.

** Oil may be analytically separated into polar and nonpolar components. If such separation is done, neither of the components may exceed 15 mg/L (i.e., 15 mg/L polar materials and 15 mg/L nonpolar materials).

*** Except if all of the following conditions are met:

1. The discharger does not use mercury; or the discharger uses mercury and this use cannot be eliminated; or the discharger uses mercury only in chemical analysis or in laboratory or other equipment and takes reasonable care to avoid contamination of wastewater; and
2. The effluent mercury concentration is less than 0.003 mg/L, as determined by application of the averaging rules of Section 1c of this Appendix; and

3. The discharger is providing the best degree of treatment consistent with technological feasibility, economic reasonableness, and sound engineering judgment. This may include no treatment for mercury; and
4. The discharger has an inspection and maintenance program likely to reduce or prevent an increase in the level of mercury discharges.

Section 9. Discharges Made Under Current and Valid National Pollutant Discharge Elimination System Permit

The provisions of this Appendix shall not be applicable to discharges subject to regulation under a current and valid National Pollutant Discharge Elimination System Permit issued by the Illinois Environmental Protection Agency.

APPENDIX B
to the
SEWAGE AND WASTE CONTROL
ORDINANCE
DISCHARGES TO AND POLLUTION OF
SEWERAGE SYSTEMS

Section 1. Pollutant Concentration Limits

The following are the maximum concentrations acceptable for discharge of sewage, industrial wastes, or other wastes into sewerage systems under the jurisdiction of the District at any time:

Waste or Chemical	Concentration (mg/L)
Cadmium.....	2.0
Chromium (total).....	25.0
Chromium (hexavalent).....	10.0
Copper.....	3.0
Cyanide (total).....	5.0
Fats, oils and greases (FOG) (total)†.....	250.0
Iron*.....	250.0
Lead.....	0.5
Mercury**.....	0.0005
Nickel††.....	10.0
Zinc.....	15.0
pH range***	Not lower than 5.0 or greater than 10.0

Temperatures of liquids or vapors at point of entrance to a public sewer shall not exceed 150°F.

* Discharges from domestic water treatment

plants which supply potable water to the general public shall be exempt from this limitation for iron.

** Except as provided under Appendix B, Section 2i.

*** Discharges which are monitored continuously for pH may exceed the upper pH range of 10.0 by not more than 0.5 pH units, for not more than four hours in any single calendar day.

† Effluent leachate discharges from landfill facilities that are closed for the acceptance of wastes shall be exempt from this limitation for Fats, oils and greases (FOG) (total), provided that approved Best Management Practices (BMPs) are implemented and maintained. Failure to adhere to BMPs may result in enforcement action.

†† Effluent discharges from any person located within the service area of the John E. Egan Water Reclamation Plant that exceed a mass loading value of 1.0 pounds per day of nickel shall be subject to an alternative maximum pollutant concentration limit of 2.47 mg/L for nickel at all times. Failure to comply with this alternative maximum pollutant concentration limit will be considered a violation of this Ordinance.

Section 2. Discharge Prohibitions

Any discharge of waste or waters into a sewer which terminates in or is a part of the sewerage system of the District, must not introduce pollutant(s) which causes Pass Through or Interference, and must not contain the following:

- a. Liquids, solids or gases which by reason of their nature or quantity are sufficient to cause fire or explosion or be injurious in any other way to the sewerage system or to the operation of the water reclamation facilities, including, but not limited to, any wastewater having a closed cup flashpoint less than 140 degrees Fahrenheit (60 degrees Centigrade) using the test methods specified in 40 CFR 261.21.
- b. Noxious or malodorous liquids, gases or substances which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life, to cause injury or acute worker health or safety problems, or to prevent entry into the sewers for their maintenance or repair.
- c. Water or wastes containing toxic substances in quantities which are sufficient to interfere

with the biological processes of the water reclamation facilities.

- d. Garbage that has not been ground or comminuted to such a degree that all particles will be carried freely in suspension under conditions normally prevailing in public sewers, with no particle greater than one-half inch in any dimension.
- e. Radioactive wastes unless they comply with 10 CFR 20 and 32 Illinois Administrative Code 340.
- f. Solid or viscous wastes which cause obstruction to the flow in sewers or other interference with the proper operation of the sewerage system or water reclamation facilities, such as grease, uncomminuted garbage, animal guts or tissues, paunch manure, bone, hair, hides, fleshings, entrails, feathers, sand, cinders, ashes, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, spent grain, waste paper, wood, plastic, gas, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, gasoline, naphtha, and similar substances. Potentially Infectious Medical Wastes unless they comply with 35 Illinois Administrative Code, Subtitle C.
- g. Waters or waste containing substances which are not amenable to treatment or reduction by the sewage treatment process employed, or are amenable to treatment only to such degree that the water reclamation facilities' effluent cannot meet the requirements of other agencies having jurisdiction over discharge to the receiving waters.
- h. Excessive discoloration (such as, but not limited to, dye waste and vegetable tanning solutions) which threatens the District's operations.
- i. Mercury in excess of 0.0005 mg/L on a monthly average, 0.001 mg/L in a daily composite, and 0.0025 mg/L in any grab sample; except when all of the following conditions are met:
 - (1) The discharger does not use mercury; or the discharger uses mercury and this use cannot be eliminated; or the discharger uses mercury only in chemical analyses or in laboratory or other equipment and takes reasonable care to avoid contamination of wastewater; and
 - (2) The discharge mercury concentration is less than 0.003 mg/L on a monthly av-

erage, 0.006 mg/L in a daily composite, and 0.015 mg/L in any grab sample; and

- (3) The discharger is providing the best degree of treatment consistent with technological feasibility, economic reasonableness, and sound engineering judgment. This may include no treatment for mercury; and
- (4) The discharger has an inspection and maintenance program likely to reduce or to prevent an increase in the level of mercury discharges.

Any person seeking application of the alternative discharge limitations for mercury into the sanitary sewerage system shall submit a written request, together with a complete report indicating why the alternative discharge limitations for mercury should be applicable to such person's discharge, to the Director of the District's Monitoring and Research Department, in accordance with procedures established by the Director of the District's Monitoring and Research Department. The District will advise the person, in writing, of approval or denial of the person's request, within 90 days of the District's receipt of the person's request.

- j. The discharge of wastes from medicinal or therapeutic uses of mercury, exclusive of laboratory use, shall be exempt from the 0.0005 mg/L limitation of this section if all the following conditions are met:
 - (1) The total plant discharge is less than 227g (one half pound) as Hg in any year; and
 - (2) The discharge does not, alone or in conjunction with other sources, cause the effluent from the sewer system or treatment facility to exceed 0.0005 mg/L of mercury.
- k. Pollutants which will cause corrosive structural damage.
- l. Pollutants including, but not limited to, petroleum oil, non-biodegradable cutting oil, and products of mineral origin, which cause interference or pass-through.
- m. Hauled or trucked wastes, except at discharge points designated by and under valid written authorization of the District.
- n. Any pollutant, including oxygen-demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant con-

centration, which will cause Interference with the water reclamation facilities.

- o. Heat in amounts, which will inhibit biological activity in the water reclamation facilities resulting in Interference, but in no case heat in such quantities that the temperature at the water reclamation plant exceeds 40°C (104 °F).

Section 3. Dischargers in the Poplar Creek Service Area

Persons located in the Poplar Creek Service Area of the District discharging sewage, industrial waste, and other wastes to the sewerage system under the jurisdiction of the District which is tributary to the water reclamation facility owned and operated by the Fox River Water Reclamation District may be subject to more stringent limitations than the limitations found in Appendix B to this Ordinance.

Section 4. Compliance Determination

Compliance with the discharge limitations in this Appendix shall be maintained at all times, without exception. Any grab sample, or a composite sample of any duration, may be used for purposes of determining compliance with the discharge limitations in this Appendix. District monitoring of industrial users for determining compliance with the discharge limitations in this Appendix shall conform to the provisions of 40 CFR 403.8(f)(2)(vii) and shall be performed with sufficient care to produce evidence admissible in enforcement proceedings.

APPENDIX C

to the

SEWAGE AND WASTE CONTROL ORDINANCE

REGULATIONS APPLICABLE TO SIGNIFICANT INDUSTRIAL USERS

ARTICLE I

Reporting Requirements Applicable to Significant Industrial Users

In addition to the reporting requirements contained in Article V of this Ordinance, the following reporting requirements are applicable to any person identified by the District as a significant industrial user.

Section 1. Baseline Monitoring Report

Within 90 days after the date of promulgation for the applicable categorical standards found in Appendix C, existing industrial users subject to categorical pretreatment standards and currently discharging an effluent into a sewerage system under the jurisdiction of the District, shall complete and

submit to the District, on forms supplied by the District, a BMR. Within 90 days after being notified by the District of designation as a significant industrial user, significant industrial users not subject to categorical standards shall submit a BMR to the District. Sampling requirements for the completion of the BMR shall be supplied by the District and shall conform to the requirements of 40 CFR 403.12(g).

Upon adoption of Appendix D to this Ordinance, the BMR form supplied by the District for purposes of reporting under this section is replaced by the Discharge Authorization Request (DAR) form supplied by the District. All provisions of this Ordinance relating to the preparation and submittal of the BMR form shall be applicable to the preparation and submittal of the DAR form.

The BMR shall contain all information required by 40 CFR 403.12 (b), (c) and (g) of the general pretreatment regulations together with additional information as required by the District.

The BMR shall comply with the certification provisions of 40 CFR 403.12(b) and the signatory requirements of 40 CFR 403.12(l), and shall be executed by an authorized representative of the significant industrial user and certified as accurate and complete by a Registered Professional Engineer licensed by the state of Illinois.

New significant industrial users shall complete and submit to the District, on forms supplied by the District, an acceptable BMR at least 90 days prior to commencing discharge.

Section 2. Compliance Schedule

It shall be unlawful for a significant industrial user to continue to discharge process wastewater to a sewerage system under the jurisdiction of the District if the Executive Director has found the person in violation pursuant to Article VI, Section 1 of this Ordinance, or if the person certifies in their BMR or DAR that applicable pretreatment standards or other requirements are not being met on a consistent basis and that additional operation and maintenance or pretreatment facilities are required to meet those standards or requirements, unless the significant industrial user has submitted to the District a compliance schedule which conforms to the requirements of 40 CFR 403.12(c) and which is acceptable to and approved by the Executive Director. The schedule shall comply with the certification provisions of 40 CFR 403.12(b) and the signatory requirements of 40 CFR 403.12(l) and shall be certified by an authorized representative of the industrial user and certified by a Registered Professional Engineer licensed by the state of Illinois. In the event the compliance schedule is not acceptable, the Executive Director may require re-submittal of a compliance schedule

acceptable to the District, or may proceed as set forth under Article VI of this Ordinance.

A compliance schedule for attaining compliance with an applicable categorical pretreatment standard cannot extend beyond the final compliance date for the applicable categorical pretreatment standard contained in the Code of Federal Regulations.

A compliance schedule submitted by a significant industrial user as required herein shall be considered an enforceable requirement of a DA issued to the significant industrial user, and failure to comply with the compliance schedule shall be considered a violation of this Ordinance.

Section 3. Final Compliance Report

Each person subject to categorical pretreatment standards shall, within 90 days following the date for final compliance as set forth in Appendix C, Article III, submit to the Director of the District's Monitoring and Research Department, a report of final compliance with the categorical pretreatment standards on forms supplied by the District. The statement shall conform to the requirements of 40 CFR 403.12(d) and (g), shall comply with the certification provisions of 40 CFR 403.12(b) and the signatory requirements of 40 CFR 403.12(l), shall be executed by an authorized representative of such person, and certified by a Registered Professional Engineer licensed by the state of Illinois.

New significant industrial users shall complete and submit to the Director of the District's Monitoring and Research Department a report of final compliance immediately upon commencement of discharge.

Each significant industrial user shall take representative samples for a minimum of three days within a two-week period for the monitoring of a wastewater stream with a flow less than or equal to 200,000 gallons per day. Where the flow of a wastewater stream exceeds 200,000 gallons per day, the user shall take samples for six days within a two-week period. Sample collection shall conform to the requirements of 40 CFR 403.12(g). Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. For all other pollutants, 24-hour composite samples must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the District. Where time-proportional composite sampling or grab sampling is authorized by the District, the samples must be representative of the wastewater discharge. Sample analysis shall include all parameters listed in Appendix B, Sections 1 and 2(i) of this Ordinance and any parameters listed in the categorical pretreatment standards applicable to the significant industrial user.

Section 4. Reporting Continued Compliance

Each significant industrial user shall submit to the District, on forms supplied by the District and at intervals specified by the District, in the Discharge Authorization issued to the significant industrial user, which shall be not more than once per month nor less than twice per year, a report on continued compliance with applicable pretreatment standards and other requirements of this Ordinance. The reports shall cover all pertinent activities of the industrial user from the close of the previous reporting period through a date 30 calendar days prior to the report due date specified in the Discharge Authorization issued to the industrial user, and must be received by the District not later than the report due date. The reports shall conform to the requirements of 40 CFR 403.12(e) and (g), shall comply with the signatory requirements of 40 CFR 403.12(l), and shall be certified by an authorized representative of the industrial user.

Sampling requirements for the completion of reports on continued compliance shall be the same as described in Section 3 above.

Notwithstanding any other non-monetary remedies which the District may have by statute, common law or this Ordinance, any person failing to submit a report or submitting a deficient report to the District, as required hereunder, within the filing period established by the District for such report, shall be assessed a late filing fee, as set forth under Article V, Section 10 of this Ordinance.

Any significant industrial user whose total industrial waste discharge does not exceed 5,000 gallons in any calendar month, may request a waiver of the self-monitoring requirements of this section. The request must be submitted to the Director of Monitoring and Research and will not become effective until such determination is issued by the District, in writing. The significant industrial user must continue to submit all reports required under this section as established in the Discharge Authorization issued to said significant industrial user. The reports must be complete and accurate in all aspects, except for self-monitoring data. The District will perform the required sampling on behalf of the significant industrial user and shall insert its data to complete the report. The Director of Monitoring and Research may withdraw a waiver of the self-monitoring requirements granted under this paragraph upon a determination that the significant industrial user discharges greater than 5,000 gallons of industrial waste in any calendar month, or if the significant industrial user is found in significant noncompliance with any provisions of this Ordinance.

Any significant industrial user may request a waiver from the self-monitoring requirements of this

section for one continued compliance report, as required hereunder, annually. The significant industrial user must have an acceptable outside control manhole/sampling chamber, as required under the provisions of Article IV of this Ordinance, to enable the District to perform the required monitoring on behalf of the significant industrial user. The request must clearly indicate which annual continued compliance report is the subject of the waiver request, must be submitted to the Director of Monitoring and Research and will not become effective until such determination is issued by the District, in writing. The significant industrial user must continue to submit all reports required under this section as established in the Discharge Authorization issued to said significant industrial user. The District will perform the required sampling on behalf of the significant industrial user and shall provide its data to the significant industrial user to complete the continued compliance report. The reports must be complete and accurate in all aspects. The Director of Monitoring and Research may withdraw a waiver of the self-monitoring requirements granted under this paragraph upon a determination that the significant industrial user is in significant noncompliance with any provisions of this Ordinance.

Section 5. Late Filing of Reports

Notwithstanding any other non-monetary remedies which the District may have by statute, common law or this Ordinance, any person failing to submit a report or submitting a deficient report to the District, as required under any provision of this Appendix, within the filing period established by the District for such report, shall be assessed a late filing fee, as set forth under Article V, Section 10 of this Ordinance.

ARTICLE II

Additional Requirements Relating to Compliance with Appendix C

Section 1. Dilution Prohibition

No person shall augment the use of process water or, in any way, dilute or attempt to dilute a discharge as a partial or complete substitute for adequate pretreatment to achieve compliance with the limitations contained in this Ordinance.

Section 2. Intake Water Adjustment

Persons seeking adjustment of categorical pretreatment standards to reflect the presence of pollutants in their intake water must comply with the requirements of 40 CFR 403.15.

Section 3. Fundamentally Different Factors Variance

Persons seeking variances for reasons of fundamentally different factors must comply with the requirements of 40 CFR 403.13. The Executive Director may, upon notification of approval by the USEPA of the variance request, apply limitations to the industrial user.

Section 4. Adjustment for Combined Waste Streams

Persons seeking adjustments in the categorical pretreatment standards may petition the District for approval of adjustments to account for the combining or mixing of industrial process waste discharges with other flows or industrial process waste discharges prior to pretreatment or to discharge to the sewerage system under the jurisdiction of the District. The petition to the District must follow requirements and formulae established in 40 CFR 403.6(e) and be certified by an authorized representative and certified by a Registered Professional Engineer licensed by the state of Illinois.

Section 5. End-of-Process Monitoring

Where required to comply with the categorical pretreatment standards of Appendix C, additional control manholes or sampling chambers shall be provided at the end of each industrial process within an industrial user's facility.

ARTICLE III
Categorical Pretreatment Standards

Section 1. Categorical Standards

Industrial categories for which pretreatment standards have been promulgated and as amended by the USEPA are listed herein. Industrial users in one or more of the regulated categories will be supplied with the appropriate pretreatment standards by the District. Those categorical standards as promulgated and as amended by the USEPA and set forth below are adopted by the Board of Commissioners as its performance criteria for discharge to sewers under the jurisdiction of the District.

Industrial Point Source Category	Final Rule Date	Industrial Point Source Category	Final Rule Date
401 General provisions	2/1/1974	415 Inorganic chemicals manufacturing	6/29/1982
403 General pretreatment regulations for existing and new sources of pollution	1/28/1981	420 Iron and steel manufacturing	5/27/1982
449 Airport Deicing	5/16/2012	445 Landfills	1/19/2000
467 Aluminum forming	10/24/1983	425 Leather tanning and finishing	11/23/1982
427 Asbestos manufacturing	2/26/1974	432 Meat and poultry products	9/8/2004
461 Battery manufacturing	3/9/1984	433 Metal finishing	7/15/1983
407 Canned and preserved fruits and vegetables processing	3/21/1974	464 Metal molding and casting	10/30/1985
408 Canned and preserved seafood processing	6/26/1974	438 Metal products and machinery	5/13/2003
458 Carbon black manufacturing	1/9/1978	436 Mineral mining and processing	10/16/1975
411 Cement manufacturing	2/20/1974	471 Nonferrous metals forming and metal powders	8/23/1985
437 Centralized waste treatment	12/22/2000	421 Nonferrous metals manufacturing	3/8/1984
434 Coal mining	10/9/1985	435 Oil and gas extraction	4/13/1979
465 Coil coating	12/1/1982	440 Ore mining and dressing	12/3/1982
451 Concentrated aquatic animal production	8/23/2004	414 Organic chemicals, plastics and synthetic fibers	11/5/1987
412 Concentrated animal feeding Operations (CAFO)	2/12/2003	446 Paint formulating	7/28/1975
450 Construction and Development	12/1/2009	443 Paving and roofing materials (tars and asphalt)	7/24/1975
468 Copper forming	8/15/1983	455 Pesticide chemicals	4/25/1978
405 Dairy products processing	3/28/1974	419 Petroleum refining	10/18/1982
441 Dental Office	6/14/2017	439 Pharmaceutical manufacturing	10/27/1983
469 Electrical and electronic components	4/8/1983	422 Phosphate manufacturing	2/20/1974
413 Electroplating	1/28/1981	459 Photographic	7/14/1976
457 Explosives manufacturing	3/9/1976	463 Plastics molding and forming	12/17/1984
424 Ferroalloy manufacturing	2/22/1974	466 Porcelain enameling	11/24/1982
418 Fertilizer manufacturing	4/8/1974	430 Pulp, paper and paperboard	4/15/1998
426 Glass manufacturing	1/22/1974	428 Rubber manufacturing	2/21/1974
406 Grain mills	3/20/1974	417 Soap and detergent manufacturing	4/12/1974
454 Gum and wood chemicals manufacturing	5/18/1976	423 Steam electric power generating	11/19/1982
460 Hospital	5/6/1976	409 Sugar processing	1/31/1974
447 Ink formulating	7/28/1975	410 Textile mills	9/2/1982
		429 Timber products processing	1/26/1981
		442 Transportation equipment cleaning	8/14/2000
		444 Waste combustors	1/27/2000

Section 2. Compliance Determination

Industrial user self-monitoring for determining compliance with categorical pretreatment standards shall conform to the provisions contained in Appendix C, Article I of this Ordinance.

District monitoring of industrial users for determining compliance with categorical pretreatment standards shall conform to the provisions of 40 CFR 403.8(f)(2)(vii), and shall be performed with sufficient care to produce evidence admissible in enforcement proceedings.

APPENDIX D **to the** **SEWAGE AND WASTE CONTROL** **ORDINANCE** **Discharge Authorizations**

Section 1. Applicability

As provided under Article III, Section 1 of this Ordinance, and except as provided elsewhere in this Appendix, it shall be unlawful for any significant industrial user, as defined herein, to cause or allow the discharge of process wastewater into the sewerage system under the jurisdiction of the District unless such significant industrial user is in conformance with all terms and conditions of a current valid Discharge Authorization issued to said significant industrial user by the District.

Section 2. Discharge Authorization Document

The Discharge Authorization document issued by the District shall contain, at a minimum, the following conditions:

- a. Statement of limited duration not to exceed five years, as provided for in Appendix D, Section 6 of this Ordinance;
- b. Transferability provision, as provided for in Appendix D, Section 7 of this Ordinance;
- c. Effluent discharge limitations applicable to all effluent discharge monitoring points of the industrial user, as provided for in Appendix B and Appendix C of this Ordinance;
- d. Self-monitoring, sampling, reporting, notification and record-keeping requirements, including identification of the pollutants to be monitored, sampling points, sampling frequency, and sample type, as provided for in Article V, Article VI, Appendix C and Appendix D of this Ordinance;
- e. Statement of applicable penalties for violation of standards and requirements, as provided for in Article VI and Article VII of this Ordinance;

- f. Compliance milestone requirements and dates of any compliance schedule entered into by the significant industrial user to remedy a condition of noncompliance with the terms and conditions of this Ordinance or a DA issued to the significant industrial user pursuant hereto; and
- g. Requirements concerning spill containment and potential for slug discharge described in Article V, Section 4 of this Ordinance.

Section 3. Discharge Authorization Request

Within 90 days of the date of notification from the District that a person has been determined to be a significant industrial user, such person shall complete and submit to the District, on forms supplied by the District, a Discharge Authorization Request (DAR). Sampling requirements for the completion of the DAR shall be specified on the DAR form supplied by the District. Sample collection and analysis shall conform to the requirements of 40 CFR 403.12(g).

Any person who submits a completed and certified DAR to the District, in a timely manner as provided herein, may continue to cause or allow the discharge of process wastewater into the sewerage system under the jurisdiction of the District, in the absence of a DA, only in conformance with all other terms and conditions of this Ordinance.

For the purposes of this provision, any person who has on file with the District, a current and approved BMR shall be deemed to have been issued an interim DA, and shall not be required to submit a DAR, until 90 days after being notified of such requirement by the District.

The DAR shall disclose the name and address of the person, as defined herein, seeking the Discharge Authorization and identify the name(s) of all officers or principal owners of said person. The DAR shall be executed by an authorized representative of the person and certified as accurate and complete by a Registered Professional Engineer licensed by the state of Illinois.

Any person who plans to commence new activities or who plans to modify existing activities such that said person becomes a significant industrial user shall notify the District of such activities and shall submit to the District, on forms supplied by the District, a DAR at least 90 days prior to commencement of such activities and discharge to the sewerage system.

Section 4. Issuance of Discharge Authorization By District

Within 90 days of receipt of a completed DAR, the District shall notify the person submitting said

DAR of approval or denial of the DAR and the reason(s) for denial.

For the purposes of this provision, any person who has on file with the District, a current and approved BMR shall be deemed to have been issued an interim DA.

Section 5. Review of Denial of Discharge Authorization or Special Condition in Discharge Authorization

Any person whose DAR has been denied by the District, or who wishes to have reviewed any special condition of a Discharge Authorization issued to such person, may request a review of the District's determination. Such request must be made in writing, to the Director of Monitoring and Research, and must be received by the District within 30 days of the date of notification that the DAR has been denied or of notification of the special condition. The request for review must clearly state the reason(s) why such person believes that the District's denial of the DAR or the special condition should be reviewed.

- a. Any person whose DAR for a new discharge has been denied by the District is prohibited from commencing the discharge of process wastewater into the sewerage system of the District until such time as a Discharge Authorization is issued to said person.
- b. Any person whose DAR for an existing discharge has been denied may continue to discharge process wastewater into the sewerage system of the District, only in accordance with all conditions reported in the DAR and not otherwise in violation of this Ordinance, during the review and until a final administrative decision by the District.
- c. Any person who requests a review of a special condition contained in a Discharge Authorization issued to said person, for an existing discharge of process wastewater, may continue to discharge process wastewater into the sewerage system of the District, only in accordance with all conditions of the Discharge Authorization issued to said person, except the special condition under review, and not otherwise in violation of this Ordinance, during the review and until a final administrative decision by the District.

The Director of Monitoring and Research will inform the Executive Director of all requests for review. The Executive Director shall order that a hearing be held for each request for review. The review hearing shall comply with the hearing procedures of Article VI, Section 3 of this Ordinance. The final administrative decision on each review will be made by the Board of Commissioners after it receives a

report with recommendations from the Review Hearing Officer.

Section 6. Request for Renewal of Discharge Authorization

Discharge Authorizations issued pursuant to this Ordinance shall be valid for a period not exceeding five years. Not less than 90 days prior to the expiration date of a discharge authorization issued by the District, the person to whom said discharge authorization was issued shall submit to the District, on a DAR form supplied by the District, a request for renewal of the discharge authorization. Any person who submits a completed and certified request for renewal, in a timely manner as provided herein, shall be granted an extension of the termination date of their DA, until such time as the District issues a determination with regard to such person's request for renewal of the DA. Any person whose request for renewal of a DA has been denied may seek review of such denial, as provided in Appendix D, Section 5 of this Ordinance.

In addition to the provisions for administrative and legal proceedings contained in Article VI and Article VII of this Ordinance, whenever the Executive Director determines that a person to whom a Discharge Authorization has been issued has failed to comply with an Order of the Board issued pursuant to this Ordinance; has failed to comply with a substantive Order of the Court issued in litigation initiated by the District, the Office of the State's Attorney or the United States Attorney, against such person for noncompliance with this Ordinance; has failed to promptly pay all civil penalties, late filing fees or other costs assessed against such person in any action taken by the District; or has failed to pay all User Charges owed to the District by such person, the Director of Monitoring and Research may deny renewal of such person's Discharge Authorization, except that actions subject to a pending and properly filed appeal taken pursuant to the provisions set forth in this Ordinance, the Rules Governing the Proceedings, Assessment of Civil Penalties, and Issuance of Orders Under the Sewage and Waste Control Ordinance of the Metropolitan Water Reclamation District of Greater Chicago, or the User Charge Ordinance, shall not be considered sufficient cause for the District to deny renewal of such person's Discharge Authorization until said appeal has been finally resolved by the District.

During the period of review of any denial of a request for renewal of an existing DA, the person may continue to cause or allow the discharge of process wastewater into the sewerage system under the jurisdiction of the District only in conformance with all terms and conditions of this Ordinance and the DA previously issued to said person.

Section 7. Reissuance of Discharge Authorization to Another Person

Discharge Authorizations issued pursuant to this Ordinance shall be issued to the specific person, as defined in Article II of this Ordinance, and for the specific location identified in the Discharge Authorization Request submitted to the District. Such Discharge Authorization shall remain in full force and effect until expiration thereof, or until non-renewal or revocation by the District.

No Discharge Authorization may be reissued to another person if the person to whom the Discharge Authorization was issued is the subject of an unresolved enforcement action taken by the District, or if the person has failed to pay, within 30 days of the payment due date, all monies owed to the District under this Ordinance and the District's User Charge Ordinance, unless the following occurs prior to the effective date of the transfer:

1. The person seeking to transfer the Discharge Authorization has resolved the outstanding enforcement action to the satisfaction of the District and has paid all monies owed to the District, or,
2. In the event of an unresolved enforcement action, the transferee has submitted a plan and schedule for resolving the outstanding enforcement action within a period acceptable to the District. Such plan and schedule must be certified by a Registered Professional Engineer licensed by the state of Illinois and an authorized representative of the transferee and shall be incorporated as an enforceable Special Condition in the Discharge Authorization reissued to the transferee, and,
3. In the event of monies owed to the District, the transferee has submitted an affidavit to the District assuming full responsibility for payment of all monies owed to the District. The affidavit shall also be signed by the transferor and acknowledge that assumption of liability by the transferee shall not release the transferor from any outstanding monies owed to the District at the time of the transfer until said amounts are paid-in-full. This provision neither abrogates any existing rights nor conveys any additional rights which the transferor or transferee may otherwise have to appeal the District's assessment of charges or fees.

No Discharge Authorization for the commencement of a discharge at a new location shall be issued to any person if said person has failed to comply with an Order of the Board issued pursuant to this Ordinance; has failed to comply with a substan-

tive Order of the Court issued in litigation initiated by the District, the Office of the State's Attorney or the United States Attorney, against such person for noncompliance with this Ordinance; has failed to promptly pay all civil penalties, late filing fees or other costs assessed against such person in any action taken by the District; or has failed to pay any User Charges owed to the District by said person.

Any change in the person to whom a Discharge Authorization has been issued must be reported to the Director of Monitoring and Research not less than 30 days prior to such change, together with the effective date of the change and the identity of the person to whom the Discharge Authorization should be reissued. Not less than 20 days prior to the effective date of the change, the District will advise all parties of any unresolved enforcement actions and monies owed to the District. The parties shall have ten days to resolve these matters in accordance with the terms of this section. Not less than five days prior to the effective date of the change, the District will advise all parties whether the Discharge Authorization may be reissued. If the District does not object to reissuance of the Discharge Authorization, the person to whom the Discharge Authorization was originally issued must submit to the District, before the effective change date, an affidavit verifying delivery of a copy of the existing Discharge Authorization to the person to whom the Discharge Authorization is to be reissued. The District will reissue the Discharge Authorization to the person, as identified in the above notification, within 30 days of receipt of said notification, if there has been compliance with the terms of this section of the Ordinance.

Continued discharge of process wastewater into a sewerage system under the jurisdiction of the District, in the absence of a current and valid Discharge Authorization, will be considered a knowing and willful violation of this Ordinance, the applicable statutes of the state of Illinois and applicable federal pretreatment regulations.

The Executive Director may refer such violation to the Office of State's Attorney or the Office of the United States Attorney, for such action as they may deem appropriate.

Section 8. Revocation of Discharge Authorization

In addition to the provisions for administrative and legal proceedings contained in Article VI and Article VII of this Ordinance, whenever the Executive Director determines that a person to whom a Discharge Authorization has been issued has failed to comply with a Cease and Desist Order issued pursuant to Article VI of this Ordinance, or whenever a person has failed to comply with an Order of the Board

issued pursuant to this Ordinance; has failed to comply with a substantive Order of the Court issued in litigation initiated by the District, the Office of the State's Attorney or the United States Attorney, against such person for noncompliance with this Ordinance; has failed to promptly pay all civil penalties, late filing fees or other costs assessed against such person in any action taken by the District; or has failed to pay all User Charges owed to the District by such person, the Executive Director may order such person to show cause before the Board why the Discharge Authorization should not be revoked, except that actions subject to a pending and properly filed appeal taken pursuant to the provisions set forth in this Ordinance, the Rules Governing the Proceedings, Assessment of Civil Penalties, and Issuance of Orders Under the Sewage and Waste Control Ordinance of the Metropolitan Water Reclamation District of Greater Chicago, or the User Charge Ordinance, shall not be considered sufficient cause for the District to revoke such person's Discharge Authorization until said appeal has been finally resolved by the District. The show cause proceeding so ordered shall comply with the provisions of Article VI, Section 3 and Appendix D, Section 5 of this Ordinance.

Section 9. Continued Discharge in Absence of Current and Valid Discharge Authorization to be Considered a Violation

Whenever a person to whom a notification of applicability of this Appendix has been transmitted fails to submit a DAR as required under this Appendix, or whenever a person whose DA has been revoked pursuant to an order of the Board of Commissioners, or whose DA has expired, continues to cause or allow the discharge of process wastewater into a sewerage system under the jurisdiction of the District, the Executive Director shall, by Registered or Certified Mail or by personal service by any employee of the District, notify such person that continued discharge in the absence of a valid DA may be considered a knowing and willful violation of this Ordinance, the applicable statutes of the state of Illinois and applicable federal pretreatment regulations.

The Executive Director may refer such violation to the Office of State's Attorney in and for the county in which the District is located, or the Office of the United States Attorney, for such action as they may deem appropriate.

APPENDIX E
to the
SEWAGE AND WASTE CONTROL
ORDINANCE

RULES GOVERNING CONFIDENTIALITY AND PUBLIC ACCESS TO INFORMATION

Section 1. Confidentiality and Information Available to the Public

All information submitted to the District pursuant to the reporting provisions of this Ordinance, with the exception of data as described below, may be claimed as confidential by the submitter and may not be released to the public without prior written approval of the person submitting such information. Any such claim must be asserted at the time of submission in the manner prescribed on the application form or instructions, or, in the case of other submissions, by stamping the words "confidential business information" on each page containing such information. If no claim is made at the time of submission, the District may make the information available to the public without further notice.

Information and data provided to the District relative to Article V, Sections 3 and 4, Appendix C, and Appendix D of this Ordinance, which describe the concentration and/or mass loading of pollutants discharged, physical characteristics of discharge, general description of the location and nature of the source of pollutants, and analyses of samples of discharge, shall be available to the public in accordance with 40 CFR 403.14. Cease and Desist Orders, Notices of Show Cause, and other notices of enforcement action taken by the District pursuant to this Ordinance shall be available to the public upon written request to the Director of Monitoring and Research. Information regarding enforcement actions taken against persons in violation of this Ordinance is routinely provided to officials of municipalities in which the persons in violation are located or have indicated they plan to relocate.

All information regarding industrial users shall be made available to the USEPA, the IEPA and any other unit of government subject to the confidentiality provisions found at 40 CFR 2.302 and 40 CFR 403.14.

Section 2. Annual Publication of Persons in Significant Noncompliance

In accordance with the public participation requirements of 40 CFR 403.8(f)(2)(viii), the District, at least annually, will publish the identity of each person in significant noncompliance with this Ordinance, along with the nature of such significant noncompliance, in a newspaper of general circulation that provides meaningful public notice within the

jurisdiction of the District. Prior to publication, each such person will be advised in writing of the District's intent to publish the identity of the person and will be granted an opportunity to provide comment to the District regarding the appropriateness of such publication.

APPENDIX F
to the
SEWAGE AND WASTE CONTROL
ORDINANCE
ENFORCEMENT RESPONSE PROCEDURE

This appendix represents the Enforcement Response Procedure (ERP) of the Metropolitan Water Reclamation District of Greater Chicago (District) for the enforcement of the terms and conditions of the District's Sewage and Waste Control Ordinance (Ordinance).

As recommended by the United States Environmental Protection Agency in "Pretreatment Compliance Monitoring And Enforcement Guidance", published July 25, 1986, the ERP has been developed to include a range of enforcement responses available to the District to effectively enforce the terms and conditions of its Ordinance. The ERP establishes a framework, the Response Option Matrix (ROM), in which the District will assess the degree of noncompliance by an Industrial User (IU) and in which the District may consider both mitigating and aggravating circumstances in determining the appropriate enforcement response. The ERP also establishes minimum response levels for incidents of noncompliance which are deemed critical in nature, including interference and pass-through.

TYPES OF ENFORCEMENT RESPONSES

Industrial Users (IU) found in noncompliance with any of the terms or conditions of the Ordinance are subject to enforcement action under the ERP. Enforcement actions such as Notices of Noncompliance and Cease and Desist Orders are determined by the District's Executive Director and are administered through the office of the Director of Monitoring and Research (Director). Show Cause proceedings and legal actions are administered by the District's General Counsel upon recommendation from the Director.

Incidents of noncompliance with the Ordinance will be evaluated in accordance with the ROM as to the type of enforcement response necessary to attain prompt compliance with the Ordinance.

The following types of enforcement responses are available to the District in response to incidents of noncompliance with its Ordinance.

A. Notice of Noncompliance – Appendix B (NONB)

A NONB is a written notification, sent via Certified Mail, Return Receipt Requested, which is directed to an authorized representative of an IU found to be in minor noncompliance (not in Significant Noncompliance as herein defined) with an applicable effluent discharge standard of Appendix B (local limits) of the Ordinance. The NONB advises the IU of the nature of the noncompliance, requires the IU to investigate the incident and take measures to remediate the condition of noncompliance, and to execute, within ten days of receipt of the NONB, a Declaration of Corrective Action, indicating that compliance has been achieved.

The Declaration of Corrective Action and statement of compliance will be subject to verification by District inspection and sampling within 90 days. Failure to achieve compliance will result in the issuance of a Cease and Desist Order.

B. Notice of Noncompliance – Appendix C (NONC)

A NONC is a written notification, sent via Certified Mail, Return Receipt Requested, which is directed to an authorized representative of an IU found to be in minor noncompliance (not in Significant Noncompliance as herein defined) with an applicable effluent discharge standard of Appendix C (categorical pretreatment standards) of the Ordinance. The NONC advises the IU of the nature of the noncompliance, requires the IU to investigate the incident and take measures to remediate the condition of noncompliance, and to execute, within 45 days of receipt of the NONC, a Declaration of Corrective Action, indicating that compliance has been achieved. The IU is also required to conduct a minimum of three days of sampling to verify that compliance has been achieved and to submit all supporting analytical data with the Declaration of Corrective Action.

The Declaration of Corrective Action and statement of compliance will be subject to verification by District inspection and sampling within 90 days. Failure to achieve compliance will result in the issuance of a Cease and Desist Order.

C. Notice of Noncompliance – Baseline Monitoring Report Verification (NONBMR)

A NONBMR is a written notification, sent via Certified Mail, Return Receipt Requested, which is directed to an authorized representative of an IU found to be in noncompliance with an applicable effluent discharge standard of Appendix C (categorical pretreatment standards) of the Ordinance, during the initial Baseline Monitoring Report verification inspection and sampling. The NONBMR advises the IU of the nature of the noncompliance and requires the IU

to achieve compliance within 90 days of the date of the NONBMR. The IU is also advised that the District will inspect and sample the IU within 90 days of the date of the NONBMR and that the IU will be recommended for Show Cause action if the IU is again found in noncompliance. These NONBMRs are not issued to those companies who exceed a return-to-compliance period of 90 days. Companies who exceed the 90 day period are recommended for Show Cause action.

D. Cease and Desist Order – Reporting Requirements (C&DR)

A C&DR is written notification, sent via Certified Mail, Return Receipt Requested, directed to an authorized representative of an IU which failed to submit a report within 45 days of the report due date. The C&DR advises the IU of the nature of the non-compliance and requires the IU to comply with the applicable reporting requirement within 30 days of the date of the C&DR.

In the event of failure to comply with pretreatment system malfunction, bypass or accidental spill notification requirements, the IU will be required to submit, within 30 days of the date of the C&DR, a fully implemented Spill Prevention, Control and Countermeasure Plan, including specific provisions for proper notification to the District of any pretreatment system malfunction, bypass or accidental spill incident.

Failure of an IU to supply any report or other information required by the District, as required under a C&DR, will result in Show Cause action being recommended.

E. Cease and Desist Order (C&D)

A C&D is written notification, sent via Certified Mail, Return Receipt Requested, directed to an authorized representative of an IU found to be in noncompliance with an applicable effluent discharge standard of the Ordinance or with any terms or conditions of the Ordinance, with the exception of reporting requirements. The C&D advises the IU of the nature of the noncompliance and requires the IU to attain compliance with the Ordinance within 90 days of the date of the Order and to submit to the District a report regarding its investigation into the incident of noncompliance and a Compliance Schedule. The Compliance Schedule must be certified by an authorized representative of the IU, notarized, and must contain major milestone dates for implementation of remediation measures as well as a compliance date. The compliance date indicated in the Compliance Schedule cannot extend greater than 90 days beyond the date of the C&D.

The IU will be required to submit to the District, not more than 15 days after the compliance date specified in the Compliance Schedule, a Final

Compliance Report, certified by an authorized representative of the IU, and notarized, indicating that compliance has been achieved.

The IU's Final Compliance Report will be subject to verification by District inspection and sampling within 90 days of the District's receipt of the Final Compliance Report.

Failure to achieve compliance within 90 days from the date of the C&D or failure to submit a properly executed Final Compliance Report, indicating that compliance has been achieved, will result in Show Cause action being recommended.

F. Show Cause Proceedings (SC)

When it has been determined that any person has failed to comply with a Cease and Desist Order, the Executive Director of the District may order an IU who engages in activity or conduct prohibited by the Ordinance to Show Cause before the District's Board of Commissioners (Board), or its hearing officer designee, why such prohibited activity or conduct should not be discontinued.

A Notice of Show Cause, directed to an authorized representative of the IU, is served personally or by Registered or Certified Mail, specifying the time and place of a hearing to be held by the Board, and directing the IU to Show Cause before the Board why an order should not be entered directing discontinuance of such prohibited activity or conduct.

The Board may, itself, conduct the hearing and take evidence, or may designate any of its members or any officer or employee of the District or any other person to issue, in the name of the Board, notices of hearings requesting attendance and testimony of witnesses and the production of evidence relevant to any matter involved in such hearing, to take evidence, and to transmit a report of the evidence and hearing, including transcripts and other evidence, together with recommendations to the Board for action thereon. At any public hearing, testimony taken before the Board or any person designated by it must be under oath and recorded stenographically. The transcript so recorded will be made available to any member of the public or any party to the hearing upon payment of the usual charges therefor.

After the Board has reviewed the evidence, it may issue a Board Order (BO) to the IU directing that within a specified time period, the prohibited activity or conduct be discontinued unless adequate pretreatment facilities are properly installed and operated to ensure compliance, recommending penalties in the amount of not less than \$1,000.00 nor more than \$10,000.00 for each violation of the Ordinance. If a person violates the terms of a Board Order, the District will seek to recover, in a civil action, the fines recommended by the Board of Commis-

sioners for violations which are recited in the Board Order.

G. Court Proceedings (CT)

Any activity or conduct of an IU which is in violation of or prohibited by the Ordinance, or failure of an IU to comply with an Order of the Board, shall be considered a nuisance. The District may commence an action or proceeding in the Circuit Court for the purpose of having such activity or conduct stopped either by mandamus or injunction.

The District shall seek penalties in the amount of not less than \$1,000.00 nor more than \$10,000.00 for each violation of the Ordinance, together with reasonable attorney’s fees, court costs, and other expenses of litigation. The District shall also seek recovery of all inspection, monitoring, and administrative costs incurred after the issuance of a Cease and Desist Order relative to an IU found in violation of the Ordinance.

H. Civil or Criminal Referrals (CR)

If an IU engages in any activity or conduct in apparent violation of a statute of the state of Illinois or a federal regulation, the District may refer such matters to the Office of the State’s Attorney, the Illinois Environmental Protection Agency, the United States Environmental Protection Agency or any other appropriate agency for investigation and civil and criminal enforcement action. Any such referral will be made in addition to an appropriate enforcement action taken pursuant to this ERP and will not reduce the District’s responsibility to aggressively pursue such enforcement action.

The District will seek, through the appropriate agency, the maximum civil and criminal penalty assessable under statute or regulation and will supply evidence and testimony as deemed necessary by the agency in the prosecution of any such matters.

I. Noncompliance Enforcement (NCE) Activities

The cost for administering the noncompliance enforcement (NCE) activities of this Ordinance shall be recovered from persons who are found in noncompliance with this Ordinance. NCE activities include, but are not limited to the following: preparation of Notices of Noncompliance, Cease and Desist Orders, Show Cause recommendations, legal action recommendations, noncompliance referrals to the District’s Law Department, enforcement action amendments, compliance date revisions, compliance meeting notifications, delinquent report notifications, late filing fee invoicing and acceptable compliance report notifications; preparing for and participating in meetings and hearings; review and processing of Compliance Schedules (RD-112), non-compliance follow-up sampling; laboratory analysis

and review; and frequent or continuous sampling and analysis for extended significant noncompliance. Where the cost for any NCE activity is recovered through assessment of late filing fees against the person pursuant to Article V, Section 10 of this Ordinance or through a civil action taken by the District against a person pursuant to Article VII, Section 3 of this Ordinance, such cost shall be segregated from the NCE cost to be recovered. The NCE cost shall be recovered through charges based on enforcement and monitoring activities, as set forth below.

**Noncompliance Enforcement (NCE) Charges
Effective January 1, 2012**

Enforcement Level	Sampling Charge	Administrative Cost
Notice of Noncompliance	\$712	\$843
Cease & Desist Order (Single-sample SNC)	\$1,643	\$843
Cease & Desist Order (Chronic/Acute SNC)	\$4,158	\$843
Recurring Cease & Desist Order (Per each C&D Order)	\$4,158	\$843
Show Cause or Legal Action	To be addressed in resolution of the enforcement action	

The NCE charges, where applicable, will be assessed by invoice issued to the person found in noncompliance. If the person disputes the NCE charges, the person must notify the Director of Monitoring and Research, in writing, of such dispute within 30 days of receipt of the NCE invoice, together with the reasons why the person disputes the charges. All disputes regarding NCE charges will be handled in accordance with Article V, Section 10 of this Ordinance.

COMPLIANCE SCREENING / REVIEW

All IU self-reports and reports generated by District inspection and sampling of IUs will be reviewed by the Industrial Waste Division, Enforcement Section for incidents of noncompliance with applicable standards. Reports will be reviewed and enforcement actions will be taken in response to any incidents of noncompliance in accordance with the following schedule.

A. IU Self-reports

All IU self-reports will be reviewed within 45 days of receipt of said self-report. Enforcement action will

be initiated within 60 days of receipt of the report, if required.

B. District Inspection and Sampling Reports

In conformance with 40 CFR 403.8(f)(2), the District will inspect and sample each SIU at least annually. The District will inspect and sample each IU found in noncompliance to verify the IU's claims that compliance has been attained. For instances of significant noncompliance, verification inspection and sampling will be performed within 60 days of the IU's compliance date. For nonsignificant instances of noncompliance, certification inspection and sampling will be performed within 90 days of the IU's final compliance date. Sample collection and analysis shall be performed in accordance with 40 CFR 136.

All District inspection and sampling reports will be reviewed within 45 days of the receipt of said District inspection or sampling report and complete analytical data by the Industrial Waste Division, Enforcement Section. Enforcement action will be initiated within 60-days of receipt of the complete report, if required.

C. Enforcement Actions by Director

All enforcement response actions taken by the Director (NONB, NONC, NONBMR, C&DR, C&D) shall be initiated within the time periods indicated in Paragraphs A and B above.

D. Enforcement Actions by General Counsel

All enforcement responses which require action by the General Counsel (SC, CT, CR) will be recommended to the General Counsel by the Director within the time periods indicated in Paragraphs A and B above. The General Counsel will take action on all recommendations from the Director within 30 days of receipt of said recommendation.

SIGNIFICANT NONCOMPLIANCE

For purposes of determining an appropriate enforcement response, incidents of noncompliance will be deemed Significant Noncompliance in accordance with the criteria contained in Article II above.

TEST OF GOOD FAITH EFFORT

When determining an appropriate enforcement response to an incident of noncompliance, the District will consider the apparent attitude of the IU toward the effort required to achieve and maintain compliance with the Ordinance. If an IU appears to be acting in good faith to comply with the Ordinance, the District may choose an enforcement action on a more conciliatory level than if an IU does not appear to be acting in good faith to comply with the Ordinance. For the purpose of establishing a good faith

effort on the part of an IU, the District will measure the IU's effort against the following standard, as stated in Legislative History of the Clean Water Act, No. 95-14, Vol. 3, p.463: "The Act requires industry to take extraordinary efforts if the vital and ambitious goals of the Congress are to be met. This means that business-as-usual is not enough. Prompt, vigorous, and in many cases, expensive pollution control measures must be initiated and completed as promptly as possible. In assessing the good faith of a discharger, the discharger is to be judged against these criteria. Moreover, it is an established principle, which applies to this act, that administrative and judicial reviews are sought on the discharger's own time."

RESPONSE OPTION MATRIX

A. IU Reporting and Self-monitoring

<u>Noncompliance</u>	<u>Circumstances</u>	<u>Response</u>
Failure to submit Facility Classification Questionnaire (FCQ)	Initial occurrence	C&DR
Failure to submit FCQ	Repeated occurrence; failure to comply with C&DR	C&DR or SC*
Failure to submit initial Baseline Monitoring Report (BMR) or Discharge Authorization Request (DAR), or to submit amended BMR or DAR upon significant change in operation	Initial occurrence	C&DR
Failure to submit initial BMR or DAR or to submit amended BMR or DAR upon significant change in operation	Repeated occurrence	SC or CT
Failure to conduct self-monitoring and to submit periodic reports	Isolated occurrence	C&DR
Failure to conduct self-monitoring and to submit periodic reports	Repeated occurrence; failure to comply with C&DR	SC or CT
Minor deficiencies in periodic reports	Isolated occurrence	C&DR
Minor deficiencies in periodic reports	Repeated occurrence; failure to comply with C&DR	C&DR or SC
Major deficiencies in periodic reports, late reports	Isolated occurrence	C&DR
Major deficiencies in periodic reports, late reports	Repeated occurrence; failure to comply with C&DR	SC or CT
Failure to report effluent limit violation, pretreatment system malfunction, bypass or slug discharge (spill)	Isolated occurrence; no interference of pass-through	C&DR
Failure to report effluent limit violation, pretreatment system malfunction, bypass or slug discharge (spill)	Repeated occurrence; failure to comply with C&DR; no interference or pass-through	C&DR or SC
Failure to report effluent limit violation, pretreatment system malfunction, bypass or slug discharge (spill)	Isolated occurrence; interference or pass-through	C&DR or CT or CR
Failure to report effluent limit violation, pretreatment system malfunction, bypass or slug discharge (spill)	Repeated occurrence; interference or pass-through	SC or CT or CR
Failure to report effluent limit violation, pretreatment system malfunction, bypass or slug discharge (spill)	Any incident with known POTW or environmental Damage	CT or CR
Failure to report new or increased pollutant loading or change in flow	Isolated occurrence	C&DR
Failure to report new or increased pollutant loading or change in flow	Repeated occurrence	C&DR or SC

<u>Noncompliance</u>	<u>Circumstances</u>	<u>Response</u>
Failure to submit schedule of batch or infrequent discharges	Isolated occurrence	C&DR
Failure to submit schedule of batch or infrequent discharges	Repeated occurrence; failure to comply with C&DR	C&DR or SC
Failure to report batch or infrequent discharge	Isolated occurrence	C&DR
Failure to report batch or infrequent discharge	Repeated occurrence	C&DR or SC or CT
Willful submission of false information	Any incident	CR

B. Compliance Schedules

<u>Noncompliance</u>	<u>Circumstances</u>	<u>Response</u>
Willful submission of false information	Any incident	CR
Missed interim date	No impact on final date For C&D For SC For CT	C&D SC CT
Missed interim date	Delay of final date less than 90 days, good cause For C&D For SC For CT	C&D SC CT
Missed interim date	Delay of final date greater than 90 days, good cause For C&D For SC For CT	SC SC CT
Missed interim date	Delay of final date, Lacking good cause For C&D For SC For CT	SC or CT SC or CT CT
Missed final date	Good cause, non-SNC For C&D For SC For CT	C&D or SC SC or CT CT
Missed final date	Good cause, SNC For C&D For SC For CT	SC CT CT
Missed final date	No good cause For C&D For SC For CT	SC or CT CT CT

C. Effluent Limits

<u>Noncompliance</u>	<u>Circumstances</u>	<u>Response</u>
Non-SNC, local limits	Isolated occurrence	NONB
Non-SNC, categorical pretreatment limits	Isolated occurrence except BMR verification sampling	NONC
Non-SNC	Repeated occurrence	C&D or SC
Categorical pretreatment standards	BMR verification sampling	NONBMR
Categorical pretreatment standards	NONBMR compliance Sampling	C&D
SNC	Isolated occurrence	C&D or SC
SNC	Repeated occurrence; failure to comply with C&D	C&D or SC or CT
Any limit	Isolated occurrence; interference or pass-through	C&D or CT
Any limit	Repeated occurrence; interference or pass-through	SC or CT
Any limit	Any incident with known POTW or environmental Damage	CT or CR
Slug load (spill)	Isolated occurrence; no interference or pass-through	C&D or SC or CT or CR
Slug load (spill)	Repeated occurrence; no interference or pass-through	C&D or SC or CT or CR
Slug load (spill)	Isolated occurrence; interference or pass-through	C&D or CT or CR
Slug load (spill)	Repeated occurrence; interference or pass-through	SC or CT or CR
Slug load (spill)	Any incident with known POTW or environmental Damage	CT or CR
Any discharge from regulated categorical IU without approved BMR	Any incident	C&D or CT
Any discharge from IU in violation of BO	Any incident	SC or CT

D. Dilution

<u>Noncompliance</u>	<u>Circumstances</u>	<u>Response</u>
Dilution of an effluent to achieve compliance with an effluent limitation	Isolated occurrence	C&D
Dilution of an effluent to achieve compliance with an effluent limitation	Repeated occurrence; failure to comply with C&D	C&D or SC

E. Entry and Access to Sampling Facilities

<u>Noncompliance</u>	<u>Circumstances</u>	<u>Response</u>
Failure to allow entry for inspection	Isolated occurrence	C&D
Failure to allow entry for inspection	Repeated occurrence; failure to comply with C&D	C&D or SC
Failure to allow access for effluent sampling	Isolated occurrence	C&D
Failure to allow access for effluent sampling	Repeated occurrence; failure to comply with C&D	SC

F. Other Requirements

<u>Noncompliance</u>	<u>Circumstances</u>	<u>Response</u>
Failure to comply with any requirement of Ordinance or Order of ED	Isolated occurrence, no impact on POTW	C&D
Failure to comply with any requirement of Ordinance or Order of ED	Repeated occurrence, no impact on POTW; failure to comply with C&D	C&D or SC
Failure to comply with any requirement of Ordinance or Order of ED	Any incident, interference or pass-through	C&D or CT or CR
Failure to comply with any requirement of Ordinance or Order of ED	Any incident with known POTW or environmental Damage	CT or CR
Failure to comply with any BO	Any incident of SNC	SC or CT

G. Civil and Criminal Referral Considerations

<u>Noncompliance</u>	<u>Circumstances</u>	<u>Response</u>
Failure to comply with an applicable statute of state of Illinois or federal regulation, any incident with evidence of willful intent	Any incident	CR

*Whenever optional responses are stated, the office of the Director of Monitoring and Research will select the option based on the nature and severity of the incidents(s) and surrounding circumstances.

APPENDIX G

to the

SEWAGE AND WASTE CONTROL ORDINANCE

**PROVISIONS APPLICABLE TO NATIONAL
INDUSTRY SECTOR
INITIATIVES AND XL PROJECT**

This Appendix deleted effective November 4,
2004.

FW: Public Comments on Metal Management Midwest, Inc. Application for a Large Recycling Permit

John Pinion <jpinion@rka-inc.com>

Mon 2/28/2022 5:06 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (88 KB)

CDPH Inspection Logs for Fluff Migrating from SIMS.pdf;

[Warning: External email]



Dear Mayor Lightfoot and Chicago Dept. of Public Health:

The large recycling facility permit application for Sims does not include measures to prevent auto fluff from migrating off site. Based on a review of City records (attached), this has been an ongoing issue, even after a settlement between CDPH and Sims. CDPH inspectors are still repeatedly observing the presence of auto fluff off site as well as strong odors of burning metal that make it difficult to breath.

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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complaint_date	complaint_detail	inspection_log
2/28/2020	DUST AND ODORS INSIDE OF SHREDDING AREA ALSO DEBRIS IS OVERFLOWING.	[INSPECTION LOG #: 11018174 28-FEB-20 11:50:00] I INVESTIGATED A CITIZEN'S COMPLAINT ALLEGING THAT THERE WAS A NUISANCE IN THE AREA BEING CAUSED BY SHREDDING ON THE SITE. I MET WITH THE SITE SUPERINTENDENT MS. DEBBIE HAYES WHO SHOWED ME THE SHREDDING PROCESS. AT THE TIME OF MY INSPECTION I OBSERVED NO EXCESSIVE DUST OR OVERFLOWING MATERIAL FROM ANY OF THE CONTAINERS ON THE SITE.
3/5/2020	CALLER STATES THAT CHEMICAL ODORS COMING FROM FACILITY.	[INSPECTION LOG #: 11138565 06-MAR-20 15:15:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING CHEMICAL ODORS COMING FROM A FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. WHILE CANVASSING THE AREA SURROUNDING METAL MANAGEMENT MIDWEST INC ON MARCH 6, 2020, A SLIGHT ODOR OF METAL WAS OBSERVED AT THE FOLLOWING LOCATIONS: 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA, 2352 N ASHLAND AVE (CITY OF CHICAGO DEPARTMENT OF STREET AND SANITATION), 2356 S ASHLAND AVE (GRAINGER INDUSTRIAL SUPPLY), 2550 S ASHLAND AVE (CHICAGO YACHT WORKS), CANALPORT RIVERWALK PARK, AND THE INTERSECTION OF ASHLAND AVE, BLUE ISLAND AVE, AND CERMAK RD. THE SHREDDER WAS OBSERVED TO NOT IN OPERATION AT THE TIME OF THE INSPECTION. AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED AT THE FOLLOWING LOCATIONS: 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA AND 2550 S ASHLAND AVE (CHICAGO YACHT WORKS). AUTO FLUFF IS A PRODUCT OF SHREDDING OPERATIONS AND IT CONSIST OF FINE PARTICLES OF GLASS, FIBERS, RUBBER, METAL, PLASTIC, DIRT, AND AUTOMOTIVE FLUIDS. A WATER TRUCK AND A STREET SWEEPER WERE OBSERVED ON PAULINA ST. NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS DURING THE INSPECTION. FROM THE PROPERTY AT 2420 S WOOD ST (LA HACIENDA), I OBSERVED A TORCH CUTTING AREA IN OPERATION. I CHECKED THE CDPH DATABASE, HANSEN, TO ENSURE TORCH CUTTING IS LISTED ON THEIR CDPH AIR POLLUTION CONTROL PERMIT. IT WAS OBSERVED THAT THE REGULATED AREA IS NOT LISTED ON THEIR CDPH AIR POLLUTION CONTROL PERMIT AND THEY ARE OPERATING THIS REGULATED AREA WITHOUT A VALID CDPH AIR POLLUTION CONTROL PERMIT. A NOV CITATION #E000034590 IS ISSUED FOR AIR POLLUTION CONTROL PERMIT (11-4-620[A]) AND HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]) TO SIMS METAL MANAGEMENT. A NOV CITATION #E000034591 WAS ISSUED FOR VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 42 WHICH REQUIRES THE PERMITTEE TO CONTROL AND SUPPRESS DUST AND OTHER MATERIALS TO PREVENT OFF-SITE MIGRATION AND AIR POLLUTION PROHIBITED (11-4-730) TO SIMS METAL MANAGEMENT. THE HEARING DATE FOR THE CITATIONS WILL BE ON SEPTEMBER 10, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO SIMS METAL MANAGEMENT'S AGENT LISTED ON THE ILLINOIS SECRETARY OF STATE CORPORATION FILE DETAIL REPORT. THE AGENTS NAME AND ADDRESS IS ILLINOIS CORPORATION SERVICE C AT 801 ADLAI STEVENSON DRIVE, SPRINGFIELD, IL 62703.

complaint_date	complaint_detail	inspection_log
3/9/2020	METAL RECYCLING HAVE A CONSTANT METAL SMELL COMING FROM FACILITY	<p>[INSPECTION LOG #: 11114843 18-MAR-20 14:35:00] COMPLAINT INVESTIGATION: SIMS METAL MANAGEMENT FACILITY, 2500 S. PAULINA, CHICAGO, ILLINOISCHIEF COMPLAINT: METAL ODORS IN THE AIR FROM RECYCLING FACILITYOVERVIEW: SIMS METAL MANAGEMENT LOAD AND UNLOAD SCRAP METAL FROM BARGES ON THE RIVER AND IS PROCESSED AT THE FACILITY. AN OIL AND WATER SEPARATOR COLLECTS OILY RESIDUES FROM CERTAIN SCRAP AND IS STORED OF A CONCRETE SURFACE. THE BARGE AREA IS SLOPED AWAY FROM THE RIVER AND NO RUN-OFF WAS SEEN GOING INTO THE RIVER. CURRENT SCRAP INVENTORY INCLUDED, BUT WAS NOT LIMITED TO PS, HMS, BUSHLING, AND MILL SCALE AND ALL PILES WERE LABELED. METAL IS ALSO RECEIVED FROM PEDDLERS AND AUTO RECYCLERS THAT IS SHREDDED AT THE FACILITY. THE NON-FERROUS METALS ARE BALED AND SORTED FROM COMMERCIAL SCRAP ONLY. MOST NON-FERROUS PROCESSING OCCURS INSIDE THE FACILITY WAREHOUSE BUILDING. THE SHREDDER IS LOCATED AT THE CENTER OF THE FACILITY NEAR PAULINA STREET AND BLUE ISLAND STREET. CARS, TRUCKS AND OTHER LARGE METAL PARTS, WHITE GOODS, AND SHEET IRON ARE PROCESSED IN THIS AREA. IN RESPONSE TO A COMPLAINT I CONDUCTED A FOLLOW UP INSPECTION AND CANVASSED FOR ODORS FROM THE SIMS RECYCLING FACILITY. DURING MY CANVASS OF THE AREA I DETECTED MINIMAL METAL RECYCLING/PROCESSING ODORS IN THE AIR NEAR THE FACILITY ALONG BLUE ISLAND AND PAULINA. ODORS DETECTED AT THIS TIME WERE NOT EXCESSIVE AND CONFINED TO THE SITE.WINDS AT THE TIME OF THE INSPECTION WERE OUT OF THE WEST AT APPROX. 12 MPH AND RAIN. (WEATHER.COM)</p>
3/9/2020	METAL RECYCLING HAVE A CONSTANT METAL SMELL COMING FROM FACILITY	<p>[INSPECTION LOG #: 11062935 09-MAR-20 11:38:00] COMPLAINT INVESTIGATION: SIMS METAL MANAGEMENT FACILITY, 2500 S. PAULINA, CHICAGO, ILLINOISCHIEF COMPLAINT: METAL ODORS IN THE AIR FROM RECYCLING FACILITYOVERVIEW: SIMS METAL MANAGEMENT LOAD AND UNLOAD SCRAP METAL FROM BARGES ON THE RIVER AND IS PROCESSED AT THE FACILITY. AN OIL AND WATER SEPARATOR COLLECTS OILY RESIDUES FROM CERTAIN SCRAP AND IS STORED OF A CONCRETE SURFACE. THE BARGE AREA IS SLOPED AWAY FROM THE RIVER AND NO RUN-OFF WAS SEEN GOING INTO THE RIVER. CURRENT SCRAP INVENTORY INCLUDED, BUT WAS NOT LIMITED TO PS, HMS, BUSHLING, AND MILL SCALE AND ALL PILES WERE LABELED. METAL IS ALSO RECEIVED FROM PEDDLERS AND AUTO RECYCLERS THAT IS SHREDDED AT THE FACILITY. THE NON-FERROUS METALS ARE BALED AND SORTED FROM COMMERCIAL SCRAP ONLY. MOST NON-FERROUS PROCESSING OCCURS INSIDE THE FACILITY WAREHOUSE BUILDING. THE SHREDDER IS LOCATED AT THE CENTER OF THE FACILITY NEAR PAULINA STREET AND BLUE ISLAND STREET. CARS, TRUCKS AND OTHER LARGE METAL PARTS, WHITE GOODS, AND SHEET IRON ARE PROCESSED IN THIS AREA. IN RESPONSE TO A COMPLAINT, I ARRIVED TO THE AREA OF 2500 S. PAULINA STREET AND CANVASSED FOR ODORS FROM THE SIMS RECYCLING FACILITY. DURING MY CANVASS OF THE AREA I DETECTED MINIMAL METAL RECYCLING/PROCESSING ODORS IN THE AIR NEAR THE FACILITY OFFICE ONLY. ODORS DETECTED AT THIS TIME WERE NOT EXCESSIVE AND CONFINED TO THE SITE. . WINDS AT THE TIME OF THE INSPECTION WERE OUT OF THE WEST AT APPROX. 12 MPH (WEATHER.COM)I INTERVIEWED MS. DEBBIE SIMMS, FACILITY EHS MANAGER, REGARDING COMPLAINT AND FINDINGS. WE THEN TOURED THE METAL SHREDDING AND STORAGE AREA. I OBSERVED THE SHREDDER IN USE WITH STEAM PLUMES EMISSIONS AS METAL ENTERS THE SHREDDING MECHANISM. MILD ODORS WERE DETECTED AT THIS TIME. MANAGEMENT IS AWARE OF THE PREVIOUS COMPLAINTS AND IS IN THE PROCESS OF DRAFTING A PLAN TO REDUCE THE METAL PROCESSING ODORS.</p>

complaint_date	complaint_detail	inspection_log
3/16/2020	DUST AND SMOKE COMING OUT OF FACILITY.	<p>[INSPECTION LOG #: 11408797 16-MAR-20 14:40:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING DUST AND SMOKE COMING FROM A FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON MARCH 16, 2020, ODORS WERE OBSERVED AT 2352 N ASHLAND AVE (CITY OF CHICAGO DEPARTMENT OF STREET AND SANITATION). IT IS A PUNGENT ODOR OF SWEET, BURNING METAL THAT BURNS MY NOSTRILS AND MAKES IT UNCOMFORTABLE AND DIFFICULT FOR ME TO FULLY INHALE. THERE WERE ALSO WAVES OF A STRONG AND UNPLEASANT ODOR SIMILAR TO MEN'S COLOGNE COMING FROM SIMS. UNTREATED EMISSIONS WERE OBSERVED ESCAPING FROM THE SHREDDER. NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS TO AND FROM TRUCK TRAILERS SINCE THE PILES AND GROUND HAD BEEN SATURATED WITH WATER FROM THE RECENT RAIN.A NOV CITATION #E000034580 WAS ISSUED FOR AIR POLLUTION PROHIBITED (11-4-730) AND NUISANCE IN CONNECTION WITH BUSINESS (7-28-080) TO SIMS METAL MANAGEMENT. THE HEARING DATE FOR THE CITATIONS WILL BE ON AUGUST 6, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO SIMS METAL MANAGEMENT'S AGENT LISTED ON THE ILLINOIS SECRETARY OF STATE CORPORATION FILE DETAIL REPORT. THE AGENTS NAME AND ADDRESS IS ILLINOIS CORPORATION SERVICE C AT 801 ADLAI STEVENSON DRIVE, SPRINGFIELD, IL 62703.</p>
3/24/2020	THEY ARE GRINDING AND CUTTING UP CARS INSIDE AND DUST IS BLOWING ALL OVER THE AREA.	<p>[INSPECTION LOG #: 11470560 24-MAR-20 14:40:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING GRINDING AND CUTTING UP CARS AND CREATING DUST FROM THE FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON MARCH 24, 2020, NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS. NO MISTING CANNONS OR WATER TRUCKS WERE OBSERVED.ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA, 2420 S WOOD ST (LA HACIENDA), AND 2404 S WOLCOTT AVE (CHICAGO INTERNATIONAL PRODUCE MARKET). IT IS A STRONG ODOR OF SWEET, BURNING METAL THAT IS HARD TO FULLY INHALE. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED AT THE FOLLOWING LOCATION: 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA AND THEIR ENTERENCE ON WOODS ST.A NOV CITATION #E000034583 WAS ISSUED FOR AIR POLLUTION PROHIBITED (11-4-730) AND HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]) TO SIMS METAL MANAGEMENT. A NOV CITATION #E000034584 WAS ISSUED FOR VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 42 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) SIMS METAL MANAGEMENT. THE HEARING DATE FOR THE CITATIONS WILL BE ON SEPTEMBER 10, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO SIMS METAL MANAGEMENT'S AGENT LISTED ON THE ILLINOIS SECRETARY OF STATE CORPORATION FILE DETAIL REPORT. THE AGENTS NAME AND ADDRESS IS ILLINOIS CORPORATION SERVICE C AT 801 ADLAI STEVENSON DRIVE, SPRINGFIELD, IL 62703.</p>

complaint_date	complaint_detail	inspection_log
3/27/2020	SHRED CARS ALSO BURNING CAUSING DUST.	<p>[INSPECTION LOG #: 11498667 27-MAR-20 14:15:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING SMOKE AND DUST FROM THE FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON MARCH 27, 2020, NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS AS GROUND WAS SATURATED. NO MISTING CANNONS OR WATER TRUCKS WERE OBSERVED BUT A STREET SWEEPER WAS.ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA, 2420 S WOOD ST (LA HACIENDA), AND 2404 S WOLCOTT AVE (CHICAGO INTERNATIONAL PRODUCE MARKET). IT IS A STRONG ODOR OF SWEET, BURNING METAL. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED AGAIN AT THE FOLLOWING LOCATION: 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA.A NOV CITATION #E000034585 WAS ISSUED FOR AIR POLLUTION PROHIBITED (11-4-730) AND NUISANCE IN CONNECTION WITH BUSINESS (7-28-080) SIMS METAL MANAGEMENT. THE HEARING DATE FOR THE CITATIONS WILL BE ON SEPTEMBER 10, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO SIMS METAL MANAGEMENT'S 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.</p>
3/31/2020	VERY STRONG METALLIC ODOR COMING FROM FACILITY.	<p>[INSPECTION LOG #: 11500269 31-MAR-20 15:25:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING VERY STRONG METALLIC ODOR COMING FROM THE FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON MARCH 31, 2020, NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS. NO WATER TRUCK OR MISTING CANNONS WERE OPERATING AT THE TIME OF THE INSPECTION.ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA AND THE CANAL RIVERWALK PARK. IT IS A STRONG ODOR OF SWEET, BURNING METAL. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED AT THE GRAINGER (2356 S ASHLAND AVE) PARKING LOT.A NOV CITATION #E000034586 WAS ISSUED FOR AIR POLLUTION PROHIBITED (11-4-730) AND HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]) TO SIMS METAL MANAGEMENT. A NOV CITATION #E000034587 WAS ISSUED FOR VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 42 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) SIMS METAL MANAGEMENT. THE HEARING DATE FOR THE CITATIONS WILL BE ON SEPTEMBER 10, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO SIMS METAL MANAGEMENT'S 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.</p>

complaint_date	complaint_detail	inspection_log
4/10/2020	DUST ALL OVER THE AREA.	[INSPECTION LOG #: 11276072 10-APR-20 10:45:00] ON APRIL 10, 2020 CITY OF CHICAGO DEPARTMENT OF PUBLIC HEALTH INSPECTOR TIFFANY WILLIAMS RESPONDED TO AN ANONYMOUS COMPLAINT OF DUST AT 2500 S PAULINA. UPON ARRIVAL THE INSPECTOR MET WITH SAM THE SITE MANAGER AS DEBBY HAS TEMPORARILY BEEN REASSIGNED DURING COVID -19. THE INSPECTOR DID NOT OBSERVE ANY DUST OR PARTICULATES LEAVING OFF SITE AS SHE ARRIVED ON SITE NOR DURING THE WALK THRU OF THE SITE. THE INSPECTOR HOWEVER NOTES THAT ON YESTERDAY THE WINDS WERE IN EXCESS OF 45 MPH, WHICH COULD EXPLAIN MINIMAL DUST ON SITE.
4/14/2020	DUST COMING FROM FACILITY	[INSPECTION LOG #: 11296537 14-APR-20 12:15:00] SIMS METAL MANAGEMENT-2500 S. PAULINA UPON ARRIVAL TO THE SITE, I CANVASSED THE AREA FOR DUST AND DEBRIS MIGRATIONS AROUND THE PARAMETER OF THE FACILITY. OBSERVED METAL PROCESSING AND CRUSHING ACTIVITY IN PROGRESS. STEAM EMISSIONS WERE OBSERVED AS METAL ENTERED THE SHREDDER AND REACTS WITH WATER USED IN THE SHREDDING PROCESS. NO DUST CLOUDS WERE OBSERVED AT THE TIME OF THE INSPECTION. I INTERVIEWED DEBBIE SIMS VIA TELEPHONE REGARDING THE COMPLAINT. DEBBIE STATED THAT THE FACILITY IS OPERATING NORMALLY WITH NO MALFUNCTIONS OR OTHER PROBLEMS REPORTED. I INFORMED DEBBIE OF MY INSPECTION OBSERVATIONS. WEATHER CONDITIONS: LIGHT SNOW, WIND SPEED 18MPH (W), TEMP:38F.
4/23/2020	DUST COMING FROM SHREDDER.	[INSPECTION LOG #:]
5/7/2020	FACILITY IS CAUSING LOTS OF DUST.	[INSPECTION LOG #: 11481719 07-MAY-20 11:15:00] ON MAY 7, 2020 DEPARTMENT OF PUBLIC HEALTH INSPECTOR DWIGHT T-KILGORE RESPONDED TO A COMPLAINT AT 2500 S. PAULINA ST. ABOUT A DUST COMPLAINT. UPON ARRIVING AT THE SITE I NOTICE THAT THE AREA (STREET) DRIVING INTO THE FACILITY WAS WET I TALK WITH MARIA A ADMINISTRATIVE ASSISTANT SHE HAD ME WAIT AND TALK WITH PLANT MANAGER SAM FLORES WHO WALKED ME THROUGH THE PLANT OUT FRONT AND EXPLAIN WHAT THE PROCESS OF WHAT THEY WERE DOING, HE INFORMED ME THAT THEY HAD THREE WATER TRUCKS THAT ARE USED WHEN THE SITUATION OUT SIDE GETS REAL DRY, WHILE ON SITE TWO WERE OPERATING ONE INSIDE THE PLANT AND THE OTHER OUTSIDE, THE STREET WHERE I DROVE UP WAS WET, WHILE DRIVING TO THE SITE AND WHILE ON SITE I DID NOT NOTICE ANY DUST DRY IN THE AREA.
5/11/2020	CARS ARE BEING GROUND UP INTO PIECES CAUSING DUST.	[INSPECTION LOG #: 11515010 11-MAY-20 14:40:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING DUST COMING FROM THE FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON MAY 11, 2020, NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS. THE SHREDDER WAS NOT IN OPERATION AT THE TIME OF THE INSPECTION. NO WATER TRUCK, MISTERS, OR STREET SWEEPER WERE SEEN. A SLIGHT ODOR OF METAL WAS OBSERVED AT 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA. WE WILL CONTINUE TO INSPECT AND OBSERVE SIMS METAL MANAGEMENT.

complaint_date	complaint_detail	inspection_log
5/27/2020	THEY ARE SHREDDING CARS CAUSING DUST ALL OVER AND STRONG ODORS.	[INSPECTION LOG #: 11678243 27-MAY-20 14:10:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING DUST AND ODORS COMING FROM THE FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON MAY 27, 2020, NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS. THE SHREDDER WAS NOT IN OPERATION AT THE TIME OF THE INSPECTION. A WATER TRUCK WAS OBSERVED WETTING THE STREETS. A SLIGHT ODOR OF GARBAGE WAS OBSERVED AT 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA. MATERIAL PILES WERE HIGH BUT I DID NOT OBSERVED THEIR 30FT HEIGHT POLE AS A REFERENCE. THE PILES WERE UP TO THEIR LIGHT POLES.WE WILL CONTINUE TO INSPECT AND OBSERVE SIMS METAL MANAGEMENT.
5/28/2020	DUST COMING FROM THE MOVING MATERIAL PILES ALSO SHREDDING CARS VERY STRONG ODORS.	[INSPECTION LOG #: 11687907 28-MAY-20 14:30:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING DUST AND ODORS COMING FROM THE FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON MAY 28, 2020, NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS. THE SHREDDER WAS NOT IN OPERATION AT THE TIME OF THE INSPECTION. NO WATER TRUCK OR MISTING CANNONS WERE OPERATING. A SLIGHT ODOR OF METAL AND GARBAGE AND AUTO FLUFF WAS OBSERVED AT 2352 S ASHLAND AVE. MATERIAL PILES WERE HIGH AND I DID NOT OBSERVED THEIR 30FT HEIGHT POLE AS A REFERENCE. THE PILES ARE UP TO THEIR LIGHT POLES.I WILL BE BACK TOMORROW TO OBSERVE SIMS METAL MANAGEMENT.
5/28/2020	DUST COMING FROM THE MOVING MATERIAL PILES ALSO SHREDDING CARS VERY STRONG ODORS.	[INSPECTION LOG #: 11690266 29-MAY-20 10:20:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING DUST AND ODORS COMING FROM THE FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON MAY 29, 2020, NO FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS. THE SHREDDER WAS NOT IN OPERATION AT THE TIME OF THE INSPECTION. THE PAVEMENT WAS WETTED BUT NO MISTERS WERE OBSERVED NEAR THE MATERIAL PILES. MATERIAL PILES WERE HIGH AND I DID NOT OBSERVED THEIR 30FT HEIGHT POLE AS A REFERENCE. THE PILES ARE UP TO THEIR LIGHT POLES.I WILL BE BACK TOMORROW TO OBSERVE SIMS METAL MANAGEMENT.

complaint_date	complaint_detail	inspection_log
6/2/2020	BUSINESS IS SHREDDING AND BURNING AUTO ARTS SMELL OF SMOKE IS VERY OVERWHELMING IN AREA.	[[INSPECTION LOG #: 11869082 10-JUN-20 12:45:00] PLEASE VIEW SR# 600840417.
6/5/2020	SMELLS LIKE BURNING PLASTIC COMING FROM FACILITY.	[[INSPECTION LOG #: 11869101 10-JUN-20 12:45:00] PLEASE VIEW SR# 600840417.
6/9/2020	BURNING CAUSING STRONG ODORS.	<p>[[INSPECTION LOG #: 11869074 10-JUN-20 12:45:00] *MAIL*CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINTS REGARDING ODORS AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON JUNE, 10 2020, ODORS OF SWEET METAL AND CHEMICALS WERE OBSERVED AT THE INTERSECTION OF BLUE ISLAND AVE, CERMAK AVE, AND ASHLAND ST. I ALSO OBSERVED THIS ODOR AT THE 2352 S ASHLAND ST FACILITY PARKING LOT. THESE ODORS ARE UNPLEASANT AND MAKES ME UNCOMFORTABLE TO INHALE. EMISSIONS AND SMOKE WERE OBSERVED LEAVING THE SHREDDER.I ALSO OBSERVED THE CLAW OPERATORS MOVING MATERIALS. DUST WAS CREATED WHEN THE OPERATORS MOVED MATERIALS. I DID NOTICED THAT THE CLAW OPERATORS WERE PURPOSELY THROWING MATERIALS WITH THE CLAW AND SLOWLY RELEASING MATERIALS WITH THE CLAW AT A HIGH HEIGHT WHICH WAS CAUSING DUST. NO WATER WAS OBSERVED TO BE SPRAYING THE MATERIAL PILES.A NOV CITATION #E000037759 WAS ISSUED FOR HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]) AND AIR POLLUTION PROHIBITED (11-4-730) TO SIMS METAL MANAGEMENT. A NOV CITATION #E000037760 WAS ISSUED FOR NUISANCE IN CONNECTION WITH BUSINESS (7-28-080) AND VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 42 WHICH REQUIRES THE PERMITTEE TO CONTROL AND SUPPRESS DUST AND OTHER MATERIALS TO PREVENT OFF-SITE MIGRATION TO SIMS METAL MANAGEMENT. THE HEARING DATE FOR THE CITATIONS WILL BE ON DECEMBER 10, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO SIMS METAL MANAGEMENT'S SHEC DIRECTOR DEBORAH HAYES. THE ADDRESS IS 2500 S PAULINA ST, CHICAGO, IL 60608.</p>

complaint_date	complaint_detail	inspection_log
6/12/2020	DUST AND ODORS BLOWING OFF OF THE EAST SIDE OF LOT.	<p>[INSPECTION LOG #: 11900502 12-JUN-20 14:30:00] *MAIL*CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING DUST AND ODORS COMING FROM 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON JUNE 12, 2020, ODORS OF SWEET METAL WERE OBSERVED AT 357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA. THESE ODORS ARE UNPLEASANT AND MAKES ME UNCOMFORTABLE TO INHALE. EMISSIONS AND SMOKE WERE OBSERVED LEAVING THE SHREDDER.I OBSERVED THE CLAW OPERATORS MOVING MATERIALS AND CREATING DUST. I ALSO OBSERVED THE CLAW OPERATORS PURPOSELY THROWING MATERIALS WITH THE CLAW AND SLOWLY RELEASING MATERIALS WITH THE CLAW AT A HIGH HEIGHT WHICH WAS CAUSING DUST. A LAWN SPRINKLER WAS SPRAYING WATER ONTO ONE SIDE OF THE MATERIAL PILE. A NOV CITATION #E000037761 WAS ISSUED FOR HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]) AND AIR POLLUTION PROHIBITED (11-4-730) TO SIMS METAL MANAGEMENT. A NOV CITATION #E000037762 WAS ISSUED FOR NUISANCE IN CONNECTION WITH BUSINESS (7-28-080) AND VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 42 WHICH REQUIRES THE PERMITTEE TO CONTROL AND SUPPRESS DUST AND OTHER MATERIALS TO PREVENT OFF-SITE MIGRATION TO SIMS METAL MANAGEMENT. THE HEARING DATE FOR THE CITATIONS WILL BE ON DECEMBER 10, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO SIMS METAL MANAGEMENT'S SHEC DIRECTOR DEBORAH HAYES. THE ADDRESS IS 2500 S PAULINA ST, CHICAGO, IL 60608.</p>
6/12/2020	DUST AND ODORS BLOWING OFF OF THE EAST SIDE OF LOT.	<p>[INSPECTION LOG #: 11911621 15-JUN-20 10:40:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER PERFORMED A FOLLOW UP INSPECTION TO AN ANONYMOUS COMPLAINT REGARDING DUST AND ODORS COMING FROM 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON JUNE 15, 2020, ODORS OF SWEET METAL WERE OBSERVED AT THE INTERSECTION OF ASHLAND AVE, CERMAK RD, AND BLUE ISLAND AVE. STRONG ODORS WERE OBSERVED AT 357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA. THESE ODORS ARE UNPLEASANT AND MAKES ME UNCOMFORTABLE TO INHALE. EMISSIONS AND SMOKE WERE OBSERVED LEAVING THE SHREDDER.I OBSERVED THE CLAW OPERATORS MOVING MATERIALS AND CREATING DUST. I ALSO OBSERVED THE CLAW OPERATORS PURPOSELY THROWING MATERIALS WITH THE CLAW AND SLOWLY RELEASING MATERIALS WITH THE CLAW AT A HIGH HEIGHT WHICH WAS CAUSING DUST. A LAWN SPRINKLER WAS SPRAYING WATER ONTO ONE SIDE OF THE MATERIAL PILE.CONDITIONS FROM THE PREVIOUS INSPECTION HAVE CONTINUED.</p>

complaint_date	complaint_detail	inspection_log
6/16/2020	VERY STRONG BURNING ODORS COMING FROM FACILITY.	<p>[INSPECTION LOG #: 11911943 16-JUN-20 11:15:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO A CITIZEN'S COMPLAINTS REGARDING DUST AND ODORS COMING FROM 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON JUNE 16, 2020, ODORS OF SWEET METAL WERE OBSERVED AT 357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA. THESE ODORS ARE UNPLEASANT AND MAKES ME UNCOMFORTABLE TO INHALE. EMISSIONS AND SMOKE WERE OBSERVED LEAVING THE SHREDDER.I OBSERVED THE CLAW OPERATORS MOVING MATERIALS AND CREATING DUST. I ALSO OBSERVED THE CLAW OPERATORS PURPOSELY THROWING MATERIALS WITH THE CLAW AND SLOWLY RELEASING MATERIALS WITH THE CLAW AT A HIGH HEIGHT WHICH WAS CAUSING DUST. A LAWN SPRINKLER WAS SPRAYING WATER ONTO ONE SIDE OF THE MATERIAL PILE. AUTO FLUFF WAS OBSERVED ON THE 2352 S ASHLAND ST PARKING LOT.I SPOKE TO DEBBIE AND INFORMED HER OF THE ISSUES I HAVE SEEN. WE SCHEDULED A FULL INSPECTION FOR THE NEXT WEEK.A NOV CITATION #E000037763 WAS ISSUED FOR HANDLING OF MATERIAL SUSCEPTIBLE TO BECOMING WINDBORNE (11-4-760[A]) AND AIR POLLUTION PROHIBITED (11-4-730) TO SIMS METAL MANAGEMENT. A NOV CITATION #E000037764 WAS ISSUED FOR NUISANCE IN CONNECTION WITH BUSINESS (7-28-080) AND VIOLATING ANY CONDITION IMPOSED BY THE PERMIT (11-4-030[B]) SPECIAL CONDITION 42 WHICH REQUIRES THE PERMITTEE TO CONTROL AND SUPPRESS DUST AND OTHER MATERIALS TO PREVENT OFF-SITE MIGRATION TO SIMS METAL MANAGEMENT. THE HEARING DATE FOR THE CITATIONS WILL BE ON DECEMBER 10, 2020 AT 1:00 P.M. AT 400 W. SUPERIOR ST. THE CITATION WILL BE SERVED VIA US MAIL TO SIMS METAL MANAGEMENT'S SHEC DIRECTOR DEBORAH HAYES. THE ADDRESS IS 2500 S PAULINA ST, CHICAGO, IL 60608.</p>
6/29/2020	CONCRETE SAW CUTTING CAUSING DUST.	<p>[INSPECTION LOG #: 11879480 29-JUN-20 11:25:00] ON JUNE 29, 2020 DEPARTMENT OF PUBLIC HEALTH INSPECTOR DWIGHT T-KILGORE RESPONDED TO AN ANONYMOUS COMPLAINT AT 2500 S. PAULINA ST. ABOUT SOMEONE CUTTING CONCRETE AND CREATING DUST, UPON ARRIVING AT THE ABOVE SITE I DID NOT NOTICE ANY DUST OR ANYONE CUTTING IN THE AREA, I WENT TO THE COMPANY (SMS METAL MANAGEMENT) ADMINISTRATIVE OFFICE AND TALK WITH THE RECEPTIONIST ABOUT THE COMPLAINT AND SHE PHONE THE SAFETY MANAGER AND HE REPLIED THAT NO ONE WAS ON SITE DOING ANY CUTTING, DIANA THE RECEPTIONIST ALSO INFORMED ME THAT TWO WEEKS AGO A CONSTRUCTION COMPANY CAME BY AND ASKED IF THEY COULD USE SOME OF THERE PROPERTY TO CUT SOME STONES, THEY DID NOT ALLOW THAT TO PROCEED.</p>
7/15/2020	FACILITY CAUSING DUST ALL OVER THE AREA.	<p>[INSPECTION LOG #: 12134472 15-JUL-20 13:25:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINTS REGARDING DUST CREATED FROM 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA SURROUNDING SIMS METAL MANAGEMENT ON JULY 15, 2020, A SLIGHT ODOR OF SWEET METAL AND AN ODOR SIMILAR TO GARLIC WAS OBSERVED 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA AND 2352 S ASHLAND AVE (CITY OF CHICAGO STREETS AND SANITATION). THESE ODORS WERE NOT OVERBEARING. THE SHREDDER WAS IN OPERATION DURING THE INSPECTION.WE WILL CONTINUE TO INVESTIGATE AND INSPECT SIMS METAL MANAGEMENT.</p>

complaint_date	complaint_detail	inspection_log
8/21/2020	COMPANY SHREDDING VEHICLES AND CAUSING VERY STRONG SMOKE AND ODORS.	[INSPECTION LOG #: 12559126 21-AUG-20 00:00:00]
11/3/2020	VERY STRONG BURNING ODORS COMING FROM FACILITY.	<p>[INSPECTION LOG #: 12910539 03-NOV-20 12:10:00] ANONYMOUS COMPLAINT RESPONSE DUE TO ?BURNING ODORS.? THIS FACILITY IS LISTED AS THE SOURCE BUT NONE OF THEIR PROCESSES INCLUDE BURNING.</p> <p>PHOTO A) FACILITY</p> <p>NO BURNING NOTED. NOTHING FURTHER.</p>
12/7/2020	STRONG ODOR THAT COMES FROM THE GRINDING OF CARS	<p>[INSPECTION LOG #: 13097245 09-DEC-20 14:10:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEERS RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING ?STRONG ODORS COMING FROM GRINDING CARS ?AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE REGARDING THE ISSUE.WHILE CANVASSING THE AREA SURROUNDING METAL MANAGEMENT MIDWEST INC ON DECEMBER 9, 2020, ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: 2352 N ASHLAND AVE (CITY OF CHICAGO DEPARTMENT OF STREET AND SANITATION), AND 2356 S ASHLAND AVE (GRAINGER INDUSTRIAL SUPPLY). IT IS AN ODOR OF SWEET METAL. THIS ODOR WAS UNCOMFORTABLE TO INHALE AND DISCOURAGED US FROM BEING DOWNWIND FROM THE SHREDDER. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. WE OBSERVED VISIBLE EMISSIONS ESCAPING THE SHREDDER.AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED AT THE FOLLOWING LOCATIONS: 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA, 2352 N ASHLAND AVE (CITY OF CHICAGO DEPARTMENT OF STREET AND SANITATION), AND 2356 S ASHLAND AVE (GRAINGER INDUSTRIAL SUPPLY). AUTO FLUFF IS A PRODUCT OF SHREDDING OPERATIONS AND IT CONSIST OF FINE PARTICLES OF GLASS, FIBERS, RUBBER, METAL, PLASTIC, DIRT, AND AUTOMOTIVE FLUIDS. WE OBSERVED WET PAVEMENT ON PAULINA ST. FUGITIVE DUST OR DEBRIS WAS OBSERVED WHEN WORKERS DISTURBED MATERIAL PILES AND MOVED MATERIALS.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.</p>
1/19/2021	DUST (SIDEWALK) NO OTHER DETAILS OR COMMENTS.	[INSPECTION LOG #: 13309113 21-JAN-21 13:40:00] PLEASE VIEW SR# 600941631 FOR REPORT.

complaint_date	complaint_detail	inspection_log
1/19/2021	MATERIAL IS UP IN THE AIR AND FLOATING INTO THE RIVER.	[INSPECTION LOG #: 13309048 21-JAN-21 13:40:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING 'MATERIAL UP IN THE AIR' AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE REGARDING THE ISSUE.WHILE CANVASSING THE AREA SURROUNDING SIMS ON JANUARY 21, 2020, NO DUST WAS OBSERVED UP IN THE AIR. ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: 2352 N ASHLAND AVE (CITY OF CHICAGO DEPARTMENT OF STREET AND SANITATION), AND 2356 S ASHLAND AVE (GRAINGER INDUSTRIAL SUPPLY). IT IS AN ODOR OF SWEET METAL. THIS ODOR WAS UNCOMFORTABLE TO INHALE AND DISCOURAGED US FROM BEING DOWNWIND FROM THE SHREDDER. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. WE OBSERVED VISIBLE EMISSIONS ESCAPING THE SHREDDER.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.
1/21/2021	THERE IS MATERIAL COMING INTO THE AIR ALL OVER THE PLACE.	[INSPECTION LOG #: 13309121 21-JAN-20 13:40:00] PLEASE VIEW SR# 600941631 FOR REPORT.
1/21/2021	WHEN THEY MOVE THERE SCRAP AROUND DUST FLIES.	[INSPECTION LOG #: 13309154 21-JAN-21 13:40:00] PLEASE VIEW SR# 600941631 FOR REPORT.
1/22/2021	BURNING (NO OTHER DETAILS OR COMMENTS)	[INSPECTION LOG #: 13309149 21-JAN-21 13:40:00] PLEASE VIEW SR# 600941631 FOR REPORT.
1/26/2021	DUST COMING FROM FACILITY INTO THE STREET.	[INSPECTION LOG #: 13332132 26-JAN-21 15:10:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEERS RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING 'DUST COMING FROM FACILITY INTO THE STREET' AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE REGARDING THE ISSUE.WHILE CANVASSING THE AREA SURROUNDING SIMS ON JANUARY 26, 2021, NO ODORS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. WE OBSERVED VISIBLE EMISSIONS ESCAPING THE SHREDDER. THE TEMPERATURE AT THE TIME OF THE INSPECTION WAS 32 °F, WITH WINDS FROM THE NORTH TRAVELING AT A VELOCITY OF 14 MPH, SNOWFALL WAS ALSO OBSERVED. NO DUST WAS OBSERVED LEAVING THE SITE.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.

complaint_date	complaint_detail	inspection_log
1/28/2021	FACILITY CAUSING DUST IN STREET.	[INSPECTION LOG #: 13350808 28-JAN-21 10:45:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEERS RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING 'DUST' COMING FROM A FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE REGARDING THE ISSUE.WHILE CANVASSING THE AREA SURROUNDING SIMS ON JANUARY 28, 2021, NO ODORS OR DUST WERE OBSERVED. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. WE OBSERVED VISIBLE EMISSIONS ESCAPING THE SHREDDER. NO DUST WAS OBSERVED LEAVING THE SITE.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
1/28/2021	BURNING/CHEMICAL/DUST/PROCESS FUMES/EMISSIONS AND SMOKE.	[INSPECTION LOG #: 13350849 28-JAN-21 10:45:00] PLEASE VIEW SR# 600944905 FOR REPORT.
1/29/2021	BURNING ON THE SIDE OF LOT (GRADING).	[INSPECTION LOG #: 13350870 28-JAN-21 10:45:00] PLEASE VIEW SR# 600944905 FOR REPORT.
2/1/2021	SMOKE COMING FROM ROOFTOP.	[INSPECTION LOG #: 13378550 02-FEB-21 10:00:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEERS RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING FUMES, SMOKE, DUST COMING FROM THE FACILITY AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE FOR MORE INFORMATION.WHILE CANVASSING THE AREA SURROUNDING SIMS ON FEBRUARY 2, 2021, NO ODORS OR DUST WERE OBSERVED. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION AND VISIBLE EMISSIONS WERE OBSERVED LEAVING THE SHREDDER. WORKERS WERE SEEN MOVING MATERIALS BUT NO DUST WAS OBSERVED LEAVING THE SITE.I SPOKE TO DEBBIE AND EXPLAINED THE NATURE OF THE COMPLAINTS AND WHAT WAS OBSERVED DURING MY INSPECTIONS.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.
2/2/2021	OPEN BURNING	[INSPECTION LOG #: 13378805 02-FEB-21 10:00:00] PLEASE VIEW SR# 600945727 FOR REPORT.
2/2/2021	VEHICLES ARE BEING SHREDDED AT THIS BUILDING LOT.	[INSPECTION LOG #: 13378751 02-FEB-21 10:00:00] PLEASE VIEW SR# 600945727 FOR REPORT.
2/4/2021	DUST/GARBAGE/PROCESS FUMES/EMISSION AND SMOKE	[INSPECTION LOG #: 13379669 02-FEB-21 10:00:00] PLEASE VIEW SR# 600945727 FOR REPORT.

complaint_date	complaint_detail	inspection_log
2/4/2021	SHREDDER IS IN THE CENTER PORTION ON THE PROPERTY CALLER REPORTS THAT THIS BUSINESS SHREDS METAL AND THE FUMES/SMOKE FROM THE METAL IS VERY STRONG AND IS DANGEROUS TO PEOPLE'S HEALTH.	[INSPECTION LOG #: 13379713 02-FEB-21 10:00:00] PLEASE VIEW SR# 600945727 FOR REPORT.
2/8/2021	SMOKE COMING FROM FACILITY.	[INSPECTION LOG #: 13430226 09-FEB-21 09:50:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEERS RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `SMOKE COMING FROM THE FACILITY? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE FOR MORE INFORMATION.WHILE CANVASSING THE AREA SURROUNDING SIMS ON FEBRUARY 9, 2021, NO ODORS OR DUST WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AT THE TIME OF THE INSPECTION. WORKERS WERE SEEN MOVING MATERIALS BUT NO DUST WAS OBSERVED LEAVING THE SITE.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
2/10/2021	EVERYTHING IS OUT DOORS AND DUST IS BLOWING OFF THE BARGE DUST IS BLOWING EVERYWHERE.	[INSPECTION LOG #: 13431011 09-FEB-21 09:50:00] PLEASE VIEW SR# 600947645 FOR REPORT.
2/17/2021	METAL SMELL	[INSPECTION LOG #: 13465705 18-FEB-21 09:55:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEERS RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `METAL SMELL? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE FOR MORE INFORMATION.WHILE CANVASSING THE AREA ON FEBRUARY 18, 2021, NO ODORS OR DUST WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AT THE TIME OF THE INSPECTION. A WORKER (1 MACHINE) WAS SEEN MOVING MATERIALS BUT NO DUST WAS OBSERVED LEAVING THE SITE. I SPOKE TO DEBBIE AND SHE INFORMED ME THAT THE SHREDDER OPERATES A COUPLE HOURS A DAY BUT NOT ON SUNDAYS.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.

complaint_date	complaint_detail	inspection_log
2/23/2021	CHOPS OLD CARS GRINDER AND METAL ODOR (SMELL).	[[INSPECTION LOG #: 13570916 25-FEB-21 15:20:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEERS RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `CHOPS OLD CARS GRINDER AND METAL ODOR (SMELL)? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE FOR MORE INFORMATION.WHILE CANVASSING THE AREA ON FEBRUARY 25, 2021, NO ODORS, DUST, OR VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AT THE TIME OF THE INSPECTION. WORKERS (3 MACHINES) WERE SEEN MOVING MATERIALS BUT NO DUST WAS OBSERVED LEAVING THE SITE.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
4/6/2021	SHREDDING CARS AND THE SMOKE IS BAD.	[[INSPECTION LOG #: 13786669 06-APR-21 14:30:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `SHREDDING CARS AND THE SMOKE IS BAD? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON APRIL 6, 2021, ODORS WERE OBSERVED AT 2352 N ASHLAND AVE (CITY OF CHICAGO DEPARTMENT OF STREET AND SANITATION). THE ODOR IS SIMILAR TO A SWEET, BURNING METAL. SMOKE WAS OBSERVED LEAVING THE SHREDDER AS THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION.AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED AT 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA. PAULINA ST WAS WETTED BUT NO OTHER DUST CONTROLS WERE OBSERVED (SPRINKLERS, MISTING CANNON). DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS.AN ENFORCEMENT ACTION IS PENDING FOR THESE ISSUES. CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
4/6/2021	DUST AND GARBAGE.	[[INSPECTION LOG #: 13786715 06-APR-21 14:30:00] VIEW SR# 600972679 FOR INSPECTION REPORT.
5/26/2021	SHRED CARS IN YARD CAUSING STRONG ODORS.	[[INSPECTION LOG #: 14213547 26-MAY-21 16:00:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `SHRED CARS IN YARD CAUSING STRONG ODORS? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON MAY 26, 2021, ODORS WERE OBSERVED AT 2352 N ASHLAND AVE (CITY OF CHICAGO DEPARTMENT OF STREET AND SANITATION). THE ODOR IS SIMILAR TO A SWEET, BURNING METAL. SMOKE WAS OBSERVED LEAVING THE SHREDDER AS THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION.DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS AND VEHICLES.AN ENFORCEMENT ACTION IS PENDING FOR THESE ISSUES. CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.

complaint_date	complaint_detail	inspection_log
6/7/2021	VERY STRONG FUMES/DUST COMING FROM FACILITY.	[INSPECTION LOG #: 14310978 08-JUN-21 12:05:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `VERY STRONG FUMES/DUST COMING FROM FACILITY? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON JUNE 7, 2021, ODORS WERE OBSERVED AT 2357 S WOOD ST (PREFERRED FREEZER SERVICES). THE ODOR IS SIMILAR TO A SWEET, BURNING METAL. SMOKE WAS OBSERVED LEAVING THE SHREDDER AS THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. AUTO FLUFF/AUTO SHREDDER RESIDUE WAS OBSERVED AT 2357 S WOOD ST (PREFERRED FREEZER SERVICES) LOADING AREA. PAULINA ST WAS WETTED AND ONE MISTING CANNON WAS OBSERVED IN OPERATION. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. MATERIALS PILES WERE HIGH. AN ENFORCEMENT ACTION IS PENDING FOR THESE ISSUES. CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
6/21/2021		[INSPECTION LOG #: 14435915 22-JUN-21 16:00:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `VERY STRONG FUMES/DUST COMING FROM FACILITY? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON JUNE 22, 2021, NO ODORS OR VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AND NO MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND NOT MANY DELIVERIES WERE OBSERVED.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
7/20/2021	SHREDDER IS IN MIDDLE OF YARD ODORS AND SMOKE BLOWING INTO	[INSPECTION LOG #: 14676504 20-JUL-21 15:30:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `SHREDDER IS IN MIDDLE OF YARD ODORS AND SMOKE BLOWING? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON JULY 20, 2021, NO ODORS OR VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AND NO MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND NOT MANY DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
7/23/2021		[INSPECTION LOG #: 14689386 23-JUL-21 16:00:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `SIMS METAL MANAGEMENT AUTOMOBILE SHREDDER CAUSING DUST, SMOKE, AND ODOR? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON JULY 23, 2021, NO ODORS OR VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AND NO MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND NO DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.

complaint_date	complaint_detail	inspection_log
7/27/2021	THIS IS A JUNK YARD THEY CRUSH CARS CAUSING SMOKE/FUMES IS ALL IN THE AIR.	[INSPECTION LOG #: 14689486 27-JUL-21 14:50:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `SIMS METAL MANAGEMENT AUTOMOBILE SHREDDER CAUSING DUST, SMOKE, AND ODOR? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON JULY 27, 2021, NO ODORS OR VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AND NO MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
8/4/2021		[INSPECTION LOG #: 14753349 04-AUG-21 15:10:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO A CITIZEN'S COMPLAINT REGARDING `CHEMICAL? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON AUGUST 4, 2021, NO ODORS OR VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AND NO MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. A WATER TRUCK AND STREET SWEEPER WERE OBSERVED.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
8/4/2021		[INSPECTION LOG #: 14753392 05-AUG-21 09:15:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO A CITIZEN'S COMPLAINT REGARDING `CHEMICAL? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON AUGUST 5, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. A WATER TRUCK AND STREET SWEEPER WERE OBSERVED.AUTO FLUFF WAS OBSERVED AT PREFERRED FREEZER LOADING DOCK (2357 S WOOD ST) AND THE CITY OF CHICAGO STREETS AND SANITATION FACILITY (2352 S ASHLAND AVE).SWEET METAL ODORS WERE OBSERVED AT 2352 S ASHLAND AVE.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.
8/13/2021	SMOKE FROM INDURSTRIAL PLANT COMING FROM THE SHREDDER THAT CHOPS UP CARS AND HAS AFOUL SMELL.	[INSPECTION LOG #: 14885919 13-AUG-21 15:50:00] ON AUGUST 13, 2021, A CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT AT 2500 S. PAULINA STREET. THE SITE ASSOCIATED WITH THE ADDRESS IS SIMS METAL MANAGEMENT, A METAL RECYCLING FACILITY. WHILE CANVASSING THE AREA, VISIBLE EMISSIONS WERE NOT OBSERVED, AND ODORS WERE NOT DETECTED. THE ENVIRONMENTAL ENGINEER ATTEMPTED TO CONTACT THE COMPLAINANT FOR ADDITIONAL DETAILS, BUT THE COMPLAINT WAS ANONYMOUS. DURING THE INSPECTION, THE ENVIRONMENTAL ENGINEER OBSERVED THAT THE SHREDDER WAS NOT IN USE. THE WIND DIRECTION DURING THE TIME OF THE INSPECTION WAS BLOWING FROM THE EAST. NO CITATIONS HAVE BEEN FILED AS A RESULT OF THIS COMPLAINT.

complaint_date	complaint_detail	inspection_log
8/26/2021	METAL SHERDDING OUTSIDE CAUSING METAL FUMES ,DUST	[INSPECTION LOG #: 14929246 26-AUG-21 14:35:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `METAL SHREDDING OUTSIDE CAUSING METAL FUMES AND DUST? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. (COMPLAINANT SR# 601058013 IS ALSO ASSOCIATED WITH THIS REPORT)WHILE CANVASSING THE AREA ON AUGUST 26, 2021, NO ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION AND NO MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS NOT MOVING MUCH MATERIALS AROUND AND NO DELIVERIES WERE OBSERVED. A WATER TRUCK WAS OBSERVED.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.
8/26/2021	METAL SHERDDING OUTSIDE CAUSING METAL FUMES ,DUST	[INSPECTION LOG #: 14929270 27-AUG-21 09:10:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `METAL SHREDDING OUTSIDE CAUSING METAL FUMES AND DUST? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. (COMPLAINANT SR# 601058013 IS ALSO ASSOCIATED WITH THIS REPORT)WHILE CANVASSING THE AREA ON AUGUST 27, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. A WATER TRUCK WAS OBSERVED.SWEET METAL ODORS WERE OBSERVED AT 2352 S ASHLAND AVE.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.
8/31/2021	THIS IS IS A CAR SHEDDING PLACE AND THERE SMOKE COMING FROM THE PLACE	[INSPECTION LOG #: 14995400 31-AUG-21 16:00:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TOAN ANONYMOUS COMPLAINT REGARDING `THIS IS A CAR SHEDDING PLACE AND THERE SMOKE COMING FROM THE PLACE? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON AUGUST 31, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. A WATER TRUCK AND STREET SWEEPER WAS OBSERVED. THE WIND WAS TRAVELING FROM THE EAST AT 9MPH AT 1:00PM (LOCALCONDITIONS.COM).SWEET METAL ODORS AND AUTO FLUFF WAS OBSERVED AT 2357 S WOOD ST, PREFERRED FREEZER.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.

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9/24/2021	DUST	<p>[INSPECTION LOG #: 15201327 28-SEP-21 11:15:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `DUST? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON SEPTEMBER 28, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. A WATER TRUCK AND STREET SWEEPER WAS OBSERVED. THE WIND WAS TRAVELING FROM THE EAST-NORTHEAST AT 10MPH AT 9:00AM (LOCALCONDITIONS.COM).SWEET METAL ODORS AND AUTO FLUFF WAS OBSERVED AT 2357 S WOOD ST, PREFERRED FREEZER.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.</p>
9/24/2021	DUST	<p>[INSPECTION LOG #: 15200872 24-SEP-21 16:00:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `DUST? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON SEPTEMBER 24, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. A WATER TRUCK AND STREET SWEEPER WAS OBSERVED. THE WIND WAS TRAVELING FROM THE EAST AT 9MPH AT 1:00PM (LOCALCONDITIONS.COM).SWEET METAL ODORS AND AUTO FLUFF WAS OBSERVED AT 2352 S ASHLAND AVE, CITY OF CHICAGO FACILITY.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>
10/8/2021		<p>[INSPECTION LOG #: 15294091 08-OCT-21 15:20:00] CCHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `DUST AND ODORS? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THIS REPORT INCLUDES THE INSPECTION FOR SR# 601084861.WHILE CANVASSING THE AREA ON OCTOBER 8, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. MACHINERY WAS MOVING MATERIALS AROUND AND DELIVERIES WERE OBSERVED. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. A WATER TRUCK AND STREET SWEEPER WAS OBSERVED. THE WIND WAS TRAVELING FROM THE SOUTHWEST AT 7MPH AT 2:00PM (LOCALCONDITIONS.COM).SWEET METAL ODORS AND AUTO FLUFF WAS OBSERVED AT 2352 S ASHLAND AVE, CITY OF CHICAGO FACILITY.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>

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12/7/2021		<p>[INSPECTION LOG #: 15704824 08-DEC-21 09:25:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO A CITIZEN'S COMPLAINT REGARDING `DUST? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). THE COMPLAINT LISTED SIMS METAL MANAGEMENT AT THE BUSINESS NAME. METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THIS FACILITY WAS SIMULTANEOUSLY INSPECTED FOR SR# 601111936.WHILE CANVASSING THE AREA ON DECEMBER 8, 2021, NO ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION. CLAW EXCAVATORS WERE SEEN MOVING MATERIALS AROUND AND CREATING DUST WHEN WORKERS MOVED MATERIALS. NO WATER TRUCK WAS OBSERVED OR STREET SWEEPER WAS SEEN. THE ROADS WERE NOT WETTED AND NO WATER CONTROLS WERE OBSERVED. TRUCKS THAT WERE DRIVING ON THE PROPERTY WERE CREATING DUST. THE WIND WAS TRAVELING FROM THE WEST AT 7MPH AT 9:00AM (LOCALCONDITIONS.COM). THE TEMPERATURE WAS 30°F AT THE TIME OF THE INSPECTION.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>
12/7/2021		<p>[INSPECTION LOG #: 15704900 08-DEC-21 09:25:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING `DUST? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). THE COMPLAINT LISTED SIMS METAL MANAGEMENT AT THE BUSINESS NAME. METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THIS FACILITY WAS SIMULTANEOUSLY INSPECTED FOR SR# 601111935. VIEW 601111935 FOR PHOTOS.WHILE CANVASSING THE AREA ON DECEMBER 8, 2021, NO ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS NOT IN OPERATION. CLAW EXCAVATORS WERE SEEN MOVING MATERIALS AROUND AND CREATING DUST WHEN WORKERS MOVED MATERIALS. NO WATER TRUCK WAS OBSERVED OR STREET SWEEPER WAS SEEN. THE ROADS WERE NOT WETTED AND NO WATER CONTROLS WERE OBSERVED. TRUCKS THAT WERE DRIVING ON THE PROPERTY WERE CREATING DUST. THE WIND WAS TRAVELING FROM THE WEST AT 7MPH AT 9:00AM (LOCALCONDITIONS.COM). THE TEMPERATURE WAS 30°F AT THE TIME OF THE INSPECTION.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>

complaint_date	complaint_detail	inspection_log
12/7/2021		<p>[INSPECTION LOG #: 15704892 07-DEC-21 15:10:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING 'DUST?' AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). THE COMPLAINT LISTED SIMS METAL MANAGEMENT AT THE BUSINESS NAME. METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THIS FACILITY WAS SIMULTANEOUSLY INSPECTED FOR SR# 601111935. VIEW SR# 601111935 FOR PHOTOS.WHILE CANVASSING THE AREA ON DECEMBER 7, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. CLAW EXCAVATORS WERE SEEN MOVING MATERIALS AROUND AND TO THE SHREDDER CONVEYOR BELT. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. NO WATER TRUCK WAS OBSERVED BUT THE STREET SWEEPER WAS SEEN. THE ROADS WERE NOT WETTED AND NO WATER CONTROLS WERE OBSERVED. TRUCKS THAT WERE DRIVING ON PAULINA ST WERE CREATING DUST AND TRACK OUT FROM PAULINA ST TO S BLUE ISLAND AVE WAS SEEN. THE WIND WAS TRAVELING FROM THE SOUTH-SOUTHWEST AT 7MPH AT 2:00PM (WHEATHERCHANNEL.COM). THE TEMPERATURE WAS 23°F AT THE TIME OF THE INSPECTION.AN INTENSE SWEET/BURNING METAL/OIL ODORS AND AUTO FLUFF WAS OBSERVED DOWN WIND AT 2352 S ASHLAND AVE, CITY OF CHICAGO FACILITY.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>
12/7/2021		<p>[INSPECTION LOG #: 15704550 07-DEC-21 15:10:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO A CITIZEN'S COMPLAINT REGARDING 'DUST?' AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). THE COMPLAINT LISTED SIMS METAL MANAGEMENT AT THE BUSINESS NAME. METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THIS FACILITY WAS SIMULTANEOUSLY INSPECTED FOR SR# 601111936. THE COMPLAINANT WAS CONTACTED FOR MORE INFORMATION AND INFORMED ME THAT SIMS IS CREATING AIRBORNE PARTICULATE FOR THE SHREDDER. THEY WERE WALKING NEARBY AND OBSERVED PARTICULATE. THEY DO NOT UNDERSTAND WHY SIMS IS STILL IN OPERATION WHILE THE OTHER SHREDDER IS NOT.WHILE CANVASSING THE AREA ON DECEMBER 7, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. CLAW EXCAVATORS WERE SEEN MOVING MATERIALS AROUND AND TO THE SHREDDER CONVEYOR BELT. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. NO WATER TRUCK WAS OBSERVED BUT THE STREET SWEEPER WAS SEEN. THE ROADS WERE NOT WETTED AND NO WATER CONTROLS WERE OBSERVED. TRUCKS THAT WERE DRIVING ON PAULINA ST WERE CREATING DUST AND TRACK OUT FROM PAULINA ST TO S BLUE ISLAND AVE WAS SEEN. THE WIND WAS TRAVELING FROM THE SOUTH-SOUTHWEST AT 7MPH AT 2:00PM (WHEATHERCHANNEL.COM). THE TEMPERATURE WAS 23°F AT THE TIME OF THE INSPECTION.AN INTENSE SWEET/BURNING METAL/OIL ODORS AND AUTO FLUFF WAS OBSERVED DOWN WIND AT 2352 S ASHLAND AVE, CITY OF CHICAGO FACILITY.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>

complaint_date	complaint_detail	inspection_log
12/10/2021		<p>[INSPECTION LOG #: 15736478 14-DEC-21 10:40:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING 'DUST? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). THE COMPLAINT LISTED SIMS METAL MANAGEMENT AT THE BUSINESS NAME. METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON DECEMBER 14, 2021, ODORS AND VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. CLAW EXCAVATORS WERE SEEN MOVING MATERIALS AROUND AND TO THE SHREDDER CONVEYOR BELT. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. EMISSIONS WERE SEEN ESCAPING THE SHREDDER. NO WATER TRUCK WAS OBSERVED BUT THE STREET SWEEPER WAS SEEN. THE ROADS WERE NOT WETTED AND NO WATER CONTROLS WERE OBSERVED. TRUCKS THAT WERE DRIVING ON PAULINA ST WERE CREATING DUST AND TRACK OUT FROM PAULINA ST TO S BLUE ISLAND AVE WAS SEEN.THE WIND WAS TRAVELING FROM THE SOUTHEAST AT 9MPH AT 10:00AM (WHEATHERCHANNEL.COM). THE TEMPERATURE WAS 46°F AT THE TIME OF THE INSPECTION.AN INTENSE SICKLY SWEET AND BURNING METAL/OIL ODORS WERE OBSERVED DOWNWIND OF THE FACILITY, ON PAULINA ST. AUTO FLUFF WAS ALSO OBSERVED AT LOADING DOCK OF THE PREFERRED FREEZER (2357 S WOOD ST).AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>
12/17/2021		<p>[INSPECTION LOG #: 15757810 17-DEC-21 14:00:00] ON DECEMBER 17, 2021, CHICAGO DEPARTMENT OF PUBLIC HEALTH (CDPH) SENIOR ENVIRONMENTAL INSPECTOR JUSTIN BARNES RESPONDED TO A NOISE COMPLAINT AT 2500 S. PAULINA ST. INSPECTOR BARNES ARRIVED AT 1:35PM TO SURVEY THE LOCATION (PHOTOS A B).AN ANONYMOUS COMPLAINT FILED WITH THE CITY OF CHICAGO'S 311 SYSTEM STATED LOUD NOISES WERE EMANATING FROM THE INDUSTRIAL YARD LOCATED AT THE ABOVE LISTED AREA.DURING THE SURVEY, INSPECTOR BARNES OBSERVED NOISE EMANATING FROM THE INDUSTRIAL AREA. INSPECTOR BARNES ALSO OBSERVED EXTENSIVE NOISE RESULTING FROM ADJACENT VEHICLE, CTA, AND COMMERCIAL TRUCKING TRAFFIC IN THE AREA. INFORMATIONAL NOISE METER READINGS TAKEN OF THE AREA WERE GREATLY IMPACTED BY THE ADJACENT NOISE.FOLLOWING THE SURVEY, INSPECTOR BARNES MET WITH THE MANAGER OF THE INDUSTRIAL YARD AT THE CENTER OF THE COMPLAINT (SIMS METAL MIDWEST - CHICAGO, 2500 S. PAULINA ST., CHICAGO, IL 60608). THE MANAGER STATED THEY WERE NOT AWARE OF COMPLAINTS MADE AGAINST THEIR YARD. THE MANAGER ALSO STATED THAT THE YARD WAS OPERATIONAL FROM 6:00AM TO 4:00PM. INSPECTOR BARNES REVIEWED THE GENERAL REQUIREMENTS OF THE CHICAGO NOISE ORDINANCE IN THE MUNICIPAL CODE OF CHICAGO WITH THE YARD MANAGER.DUE TO THE COMPLAINANT NOT LEAVING ANY CONTACT INFORMATION WITH THEIR COMPLAINT, NO ADDITIONAL FOLLOW UP COULD BE CONDUCTED. CDPH DETERMINED NO CITATIONS WERE REQUIRED.</p>

complaint_date	complaint_detail	inspection_log
1/5/2022		<p>[INSPECTION LOG #: 15827927 05-JAN-22 13:30:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO MULTIPLE COMPLAINTS REGARDING THE FOLLOWING: `WHY ARE THEY ALLOWED TO KEEP MAKING POLLUTION?? WHY DO YOU LET THEM KEEP OPERATING WHEN YOU ALREADY SHUT DOWN ONE SHREDDER ON THE SOUTH SIDE. IS MY LIFE NOT AS IMPORTANT AS THE ONES ON THE SOUTH SIDE? (601119025) AND AN ANONYMOUS COMPLAINT REGARDING `OPEN BURNING? (601119027) AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). THE COMPLAINT LISTED SIMS METAL MANAGEMENT AT THE BUSINESS NAME. METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON JANUARY 5, 2022, VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. CLAW EXCAVATORS WERE SEEN MOVING MATERIALS AROUND AND TO THE SHREDDER CONVEYOR BELT. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS. EMISSIONS WERE SEEN ESCAPING THE SHREDDER. NO WATER TRUCK OR STREET SWEEPER WAS SEEN. THE STREETS WERE WET FROM THE RECENT SNOW FALL.THE WIND WAS TRAVELING FROM THE WEST SOUTHWEST AT 25MPH AT 01:15PM (WHEATHERCHANNEL.COM). THE TEMPERATURE WAS 14°F AT THE TIME OF THE INSPECTION.I WAS NOT ABLE TO DETECT ODORS DURING THIS INSPECTION.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>
1/21/2022		<p>[INSPECTION LOG #: 15906911 21-JAN-22 09:30:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING THE FOLLOWING: `CAR SHREDDING BUSINESS? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON JANUARY 21, 2022, VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. CLAW EXCAVATORS WERE SEEN MOVING MATERIALS AROUND AND TO THE SHREDDER CONVEYOR BELT. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS AND TRUCKS DROVE DOWN PAULINA ST. EMISSIONS WERE SEEN ESCAPING THE SHREDDER. NO WATER TRUCK OR STREET SWEEPER WAS OBSERVED AND THE STREET WAS DRY.THE WIND WAS TRAVELING FROM THE WEST-SOUTHWEST AT 2MPH AT 08:45AM (WHEATHERCHANNEL.COM). THE TEMPERATURE WAS 18°F AT THE TIME OF THE INSPECTION.STRONG ODORS OF SICKLY SWEET, BURNING METAL WAS OBSERVED AT THE CITY OF CHICAGO FACILITY (2352 S ASHLAND AVE) WHICH IS DIRECTLY DOWNWIND OF THE SHREDDER (NORTH-NORTHEAST). IT WAS UNCOMFORTABLE TO INHALE THIS ODOR.AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>

complaint_date	complaint_detail	inspection_log
1/21/2022		<p>[INSPECTION LOG #: 15906837 20-JAN-22 14:50:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO AN ANONYMOUS COMPLAINT REGARDING THE FOLLOWING: `CAR SHREDDING BUSINESS? AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH.WHILE CANVASSING THE AREA ON JANUARY 20, 2022, VISIBLE EMISSIONS WERE OBSERVED. THE SHREDDER WAS IN OPERATION AND MATERIALS WERE ON THE CONVEYOR BELT. CLAW EXCAVATORS WERE SEEN MOVING MATERIALS AROUND AND TO THE SHREDDER CONVEYOR BELT. DUST WAS OBSERVED WHEN WORKERS MOVED MATERIALS AND TRUCKS DROVE DOWN PAULINA ST. EMISSIONS WERE SEEN ESCAPING THE SHREDDER. NO WATER TRUCK WAS SEEN AND THE STREET WAS DRY. A STREET SWEEPER WAS OBSERVED.THE WIND WAS TRAVELING FROM THE NORTH-NORTHWEST AT 10MPH AT 01:45PM (WHEATHERCHANNEL.COM). THE TEMPERATURE WAS 19°F AT THE TIME OF THE INSPECTION.I WAS NOT ABLE TO DETECT ODORS DURING THIS INSPECTION.CDPH WILL CONTINUE TO OBSERVE AND INVESTIGATE.</p>

From a concerned Pilsen resident

Kimberly Lopez [REDACTED]

Sat 2/26/2022 7:23 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom it May Concern:

As a resident of Pilsen and a healthcare provider, I take pride in my community's health. With the local buzz regarding Sims Metal Management filing for a new permit, I looked into this and what I found is a resident's nightmare! The fact that Chicago is even considering issuing any permit to Sims Metal instead of shutting them down is mind-blowing. Even though Chicago continues to inspect Sims Metal, the Chicago Department of Public Health inspector reports observing auto fluff on nearby properties.

Sims was fined \$18,000, admitted no-fault, and changed nothing. It paid **\$225,000** to settle a federal environmental case in 2018 and, more recently, has been [accused in a state lawsuit](#) of inadequately controlling air pollution, potentially releasing more than 25 tons of chemicals known as volatile organic compounds in a single year; all of which occurred after Chicago issued the last ticket. Given Sim's track record, not only should any permit be denied, Sims need to be shut down. How can this corporation be trusted? They can't!

Denying Sim's permit is what is best for the people of Pilsen.

Respectfully,
Kimberly Lopez, APRN, PMHNP, FNP-C

They tried to bury us. They didn't know we were seeds"
~ Mexican Proverb

Sims

Robert Rico 

Sat 2/26/2022 7:35 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

My name is Robert Rico I live in pilsen and a registered voter

We demand a community meeting and that Sims management application to operate be denied and the city state and county invest in clean up and creation of green safe jobs for those of us who live here and been poisoned

[Sent from Yahoo Mail on Android](#)

Metal Management Midwest , Inc. (d/b/a Sims Metal Management) permit renewal application

Erica D [REDACTED]

Sun 2/27/2022 11:11 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom It May Concern:

As a resident of Chicago who is committed to confronting environmental racism in our city and fostering environmental justice, I am eager to provide comments on the Metal Management Midwest, Inc. (d/b/a Sims Metal Management) permit renewal application. However, the permit renewal application does not provide the public with the minimally necessary information for informed comment on whether it meets applicable rules for the safe operation of recycling facilities. The absence of such information is consistent with a troubling history of obfuscation and bad faith on the part of Sims Metal Management. This troubling history calls for far greater explanation of their existing and planned operations before any of us can assess whether those plans are consistent with the letter and the spirit of the City's rules and with the rights of the primarily Latinx residents in the neighborhoods affected by the Sims metal shredder's operations to a safe and healthy environment.

Under an administrative consent order resulting from a 2018 U.S. EPA action, Sims is required to obtain a federally enforceable operating permit (FESOP) from the State of Illinois. But Sims submitted data from a Rhode Island facility instead of its Pilsen site in its initial FESOP application in January 2019! Its amended permit in January 2020 presented emissions data from independent testing of the Chicago site that was far higher than the Rhode Island data originally presented. There is reason to suspect that even that amended permit data is unreliable. A May 2021 emissions capture test, requested by the Illinois EPA pursuant to its review of Sims's FESOP application, indicated that more than half of the emissions from the shredder were not being captured at the measurement point, suggesting that true emissions could be twice as high as reported emissions. For all we know the true emissions level could be even higher.

Data from this same questionable emissions testing were used to build the current permit application's Air Dispersion Model for the Air Quality Impact Assessment required by Chicago's Rules for Large Recyclers. Due to errors in that data, we must expect the modeling analysis itself to be biased toward underestimating emissions.

The public is asked to provide comments on Sims's request to continue operations of a metal shredder, but the most we can say given the data we have been presented in the permit application is that we do not know if Sims has been, or can in the future, operate this facility safely. The path that led to this point of uncertainty gives ample cause for heightened scrutiny and I therefore urge the CDPH not to consider the Sims permit renewal application until reliable testing produces accurate emissions data and valid air quality modeling analysis that can be the basis of informed, transparent, meaningful community input into this important decision.

Finally, the City's momentous decision, just last week, to deny an operating permit for the RMG/General Iron metal shredder sets a new standard and framework for permitting of facilities generating toxic emissions. In making that decision, the City considered not just the air but the people who would be breathing it, who have been raising their voices against environmental racism and corporate corruption for years. Residents of Pilsen and Little Village have shouldered the burden of lead contamination from H. Kramer & Co. and BNSF Railway, the

infamous dust cloud from the Hilco smokestack implosion, and decades of pollution from coal-fired power plants. Under Chicago's cumulative impact and health equity principles, we cannot demand that they also endure the uncertain contamination from ongoing operations of the Sims facility.

Like RMG/General Iron, Sims Metal Management has not demonstrated that its facility will operate in a manner that prevents public nuisance and protects the public health, though it has been given opportunities in multiple public processes to do so. The guiding principles applied to the Southeast Side apply to Pilsen and Little Village as well: Chicagoans who have been *made* vulnerable by the concentration of polluting industries in their backyards should not be asked to absorb an unknown cost of further environmental risks from an industry that has failed to take seriously their own responsibility to the communities in which they operate.


Sincerely,
Erica Dix

--

Erica Dix



Metal Management Midwest , Inc. (d/b/a Sims Metal Management) permit renewal application

Ted Henley 

Sun 2/27/2022 9:18 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

February 16, 2022

Chicago Department of Public Health
333 S. State Street, Suite 200
Chicago, IL 60604

envcomments@cityofchicago.org

Re: Metal Management Midwest , Inc. (d/b/a Sims Metal Management) permit renewal application

To Whom It May Concern:


Under an administrative consent order resulting from a 2018 U.S. EPA action, Sims is required to obtain a federally enforceable operating permit (FESOP) from the State of Illinois. But Sims submitted data from a Rhode Island facility instead of its Pilsen site in its initial FESOP application in January 2019! Its amended permit in January 2020 presented emissions data from independent testing of the Chicago site that was far higher than the Rhode Island data originally presented. There is reason to suspect that even that amended permit data is unreliable. A May 2021 emissions capture test, requested by the Illinois EPA pursuant to its review of Sims's FESOP application, indicated that more than half of the emissions from the shredder were not being captured at the measurement point, suggesting that true emissions could be twice as high as reported emissions. For all we know the true emissions level could be even higher. Data from this same questionable emissions testing were used to build the current permit application's Air Dispersion Model for the Air Quality Impact Assessment required by Chicago's Rules for Large Recyclers. Due to errors in that data, we must expect the modeling analysis itself to be biased toward underestimating emissions.

The public is asked to provide comments on Sims's request to continue operations of a metal shredder, but the most we can say given the data we have been presented in the permit application is that we do not know if Sims has been, or can in the future, operate this facility safely. The path that led to this point of uncertainty gives ample cause for heightened scrutiny and I therefore urge the CDPH not to consider the Sims permit renewal application until reliable testing produces accurate emissions data and valid air quality modeling analysis that can be the basis of informed, transparent, meaningful community input into this important decision.

Sincerely,

Ted Henley
Pilsen Resident

Sims Metal Management

Joseluis Garcia 

Mon 2/28/2022 9:20 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lori.

It has come to my attention that Sims located in Pilsen is in renewal of their shredder permit. This company has been polluting for too many years now. The smell is so bad, the black smoke coming out of the facility is just outrageous. As a citizen of the city I asked for this permit to be DENIED. For the well being and future of our kids.

Thanks!

DENY THE PERMIT

Ms denise follmar [REDACTED]

Mon 2/28/2022 9:38 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom it May Concern,

The citizens of Chicago deserve better; the people of Pilsen deserve better! If it doesn't belong in Lincoln Park, doesn't belong in Southside why does it belong in Pilsen????

Sincerely,

A Concerned Citizen

Sims Permit

Janine Stewart 

Mon 2/28/2022 9:59 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern,

The Sims MM permit must be denied. The shredder is putting out toxic pollution that you can see and smell, which leaves the property. If it doesn't belong in Lincoln Park or the Southside, then why does it deserve to be in Pilsen? The citizens of Chicago and Pilsen deserve better!

Thank you.

SIMS MM PERMIT - DENY PERMIT

Tina ATTEBERRY 

Mon 2/28/2022 10:09 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dr Arwady and the City of Chicago,

Please deny the permit for the Sims Metal Management permit. Their shredder is not up to standard. It is putting out toxic pollution that you can see and smell. All the tickets and write ups from the city of Chicago did nothing. They didn't fix anything but yet continue to operate.

Stop the renewal process of this permit immediately. The people of Pilsen deserve better. Stop this environmental burden. The people have put their trust in you, do the right thing. Just say no.

Thank you for your consideration

Denise the permit

Francisco Amaya 

Mon 2/28/2022 10:33 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To the city of Chicago department of health, this city need to deny the sims permit there's toxic pollution you can see and smell coming out of the shredder the people of pilson deserve better you deny the shredder on the Far East side deny this permit.

Thank you, Francisco

Recycling permit

Javier Cervantes 

Mon 2/28/2022 10:40 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

The permit for the recycling yard should be denied even the department of health has given them tickets for dust and pollution leaving the yard nothing has changed since then. Its been many months and it still continues they're obviously not running the operation responsible, how can you let this continue?

Thank you

J. Cervantes

Sims Permit

bruce miller [REDACTED]

Mon 2/28/2022 10:44 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern,

A permit for a Shredder in the same was denied due to air quality issues and you are going to allow a know polluter access to continue to pollute the same air!!! This is not fair to anyone that lives in this area!!! We are outraged and demand that this permit also be denied!! This Shredder is known to put out toxic pollutions into the air already!!! Think of the citizens who live in this first.

Sincerely,

A very concerned citizen who works in this area

SIMS Shredder Racism

Mac D 

Mon 2/28/2022 10:46 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Department of Health Chicago,

As a concerned citizen, I call on you to deny the permit to SIMS metal shredder!! The smoke and chemicals let out into the air are harmful to us and especially the kids at Benito Juarez. This is a predominantly Latino community and it is racism that these people are allowed to operate. Have they not had many EPA violations? Have they not been sued by the Attorney General? This company operates without any regulation, and that's injustice to the community.

Pilsen deserves better, our children at Benito Juarez deserve better, anything other than the permit denial, is total and complete RACISM.

Harlan

Sims Permit

Lucas Annen 

Mon 2/28/2022 10:49 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]


City of Chicago,

Sims has not fixed any of their issues even after tickets and write ups from the city of Chicago. I don't know how you can deny a state of the art facility, Southside Recycling, but let this polluter continue to operate. That doesn't make any sense. Keep an even playing field and hold them responsible.

Luke Annen

Sent from my iPhone

Sims metal

Fernando Serrano 

Mon 2/28/2022 10:51 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

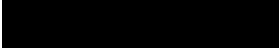
Dear major Lightfoot:

I've read that sims is being sued by the state. And they've had many city and state violations of environmental rules. They should not be allowed to keep operating with all there problems.

Regards

F. Serrano

Sims permit

Antonio navarrete 

Mon 2/28/2022 10:57 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

I've read that the RMG shredder permit was denied. if they can't get a permit how can the city give a permit to SIMS? they have teriable environmental problems and violations. Their permit should not be issued. Thank you!

Antonio Navarrete

Sent from my iPhone

Public comment on permit renewal application from Metal Management Midwest, Inc. d/b/a Sims Metal Management

Sharon Post [REDACTED]

Mon 2/28/2022 11:05 AM

To: envcomments <envcomments@cityofchicago.org>

Cc: bary feldman [REDACTED]; Kathyne Dunlap [REDACTED]; Andrea Beschel-Sutherland [REDACTED]

 1 attachments (66 KB)

Public Comment Metal Management Midwest.pdf;

[Warning: External email]

Please see the attached public comments that I am submitting on behalf of the Justice & Service Committee of Northside Friends Meeting, a Meeting (chapter/church) of the Religious Society of Friends, also known as Quakers.

Thank you,
Sharon Post

February 28, 2022

Chicago Department of Public Health

333 S. State Street, Suite 200

Chicago, IL 60604

envcomments@cityofchicago.org

Re: Metal Management Midwest , Inc. (d/b/a Sims Metal Management) permit renewal application

To Whom It May Concern:

As members of the Northside Friends Meeting Justice and Service Committee and residents of Chicago who are committed to confronting environmental racism in our city and fostering environmental justice, we are eager to provide comments on the Metal Management Midwest, Inc. (d/b/a Sims Metal Management) permit renewal application. However, the permit renewal application does not provide the public with the minimally necessary information for informed comment on whether it meets applicable rules for the safe operation of recycling facilities. The absence of such information is consistent with a troubling history of obfuscation and bad faith on the part of Sims Metal Management. This troubling history calls for far greater explanation of their existing and planned operations before any of us can assess whether those plans are consistent with the letter and the spirit of the City's rules and with the rights of the primarily Latinx residents in the neighborhoods affected by the Sims metal shredder's operations to a safe and healthy environment.

Under an administrative consent order resulting from a 2018 U.S. EPA action, Sims is required to obtain a federally enforceable operating permit (FESOP) from the State of Illinois. But Sims submitted data from a Rhode Island facility instead of its Pilsen site in its initial FESOP application in January 2019! Its amended permit in January 2020 presented emissions data from independent testing of the Chicago site that was far higher than the Rhode Island data originally presented. There is reason to suspect that even that amended permit data is unreliable. A May 2021 emissions capture test, requested by the Illinois EPA pursuant to its review of Sims's FESOP application, indicated that more than half of the emissions from the shredder were not being captured at the measurement point, suggesting that true emissions could be twice as high as reported emissions. For all we know the true emissions level could be even higher.

Data from this same questionable emissions testing were used to build the current permit application's Air Dispersion Model for the Air Quality Impact Assessment required by Chicago's Rules for Large Recyclers. Due to errors in that data, we must expect the modeling analysis itself to be biased toward underestimating emissions.

The public is asked to provide comments on Sims's request to continue operations of a metal shredder, but the most we can say given the data we have been presented in the permit application is that we do not know if Sims has been, or can in the future, operate this facility safely. The path that led to this point of uncertainty gives ample cause for heightened scrutiny and we therefore urge the CDPH not to consider the Sims permit renewal application until reliable testing produces accurate emissions data and

valid air quality modeling analysis that can be the basis of informed, transparent, meaningful community input into this important decision.

Finally, the City's momentous decision, less than two weeks ago, to deny an operating permit for the RMG/General Iron metal shredder sets a new standard and framework for permitting of facilities generating toxic emissions. In making that decision, the City considered not just the air but the people who would be breathing it, who have been raising their voices against environmental racism and corporate corruption for years. Residents of Pilsen and Little Village have shouldered the burden of lead contamination from H. Kramer & Co. and BNSF Railway, the infamous dust cloud from the Hilco smokestack implosion, and decades of pollution from coal-fired power plants. Under Chicago's cumulative impact and health equity principles, we cannot demand that they also endure the uncertain contamination from ongoing operations of the Sims facility.

Like RMG/General Iron, Sims Metal Management has not demonstrated that its facility will operate in a manner that prevents public nuisance and protects the public health, though it has been given opportunities in multiple public processes to do so. The guiding principles applied to the Southeast Side apply to Pilsen and Little Village as well: Chicagoans who have been *made* vulnerable by the concentration of polluting industries in their backyards should not be asked to absorb an unknown cost of further environmental risks from an industry that has failed to take seriously their own responsibility to the communities in which they operate.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Post', with a horizontal line extending to the right.

Sharon Post,
on behalf of the Justice & Service Committee of Northside Friends Meeting

DENY Sims Permit



Mon 2/28/2022 11:05 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

If a Auto Shredder is not allowed in Lincoln Park and not allowed on the Southside, one should not be allowed in Pilsen. Do our lives not matter as much as the people of the southside and the rich white northside people. SIMS is getting sued by the attorney General for Environmental Violations why would you allow another shredder?

Don't contradict your selves.

DENY the permit like you have Denied all the others!!!!!!!!!!

Concerned resident of Pilsen

Environmental justice

Edwin Hernandez 

Mon 2/28/2022 11:09 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

There are schools right near this scrap yard, including Benito Juarez High school. The city should stop this polluter from operating . There's already a lot of industry in the area and alot of truck driving. You can see it from blocks away. The air quality in pilsen is one of the worst in the city, the city should not have another polluter, especially in Pilsen.

Thanks you, Edwin

Metal management

Segundo Gonzalez 

Mon 2/28/2022 11:18 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

I read that the city does not require a health assessment because metal management is an existng facility. Do the people of Pilsen not matter to the city? Or just not as much as the people of the south east side or in Lincoln park?

Bolivar González

Enviado desde mi iPhone

Environmental Injustice

Mario Dominguez 

Mon 2/28/2022 11:18 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lightfoot,

Allowing Sims to continue operating in an area with a high environmental burden like Pilsen and denying a permit to RMG, is classic environmental injustice! Deny their permit TOO.

Mario Dominguez

Environmental Justice

Beth Ramsey 

Mon 2/28/2022 11:18 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Mayor Lightfoot

It has come to my attention that Sims Chicago has applied for a permit. If other companies have been denied, this permit, that are responsible for their action, Why would this irresponsible company that is not fixing it's issues be aloud to even apply. This permit process should be stopped immediately to protect the health of the people of Pilsen and to show Chicago's commitment to environmental justice.

Stop sims now

Anita Rico 

Mon 2/28/2022 11:19 AM

To: envcomments <envcomments@cityofchicago.org>


[Warning: External email]

I demand meeting with city county invest in clean up and reparations to create green jobs
Sims has to go get out of Pilsen.

We are either part of the problem or part of the solution. They been taking advantage,
abusing and poisoning us because we are a Latino immigrant community! Stop Sims now

Anita Rico

Sims permit application

Isarel Hernandez 

Mon 2/28/2022 11:28 AM

To: envcomments <envcomments@cityofchicago.org>


[Warning: External email]

To department of public health,

Your department should not issue a new permit to this company. The pollution that comes from their property and goes into the neighborhood is sickening. Specifically so close to the schools in Pilsen. Please deny the permit!!

Isarel Hernández

Sims Permit

george steele 

Mon 2/28/2022 11:30 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

City of Chicago,

If shredders don't belong in Lincoln Park or the Southeast side, then why is it ok in Pilsner?
Please deny Sims permit.

George

Sent from my iPad

Pilsen environment justice

Ousmane Sylla [REDACTED]

Mon 2/28/2022 11:31 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

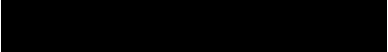
Dear Mayor and public health department:

Letting this business keep operating with all the pollution, smoke, and fluff that they release into the environment and denying the permit on the Southeast side is a case of environmental racism. The city should not be choosing one neighborhood over another. They should be shut down and their permit should be denied!!!

Sincerely,

Ousmane Sylla

Metal Management Permit

Mike Junewicz 

Mon 2/28/2022 11:36 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom it May Concern,

If shredders don't belong in Lincoln Park or on the Southeast Side, why does one belong in Pilsen?

-Mike Junewicz

Sims Permit Renewal

Dennis Stropko [REDACTED]

Mon 2/28/2022 11:41 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

City of Chicago, Dept of Health. If a state-of-the-art auto shredder is not permitted on the South Side of Chicago, surely an auto shredder permit should not be approved/permitted in Pilsner, especially one that doesn't have any of the environmental controls that the already denied shredder has. DENY THE PERMIT RENEWAL for the Sims Auto Shredder.

Pilsen Environmental

Marcelo Castro 

Mon 2/28/2022 11:43 AM


To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

The air quality in pilsen is one of the worst in the city .this was even in the city's air quality report. Knowing this and the city also knowing that sims is in violation of their current city permit contamination and fluff going off site. The city knows this yard is violating the clean air act and is being sued by the state of Illinois, how can they be allowed in operate? The toxins they put out can cause serious heath issues including birth defects and Brain and lung issues. Shut it down!

Sincerely ,marcelo castro

Sims Permit

Dan Greathouse 

Mon 2/28/2022 11:47 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern,

I've just become aware of the fact that Sims Metal Management is applying for a new operating permit for their location in Pilsen. Based on the fact that permits for a new General Iron facility on the Southside were not approved, will the same amount of rigor be put into studies on the renewal of the Sims permit?

SIMS Permit and Environmental Justice

Terri Cooper [REDACTED]

Mon 2/28/2022 12:13 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To the City of Chicago,

I'm demanding that you deny the permit renewal for SIMS Metal Management and their shredder in Pilsen. This company has not been a good neighbor to the Pilsen community. Their shredder is putting out toxic pollution that you can see and smell. Not to mention, the fuzz (or dust) that is blowing in the neighborhood. They are operating right next to a school. The people of Pilsen deserve better. The company has done nothing to address the environmental concerns of the residents, nor have they taken seriously the citations issued by the City. To be consistent with your ruling last week to deny the permit of RMG, you must deny this one as well. This is clearly Environmental Racism. If this is not acceptable in the Lincoln Park area or the SE side, then why would it be acceptable in Pilsen, which is an environmentally burdened area.

Thank you,

Terri Cooper

Environmental justice

Fernando Albs [REDACTED]

Mon 2/28/2022 11:56 AM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

There's alot of talk abNout environmental justice. For environmental justice to be true justice it needs to be delivered equally to all neighborhoods and not just when the politicians feel like it. If this type of operation is not good for Lincoln park and no good for the south east side why is it ok in pilsen? Just because the operation is existing the people of Chicago should not have to deal with their pollution. The toxic pollution coming from this operation contains heavy metals and VOCs, the city knows this and knows about the pollution and does nothing. This is not environmental justice this is bad politics. Do the right thing and deny the permit, Chicago needs responsible recycling and they have proven they are not responsible.

Fernando Alba

Environmental Racism - LRF_Sims Metal Management

Kevin Trant [REDACTED]

Mon 2/28/2022 12:02 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To: Dr. Arwady, Meghan Cunningham, Department of Public Health, Mayor Lightfoot

I write with reference to the public comment period for the Large Recycling Permit (LRF) Application that Sims Metal Management (SMM) filed with the City of Chicago.

Fresh on the heels of the Department of Public Health's denial of another LRF permit applicant, the DPH needs to deny this permit, as well. Failure to deny SMM its permit, among other reasons, obliterates the Environmental Justice stance of the DPH's recent denial of that other applicant.

Examine the comparative facts between these applicants. The permit you denied was done so after detailed exhaustive investigations that proved time and again that the applicant will not negatively impact human health. To be specific, Tetra Tech went on record stating that there is less than a 1:1,000,000 chance that a Southeast Side resident will develop either a carcinogenic, or non-carcinogenic related illness from any pollutants that might, not will, might leave the facility. And more importantly, the data from the DPH's exhaustive investigation shows that any and all pollutants are well below the USEPA's benchmarks. Your denial was not based on any serious public health reasoning. Your denial is more akin to driving 31 MPH in a 30 MPH zone.

Look at SMM and their track record. They are chronic polluters and violators of the Clean Air Act. They've received numerous citations from the City of Chicago for repeatedly allowing fuzz and other forms of pollution to leave their facility. There are numerous complaints of foul odors drifting from their operation into the Pilsen neighborhood. The City of Chicago knows that SMM allows smoke containing VOC's to settle within Pilsen. The Pilsen neighborhood is no different than the southeast side of Chicago. Both are comprised largely of similar ethnicities.

The City of Chicago cannot have a double standard by denying the one LRF applicant that invested in the most advanced environmental pollution control systems in all of North America, only to approve the SMM LRF permit.

The hypocrisy of an approval to SMM will forever stain the reputation of the each of you as individuals and upon the DPH, the City of Chicago and the mayor herself.

Kevin Trant

Re: Environmental Racism - LRF_Sims Metal Management

Kevin Trant [REDACTED]

Mon 2/28/2022 12:03 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

On Mon, Feb 28, 2022 at 12:02 PM Kevin Trant [REDACTED] wrote:

To: Dr. Arwady, Meghan Cunningham, Department of Public Health, Mayor Lightfoot

I write with reference to the public comment period for the Large Recycling Permit (LRF) Application that Sims Metal Management (SMM) filed with the City of Chicago.

Fresh on the heels of the Department of Public Health's denial of another LRF permit applicant, the DPH needs to deny this permit, as well. Failure to deny SMM its permit, among other reasons, obliterates the Environmental Justice stance of the DPH's recent denial of that other applicant.

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The City of Chicago cannot have a double standard by denying the one LRF applicant that invested in the most advanced environmental pollution control systems in all of North America, only to approve the SMM LRF permit.

The hypocrisy of an approval to SMM will forever stain the reputation of the each of you as individuals and upon the DPH, the City of Chicago and the mayor herself.

Kevin Trant

Pilsen scrap yard

Flennard Jordan 

Mon 2/28/2022 12:13 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To the city of Chicago department of health

Look at your own inspection reports which show they've fluff and pollution leaving the site. Odors that burn the inspector

Look at your own air quality studies which show Pilsen is one of the worst areas of the city

Look at the population and distance to Scholls and house.

Look at their companies trade record with the violation of the clear air act

Look at your stance on environmental justice.

The citizens of Chicago are looking at this decision. Do you obey reject operations for votes or do you do the right thing. ?

We are watching.

SIMS Permit and Environmental Justice

Terri Cooper [REDACTED]

Mon 2/28/2022 12:13 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To the City of Chicago,

I'm demanding that you deny the permit renewal for SIMS Metal Management and their shredder in Pilsen. This company has not been a good neighbor to the Pilsen community. Their shredder is putting out toxic pollution that you can see and smell. Not to mention, the fuzz (or dust) that is blowing in the neighborhood. They are operating right next to a school. The people of Pilsen deserve better. The company has done nothing to address the environmental concerns of the residents, nor have they taken seriously the citations issued by the City. To be consistent with your ruling last week to deny the permit of RMG, you must deny this one as well. This is clearly Environmental Racism. If this is not acceptable in the Lincoln Park area or the SE side, then why would it be acceptable in Pilsen, which is an environmentally burdened area.

Thank you,

Terri Cooper

Sims Permit Application

Mariano Hernandez 

Mon 2/28/2022 12:14 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Lori Lightfoot and Public Health Department,

The permit for this company should not be issued. They are constantly contaminating the Pilsen neighborhood with smoke and fluff from their car shredder. Why are you allowing them to keep running with no way of controlling their pollution? We demand you to deny their permit!!!!
Thank you for taking this email into consideration.

Mariano Hernández

Sent from my iPhone

Sims Permit in Pilsen

Johnny Glenn 

Mon 2/28/2022 12:16 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Mayor and Public Health Department,

Do you know, there are schools, house, grocery stores and a youth wellness center all within a few blocks of Sims Shredder? They have been fined numerous times for violation of pollution regulations. What is it going to take to protect the Pilsen community and all these children? This community deserves better. You have the power to make a difference and force Sims to shut down and rid this community of toxic pollution. DENY THE PERMIT.

Johnny Glenn

Environmental justice

Linda Kruczek [REDACTED]

Mon 2/28/2022 12:20 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

If the shredders don't belong in Lincoln Park or on the Southeast Side, why does one belong in Pilsen

Sent from my iPhone

Shredder permit

Agustin Gonzaga 

Mon 2/28/2022 12:23 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To department of health and doctor arwady

With the recent denial of the permit of the south side the city took a stance for environmental justice even though no health issues were found

Yet in pilsen the operation is violating the clean air act and city of Chicago ordinance. I read and can see they have no pollution system to control emissions. The citizens deserve you to protect the environment and not just make decisions for votes. Deny the permit.

If new state of the art operations don't get to recycle, how can you let this one in Pilsen

It's your job to protect the environment and health if the citizens. How can you reject a new facility and allow one with no safe measures.

Do the right thing.

Sent from my iPhone Agustin

Metal Management permit

Jose Hernandez 

Mon 2/28/2022 12:26 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern

If the city of chicago cares of about the citizens of chicago and the environment then deny the permit
. The polllution and smoke coming from their yard is awful.

Sims MM Permit

Laurie Nase 

Mon 2/28/2022 12:27 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

City of Chicago,

I am asking that you stop the permit process immediately for Simms MM to protect the health of the people of Pilsen and to show Chicago's commitment to environmental Justice.

Thank You.

Laurie Saunders

Sims Permit

Erika Langham 

Mon 2/28/2022 12:38 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom it may concern,

The citizens of Chicago and the residents of Pilsen deserve better.

If shredders don't belong in Lincoln Park or on the Southeast Side, why does one belong in Pilsen?

In my opinion, the Sims permit should be stopped.

The shredder is putting out toxic pollution that you can see and smell.

Thank you!

Metal Management Permit

Jessica Taylor 

Mon 2/28/2022 12:43 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom It May Concern,

I am aware that the city has denied other companies the same permit that Sims has applied for. If it is not okay for a shredder to operate in two other cities, why is it okay for one to operate in Pilsen.

Please deny the permit.

Sincerely, a Concerned Citizen.

Deny the permit

Sarah Keller [REDACTED]

Mon 2/28/2022 12:46 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern

I feel the Sims permit should be denied. The shredder puts toxic fumes in the air you can see and smell. It is irresponsible for the city to consider approving.

Thank you.

Sent from my iPhone

Operating Permits

Nick Smith 

Mon 2/28/2022 12:51 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To the City of Chicago,

I am writing to you today with concern for the cities recent decision to approve the operating permit to the Sims recycling facility in Chiacgo. My concern is not with Sims the company itself, but instead concerned for the process in which these city operating permits are distributed within the city. It is of my concern that these shredders will bring along reported pollution. And we're accepted operating permits. While at the same time a state of the art facility offering more jobs, and greater green benefits is being denied an operating permit. Make it make sense. I do not understand why the city of Chicago is approving the Sims facility and not the recent state of the art facility that would provide a greater economic impact for the residents of Chicago while at the same time offering reduced pollution. I am concerned that the process to allow operating permits is flawed in the city of Chicago. Thank you for your time.

Best Regards,

Nick B.

Sent from my Verizon, Samsung Galaxy smartphone

Sims Permit

Lisa 

Mon 2/28/2022 12:53 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

This is environmental racism. Pilsen is being used as a sacrifice zone while other areas don't have to deal with these types of plants. Deny the permit.

Lisa Ikey

Sims Permit

Joanne Weinman 

Mon 2/28/2022 12:55 PM

To: envcomments <envcomments@cityofchicago.org>

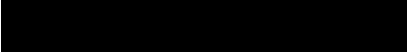
[Warning: External email]

To Whom it May Concern,

Please reject the Sims permit. Why is it ok to operate in the Pilsen area and not any other areas in Chicago?

Thanks,
Joanne

STOP SIMS PERMIT

mark kordahi 

Mon 2/28/2022 1:07 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Mayor Lightfoot.

Sims outdoor shredder is putting out toxic pollution.

The permit should be denied/canceled!

Mark K.

Sims MM Permit

Evan Joyce 

Mon 2/28/2022 1:22 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

City of Chicago,

I wanted to look into why there's a metal shredding and processing plant is being permitted to operate in the Pilsen neighborhood even though the facility was denied the same permit in the Southeast side? It seems like if these facilities are producing that much pollution, the same type of facility shouldn't be allowed to operate in any Chicago neighborhoods, for health and safety reasons. It feels really disrespectful to the hard work that protestors and activists put in to secure a healthier environment to then turn around and give the exact same permit to a company with a worse environmental record and older, more pollutant creating facility.

Is there a reason that the Sims metal processing permit would be granted but the other permit was denied? It feels like the environmental concerns should still apply.

Thanks,

Evan

Deny Permit to SIMS



Mon 2/28/2022 1:26 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

Please do not allow a permit to be re issued to SIMS due to pollution and previous fines.

-Resident of Chicago

This email was sent using www.SendEmail.in Requires: No Login No Password. Just Send Email
Sent on:Monday, February 28, 2022 1:26:07 PM from computer IP Address:174.209.40.179

Stop Sims MM Permit

bob frapples 

Mon 2/28/2022 1:28 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To Whom It May Concern,

I have learned that Simms Metal Management has applied for a metal shredding permit in the Pilsen neighborhood. The same permit has been denied in two other local neighborhoods so I hope that this one will be denied as well.

Thank you for your time and consideration.

Deny Permit - SIMS



Mon 2/28/2022 1:31 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello Agency,

Please do not allow a permit to be re-issued to SIMS due to pollution and previous fines.

-Resident of Chicago

This email was sent using www.SendEmail.in Requires: No Login No Password. Just Send Email
Sent on:Monday, February 28, 2022 1:31:28 PM from computer IP Address:174.209.40.179

DENY THE PERMIT

Tania Camarena 

Mon 2/28/2022 1:35 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lightfoot,

Please Deny the renewal of the permit for Sims Metal Management the shredder is putting out toxic pollution that you can see and smell they are operating right next to a school and polluting pilsen they need to be SHUT DOWN dust is blowing in the neighborhood and the people from Pilsen deserves better we don't need any toxic pollution for our citizens PLEASE DENY THE PERMIT IMMEDIATELY FOR THE SAFE OF PILSEN AND FAMILIES AND CHILDREN!!!! NO SHREDDER!! NO PERMIT PLEASE!!!!

THANK YOU!

TANIA

Sims Permit

Lori Crockett 

Mon 2/28/2022 1:37 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To City of Chicago,

The shredder is putting out toxic pollution you can see and smell, there is dust blowing in the neighborhood. The people of Pilsen and Chicago deserve better.

Deny their permit

Lori

[Sent from Yahoo Mail for iPhone](#)

Sims permit

Kelley 

Mon 2/28/2022 1:39 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To whom it may concern:

This permit was denied prior in two other Chicago neighborhoods due to possible pollution. I would be curious to know why it's acceptable in Pilsen neighborhood and not on surrounding areas??

Kelley McNeil-Mills

Sent from my iPhone

Deny Permit - SIMS



Mon 2/28/2022 1:42 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello Environmental

As we are trying to improve the overall state of our breathable air we urge you to please do not allow a permit to be re-issued to SIMS shredder. They have failed to address ongoing issues and contamination of the air and continue to operate. Please do not renew until further investigation takes place. We are demanding an air quality, and ground contamination study.

-City Resident

This email was sent using www.SendEmail.in Requires: No Login No Password. Just Send Email
Sent on:Monday, February 28, 2022 1:42:21 PM from computer IP Address:174.209.40.179

Deny Permit Sims

Mon 2/28/2022 1:45 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello Environmental Agency

As we are trying to improve the overall state of our breathable air we urge you to please do not allow a permit to be re-issued to SIMS shredder. They have failed to address ongoing issues and contamination of the air and continue to operate. Please do not renew until further investigation takes place. We are demanding an air quality, and ground contamination study.

-City Resident

This email was sent using www.SendEmail.in Requires: No Login No Password. Just Send Email
Sent on:Monday, February 28, 2022 1:45:37 PM from computer IP Address:174.209.40.179

Deny Permit -SIMS



Mon 2/28/2022 1:47 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello Environmental Agency

As we are trying to improve the overall state of our breathable air we urge you to please do not allow a permit to be re-issued to SIMS shredder. They have failed to address ongoing issues and contamination of the air and continue to operate. Please do not renew until further investigation takes place. We are demanding an air quality, and ground contamination study.

-City Resident

This email was sent using www.SendEmail.in Requires: No Login No Password. Just Send Email
Sent on:Monday, February 28, 2022 1:47:17 PM from computer IP Address:174.209.40.179

Sims Permit

Michelle Manley 

Mon 2/28/2022 2:06 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

I am writing this request for you to deny Sims for shredder. You have denied this permit for two other neighborhoods, Pilsen should receive the same treatment as surrounding neighborhoods or this will environmental racism.

Sincerely,
Michelle Manley

Environmental Justice Sims MM Permit

Mon 2/28/2022 2:07 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lightfoot and Department of Public Health,

I am very concerned about the City of Chicago allowing Permits to go through in the Pilsen Neighborhood. Sims Metal Management who has many Citations from the EPA and the City of Chicago I understand is up for renewal. My understanding and being in the Bridgeport Neighborhood and working there for over 25 years and the Climate of change for Recycling Facilities the Pilsen area deserves much better. I believe all the pollution that comes from this site is a real Injustice to Pilsen and the surrounding areas. I would hope that in future you can understand my issues and Needs for A clean Recycling Facility that respects it's neighbors. Speaking of Air Pollutants you can always smell and see the issues at the Sims Facility!! Please give my concerns a good hard look . Hopefully I will see a response to this Timely Issue. Regards Billy Kramer

Sent from my Verizon, Samsung Galaxy smartphone

Sims permit



Mon 2/28/2022 2:15 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Please don't issue a permit to Sims due to health and safety concerns.
It will pollute the surrounding neighborhood.

Thank you,
Denise

Sims Metal Management LRF Renewal Application Comments

Sarah Anne [REDACTED]

Mon 2/28/2022 2:33 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Sims Metal Management's (Paulina Facility) Large Recycling Facility application should be put on hold until further notice. The renewal permit should not be granted at this time.

Currently, they operate within 600 feet of a sensitive area without any emission controls. They do not have any dust collectors to handle particulate matter emissions, or Regenerative Thermal Oxidizers capable of capturing and destroying VOCs. With complete lack of emission controls, there is no way that they can guarantee that they have community safety in mind.

Sims is also currently involved in a lawsuit with Illinois EPA for failing to demonstrate overall reduction in uncontrolled emissions. Sims is working with the EPA to address the issue, but is still operating with no emission controls of any kind. A company that is under current litigation with the state should not be issued a permit from the city. The matter with the state should be resolved prior to administering a LRF permit renewal through the city.

For these reasons, their renewal permit should be put on hold until they demonstrate, with physical proof, that they are in the process of installing emission controls to keep the community safe. Without the emission controls, they are not in compliance with state emission standards or city emission standards, so permit issuance would be irresponsible. Large Recycling Facilities in the city limits of Chicago should all be held to the same standards. Without that, the rules themselves hold no meaning.

Thank you.

Open Comment Period - Sims Metal Mgmt Permit

Bre B [REDACTED]

Mon 2/28/2022 2:50 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear City of Chicago, Lori Lightfoot, Allison Arwady

I am writing you today regarding the renewal of the permit for the Sims car crusher/shredder that is currently operating on Paulina Street in Pilsen.

If you take the time to see what is happening with this facility, you will see:

- Toxic smoke emanating from their shredder
- An accumulation of fluff collected in the cracks of the sidewalks and driveways all over the neighborhood.
- The smell of noxious odors during all hours of operations.
- Very heavy truck traffic adding to air pollution in a vulnerable minority community.
- That their shredder is literally 200 yards from homes and apartments!!
- That their shredder is 300 yards away from Aldi grocery store, Cermak Fresh Market and WIC Grocery!!
- That their shredder is 400 yards away from over 1,700 students located at Benito Juarez High School of which the total minority enrollment is 99% (mostly Hispanic) and 72% of students are economically disadvantaged!!
- That their shredder is 500 yards from 570 students located at Cristo Rey high school (minority 100%) and Wittier Elementary school (98% minority) and a youth wellness center!!
- That these areas are on many days ALL downwind of the toxic emissions spewing out of Sims car shredder!!

I've been reading public comments and media stories related to car shredders and their related operations and note the following:

- Allowing documented polluters to operate in an environmental justice area such as the Pilsen community is the definition of environmental racism. If these types of businesses are not good enough for white Lincoln Park; not good enough for black/brown Southside then why the hell are they good enough for Pilsen? Is the vulnerable Pilsen community expendable?
- Per Allison Arwady, these types of recycling operations carry inherent risks, including explosions and fires and is considered an inherently dangerous activity.
- Per Allison Arwady, these types of shredding operations have negative impacts to the environment, health and quality of life for area residents that cannot be adequately addressed through mitigations.
- Per Allison Arwady, these types of shredding operations produce an increase in particulate matter, noise and diesel emissions.
- Per Allison Arwady, when weighing permit decisions past noncompliance must be taken into account.

See following non-compliance notes regarding Sims shredder:

- o While operating in Pilsen, Sims violated environmental laws in 2018 and had to pay a fine of \$225,000. This is an operator that cannot be trusted to do the right thing.
- o Sims failed an EPA test in May 2021 yet still say that they did nothing wrong. They are an irresponsible operator yet will not commit to protecting the Pilsen community. They are placing profits over human lives in an environmental justice neighborhood!
- o Sims is being sued by Kwame Raoul for capturing less than 50% of the VOC's emitted from their facility. The mandated requirement is 81%. Sims is reckless! They actually have NO pollution controls on their shredder so their ACTUAL capture is 0%!
- o The state of IL is on record saying that Sims does NOT have sufficient controls to capture OR measure the pollution that it is releasing into the Pilsen community, homes, grocery stores and schools! How can you grant a permit to a serial polluter?? They are not following the rules RIGHT NOW!! Why are they allowed to operate a day past today??

- US EPA chair Michael Regan says that the city of Chicago is right to act in favor of residents' health. If the city is going to act in favor of the Pilsen communities' health, then you have no choice other than to DENY THE PERMIT!

Given all of these facts, I can only hope and pray that you make the right choice and DENY THE PERMIT!! Hopefully, this time around it doesn't have to take hunger strikes, interviews with media, rallies in front of your homes and stopping traffic by laying down bodies and coffins in city streets just to get your attention in this matter. THIS IS LIFE AND DEATH FOR THIS COMMUNITY!!!! DENY THE PERMIT!!!!

#PilsenStrong

#DenythePermit

#StopSims

#EnvironmentalJustice

SIMS PERMIT MUST BE DENIED

Hal Tolin <HalTolin@reserve-group.com>

Mon 2/28/2022 3:27 PM

To: envcomments <envcomments@cityofchicago.org>

 1 attachments (2 MB)

M Harris EPA from RMG (2-28-22) with attachments.pdf;

[Warning: External email]

The attached letter to US EPA is a true account of the FACTS and all you should need to deny SIMS LRF permit. They have been knowingly violating the Clean Air Act for years and the City and CDPH have been knowingly allowing it.

HAL TOLIN / RESERVE MANAGEMENT GROUP
[HALTOLIN@RESERVE-GROUP.COM]HALTOLIN@RESERVE-GROUP.COM
11554 SOUTH AVENUE O, 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.

RMG

This e-mail contains privileged and confidential information which is the property of Reserve Management Group and its affiliates, intended only for the use of the intended recipient(s). Unauthorized use or disclosure of this information is STRICTLY PROHIBITED. If you are not an intended recipient, please immediately notify Reserve Management Group and its affiliates and destroy any copies of this email. Receipt of this e-mail shall not be deemed a waiver by Reserve Management Group and its affiliates of any privilege or the confidential nature of the information.



February 28, 2022

SENT OVERNIGHT DELIVERY and VIA ELECTRONIC MAIL to harris.michael@epa.gov

Mr. Michael D. Harris
Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: **Request for Immediate Action**
In the Matter of: Metal Management Midwest, Inc., d/b/a Sims Metal Management
2500 South Paulina, Chicago, Illinois
Administrative Consent Order EPA-5-17-113(a)-IL-09

Dear Mr. Harris:

I am writing to bring to your attention a significant error made by Region 5 in the above-referenced Administrative Consent Order (ACO) entered into with Metal Management Midwest, Inc. (SIMS) and to request the error be immediately corrected. The ACO pertains to the scrap metal shredding operations of SIMS located in the Pilsen area of Chicago, an environmental justice (EJ) area on the lower west side. The ACO permits SIMS to operate at a throughput level based on an emission factor that is now widely recognized by the State of Illinois and EPA as being fundamentally flawed and grossly understated. The approval of this emission factor is allowing SIMS to emit excessive VOM emissions in violation of the Illinois RACT rules without any emission controls in an EJ area. The State of Illinois has rejected the validity of that emission factor and entered into an order requiring SIMS to install emission controls and meet the VOM RACT rules. It is abundantly clear EPA made a mistake in approving the emission factor for this facility. EPA needs to fix this error immediately.

As you know, the SIMS ACO was intended to address, among other things, VOM emissions from the metal shredder. The ACO limits the throughput of the facility to 344,000 tpy, as well as the quantity of end-of-life vehicles (ELVs) to 50% by weight, to restrict the facility's potential to emit to less than 25 tpy (the VOM RACT applicability limit). See Attachment A, ¶¶ 30-31. EPA utilized a VOM emission factor of 0.117 lb VOM/ton in establishing the 344,000 tpy limit. This emission factor was not based on site-specific testing, but was a number that SIMS and counsel for EPA Region 5 agreed by email was an appropriate factor to use in lieu of valid testing. See Attachment B. The emission factor is also the same factor from a faulty September 2017 emission test performed at the SIMS Johnston, Rhode Island facility. That testing was fundamentally flawed in that there were significant amounts of uncaptured VOM emissions escaping from the shredder during testing that were observed and documented by EPA Region 1 inspectors. As a result, the testing significantly underestimated VOM emissions from the shredder.

SIMS then applied to the Illinois EPA for a federally enforceable state operating permit (FESOP) using this faulty emission factor. To its credit, Illinois EPA rejected the emission factor and recognized the need for a site-specific test using EPA approved test methods. Illinois EPA then required SIMS to perform a proof-of-concept emissions capture test on the shredder. The purpose of the test was to evaluate whether SIMS could sufficiently capture emissions from the shredder to meet the applicable testing method. The Illinois EPA concluded that SIMS failed



the proof-of-concept capture emissions test. The test revealed that SIMS was capturing less than 50% of emissions from the shredder, confirming that emissions testing should be invalidated when there are significant amounts of unquantifiable emissions.

As a consequence of the failed test, Illinois EPA initiated an enforcement action and referred the matter to the Illinois Attorney General. The parties then entered into an Agreed Preliminary Injunction Order, requiring SIMS to develop and implement an emissions control system to meet the VOM RACT requirements and submit a construction permit application for the control system to the Illinois EPA.

We applaud the Illinois EPA's actions in not only rejecting the faulty emission factor utilized by Region 5 and the proof of concept testing, but also a flawed onsite test conducted by SIMS, and then requiring emission controls. However, in all likelihood, there will be lengthy delays in the issuance of a construction permit to SIMS in an EJ area, and then significant time needed to order, install and shakedown the control equipment. Until SIMS obtains the required construction permit and installs the emissions control system, SIMS will be continuing to process up to 344,000 tons of scrap metal per year under the ACO, including up to 172,000 tons of ELVs, while emitting as much as 88 tons per year of VOM from its shredder into an EJ area. These 88 tons of VOM will continue to be emitted every year until the permitting and installation process is concluded.

Since the ACO was executed, EPA has conducted numerous investigations at metal recycling facilities for Clean Air Act violations. EPA even issued an Enforcement Alert in July 2021 entitled *Violations at Metal Recycling Facilities Cause Excess Emissions in Nearby Communities*. In that Alert, EPA states that there have been over 25 emissions tests measuring VOMs at scrap metal shredders, but the "quality of the emissions data for these tests varies" and "[t]est results are greatly determined by the capture efficiency of the test equipment." EPA also states that the recent emission tests "with a focus on maximizing capture efficiency have shown that emission rates from shredders" are higher than previously known. EPA has clearly recognized much of the historic test data is no longer appropriate and does not accurately reflect VOM emissions from metal shredders.

We are aware that EPA Region 2 also recently evaluated VOM emission test results from scrap metal shredders across the U.S. for regulatory oversight, adequate VOM capture, consistent test methods and a range of scrap metal composition (% of ELVs). In discussions with Region 2, it was conveyed to us that they are requiring facilities to either conduct approved site-specific testing or accept an appropriate emission factor derived from either the EPA-supervised emission testing conducted at General Iron in Chicago in May/June 2018 and November 2019 or at Schnitzer Steel in Oakland in October 2018 and January 2019.

The November 2019 General Iron testing that utilized 50% ELVs, like SIMS, revealed an uncontrolled VOM emission factor of 0.5119 lb VOM/ton. This emission factor is 4.4 times greater than the 0.117 lb VOM/ton emission factor utilized by EPA Region 5 in setting SIMS' maximum throughput in the ACO. Using the more accurate and approved General Iron emission factor of 0.5119 lb VOM/ton, SIMS' throughput at its Pilsen facility would need to be limited to 97,675 tpy for SIMS to demonstrate the facility has the potential to emit less than 25 tpy of VOM and avoid controls.

The bottom line is EPA Region 5 chose to base the throughput limit in the ACO on flawed information that was never appropriate. If it had used an accurate emission factor, the allowable throughput would have been reduced to less than 100,000 tpy. Region 5 should immediately fix its own error by either amending the ACO or issuing a new ACO utilizing an appropriate emission factor and corrected throughput. Any increase in throughput should only be allowed after SIMS obtains the necessary construction permit and installs the required emission capture and control system.

Should EPA Region 5 allow SIMS to continue to operate at this inflated throughput level without any controls in an EJ area, it would be subjecting the residents in the EJ area to high levels of emissions. This is inconsistent with how EPA and the City of Chicago have continued to treat Southside Recycling, which has been permitted, after

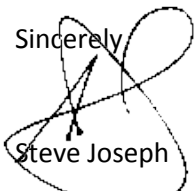


careful scrutiny by competent State and EPA technical staff, to emit no more than 5.12 tpy of VOM – a far cry from the 88 tpy of VOM EPA Region 5 is currently allowing SIMS to emit.

It is imperative EPA applies its laws and regulations fairly and equitably across the board. Southside Recycling is being unfairly targeted and singled out under the guise of environmental justice. As I have conveyed to EPA Administrator Regan, EPA should not be in the business of picking winners and losers. EPA should not require an unknown and unclear “environmental justice analysis” for one business to operate, while allowing others to operate in gross violation of its regulations. EPA should not make one Chicago operation the poster child for its national environmental justice agenda, while turning a blind eye to a similar operation in another EJ area in Chicago.

By failing to correct this error, EPA is knowingly allowing SIMS to operate at an inflated throughput level, without any controls, in one of the EJ areas it is claiming to protect. This is wrong and needs to be corrected. If EPA is serious about environmental justice, as it claims to be, it is even more important that justice be applied equitably across the board and this error be rectified immediately.

Sincerely



Steve Joseph
Manager/CEO

Attachment

cc: Michael Regan, EPA Administrator
Debra Shore, Regional Administrator, EPA Region 5
Hon. Lori Lightfoot, Mayor, City of Chicago
Dr. Allison Arwady, M.D., Commissioner, CDPH
John Kim, Director, IEPA
Julie Armitage, Chief - Bureau of Air, IEPA

Attachment A



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

DEC 18 2018

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mark LaRose
LaRose & Bosco, Ltd.
200 N. LaSalle Street
Suite 2810
Chicago, Illinois 60601

Re: Administrative Order EPA-5-18-113(a)-IL-09

Dear Mr. LaRose:

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,

A handwritten signature in black ink, appearing to read "Nathan Frank", with a long, sweeping underline that extends across the page.

Nathan Frank, Chief
Air Enforcement and Compliance Assurance Section(IL/IN)

Enclosure

cc: Nidhi O'Meara/C-14J
Julie Armitage/Julie.Armitage@Illinois.gov

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	EPA-5-18-113(a)-IL-09
)	
Metal Management Midwest Inc.,)	Proceeding Under Section 113(a)(1) and 114(a)(1)
d/b/a Sims Metal Management)	of the Clean Air Act, 42 U.S.C. §§ 7413(a)(1)
2500 Paulina Street,)	and 7414(a)(1)
Chicago, Illinois)	
<hr/>)	

Administrative Consent Order and Request to Provide Information

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this administrative consent order (Order) and Request for Information to Metal Management Midwest Inc., d/b/a Sims Metal Management (MMMI) 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. Section 110 of the CAA, 42 U.S.C. § 7410, requires each state to adopt and submit to EPA for approval a State Implementation Plan (SIP) that provides for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS).
3. 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).
4. On May 31, 1972, EPA approved Part 201.122 of Title 35 of the Illinois Administrative Code (IAC) as part of the federally enforceable Illinois SIP. 37 Fed. Reg. 10862.
5. 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.

6. On September 9, 1994, and through subsequent SIP amendment approvals, EPA approved Part 211 of the IAC as part of the federally enforceable Illinois SIP. 59 Fed. Reg. 46567.
7. 35 IAC § 211.3690 defines “maximum theoretical emissions” as the quantity of volatile organic material (VOM) 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.
8. 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.
9. On February 21, 1980, EPA approved Part 212 of the IAC as part of the federally enforceable Illinois SIP. 45 Fed. Reg. 11493.
10. 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.
11. On March 12, 1997, EPA approved 35 IAC § 218.980, as part of the federally enforceable SIP. 62 Fed. Reg. 11327.
12. 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 VOM and are not limited to less than 100 tons 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.

13. 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).
14. On October 21, 1996, EPA approved 35 IAC §§ 218.986 and 987, as part of the federally enforceable SIP. 61 Fed. Reg. 54556.
15. 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 the requirements of 35 IAC § 218.986.
16. 35 IAC § 218.987 requires every owner or operator of an emissions unit which is subject to 35 IAC Part 218, Subpart TT to comply with the requirements of 35 IAC Part 218, Subpart TT, on or after March 25, 1995.
17. Under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), the Administrator of the EPA may issue an order requiring compliance to any person who has violated or is violating the SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.
18. Under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), the Administrator of EPA may require any person who owns or operates an emissions source to make reports; sample emissions; and provide information required by the Administrator. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Alleged Findings

19. The Respondent neither admits nor denies the factual allegations and violations alleged in this Order. Neither this Order nor anything herein constitutes or shall be construed as an admission of liability on the part of MMMI.
20. MMMI owns and operates a metal shredding and recycling facility at 2500 South Paulina Street, Chicago, Illinois (Paulina Street Facility).
21. MMMI receives, handles, stockpiles and/or otherwise stores, processes, otherwise recycles, and ships ferrous and non-ferrous recyclable metallic materials such as end-of-life vehicles (ELVs), major appliances and other post-consumer sheet metal and metal clips received directly from manufacturers, and/or the specification-grade recyclable metals resulting from such processing and recycling, at the Paulina Street Facility.
22. ELVs and other recyclable metallic materials are processed in a hammermill shredder at the Paulina Street Facility.
23. During an EPA off site surveillance of the Paulina Street Facility conducted on September 7, 2016, EPA observed fugitive particulate matter emitted from the hammermill shredder crossing the property line.
24. On or about December 2, 2016, EPA conducted an onsite inspection at the Paulina Street Facility.
25. During the December 2, 2016 inspection, EPA observed and recorded hydrocarbons exiting the hammermill shredder with a FLIR infrared camera.
26. On or about December 2, 2016, EPA again observed fugitive particulate matter emitted from the hammermill shredder crossing the property line of the Paulina Street Facility.

27. On or about February 24, 2017, EPA issued a Section 114 Information Request (2017 Information Request) to MMMI regarding the Paulina Street Facility.
28. On or about March 31, 2017, MMMI provided a response to the 2017 Information Request.
29. On or about August 10, 2017, EPA issued a Notice of Violation (NOV) to MMMI alleging that it violated provisions of the Illinois SIP at 35 IAC § 212.301 and 35 IAC § 218.986 for allowing fugitive particulate matter to cross the property line and for operating without emission controls or a federally enforceable operating permit that would reduce VOM emissions to less than 25 tons per year.

Compliance Program

30. By the effective date of this Order, MMMI must limit the quantity of ELVs and other recyclable metallic material it will feed into and process in the hammermill shredder at the Paulina Street Facility to 344,000 net tons per year. The quantity of ELVs and other recyclable metallic material it will feed into the hammermill shredder must be no more than 50% ELVs by weight.
31. By the effective date of this Order, MMMI must comply with the Fugitive Dust Plan in Appendix A.
32. Within 30 calendar days after the effective date of this Order, MMMI must submit a permit application to the Illinois Environmental Protection Agency (IEPA) for a federally enforceable state operating permit (FESOP) to incorporate the production limit in Paragraph 30, a VOM emissions limit that limits the Paulina Street Facility's potential to emit to less than 25 tons per year and the Fugitive Dust Plan in Appendix A.

33. Pursuant to Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), within 300 calendar days from the effective date of this Order, MMMI must conduct emissions testing at its Paulina Street Facility in accordance with Appendix B (Emissions Testing).
34. Within 275 days of the effective date of this Order, MMMI must install hood(s), ducting, draft fan(s), and related equipment (the approved “Emissions Collection System”), that will collect emissions from the hammermill shredder and route emissions to the atmosphere for the purposes of Emissions Testing required in Paragraph 33 and described in Appendix B.
35. As expeditiously as possible after the effective date of this Order, but no later than 60 days prior to conducting Emissions Testing, MMMI shall submit:
 - a. design documents and specifications of the Emissions Collection System (the “Proposed System Design”), and
 - b. a proposed testing protocol that completely describes the methods and procedures for the Emissions Testing (the “Testing Protocol”), to EPA for EPA approval.

EPA will approve, deny, or provide comments as expeditiously as possible.

36. Within 360 calendar days of the effective date of the Order, MMMI must submit to IEPA, with a copy to EPA, a permit application to modify its FESOP for its Paulina Street Facility, or in the event such FESOP has not yet been issued, a supplement to the pending FESOP application. The permit application must request at least the following:
 - a. to use the VOM emission factor calculated as a result of Emissions Testing for the hammermill shredder at the Paulina Street Facility (the “EF”). MMMI may apply in the FESOP application for a production limit that is more stringent than that calculated pursuant to the Emissions Testing;

- b. to state that the quantity of ELVS and other recyclable metallic material it will feed into the hammermill shredder must be no more than 50% ELVs by weight;
- c. to modify its production limit so that the Paulina Street Facility has a potential to emit no more than 25 tons of VOM per year or alternatively, at the sole discretion of MMMI, MMMI may propose to comply with the control requirements of 35 IAC § 218.986; and
- d. to incorporate requirements, if not incorporated already, to operate in accordance with its Fugitive Dust Plan presented in Appendix A.

37. MMMI must send all responses, deliverables, submittals and/or reports required by this Order to omeara.nidhi@epa.gov, 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


- 38. This Order does not affect MMMI's responsibility to comply with other federal, state, and local laws.
- 39. This Order does not restrict EPA's authority to enforce the CAA and its implementing regulations.
- 40. Failure to comply with this Order may subject MMMI to penalties of up to \$97,229 per day for each violation under Section 113 and 114 of the CAA, 42 U.S.C. §§ 7413 and 7414, and 40 C.F.R. Part 19.

41. The terms of this Order are binding on MMMI, its assignees and successors. MMMI must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously notify EPA, at the above address, that it has given the notice.
42. MMMI 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 MMMI 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.
43. 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.
44. EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.
45. MMMI agrees to the terms of this Order. MMMI 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).

46. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate two years from the effective date, provided that MMMI has complied with all terms of the Order throughout its duration.

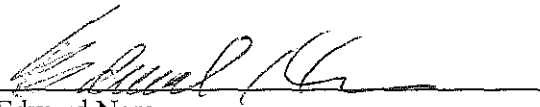
Metal Management Midwest, Inc. d/b/a Sims Metal Management

12/7/2020
Date


Peter Bird
President
Metal Management Midwest, Inc.

United States Environmental Protection Agency

12/18/18
Date


Edward Nam
Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

Appendix A
Fugitive Dust Plan



SIMS
METAL
MANAGEMENT

Fugitive Dust Plan (Operating Program for Fugitive Particulate Matter)

Metal Management Midwest, Inc.
d/b/a Sims Metal Management

Shredder/MRP Facility

2500 S. Paulina Street

Chicago, IL 60608

November 2017

(Updated 8/2018)



**SIMS
METAL
MANAGEMENT**

Fugitive Dust Plan

Shredder/MRP facility
2500 S. Paulina Street
Chicago, IL 60608

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Appendix A – Water Suppression – Daily Schedule

Appendix B - Sweeper Log

Appendix C – Fugitive Dust – Visual Site Inspections

Appendix D – Dust Control BMPs



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1. Introduction:

Keeping potential fugitive dust problems under control is an everyday job. Planning ahead and developing a dust prevention and control plan will assist this site in controlling this issue.

This plan, required per 35 Illinois Administrative Code 212.309, will address the following items:

1. A description of the operation at this facility.
2. Understanding where potential fugitive emission points are as outlined in a site map.
3. A description of:
 - a. vehicle routes in and out of the facility,
 - b. how dust will be minimized during transport,
 - c. measures taken to minimize fugitive dust, i.e., continual maintenance, upkeep of heavy gauged rubber sheeting, conveyor covers, etc.,
 - d. how vehicles are cleaned of loose material before they leave the facility.
4. A map showing the path for the water truck and the scheduled times the water truck must be operated.
5. A description of how the water truck will be used during times of increased fugitive dust.
6. A description of how the facility will suppress fugitive dust when the water truck is inoperable (including periods of inclement weather and equipment malfunction).
7. A sample and description of the record keeping system, including the employees and supervisors assigned to each task, which will include:
 - a. An outline for the use of the water truck, in combination with water spray system;
 - b. An outline for the water truck during times of increased fugitive dust (in addition to the minimum required);
 - c. An outline for routine inspections of the facility to ensure there is no visible fugitive dust crossing the property line.



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2. Description of the Operation:

Metal Management Midwest's Shredder/MRP facility is a scrap metal recycling operation that purchases, shreds, and ships recyclable ferrous metal products. The facility occupies approximately 10 acres of land, and approximately 28 people are employed at the shredder and MRP.

Materials processed and stored at the shredder are brought into the yard from a variety of sources including peddlers via peddler vehicles and commercial/industrial accounts via MMMI trucks or contract haulers. Peddlers and Semi-Trucks entering the shredder facility must first proceed to a truck scale each equipped with radiation detectors to be weighed and screened for radioactivity.

Trucks are then directed to the appropriate unloading area. Qualified inspectors¹ will inspect all loads for unauthorized materials, as detailed in Sims Metal Management's ("SMM") National Policy on the Acceptance of Inbound Materials. Unauthorized materials discovered during inspections will be grounds for rejection of the load in accordance with MMMI's Inbound Material Acceptance Program.

The shredder produces two streams of material; one is a ferrous product and one is a nonferrous (NF) metal mixed with non-magnetic material from the shredding plant. This material, damp from water application at the shredder, will be loaded into a truck, transported to the adjacent Material Recovery Plant ("MRP") location and temporarily stockpiled. A front-end loader will be used to place the mixed NF material into the MRP batch feeder. The material will then be processed to recover various NF metal products. The NF metal products generated from the MRP process will be sold and the non-metallic residue (fluff), stored in a residue bin, will be transported off-site for disposal.

Ferrous and nonferrous material from this facility is shipped directly to mills, mini-mills and smelters for recycling/remelting purposes.

¹ As of April 2018 three full time inspectors are on duty.



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3. Potential Fugitive Emission Points

Areas that pose the potential for fugitive emissions are:

- Shredder and shredder downstream equipment
- MRP equipment
- Roadways
- Material Storage Piles

See Site Map.

3.1 Vehicle Routes in and out of the facility:

Daily vehicle traffic patterns are denoted on the site map with yellow arrows. Alternate routes, denoted in orange arrows, are also depicted on the site map.

3.2 Dust Minimization:

Three methods will be immediately employed to minimize dust at the facility:

a. **SHREDDER AND SHREDDER DOWNSTREAM:**

• **SHREDDER:**

i. Water is used within the hammermill shredder, through a smart water system, to minimize potential fires as well as potential fugitive emissions that may be generated from the process of shredding.

1. The Smart Water System has a flow-control valve which takes input signals from the amount of amperage the electric shredder motor is drawing. Ordinarily, based on the amperage of the motor, water flow to the shredder



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will vary. Essentially, the system averages these amperage values to determine the maximum amount of water allowed to pass through the valve. For example, if the mill is running at 75-percent amperage load capacity, the valve allows 75-percent of maximum water through. A second component of the system is compressed air, which is delivered to the nozzle at about 40 psi and serves to atomize the water as it leaves the nozzles.

Water is introduced at four locations: two spray nozzles at the mill box and two nozzles at the 1st transfer conveyor. Water serves to moisten materials in the hammermill for the purpose of reducing dust. Application of water introduces sufficient moisture to keep material damp on the discharge end of the hammermill, but not too wet as to cause material to “stick” to conveyors and disrupt the flow of material.

If there is a malfunction with the water system, the hammermill shredder will not be operated.

Records of water consumption at the hammermill shredder are maintained on the Shredder Daily Production Report.

- ii. In 2017 Water sprayers were installed on two of the conveyors - Conveyor #3 and Conveyor #7. Conveyor #3 is the conveyor belt that consolidates materials coming from the two conveyors at the picking station. Conveyor #3 then transfers material to the product stacking conveyor. Thus, the product is wet prior to stacking. Conveyor #7 is the conveyor that discharges lighter weight fluff to a chute; it is dampened prior to entering the chute. See Appendix D.



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Three times per operating day, during the supervisor's visual inspection of operation (see section 7.d), the conveyor 3 and 7 water spray operation will be observed to be in operation.

- iii. In 2017 steel plates have been installed over the area where the Under Mill Oscillator (UMO) drops materials onto Conveyor #1 to further reduce particulate matter from leaving the area of the Mill. See Appendix D.
 - iv. In 2017 a rubberized mat has been installed over the throat of the mill box to keep particulates from leaving the processing area.
 - v. There are enclosure doors on the Under Mill Oscillator that enclose the bottom portion of the mill.
 - vi. Three times per operating day, during the supervisor's visual inspection of operation (see section 7.d), if visible fugitive emissions from shredder are noted to be occurring beyond the immediate top of the shredder opening and are observed to be approaching the property boundary, an increase in the amount of water used at the mill will be initiated. This inspection, and any corrective actions, will be logged on the supervisor's visual inspection of operation (a sample of the logging of these inspections is shown in Appendix C).
- **BMPs AND MAINTENANCE:**
 - i. Photos of the best management practices to control fugitive emissions at the shredder, including the Under Mill Oscillator steel plates and the downstream, showing all conveyors covered, discharge chutes, and the use of rubber sheeting are attached as Appendix D.
 - ii. All conveyor covers, conveyor belt scrapers, discharge chutes and rubber sheeting will be inspected daily. Records will be maintained in the manager's office. Any maintenance or necessary repairs or replacement of these items will be made promptly as necessary.
 - iii. Similar BMPs will be installed at the MRP.



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- SHREDDER DOWNSTREAM:
 - i. Conveyor Covers are in place to minimize debris that has the potential to become airborne.
 - ii. Conveyor belt scrapers are used to minimize any debris buildup on the conveyors which could also become airborne.
 - iii. Discharge Chutes are used at final material discharge points to minimize the potential of cross winds blowing material as it is deposited onto storage areas.
 - iv. All conveyor covers, conveyor belt scrapers, and discharge chutes downstream of the shredder will be inspected daily. Records will be maintained in the manager's office. Any maintenance or necessary repairs or replacement of these items will be made promptly as necessary.
- b. ROADWAYS:
 - Use of the Water Truck
 - i. The water truck to be used is a Western Truck, model #4864S, Equipment Sins #06 which is owned by Metal Management Midwest.
 - i. Routine Areas:
 - 1. The water truck will make daily rounds in areas marked as "routine" on the site map.
 - ii. More than one water truck is on site. Therefore, if the water truck listed above experiences mechanical issues the following water truck can be used in this area.
 - 1. Alternative Water Truck to be used is a Mack Truck, Model# DM690S, Sims# 69, which is owned by Metal Management Midwest.
 - iii. A log will be maintained of daily watering activities.
 - Sweeping:
 - i. The sweeper that will be used is an Elgin Pelican Sweeper, model: Pelican Series P; Sims#10779, which is owned by Metal Management Midwest.



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- ii. Sweeping of improved surfaces will occur every other day or as needed as determined by the supervisor's visual inspection of operation due to the presence of visible emissions from roadways. Roadways must be watered prior to use of the sweeper.
 - iii. A log will be maintained of daily sweeping activities.
 - Records of watering and sweeping shall be maintained. Blank copies of each log can be found in Appendices A and B.
 - Roadway conditions are continually observed by employees (employees receive training that includes notifying their supervisor if they see that the roadways or storage areas need attention), and during the supervisors visual inspection of operations (three times during an operating day).
- c. MATERIAL STORAGE AREAS:
- Water, from the water truck or other water outlets, will be sprayed on material storage areas should it be noted that fugitive emissions are generated from same.
 - Material storage areas may include light iron, end of life vehicles (ELVs), Unprocessed NF material, and auto shredder residue (ASR).
 - Under normal operating conditions material from these areas are routinely moved either through the shredder or MRP, sold to customers, or sent to landfill.
 - Records of watering in a material storage area will be noted on the 'Shredder/MRP Roadway Watering Log' found in Appendix A, under the column 'Area Watered'.
- d. MRP:
- i. NF arriving at the MRP will be sufficiently damp to minimize opportunity for fugitive emissions. This will be noted on the supervisor's visual inspection of operation recordkeeping log.



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- ii. Conveyor Covers on any exterior conveyors will be placed to minimize debris that has the potential to become airborne.
- iii. Conveyor belt scrapers will be used to minimize any debris buildup on the conveyors which could also become airborne.
- iv. Discharge Chutes will be used at final material discharge points to minimize the potential of cross winds blowing material as it is deposited onto outside storage areas.
 - 1. Conveyor Covers, belt scrapers and discharge chutes will be inspected, and documented, daily as part of the daily plant inspection. The records will be maintained in the manager's office.
- v. The area of Eddy Currents and Sensor Sort platforms will be enclosed to minimize the potential of cross winds blowing material during these operations.
- vi. Fluff material (auto shredder residue material, or ASR) will be stored in a three sided residue bin to prevent fugitive emissions from storage.

3.3 Vehicle Cleaning Station:

A track-out control device, such as rumble strips, will be installed on the north end of the large truck scale in the shredder yard requiring all large vehicles that leave the facility to travel over these strips. We will install these in an effort to knock off any potential buildup of dirt from tires on vehicles. A schedule of an inspection of the track-out device is included on the supervisor's visual inspection of operation log, to assure that at least once per day, this area is inspected.

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4. Water Truck Path and Schedule

As described in section 3.2, the water truck will make daily rounds of areas marked as “routine” on the site map. A record, see Appendix A, will be maintained documenting this daily activity.

Note: If identified during the supervisor’s visual inspection of operations (three inspections per operating day), or if identified by an employee, the water truck will address “non-routine” areas that need attention.

It should be noted that when temperatures approach 32 degrees, adding water to ground surfaces will cause a serious safety hazard to employees, truck drivers and visitors to the site. Therefore the application of water to roadways will need to be curtailed. However, if during the supervisor’s inspection visible emissions from roadways are observed when temperatures are below 32 degrees (as per the supervisor’s visual inspection of operation recordkeeping log), vehicle speeds will be reduced to minimize fugitive emissions from roads.

5. Times of Increased Fugitive Emissions

At times weather conditions, i.e. high winds or a long stretch of dry weather, or site activities; i.e. facility/equipment maintenance/repair activities or inventory control, may cause an increase in potential for fugitive emissions. To ensure that these conditions are identified and addressed as soon as possible, the following steps will be taken:

- a. The site supervisor, or designee, will make a minimum of three trips throughout the day around the facility to see if any areas need to be addressed with water. These visual inspections will be documented, see Appendix C.
 - One of these inspections will be performed as part of the supervisor’s daily plant inspection.
 - Site management will perform these walk around inspections during the times the water truck is not operating.
- b. A Tool Box Talk will be provided to all employees reviewing the importance of immediately reporting to site management areas of the facility they see as needing



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additional suppressant. Site management will document this notification on the Fugitive Dust – Visual Site Inspection log along with actions taken.

6. Alternatives to Water Truck

In the event that the water truck is compromised, an alternative water truck will be put into service.

7. Recordkeeping

- a. The amount of water consumed in Smart Water System is maintained within the Daily Shredder Production Report.
- b. A log for the times the water truck, in combination with water spray system, must be operated,
 - see Roadway Water Suppression - Daily Schedule – Appendix A
- c. A log for the sweeping activities, will be maintained,
 - see Roadway Sweeper Log - Daily Schedule – Appendix B
- d. A log for routine inspections of the facility will help to ensure there is no visible fugitive dust crossing the property line,
 - See Supervisor’s Visual Inspection of Operation – Appendix C
 - At least once per day, an observation for the presence of visible emissions from operations at the facility at the facility property boundaries will occur. This observation will occur at vantage points that allow for observations of the facility boundaries, and will be recorded on the Supervisor’s Visual Inspection of Operation – see Appendix C.



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APPENDIX A

ROADWAY WATER SUPPRESSION – DAILY SCHEDULE



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APPENDIX B

ROADWAY SWEEPER LOG

Shredder/MRP Roadway Sweeping Log

Monday		Operator	Date:	
			Area Swept	
Start Time				
End Time				
Start Time				
End Time				
Start Time				
End Time				
Tuesday		Operator		Date:
				Area Swept
Start Time				
End Time				
Start Time				
End Time				
Start Time				
End Time				
Wednesday		Operator	Date:	
			Area Swept	
Start Time				
End Time				
Start Time				
End Time				
Start Time				
End Time				
Thursday		Operator		Date:
				Area Swept
Start Time				
End Time				
Start Time				
End Time				
Start Time				
End Time				
Friday		Operator	Date:	
			Area Swept	
Start Time				
End Time				
Start Time				
End Time				
Start Time				
End Time				

Saturday		Operator	Date:	Area Swept
Start Time				
End Time				
Start Time				
End Time				
Start Time				
End Time				

Please note any unusual conditions that affected you ability to perform this task:

MONDAY:

TUESDAY:

WEDNESDAY:

THURSDAY:

FRIDAY:

SATURDAY:



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APPENDIX C – FUGITIVE DUST

SUPERVISOR'S VISUAL INSPECTION OF OPERATION

Fugitive Dust Plan - Visual Site Inspections

Facility : Metal Management Midwest, Inc. - Paulina Street

Three times a day the site supervisor, or his designee, is to walk the site looking for areas that may need additional dust suppression.

On days when air temperatures are < 32F, and fugitive dust emissions are observed on roadways, reduced speeds of traffic in the facility will be in effect, and should be noted on page 2.

Dates:	6/25/2018			6/26/2018			6/27/2018			6/28/2018			6/29/2018			6/30/2018		
	Monday			Tuesday			Wednesday			Thursday			Friday			Saturday		
#1: Time:	Roadways	OK	Not OK	Roadways	OK	Not OK	Roadways	OK	Not OK	Roadways	OK	Not OK	Roadways	OK	Not OK	Roadways	OK	Not OK
Area(s) Reviewed:**	Storage Piles			Storage Piles			Storage Piles			Storage Piles			Storage Piles			Storage Piles		
	Equipment			Equipment			Equipment			Equipment			Equipment			Equipment		
	Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7		
	MRP: Material Dampness			MRP: Material Dampness			MRP: Material Dampness			MRP: Material Dampness			MRP: Material Dampness			MRP: Material Dampness		
	If "NOT OK" describe issue noted and action(s) taken on back																	
Inspection/ Observations by:																		
#2: Time:																		
Area(s) Reviewed:**	Roadways			Roadways			Roadways			Roadways			Roadways			Roadways		
	Storage Piles			Storage Piles			Storage Piles			Storage Piles			Storage Piles			Storage Piles		
	Equipment			Equipment			Equipment			Equipment			Equipment			Equipment		
	Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7		
	No visible emissions at property boundaries?			No visible emissions at property boundaries?			No visible emissions at property boundaries?			No visible emissions at property boundaries?			No visible emissions at property boundaries?			No visible emissions at property boundaries?		
If "NOT OK" describe issue noted and action(s) taken on back																		
Inspection/ Observations by:																		
#3: Time:																		
Area(s) Reviewed:**	Roadways			Roadways			Roadways			Roadways			Roadways			Roadways		
	Storage Piles			Storage Piles			Storage Piles			Storage Piles			Storage Piles			Storage Piles		
	Equipment			Equipment			Equipment			Equipment			Equipment			Equipment		
	Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7			Shredder: Water Functional at Conveyor 3 & 7		
	Track Out Pad			Track Out Pad			Track Out Pad			Track Out Pad			Track Out Pad			Track Out Pad		
If "NOT OK" describe issue noted and action(s) taken on back																		
Inspection/ Observations by:																		

If an employee brings additional dust suppressant needs to your attention, please note on back page the issue and actions taken.

** - See Attached checklist for specifics of 'Area(s) Reviewed'.

Checklist for Area(s) Reviewed

Roadways

- Peddler Area
- Inbound Truck Scale Area
- Hulk Unloading Area
- Sheet Iron Unloading Area
- NF/Shred Loading Area
- Outbound Truck Scale Area
- Truck Cleaning Station Area
- MRP Area

Storage Piles

- Peddler Storage Area
- Hulk Storage Area
- Sheet Iron Storage Area
- NF/Shred Material Storage Area
- MRP: NF Storage Area
- MRP: Fluff Storage Area

Equipment

- Shredder
- Under Mill Oscillator
- Smart Water System
- Shredder Downstream & Conveyors
- MRP Equipment (Loader, Screens, & Conveyors)



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APPENDIX D

DUST CONTROL BMPs



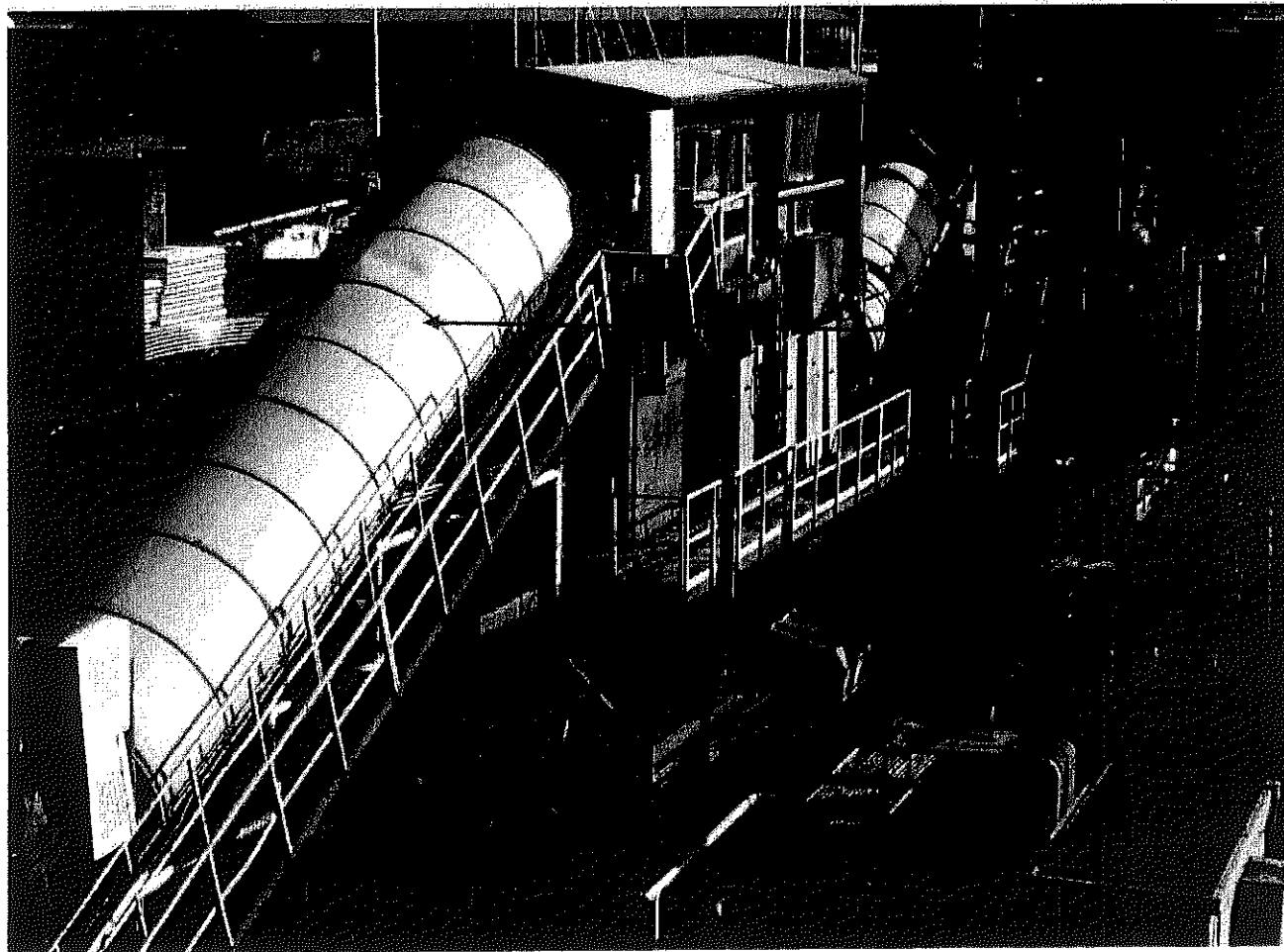
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Appendix D – Dust Control BMPs



Conveyor Covers



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Appendix D – Dust Control BMPs



Conveyor Covers



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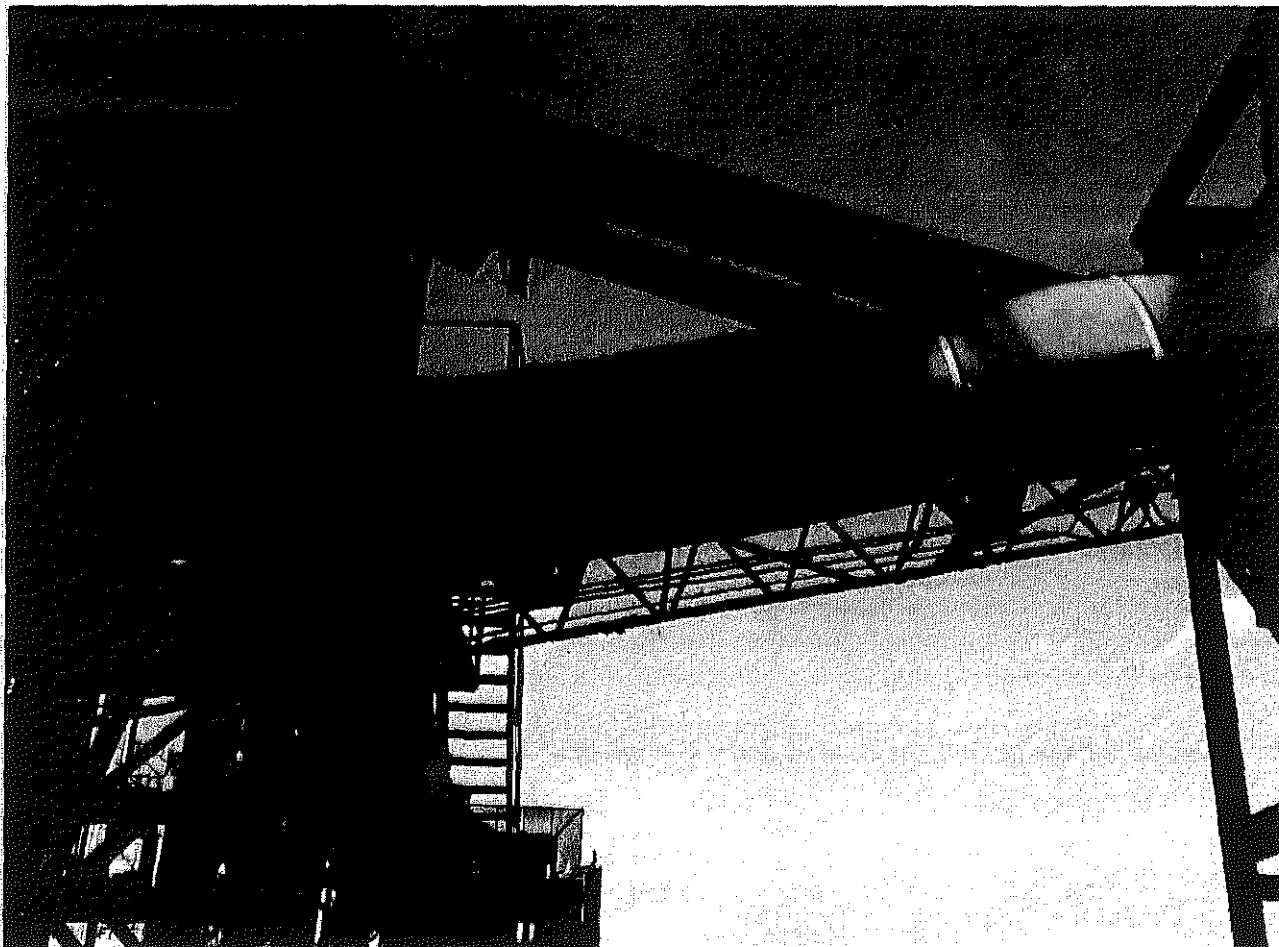
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Appendix D – Dust Control BMPs



Conveyor Covers

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Appendix D – Dust Control BMPs



Rubberized Curtains



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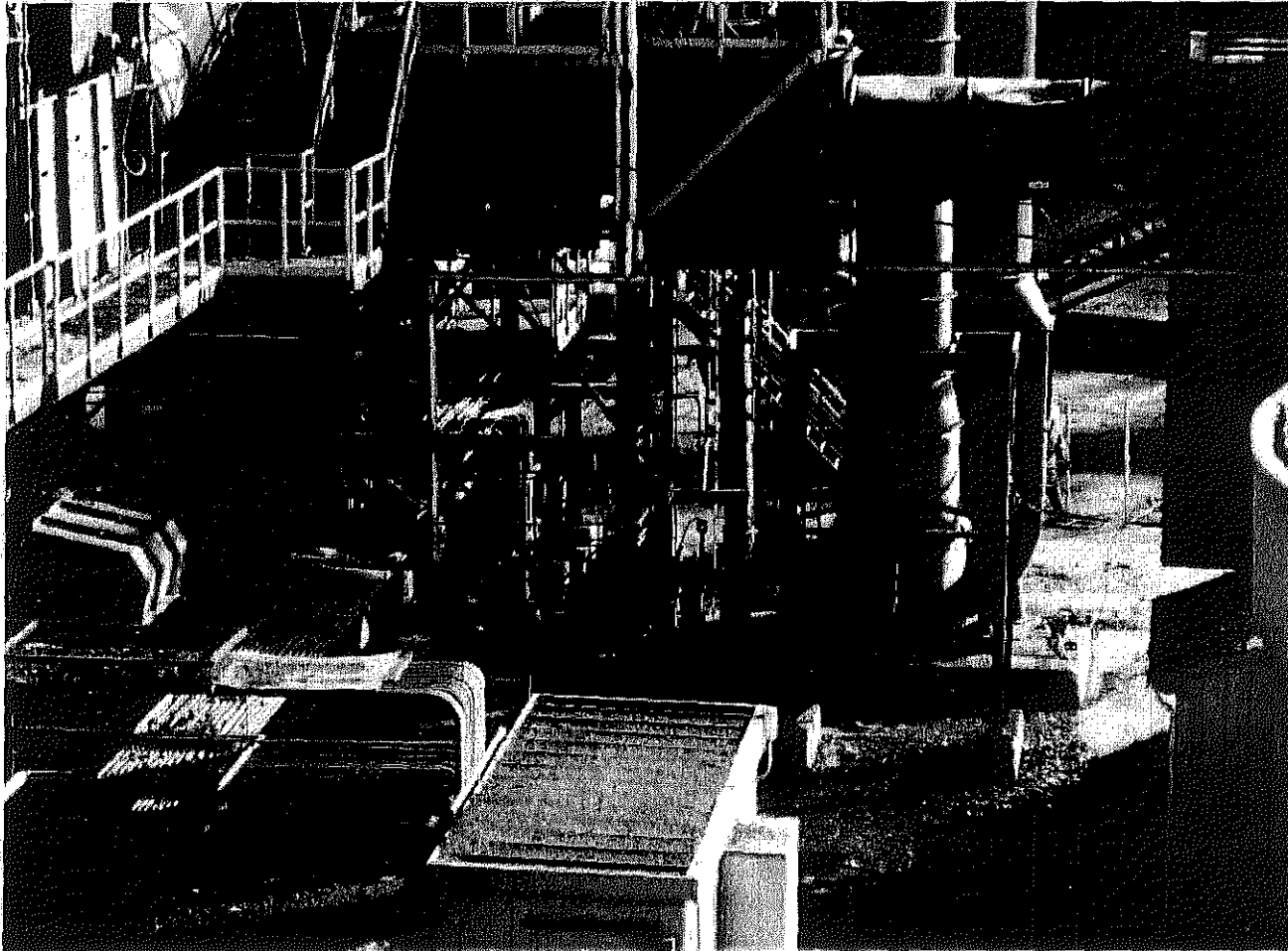
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Appendix D – Dust Control BMPs



Conveyor Cover

Rubberized Curtains



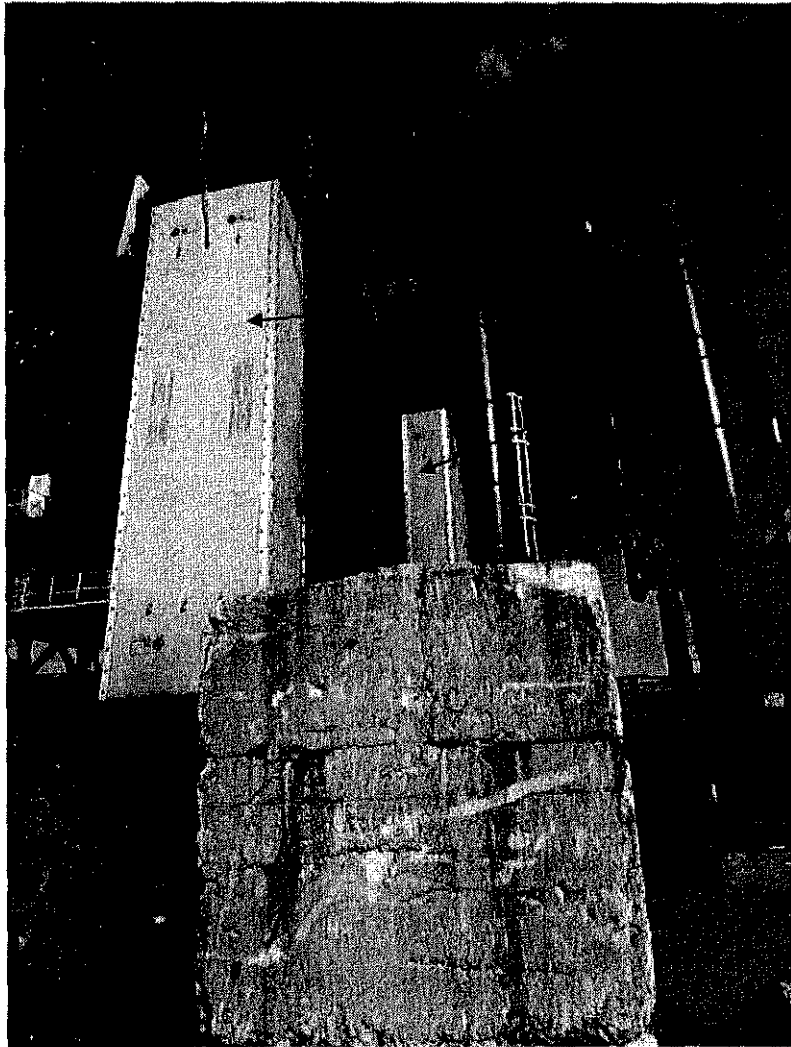
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Appendix D – Dust Control BMPs



Conveyor Chutes



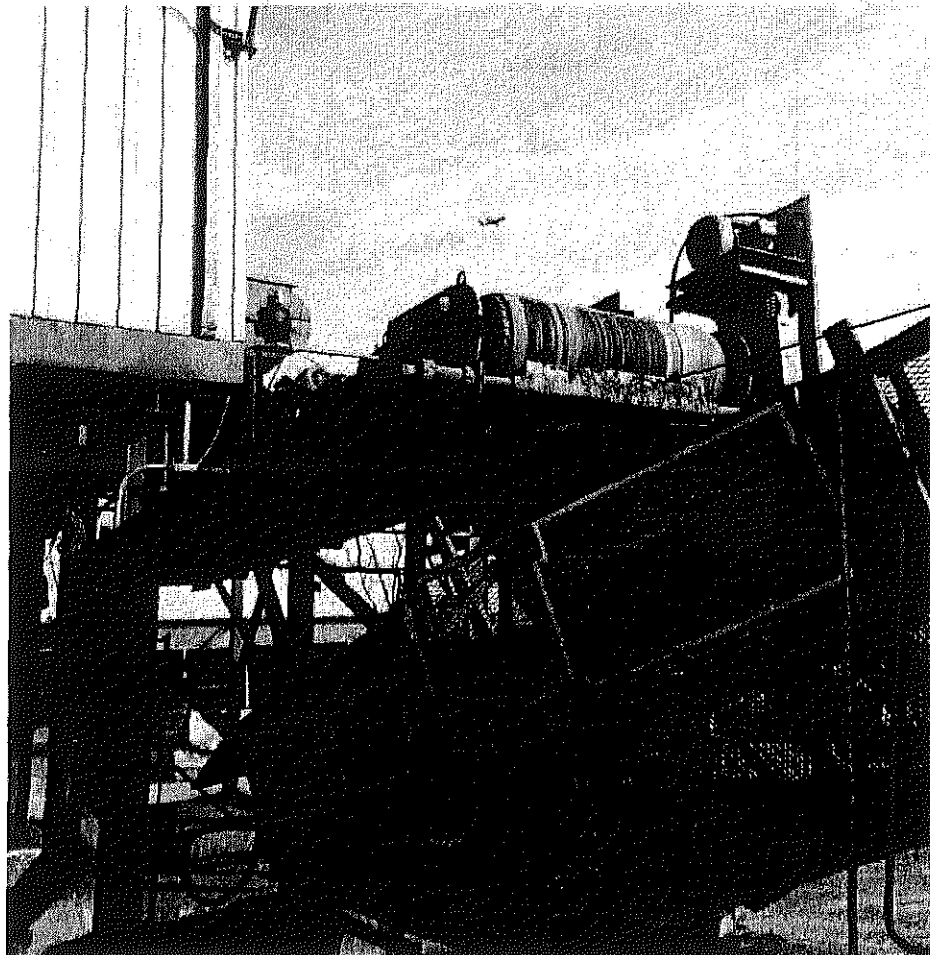
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Appendix D – Dust Control BMPs



Belt scraper

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Appendix D – Dust Control BMPs



Belt scraper into
discharge chute



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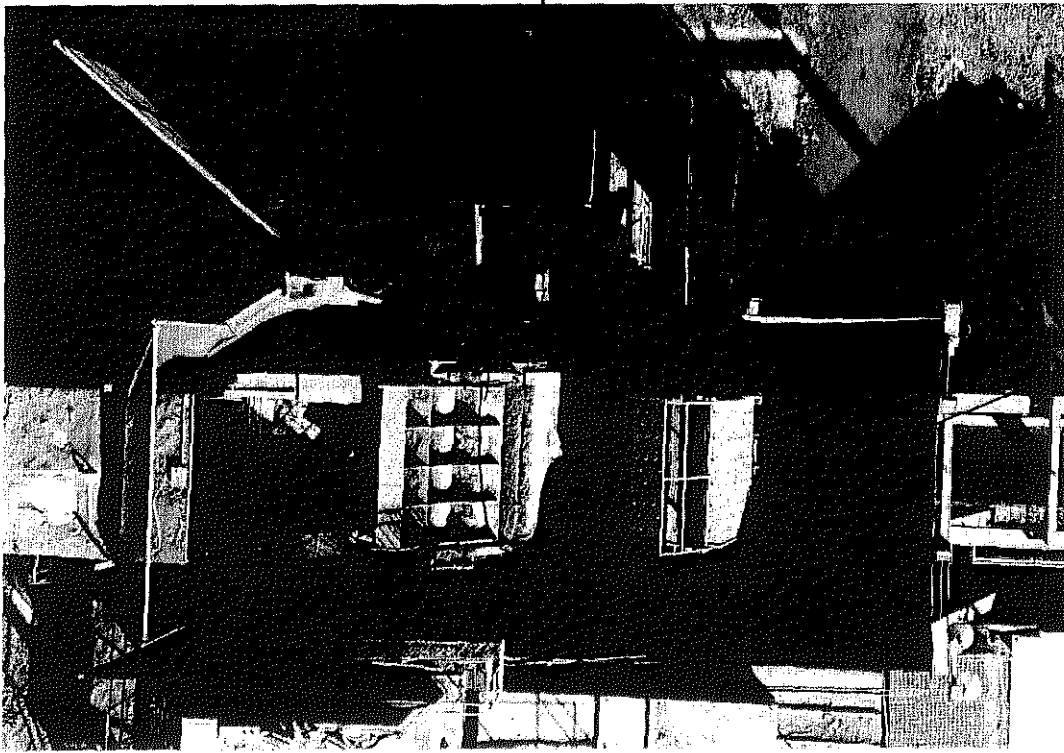
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Appendix D – Dust Control BMPs

Rubberized Matting placed over the throat of the mill.



Steel plates placed over the UMO.

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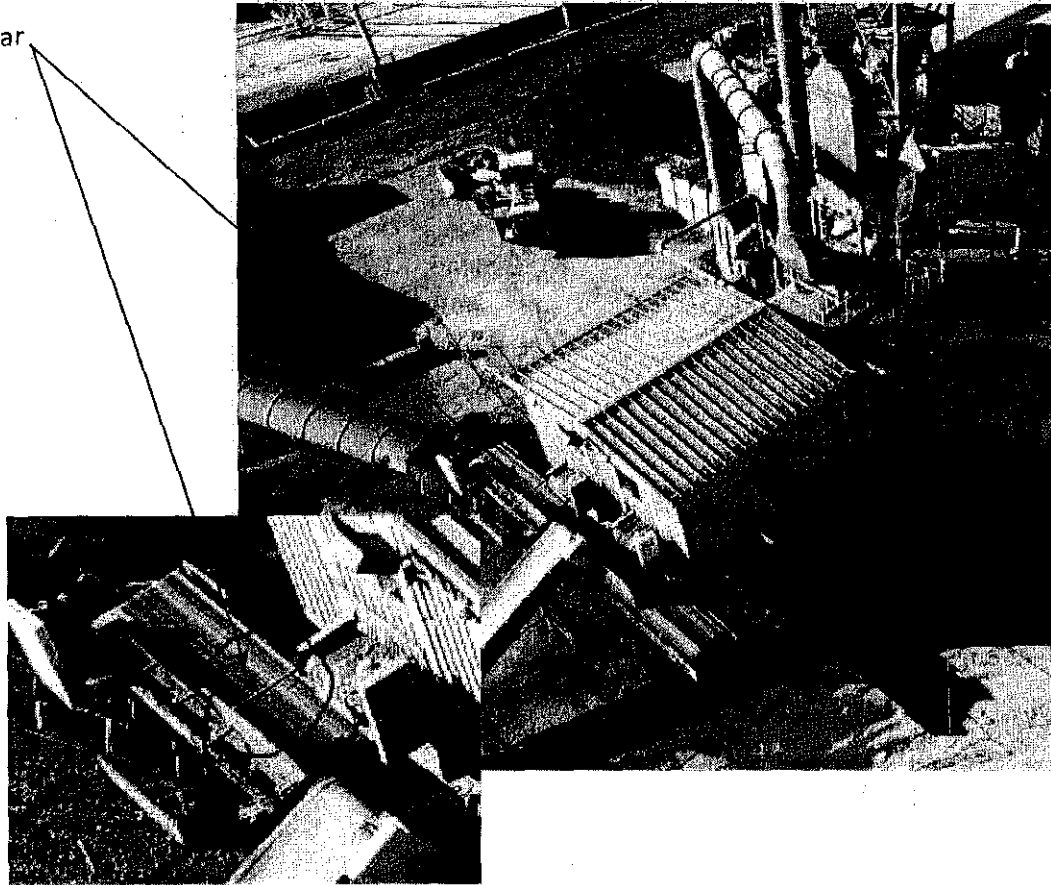
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Appendix D – Dust Control BMPs

Conveyor # 3 spray bar



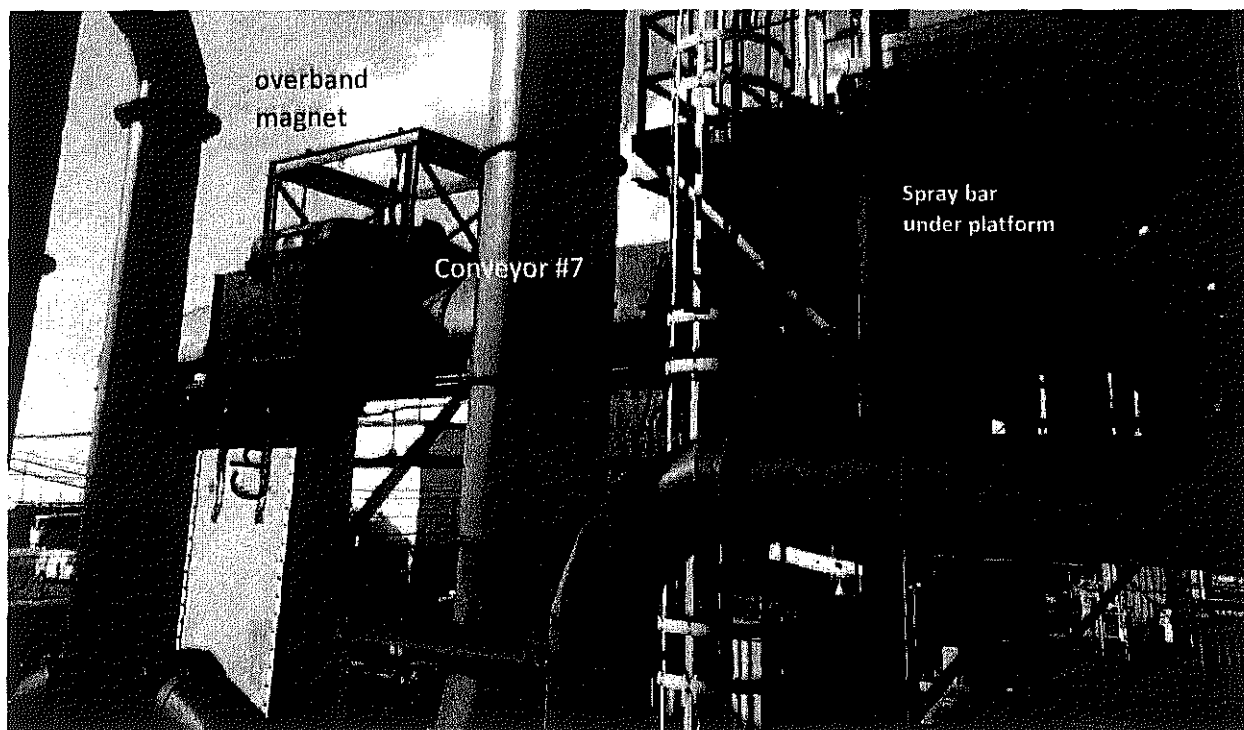
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Appendix D – Dust Control BMPs



Red arrows indicate approximate location of spray bar and how it sprays onto material on conveyor #7 prior to discharge to chute.



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SITE MAPS – OVERALL VIEW, AND SHREDDER AND MRP DETAIL PLANS



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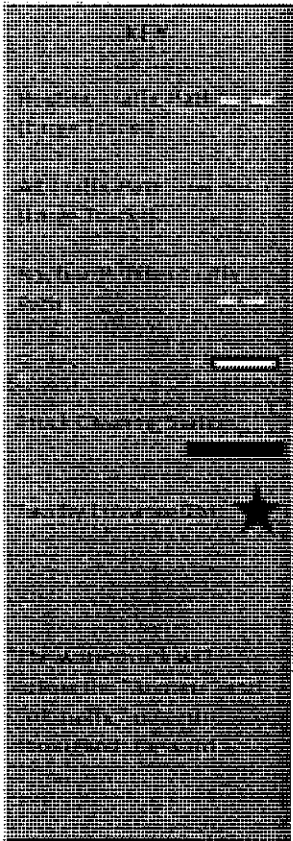
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This is a map showing the traffic flow in the Shredder yard.

You will be instructed on the path to take by scale operator and/or material Inspector.





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MANAGEMENT**

Fugitive Dust Plan

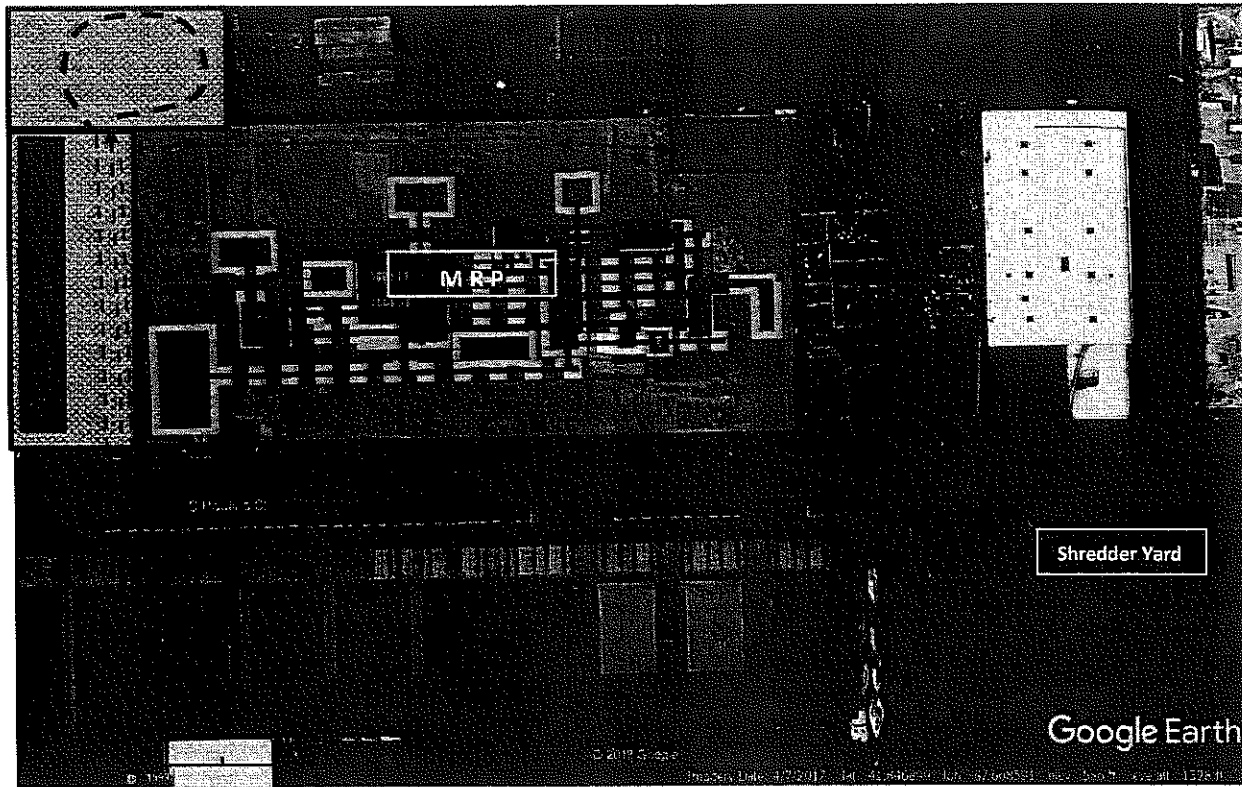
Shredder/MRP facility
2500 S. Paulina Street
Chicago, IL 60608

11/2017
(Updated 4/2018)




PAGE
19 OF 15



Plan

PROPOSED MRP TRAFFIC PLAN



Key

-  Area of Concrete
-  Routine Inbound Traffic Flow
-  Material Storage Areas

-  Paved Area
-  Routine Outbound Traffic Flow

Appendix B

Information You Are Required to Submit to EPA

Metal Management Midwest Inc., (MMMI) must respond to this information request by performing testing at its facility at 2500 South Paulina Street, Chicago, Illinois (Paulina Street Facility) pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). MMMI must submit a test plan, conduct testing, and submit all other information requested in accordance with the schedule specified below:

Submit testing Protocol(s):	Not less than 60 calendar days before testing
Notification of Intent to Test:	Not less than 21 calendar days before testing
Complete testing:	Within 300 calendar days of receipt of this request
Submit Testing Report:	Within 330 calendar days of receipt of this request

1. Within three hundred (300) calendar days after receipt of this request, MMMI must perform Emissions Testing at the facility to determine emissions from the hammermill shredder at the Paulina Street Facility:
 - a. The total gaseous organic compound emission rate as volatile organic compounds (VOC) using EPA Reference Methods 1-4 and Method 25A whereby methane and ethane concentrations shall be determined using Method 18 and subtracted from the total hydrocarbon concentration measured following Method 25A to determine VOM concentrations.
 - b. Particulate Matter emission rate using EPA Reference Methods 1-4 and Method 5; and
 - c. Metals emission rates of the hammermill shredder using EPA Reference Methods 1-4 and Method 29, as set out in the approved testing protocol.
2. During the testing conducted pursuant to Item 1, above, MMMI shall monitor and record the operating parameters of the hammermill shredder, including water flow rates, blower motor amperage, shredder amperage and estimated tonnage of ELVs and other recyclable material shredded per run.
3. During all testing, MMMI shall operate under representative conditions.
4. During testing MMMI will operate its hammermill shredder at up to 200 net tons of ELVs and other recyclable material per hour, but no less than 180 net tons per hour and approximately 50 percent of the recyclable material infeed will be ELVs, by weight.

5. Not less than 60 calendar days prior to the initial date of the planned test(s), MMMI shall submit to EPA a proposed testing protocol that completely describes the methods and procedures for testing emissions from the hammermill shredder at the Paulina Street Facility, including all relevant operating parameters. The protocol shall state what procedures will be utilized to minimize unmeasured emissions.
6. MMMI shall submit the protocol via e-mail to connolly.scott@epa.gov. EPA will provide approval or comments on the testing protocol via e-mail as expeditiously as possible.
7. After EPA has approved the testing protocol, MMMI shall conduct the testing in accordance with the approved testing protocol.
8. At least 21 calendar days prior to the planned test(s), MMMI shall submit notification to EPA of its intent to perform Emissions Testing. MMMI shall submit this notice via e-mail to connolly.scott@epa.gov.
9. Within 330 calendar days of receipt of this request, MMMI shall submit a complete report of all Emissions Testing, including, at minimum, the following:
 - a. Summary of Results
 - i. results of the above-specified emission test(s);
 - ii. process and control equipment data recorded during the test(s);
 - iii. discussion of any errors that occurred during testing;
 - iv. discussion of any deviations from the reference test methods or other problems encountered during the test(s); and
 - b. Facility Operations
 - i. description of the process and control equipment in operation during the test(s);
 - ii. operating parameters of any control equipment in operation during the test(s); and
 - iii. facility operating parameters and data, including an explanation of how the operating parameters demonstrate that the hammermill shredder was operating at greater than 180 tons per hour at the time of the test(s).
 - iv. data on production rate during testing; including
 1. Weight of ELVs processed through the hammermill shredder;
 2. Total weight of infeed material into the hammermill shredder;

3. Down time of the hammermill shredder during testing days;
4. Number and description of explosions or energy releases, if any.

c. Sampling and Analytical Procedures

- i. sampling port location(s) and dimensions of cross-section;
- ii. sampling point description, including labeling system;
- iii. brief description of sampling procedures, including equipment and diagram;
- iv. description of sampling procedures (planned or accidental) that deviated from any standard method;
- v. brief description of analytical procedures, including calibration;
- vi. description of analytical procedures (planned or accidental) that deviated from any standard method; and
- vii. quality control/quality assurance procedures, tests, and results.

d. Appendix

- i. complete results with example calculations;
- ii. raw field data;
- iii. laboratory report, with signed chain-of-custody forms;
- iv. calibration procedures and results;
- v. raw process and equipment data (water flow rates, blower motor amperage, shredder amperage and ELV and other recyclable material processed in the hammermill shredder per run), signed by a plant representative;
- vi. test log(s), if any; and
- vii. project participants and titles.

CERTIFICATE OF MAILING

I certify that I sent the Administrative Consent Order, EPA-5-18-113(a)-IL-09, by certified mail, return receipt requested, to:

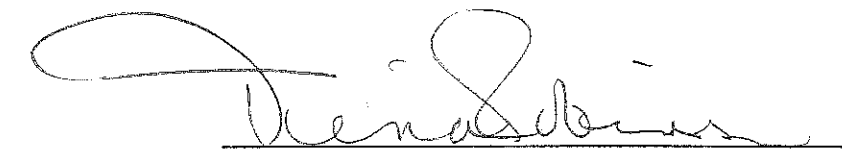
Mark A. LaRose
LaRose & Bosco, Ltd.
mlarose@laroseboscolaw.com

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-18-113(a)-IL-09 by E- mail to:

Nidhi O'Meara
US EPA
Omeara.nidhi@epa.gov

Julie Armitage, Chief
Bureau of Air
Illinois Environmental Protection Agency
Julie.Armitage@Illinois.gov

On the 20th day of December 2018.


Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT
NUMBER:

7017 0660 0000 36618403

Attachment B

Fw: Compliance with MMMI ACO

From: O'Meara, Nidhi (omeara.nidhi@epa.gov)
To: mlarose@laroseboscolaw.com
Cc: Omeara.Nidhi@epa.gov
Date: Friday, January 17, 2020, 11:37 AM CST

Mark -

As you know, MMMI must comply with the terms of the attached ACO by submitting a FESOP application to IEPA that identifies an emission factor for its shredder at the Paulina facility. Region 5, EPA gave MMMI an extension to do so in the next several weeks. Region 5, EPA, has received and carefully reviewed the stack test report for the hammer mill metal shredder at the Paulina Street facility, dated October 18, 2019.

After extensive discussions regarding the stack test parameters and possible variability of these parameters (which would impact the VOM emission factor), based on the October 18, 2019 stack test results and the variability factors, it is reasonable to conclude and therefore EPA and MMMI agree that the emission factor for the MMMI shredder is 0.117 pounds of VOM per ton of shredded material. This emission factor is based off of shredding 50% end-of-life vehicles during the stack testing.

Thanks NKO

Nidhi K. O'Meara
Associate Regional Counsel
Office of Regional Counsel
U.S. EPA, Region 5
phone: 312/886-0568

This e-mail, including attachments, contains information that is confidential and may be protected by the attorney-client (or other) privilege. This e-mail, including attachments, contains information that is intended to be conveyed only to the designated recipient(s). Please contact the sender immediately if you have received this message in error.

Mark - Here is the fully executed ACO. Happy holidays. Thanks NKO



Untitled
5.5MB



Sims Metal Management.pdf
4.1MB

SIMS Permit Denial

Mon 2/28/2022 4:47 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

When reading through SIMS permit I noticed the following serious issues.

1. In terms of pavement plan: They have asphalt in the area of the shredder. Asphalt does not hold up when dumping scrap metal or does not withstand the large tracked machines. Thus any and all fluids will go into the ground. Also there will be significant ponding. The asphalt millings by the barged dock area is an issue for materials such as oily clips.
2. The piles SIMS refers to as ASR and DNF are in reality much larger than shown, also your inspectors have sighted SIMS for this material for blowing off site. SIMS received 18k in violations and no mitigation solutions and continues to blow off site.
3. In terms of inbound screening procedures, I have noticed many items that SIMS says they outright reject so many of these items are too small for SIMS to actually see and reject. Thus a program relying on signs and outright rejects does not work. For example saying they do not accept ballast and compositor is meaningless without a stringent program of communication, inspection and having an environmental reasonable solution. The fact that they offer none of these is an illustration that the screening procedures are nothing more than window dressing.
4. Batteries same as above
5. Regarding their past waiver states they can operate 24/7 to avoid stock piles. Do you realize how ridiculous this sounds they just have an open policy to cause environmental injustice every day all day.

Sims Recycling Facility

Brent Mulder 

Mon 2/28/2022 5:37 PM

To: envcomments <envcomments@cityofchicago.org>

 1 attachments (550 KB)

EPA inspections.pdf;

[Warning: External email]

Dear Mayor Lightfoot and Commissioner Arwady,

Having reviewed the CDPH Large Recycling Facility Rules, the Sims permit application and the City's statements regarding the denial of the RMG permit, I take issue with the fact that the City has less stringent standards for an "existing" facility such as Sims. For example, there is no reason that Sims shouldn't be required to install an enclosure around the shredder. The attached EPA inspection report documenting metal scrap "shooting/ flying out of the top of the shredder" shows the real threat this facility poses to the public (see highlights). An enclosure around the shredder would prevent that type of potentially deadly incident from occurring. Additionally, a Health Impact Assessment should be required for a facility with Sims' extensive history of environmental noncompliance in an environmental justice area, regardless of whether that facility is existing or new.

Sincerely,
Brent Mulder



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: OCT 26 2016

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Metal Management Midwest, Inc., Chicago,
Illinois

FROM: Scott Connolly, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Metal Management Midwest

Facility Location: 2500 S Paulina St, Chicago, IL

Date of Inspection: September 7, 2016

Lead Inspector: Scott Connolly, Environmental Engineer, US EPA

Other Attendees:

1. Ken Ruffatto, Environmental Engineer, US EPA

Purpose of Inspection: To address citizen dust complaints

Facility Type: Metal Recycling and scrap yard

Arrival Time: 8:54 am

Departure Time: 9:30 am

Inspection Type:

- Unannounced Inspection
 Announced Inspection

OPENING CONFERENCE

- Credentials Presented
- CBI warning to facility provided

Company Ownership: The Company is listed as Metal Management Midwest, Inc., but is doing business as Sims Metal Management.

Process Description:

The facility crushes and shreds cars, and other scrap metal in their shredder to obtain scrap sizes that can be melted down for reuse.

Staff Interview: We did not enter the facility but spoke with a citizen, named Jim, who prefers not to give his last name. He works at the City of Chicago Streets and Sanitation Facility directly east of the Sims Metal Management property. The garages where he works are about 300 meters from the shredder and there is an approximately 12 foot high wall separating the properties. Jim stated that dust and smoke from the shredder and car crusher blows over into the garages and creates dust clouds and haze over the area. He says that dust accumulates on the cars, trucks and windows. He has noticed that he and his coworkers have had increased respiratory stress during periods when the dust is worse. On the day of the visit he mentioned that the smoke was worse before we arrived and had improved a little since we arrived.

TOUR INFORMATION

EPA toured the facility: No

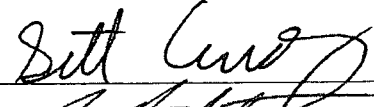
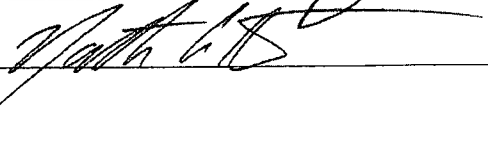
Data Collected and Observations:

Significant amounts of dust and smoke were observed exiting the top of the shredder. Clouds of smoke floated up out of the shredder and over the fence south of the Streets and Sanitation parking area. Not all smoke exiting the shredder seemed to be crossing the property line, and it seemed that gusts of wind were variable.

Field Measurements: were not taken during this inspection.

Concerns: Dust crossing the property line is a concern and there was significant amounts of PM observed exiting the shredder uncontrolled.

SIGNATURES

Lead Inspector:  Date: 9/14/16
Section Chief:  Date: 10/29/16

Facility Name: Metal Management Midwest
Facility Location: 2500 S Paulina St. Chicago, IL
Date of Inspection: September 7, 2016

APPENDICES AND ATTACHMENTS

- Appendix A: Photos

Facility Name: Metal Management Midwest
Facility Location: 2500 S Paulina St. Chicago, IL
Date of Inspection: September 7, 2016

APPENDIX A: FIELD MEASUREMENT DATA

Photos can be assessed at: G:\Air Enforcement And Compliance Branch\IL and IN\SConnolly

Photo No.	Date and Time	Description
IMG_0001	September 7, 2016 at 8:53PM	Dust and Smoke exiting the Shredder
IMG_0002	September 7, 2016 at 8:53PM	Dust and Smoke exiting the Shredder
IMG_0003	September 7, 2016 at 8:53PM	Dust and Smoke exiting the Shredder
IMG_0004	September 7, 2016 at 8:54PM	Dust crossing the property line over the boundary fence
IMG_0005	September 7, 2016 at 8:55PM	Dust and Smoke exiting the Shredder
IMG_0006	September 7, 2016 at 8:56PM	Dust crossing the property line over the boundary fence
IMG_0007	September 7, 2016 at 8:56PM	Dust and Smoke exiting the Shredder
IMG_0008	September 7, 2016 at 8:57PM	Dust and Smoke exiting the Shredder
IMG_0009	September 7, 2016 at 8:58PM	Dust and Smoke exiting the Shredder



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: JAN 13 2017

SUBJECT: CLEAN AIR ACT INSPECTION
REPORT
Metal Management Midwest, Inc., Chicago
Illinois

FROM: Scott Connolly, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Metal Management Midwest, Inc.

Facility Location: 2500 South Paulina St. Chicago, Illinois

Date of Inspection: December 2, 2016

Lead Inspector: Scott Connolly, Environmental Engineer, US EPA

Other Attendees:

1. Sara Loiacono, Environmental Scientist, US EPA
2. Debbie Hays, Central Region SHEC Director, SIMS Metal Management
3. George Malamis, Regional Ferrous Manager, SIMS Metal Management
4. Sam Flores, Plant Supervisor SIMS Metal Management

Purpose of Inspection: To inspect the facility's compliance with the Illinois SIP, to investigate if emission testing at the facility is possible and to address many citizen complaints.

Facility Type: Scrap yard that prepares post-consumer metal for recycling

Arrival Time: 11:00 am

Departure Time: 12:07 pm

Inspection Type:

- Unannounced Inspection
- Announced Inspection

OPENING CONFERENCE

- Credentials Presented
- CBI warning to facility provided

The following information was obtained verbally from Debbie Hays or George Malamis unless otherwise noted.

Company Ownership: The Company owned by Metal Management Midwest, Inc., but is doing business as Sims Metal Management (SIMS).

Process Description:

The facility processes post-consumer metals for recycling in steel mills and other foundries. Scrap metal arrives at the facility mostly by truck, but sometimes by barge. Cars, sheet iron, appliances and sheet fencing are normally the main items processed in the shredder. Cranes are used to load scrap metal onto the conveyer that feeds the hammer mill shredder. The shredder breaks apart the metal into small pieces that can be easily transported. The shredder is equipped with a water spray system that increases the spray depending on the power sent to the motor. Shredded scrap exits the shredder unit and is transferred on two open conveyors to the magnetic separator. The separator removes ferrous from non-ferrous materials and sends each to separate bins for storage. The SIMS facility operates a Z-box air cyclone system that sucks lighter materials and dust out of the scrap to maintain the consistency of the scrap. This system uses recirculating air which results in no emission point.

Staff Interview: Facility staff stated the shredder usually operates about 4-6 hours per day and starts operations after 6 am when the employees arrive. Ms. Hays stated that the facility keeps a log of start and stop times of the shredder and the amount of water used. Mr. Malamis stated that the facility processes mostly white goods or post-consumer scrap and about 35-40% cars. SIMS has contracts with the car decommissioning companies that provide the bulk of the scrap automobiles to SIMS. These contracts require the companies to certify that they remove fluids, refrigerants, and engines from car husks before sending them to SIMS. When SIMS receives scrap from non-contracted sources Ms. Hays stated that facility staff remove fluids and refrigerants from the decommissioning station on site. I asked about explosions occurring in the shredder because they were a component of the community complaints, and facility staff stated that they are very rare occurrences that have not happened in a long time. The operator of the shredder is supposed to maintain a log of explosions, which the company calls "energy releases," that includes time of occurrence.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

We toured the facility to specifically view the shredder Z-box system and water spray application. During our tour, fully shredded scrap metal was exiting a closed conveyor belt, which deposited it into piles. The piles and point of contact of the scrap metal stream appeared to be smoking and emitting some steam. The facility lists the Z-box system as control equipment for its shredder, but there are two uncovered conveyors that shredded scrap travels on before it enters the ferrous metal separator and Z-box system. During observation of shredder operations, we observed a smoky haze that drifted down from the steam plume exiting the top of the shredder. The haze lingered for several minutes before dissipating, and haze events were observed several times. **At times during operations, we observed metal scrap flying out of the top of the shredder.** At 11:58 am we observed an explosion in the hammer mill that resulted in a fire and brown smoke rapidly exiting the top of the shredder. The entire event lasted about 30-45 seconds and caused vibrations that could be felt from at least 100 meters from the shredder. We also noted that there were large amounts of painted scrap in the material sent into the shredder.

Field Measurements: were taken during this inspection.

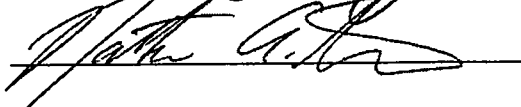
The hammer mill shredder was observed and recorded with the FLIR infrared camera. Using the FLIR infrared camera, we observed hydrocarbons exiting the top and bottom of the shredder and three videos were taken.

CLOSING CONFERENCE

Concerns: We observed hydrocarbons exiting different parts of the hammer mill shredder and pointed this out to facility staff. We also observed particulate matter emissions exiting the shredder in clouds that faded to a haze before it was blown east away from the equipment. Additionally, **we observed an explosion in the shredder that resulted in flames, metals, and brown smoke shooting out of the top of the shredder.**

SIGNATURES

Lead Inspector:  Date: 12/16/16

Section Chief:  Date: 1/3/17

Facility Name: Metal Management Midwest
Facility Location: 2500 S Paulina Ave, Chicago, IL
Date of Inspection: December 2, 2016

APPENDICES AND ATTACHMENTS

- Appendix A: FLIR Videos

Facility Name: Metal Management Midwest
Facility Location: 2500 S. Paulina Ave. Chicago, IL
Date of Inspection: December 2, 2016

APPENDIX A: FLIR VIDEOS

Videos can be assessed at: G:\Air Enforcement And Compliance Branch\IL and INASConnolly

Photo No.	Date and Time	Description
MOV_1722	December 2, 2016 at 9:12 AM	Steam and Hydrocarbons exiting the top of the Shredder as seem from the east
MOV_1723	December 2, 2016 at 11:46 AM	Steam and Hydrocarbons exiting the top of the Shredder as seem from the west
MOV_1724	December 2, 2016 at 11:48 AM	Hydrocarbons exiting the side of the Shredder as seen from the west

Sims permit

Rev. Marcus M. Guerra Jr. 

Mon 2/28/2022 3:31 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello,

My name is Rev. Marcus Guerra Jr. and I work in Pilsen as chaplain and pastor at Ezekiel's Heart Ministry.

We demand a community meeting and that Sims management application to operate be denied and the city state and county invest in clean up and creation of green safe jobs for those who live in the community and have continued to be harmed by this.

Sims Metal Management

Cristian Estrada [REDACTED]

Mon 2/28/2022 4:07 PM

To: envcomments <envcomments@cityofchicago.org>

 1 attachments (6 MB)

FOIA docs.pdf;

[Warning: External email]

Dear Mayor Lightfoot:

From what I have heard the City will only meet with the public if there is enough interest about their permit application. Your administration is preaching transparency and yet seems to only be holding a meeting if there is enough squeaky wheels. The people of Pilsen matter. I can assure you that just because Pilsen doesn't get the attention that the SE side gets because of General Iron, there is a great deal of interest about the Sims permit application as well as the continuing environmental problems at Sims. The attached documents show that many people are concerned about the environment in Pilsen, including a UIC professor and they have been trying to get Illinois EPA to regulate Sims more. Unfortunately the people of Pilsen and local environmental groups don't get much attention from the media but if you truly care about transparency and the people of Pilsen, the City needs to have a public meeting to discuss Sims and their continuing environmental problems.

Thank you,

Cristian Estrada

From: [Pressnall, Chris](#)
To: [Wink, Donald J](#); [Frost, Brad](#)
Cc: [REDACTED] [Rose Gomez](#); [REDACTED]
Subject: RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site
Date: Thursday, May 21, 2020 5:36:32 PM
Attachments: [Fisk Response to Comments - For Permit Issuance.pdf](#)
[CAAPP Permit - Midwest Generation \(031600AMI\) 052120.pdf](#)
[CAAPP Permit - Midwest Generation \(031600AMI\) 052120 Reopening for Cause.pdf](#)

Here are the documents. For reference, the materials will also be posted here: <https://www2.illinois.gov/epa/public-notices/boa-notices/Pages/archive.aspx>. To find the documents at that link tomorrow when posted, you would search for "Fisk".

Chris Pressnall

Environmental Justice Coordinator
Illinois EPA
(217) 524-1284
(217) 785-8346 (fax)
chris.pressnall@illinois.gov

From: Wink, Donald J
Sent: Thursday, May 21, 2020 5:21 PM
To: Pressnall, Chris ; Frost, Brad
Cc: Troy Hernandez ; M. Chávez ; Rose Gomez ; Jack Ailey ; Alexandra Reyes
Subject: [External] RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site

Thank you for the notice.

I assume this will post on the ILEPA site? If you have a particular location to check, I would appreciate that.

Sincerely

Donald

PS: You did respond to the thread about the FESOP process for Sims. Is there information on that?

From: Pressnall, Chris <Chris.Pressnall@Illinois.gov>
Sent: Thursday, May 21, 2020 5:14 PM
To: Wink, Donald J <dwink@uic.edu>; Frost, Brad <Brad.Frost@Illinois.gov>
Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

Subject: RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site
Hello Donald –

I just received word that the Fisk permit issued today and the materials will be posted online tomorrow.

Chris Pressnall

Environmental Justice Coordinator
Illinois EPA
(217) 524-1284
(217) 785-8346 (fax)

chris.pressnall@illinois.gov

From: Wink, Donald J <dwink@uic.edu>

Sent: Friday, February 14, 2020 2:55 PM

To: Pressnall, Chris <Chris.Pressnall@Illinois.gov>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

Subject: [External] RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site

Chris:

Thank you for the clarification. We'll keep that in mind as we consider how to respond when the draft finally appears.

Best wishes

Donald

From: Pressnall, Chris <Chris.Pressnall@Illinois.gov>

Sent: Friday, February 14, 2020 2:47 PM

To: Wink, Donald J <dwink@uic.edu>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

Subject: RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site
Hello Donald –

The plant operates pursuant the permits in place, not interim standards. It is important to note that emission units must comply with current laws or regulations whether or not the laws or regulations are contained in a permit. Permits pull together applicable requirements in one place for the benefit of the company, public and regulators.

Chris Pressnall

Environmental Justice Coordinator

Illinois EPA

(217) 524-1284

(217) 785-8346 (fax)

chris.pressnall@illinois.gov

From: Wink, Donald J <dwink@uic.edu>

Sent: Thursday, February 6, 2020 12:37 PM

To: Pressnall, Chris <Chris.Pressnall@Illinois.gov>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

Subject: [External] RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site

Chris:

Thank you for this, also. Here again I would like to check my inference that the timing on this is still very uncertain. If that is the case, does this mean that they are being allowed to operate with the

procedures in place before December, 2018, or are they being held to some interim standard?

Sincerely

Donald

From: Pressnall, Chris <Chris.Pressnall@Illinois.gov>

Sent: Thursday, February 6, 2020 10:28 AM

To: Wink, Donald J <dwink@uic.edu>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

Subject: RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site
Donald –

I did reach out to USEPA and it indicated that it was still working through testing issues with company. The Illinois EPA Permit Section is awaiting final, approved test results in order to process the FESOP. Performance test results often are a crucial data point in the permitting process as the results can form the basis for emission rates, emission limits, etc. Until the testing issue is resolved by USEPA, Illinois EPA will not proceed on the FESOP.

Best,

Chris Pressnall

Environmental Justice Coordinator

Illinois EPA

(217) 524-1284

(217) 785-8346 (fax)

chris.pressnall@illinois.gov

From: Wink, Donald J <dwink@uic.edu>

Sent: Monday, February 3, 2020 8:29 AM

To: Pressnall, Chris <Chris.Pressnall@Illinois.gov>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

[REDACTED] Wink, Donald J <dwink@uic.edu>

Subject: [External] RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site

Chris and Brad:

I am checking in again about the Sims FESOP process. In November you mentioned that you'd be reaching out to the USEPA on this. If you have an update on that, please let me know.

Also, I was under the impression that the proposed permit would actually be coming from the Illinois EPA. Is that correct? If so, are there updates from your perspective?

Thanks for your information.

Best wishes

Donald

From: Pressnall, Chris <Chris.Pressnall@Illinois.gov>

Sent: Tuesday, November 26, 2019 10:25 AM

To: Wink, Donald J <dwink@uic.edu>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

[REDACTED]
Subject: RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site
Good morning Donald –

Unfortunately, I do not have a good idea on the timing of the FESOP process. I can reach out to my counterpart at USEPA and see if there is someone that can provide information about what is going on at USEPA. I am not sure if the person I was previously dealing with at USEPA is still there. I'll see what I can find out.

Chris Pressnall

Environmental Justice Coordinator
Illinois EPA
(217) 524-1284
(217) 785-8346 (fax)
chris.pressnall@illinois.gov

From: Wink, Donald J <dwink@uic.edu>

Sent: Friday, November 22, 2019 4:49 PM

To: Pressnall, Chris <Chris.Pressnall@Illinois.gov>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

Subject: [External] RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site

Chris:

Thank you very much for this update. As with the CAAAP, I am curious if you have any idea of the timing of this process? If we want to discuss that with the USEPA and also find out what testing is being done, do you have guidance about whom to contact?

Best wishes

Donald

From: Pressnall, Chris <Chris.Pressnall@Illinois.gov>

Sent: Friday, November 22, 2019 3:35 PM

To: Wink, Donald J <dwink@uic.edu>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

Subject: RE: Followup for information on FESOP process for Metal Management Midwest Pilsen site
Hello Donald –

Yes, before Illinois EPA acts on the FESOP application there will be a public comment period. Right now I do not have an idea on timing. As you may know, USEPA is looking into MMM's operations and I believe required emissions testing. Those issues will need to be resolved before Illinois EPA moves forward on the FESOP permit application.

Best,

Chris Pressnall

Environmental Justice Coordinator
Illinois EPA
(217) 524-1284

(217) 785-8346 (fax)

chris.pressnall@illinois.gov

From: Wink, Donald J <dwink@uic.edu>

Sent: Tuesday, November 19, 2019 6:54 PM

To: Pressnall, Chris <Chris.Pressnall@Illinois.gov>; Frost, Brad <Brad.Frost@Illinois.gov>

Cc: Troy Hernandez [REDACTED] M. Chávez [REDACTED] Rose Gomez <rose@pilsenperro.org>; Jack Ailey [REDACTED] Alexandra Reyes [REDACTED]

Subject: [External] Followup for information on FESOP process for Metal Management Midwest Pilsen site

Brad and Chris:

I am following up on the correspondence of last winter MMM / Sims FESOP. I believe there is supposed to be additional information, including a period of public comment, prior to any permit going forward.

Is there additional information on this?

Sincerely

Don

Donald J. Wink, PhD

Department of Chemistry (MC 111)

Learning Sciences Research Institute

845 W. Taylor Street, RM 4500

Chicago, IL 60607

TEL 312-413-7383

EMAIL dwink@uic.edu

He / Him / His

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From: [EPA.FOIA](#)
To: ALEX.RUPPENTHAL@GMAIL.COM
Subject: Illinois EPA FOIA Request Received - Alex Ruppenthal
Date: Monday, October 26, 2020 4:15:01 PM
Attachments: [ATT00001.png](#)



Illinois Environmental Protection Agency

FOIA Request Received

Monday, October 26, 2020

Mr. Alex Ruppenthal
4170 N Marine Drive
Chicago, IL 60613

Requester Type: News Media

Dear Alex Ruppenthal,

We have received your request for information under the Illinois Freedom of Information Act. Listed below is a summary of what we received in your online request.

Please do not reply to this email. If you have questions about your request please call (217) 558-5101.

Request Summary

Received	10/26/2020 4:14:58 PM
Reference Id(s)	170000054982
Date Range	01/01/2015 - 10/26/2020
Request Narrative	October 26, 2020 FOIA Officer Illinois Environmental Protection Agency 1021 North Grand Ave. East P.O. Box 19276 Springfield, IL 62794 Re: Freedom of Information Act Request Dear IEPA FOIA Officer: THANK YOU for accepting this request for public records. Pursuant to the Illinois Freedom of Information Act, (5 ILCS 140/1 et seq.), I respectfully request access to and copies of all Violation

Notices issued to Metal Management Midwest, 2500 S. Paulina St., Chicago, IL 60608 between January 1, 2015 and October 26, 2020. (Note: Metal Management Midwest has an Agency ID of 170000054982 and Bureau of Air interest ID 031600FFO. The Bureau of Land interest ID is under the name Sims Metal Management and is 0316315032). I request that these records be made available in electronic format, to the extent possible. I am a representative of the news media – a member of Investigative Reporters and Editors and the American Society of Journalists and Authors – and make this request as part of news gathering. I request a waiver of all fees because the disclosure of the requested records is in the public interest. If my request does not adequately describe the records, please contact me so that I may clarify my request, and when appropriate inform me of the manner in which records are filed, retrieved or generated. If you have any questions about this request or if I can be of assistance in any way, please do not hesitate to call me at 630-270-6896 or email me at Alex.Ruppenthal@gmail.com. Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving your response to this request within 5 business days, as the statute requires. Sincerely, Alex Ruppenthal Independent Journalist Phone: 630-270-6896 Email: Alex.Ruppenthal@gmail.com 4170 N. Marine Drive Chicago, IL 60613

From: [REDACTED]
To: [Marr, Bill](#)
Subject: [External] SIMS /MMM FESOP
Date: Tuesday, December 15, 2020 9:12:46 AM

Hello Bill,

I spoke with you last week about the FEOP for SIMS metal shredder.

I am a member of the Pilsen Environmental Rights and Reform organization, aka PERRO, and would like to know where in the process the EPA is on this company's permit request.

SIMS has been operating without any pollution controls for many years and even with this pandemic, they are operating without a permit. Our community is in an Environmental justice area so it's even more concerning and urgent for residents to see more controlled emissions with limits.

I would appreciate it if you would please provide us a timely update or any news related to this permit and facility .

Sincerely,

Maria Chavez

From: [Bruni, Gino](#)
To: [Delgado, Daniel](#); [Robeen, Ron](#)
Subject: FW: Feedback from Pollution Complaint
Date: Tuesday, January 19, 2021 1:26:08 PM

Good Afternoon,

The below complaint was sent to me from Springfield/BOL.

The complainant's concerns appear to be something BOA/FOS would investigate - odors and dust generated from a shredder.

From: Jennings, James M.
Sent: Tuesday, January 19, 2021 9:50 AM
To: Bruni, Gino ; Eisenbrandt, Paul
Subject: FW: Feedback from Pollution Complaint
FYI

From: EPA.Pollution.Complaints <EPA.Pollution.Complaints@Illinois.gov>
Sent: Tuesday, January 19, 2021 9:48 AM
To: Jennings, James M. <James.M.Jennings@illinois.gov>
Cc: Frost, Brad <Brad.Frost@Illinois.gov>
Subject: Fw: Feedback from Pollution Complaint
Recycling Facility Odors/Emissions

From: IEXT2013_DONOTREPLY@illinois.gov <IEXT2013_DONOTREPLY@illinois.gov>
Sent: Monday, January 18, 2021 2:24 PM
To: EPA.Pollution.Complaints <EPA.Pollution.Complaints@Illinois.gov>
Subject: Feedback from Pollution Complaint
New [Feedback](#) has been received on the [Pollution Complaint](#) site.

Name: [REDACTED]
Street Address: [REDACTED]
City: [REDACTED]
County: [REDACTED]
State: IL
Zip Code: [REDACTED]
Home Phone:
Work Phone: [REDACTED]
Cell Phone:
eMail Address:
Responsible Party:

Owner or Company Name: Sims Metal Management
Street Address of Those Responsible: 2500 S. Paulina
City of Those Responsible: Chicago
County of Those Responsible: Cook
Zip Code of Those Responsible:
Nature of Complaint:

1. Air (dust/particulates, open burning, and industrial emissions)

Complaint Other:

Problem Description: The wind today (1/18/21) was blowing smoke from Sims' shredder toward the [REDACTED] Whenever the wind is blowing from Sims toward [REDACTED] the smoke and smell are terrible.

Problem Timetable: Today (1/18/21) and any day the wind is blowing smoke from the shredder toward Ashland Avenue.

Health Issues:

1. Don't Know

Doctor Consulted:

1. No

Property Damage:

1. No

Property Damage Description:

Employed By Source:

1. No

Claim Against Those Responsible:

1. No

Contacted and Complained:

1. No

Complaint Outcome:

Will Testify:

1. No
-

This email was automatically sent from the SOI Feedback web part on the Pollution Complaint site. Responses are not monitored.

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From: [Wink, Donald J](#)
To: [Pressnall, Chris](#)
Cc: [REDACTED] [Jack Ailey](#); [Dorian Breuer](#); [Joshi Radin](#); [REDACTED] [Wink, Donald J](#)
Subject: [External] Request for emissions testing results from SIMS metal management (and an additional update on FESOP)
Date: Wednesday, January 27, 2021 8:01:06 PM

Chris:

As you know, it has now been two years since SIMS filed an application for a FESOP for their Paulina Street site, following on the Administrative Consent Order of December 2018. We understand that this is still being worked on.

As the FESOP moves (very slowly) forward, regular emissions testing, and reporting of that testing to the public, is essential. Indeed, one of the requirements in the original Administrative Consent Order was for testing within 300 days. We are aware that a test was done in Fall, 2019. But to our knowledge, nothing else has been done on testing—and it has been considerably more than 300 days since Fall, 2019.

Please let us know what testing has been done at the SIMS site, and how we can obtain those results.

And, as before, please let us know on the progress of the FESOP process.

Sincerely,

Donald

Donald J. Wink, PhD

Department of Chemistry (MC 111)

Learning Sciences Research Institute

845 W. Taylor Street, RM 4500

Chicago, IL 60607

TEL 312-413-7383

EMAIL dwink@uic.edu

He / Him / His

From: [EPA.Pollution.Complaints](#)
To: [McQuillen, Deirdre](#)
Cc: [Robeen, Ron](#); [Frost, Brad](#)
Subject: Fw: Feedback from Pollution Complaint
Date: Thursday, January 28, 2021 10:06:46 AM

Odors & Smoke

From: ILEXT2013_DONOTREPLY@illinois.gov
Sent: Thursday, January 28, 2021 9:44 AM
To: EPA.Pollution.Complaints
Subject: Feedback from Pollution Complaint
New [Feedback](#) has been received on the [Pollution Complaint](#) site.

Name:
Street Address:
City:
County:
State:
Zip Code:
Home Phone:
Work Phone:
Cell Phone:
eMail Address:
Responsible Party:

Owner or Company Name: Sims
Street Address of Those Responsible: 2500 S. Paulina
City of Those Responsible: Chicago
County of Those Responsible:
Zip Code of Those Responsible:
Nature of Complaint:

1. Air (dust/particulates, open burning, and industrial emissions)

Complaint Other: The metal crusher at Sims is constantly smoking. Not sure what's in the smoke but it smells terrible especially when the wind blows it off their property. Below is an inspection report from the City website. Many other complaints about this company.

Problem Description: [INSPECTION LOG #: 13309048 21-JAN-21 13:40:00] CHICAGO DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL ENGINEER RESPONDED TO A CITIZEN'S COMPLAINT REGARDING 'MATERIAL UP IN THE AIR' AT 2500 S PAULINA ST, SIMS METAL MANAGEMENT (METAL MANAGEMENT MIDWEST INC). METAL MANAGEMENT MIDWEST INC. DBA SIMS METAL MANAGEMENT OPERATES A RECYCLING FACILITY PURSUANT TO A CLASS IVB RECYCLING PERMIT (ENVREC104577) ISSUED BY CDPH. THE COMPLAINANT WAS

ANONYMOUS AND WE WERE UNABLE TO CONTACT ANYONE REGARDING THE ISSUE. WHILE CANVASSING THE AREA SURROUNDING SIMS ON JANUARY 21, 2020, NO DUST WAS OBSERVED UP IN THE AIR. ODORS WERE OBSERVED AT THE FOLLOWING LOCATIONS: 2352 N ASHLAND AVE (CITY OF CHICAGO DEPARTMENT OF STREET AND SANITATION), AND 2356 S ASHLAND AVE (GRAINGER INDUSTRIAL SUPPLY). IT IS AN ODOR OF SWEET METAL. THIS ODOR WAS UNCOMFORTABLE TO INHALE AND DISCOURAGED US FROM BEING DOWNWIND FROM THE SHREDDER. THE SHREDDER WAS IN OPERATION AT THE TIME OF THE INSPECTION. WE OBSERVED VISIBLE EMISSIONS ESCAPING THE SHREDDER. AN ENFORCEMENT ACTION IS ALREADY PENDING FOR THESE ISSUES.

Problem Timetable: Every time they are shredding.

Health Issues:

Doctor Consulted:

Property Damage:

Property Damage Description:

Employed By Source:

Claim Against Those Responsible:

Contacted and Complained:

Complaint Outcome:

Will Testify:

This email was automatically sent from the SOI Feedback web part on the Pollution Complaint site.
Responses are not monitored.

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From: [Walsh, Amanda](#)
To: [Delgado, Daniel](#)
Subject: Anonymous Smoke Complaint -Sims Metal Management
Date: Wednesday, February 3, 2021 2:07:13 PM

Hello Dan,

A [REDACTED] called with a complaint about Sims Metal Management. The address is 2500 S Paulina Ave, Chicago IL. The company has a car shredder that makes a lot of smoke. When the wind is blowing West-East, the smoke blows over the property line to the parking lot of the company Grainger. Grainger is located at 2356 S. Ashland Ave, Chicago IL. When you stand in Grainger's parking lot, you can see scrap going into the shredder and you can see all of the smoke the shredder makes. The [REDACTED] complain about the smell that the smoke makes. The [REDACTED] that complained says [REDACTED] thinks its illegal for the smoke to cross it's property line.

Please let me know if you have any questions about the details of this email.

Amanda Walsh

Office Assistant - IL EPA

9511 West Harrison Street

Des Plaines, Illinois

Office: 847-294-4073

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From: [EPA.FOIA](#)
To: [REDACTED]
Subject: Illinois EPA FOIA Request Received - Donald Wink
Date: Wednesday, February 10, 2021 5:37:10 PM
Attachments: [ATT00001.png](#)



Illinois Environmental Protection Agency

FOIA Request Received

Wednesday, February 10, 2021

Dr. Donald Wink
PERRO
1631 Highland Avenue
Berwyn, IL 60402

Requester Type: Public Interest / Not-For-Profit

Dear Donald Wink,

We have received your request for information under the Illinois Freedom of Information Act. Listed below is a summary of what we received in your online request.

Please do not reply to this email. If you have questions about your request please call (217) 558-5101.

Request Summary

Received 2/10/2021 5:37:06 PM

Reference Id(s) 031600FFO

Date Range 01/01/2019 - 02/01/2021

Request Narrative I am making the request for any records associated with the Metal Management Midwest facility on S. Paulina in Chicago. I am particularly interested in the following: (a) Any test results, or correspondence about test results, obtained for the facility, especially in relation to permitting for the site or in relation to the December 2018, US EPA

Consent Agreement and Final Order. (b) Any correspondence concerning the provisions for a Federally Enforceable State Operating Permit, as required in the CAFO. (c) Other information on facility operations, particularly in connection to emissions. I am making this request in connection to the work of the Pilsen Environmental Rights and Reform Organization (P.E.R.R.O.).

© 2015 Illinois EPA

From: [Wink, Donald J](#)
To: [Pressnall, Chris](#)
Cc: [REDACTED] [Rose Gomez](#); [Dorian Breuer](#)
Subject: [External] Follow up on SIMS metal management
Date: Friday, February 26, 2021 5:35:41 PM

Chris:

As you may know, I recently filed a FOIA request to get additional information about SIMS Metal Management. I was pleased to see how quickly a response came through and also to have gotten an informative set of documents to look over. I am following up with a few comments on that and the general question of the FESOP process.

1. It has been two years since the ACO was issued that, in part, required SIMS to file for a FESOP. A revised application was in the FOIA documents and it shows that, in January 2020, IEPA had received all the information that, I believe, was needed. Especially with the information that was part of that revision, we have a great deal of concern that the Permit is going to be issued without any real chance to discuss, let alone challenge, some of the underlying data. Please provide a timeline, with dates, for when the permit is expected and also the plan for conducting the proper review with the community.
2. Part of the data for the revision was the result of a test done in September 2019, as per the ACO. Although the data in the test report seems carefully done, including correcting the egregious use of previous emissions estimates, there are several problems. We would like a chance to discuss these before action is taken using those test results. Taken together, the problems here, and the length of time since the September 2019 test, mean that the test basis for several parts of the FESOP are incomplete or at best out of date.

The problems indicated by the test results (or lack of them) include:

- a. The creation of anticipated emissions profiles based on the average of three test runs when, in fact, there was a large variance in the results. This means that the potential emissions are based on a lowered value compared to what did, in fact, occur in one or more of the tests. We would like the values used in the permit to reflect the actual range of results in the tests.
- b. The test results indicate that there is a high likelihood that SIMS may become the largest single source of a large number of pollutants in Pilsen—exceeding recent values reported in the EPA Toxic Release Inventory for H. Kramer, for example. We expect that, as a result, SIMS will be subject to the same monitoring provisions that H. Kramer uses, including the use of a well-sited monitoring site nearby.
- c. The September 2019 test included manganese (something not mentioned in the original FESOP). We'd raised that as a specific concern in Spring, 2019 and it was good to see that was now included. But the test did not include other metals on the TRI list of non-ferrous metals that are usually reported: zinc and copper. We understand that metal shredders are an industry that is not required to do TRI reporting. Even more reason for ILEPA to require TRI-level reporting in the Permit.
- d. The results from the test report significant levels of chromium but do not make an effort to indicate if the chromium is chromium(VI). Without that information, the only responsible position is that the chromium is all in the most dangerous form. And emitting several pounds of chromium (VI) into the community is highly problematic. Efforts to determine if the chromium emissions are Cr(VI) should be made, now and

into the future.

3. To my knowledge, PERRO and other community groups were not informed of revised FESOP application even though we had received notice of the original FESOP application. Am I mistaken about that? If so, I apologize. But if indeed the revision to the FESOP was ***not*** shared with the EJ community, we would like an explanation of why that wasn't done.
4. The environmental community in Chicago is currently embroiled in controversies, to put it mildly, around the relocation of a metal shredder from the north to the south side. We expect that ILEPA is likely involved in permitting for this. Are the same (or better) standards being used in generating the permit for SIMS as are being used elsewhere?

Thank you again for your attention and guidance.

Sincerely

Donald

From: [Wink, Donald J](#)
To: [Pressnall, Chris](#)
Cc: [REDACTED] [Rose Gomez](#); [Dorian Breuer](#)
Subject: [External] RE: Additional comment / question on lead emissions for Sims
Date: Tuesday, March 2, 2021 8:23:30 AM

Chris:

Thanks for checking back.

Learning of the January 2020 amendment only through the FOIA process felt quite surprising, though I realize I may just have missed something. With that in mind, is it possible to at least know if the FESOP application has been amended in any formal way and, if it has, if we can see those?

Sincerely

Don

From: Pressnall, Chris
Sent: Tuesday, March 2, 2021 8:00 AM
To: Wink, Donald J
Cc: Troy Hernandez ; [REDACTED] M. Chávez ; Jack Ailey ; Rose Gomez ; Dorian Breuer
Subject: RE: Additional comment / question on lead emissions for Sims

Donald –

Thank you for the emails concerning SIMS Metal Management. I have passed along your questions and comments to the Bureau of Air for its consideration. I know you and P.E.R.R.O. are anxious for the FESOP process to move forward and I am sorry I have not been able to provide more clarity on timing.

Best,

Chris Pressnall

Environmental Justice Coordinator

Illinois EPA

(217) 524-1284

(217) 785-8346 (fax)

chris.pressnall@illinois.gov

From: Wink, Donald J <dwick@uic.edu>
Sent: Saturday, February 27, 2021 11:32 AM
To: Pressnall, Chris <Chris.Pressnall@Illinois.gov>
Cc: Troy Hernandez [REDACTED] M. Chávez
[REDACTED] Jack Ailey [REDACTED] Rose Gomez
<rose@pilsenperro.org>; Dorian Breuer <dorian@aileysolarelectric.com>
Subject: [External] Additional comment / question on lead emissions for Sims

Chris:

One of the things we're trying to figure out is how the potential to emit values for Sims fit with various public health parameters. The EPA's NAAQS data (<https://www.epa.gov/criteria-air-pollutants/naaqs-table>) have information on only one metal—lead—with a standard for a 3-month rolling average of 0.15 micrograms per cubic meter (mcg/m³). The values that have been reported for actual measurement at the Perez elementary site, near H. Kramer, average 0.009 mcg/m³ for the most recent numbers I can see (from 2019). So that is definitely in the right direction.

The test data for Sims shows three tests for lead: 3.78, 5.83, and 9.11 ppb with an average of 6.24 ppb. From this they calculate emissions of 0.00838 lb/hr, or 3.8 g / hr. A very crude calculation indicates that if that is dispersed into a circle with a 500 m radius and to a height of 10 meters (a volume of $7.8 \times 10^6 \text{ m}^3$), then there would be a continuous concentration of lead of 0.5 mcg/ m^3 . I believe this could easily have created a significant amount of lead dispersal in the area (note that 500 m is the approximate distance from SIMS to Whittier Elementary School and to Juarez Academy). There would also be the likelihood for consistent levels of lead in the air that are more than three times the level indicated in the NAAQS.

With that in mind, can you let us know if there will be plans for soil testing and continuous air monitoring, at the very least for lead, within the new permit?

Sincerely

Donald

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From: [Pressnall, Chris](#)
To: [Wink, Donald J](#)
Cc: [REDACTED]; [Rose Gomez](#); [Dorian Breuer](#)
Subject: RE: Additional comment / question on lead emissions for Sims
Date: Thursday, March 11, 2021 9:56:31 AM

Good morning Donald –

While we wait for more detailed answers to your questions, I did want to address application materials received by the Illinois EPA after the initial application. Receiving additional application materials via amendment, modification, emails, etc. is a common occurrence at the Illinois EPA. Once the permit reviewer begins looking at a given permit application in detail they might have questions, need clarification, or find that certain information is missing. This back and forth can go on during the pendency of the permit. For the EJ program, I am not notified nor do I send out EJ notification letters each time a permit applicant submits additional information that ultimately becomes part of the final application therefore my office does not send out EJ notification letters each time. I do understand that this permit application in particular is of great concern you and PERRO. What others do in similar situations is regularly submit requests for information pursuant FOIA. I can try to do a better job of notifying you and PERRO if the BOA receives significant updates to the permit application so you know when to submit a FOIA request. Alternatively, you/PERRO could submit regular FOIA requests (once a month or whatever) for application materials. I can assist with the FOIA process to the extent you need me to including someone sending me an email asking if any new information has been received, which I would then send to the Illinois EPA Records Unit and ask that the inquiry be treated as a FOIA request. I do this for others working on EJ issues that may have difficulty navigating the FOIA process or just want a more direct method of requesting information. I set this system up with the Records Unit because of the frustration I and EJ community members had with going through the formal FOIA process (although the online FOIA portal makes it a little easier) for information that is known (i.e., that I have in my possession) and readily available (although, as I stated, I do not always know if there is relevant information available but sometimes I do).

One point that you made in an earlier email is about the public involvement process. The Illinois EPA is committed to a notice and comment period on FESOP given public concern and it is statutorily required. Additionally, given the community's interest and concerns over the source, it is likely that the Illinois EPA will hold a hearing in addition to the written notice and comment period. The only reason that I am equivocating is because ultimately it is the Director's decision on holding a hearing and he has not yet been presented with a request for hearing by Community Relations staff. Once the notice and comment period begins, I am assuming there will be numerous requests for hearing which will be presented to the Director. Again, given the known concerns with source, it is likely all but a foregone conclusion that the Illinois EPA will hold a hearing. Bottomline, the FESOP will not move forward without additional formal public involvement.

Talk soon,

Chris Pressnall

Environmental Justice Coordinator

Illinois EPA

(217) 524-1284

(217) 785-8346 (fax)

chris.pressnall@illinois.gov

From: Wink, Donald J
Sent: Tuesday, March 2, 2021 8:22 AM
To: Pressnall, Chris
Cc: Troy Hernandez [REDACTED] M. Chávez ; Jack Ailey ; Rose Gomez ; Dorian Breuer
Subject: [External] RE: Additional comment / question on lead emissions for Sims
Chris:

Thanks for checking back.

Learning of the January 2020 amendment only through the FOIA process felt quite surprising, though I realize I may just have missed something. With that in mind, is it possible to at least know if the FESOP application has been amended in any formal way and, if it has, if we can see those?

Sincerely

Don

From: Pressnall, Chris <Chris.Pressnall@Illinois.gov>
Sent: Tuesday, March 2, 2021 8:00 AM
To: Wink, Donald J <dwink@uic.edu>
Cc: Troy Hernandez [REDACTED] M. Chávez
[REDACTED] Jack Ailey [REDACTED] Rose Gomez
<rose@pilsenperro.org>; Dorian Breuer <dorian@aileysolarelectric.com>
Subject: RE: Additional comment / question on lead emissions for Sims
Donald –

Thank you for the emails concerning SIMS Metal Management. I have passed along your questions and comments to the Bureau of Air for its consideration. I know you and P.E.R.R.O. are anxious for the FESOP process to move forward and I am sorry I have not been able to provide more clarity on timing.

Best,

Chris Pressnall

Environmental Justice Coordinator
Illinois EPA
(217) 524-1284
(217) 785-8346 (fax)
chris.pressnall@illinois.gov

From: Wink, Donald J <dwink@uic.edu>
Sent: Saturday, February 27, 2021 11:32 AM
To: Pressnall, Chris <Chris.Pressnall@Illinois.gov>
Cc: Troy Hernandez [REDACTED] M. Chávez
[REDACTED] Jack Ailey [REDACTED] Rose Gomez
<rose@pilsenperro.org>; Dorian Breuer <dorian@aileysolarelectric.com>
Subject: [External] Additional comment / question on lead emissions for Sims
Chris:

One of the things we're trying to figure out is how the potential to emit values for Sims fit with various public health parameters. The EPA's NAAQS data (<https://www.epa.gov/criteria-air-pollutants/naaqs-table>) have information on only one metal—lead—with a standard for a 3-month rolling average of 0.15 micrograms per cubic meter (mcg/m³). The values that have been reported

for actual measurement at the Perez elementary site, near H. Kramer, average 0.009 mcg/m³ for the most recent numbers I can see (from 2019). So that is definitely in the right direction.

The test data for Sims shows three tests for lead: 3.78, 5.83, and 9.11 ppb with an average of 6.24 ppb. From this they calculate emissions of 0.00838 lb/hr, or 3.8 g / hr. A very crude calculation indicates that if that is dispersed into a circle with a 500 m radius and to a height of 10 meters (a volume of $7.8 \times 10^6 \text{ m}^3$), then there would be a continuous concentration of lead of 0.5 mcg/ m³. I believe this could easily have created a significant amount of lead dispersal in the area (note that 500 m is the approximate distance from SIMS to Whittier Elementary School and to Juarez Academy). There would also be the likelihood for consistent levels of lead in the air that are more than three times the level indicated in the NAAQS.

With that in mind, can you let us know if there will be plans for soil testing and continuous air monitoring, at the very least for lead, within the new permit?

Sincerely

Donald

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From: [Dave Graham](#)
To: [McQuillen, Deirdre](#); [John Kryl](#); [Renante Marante](#)
Cc: [Armitage, Julie](#); [Robeen, Ron](#); [Mohr, Kent](#)
Subject: [External] RE: Sims Complaint
Date: Wednesday, March 11, 2020 11:14:01 AM

I will give Ron and Kent a call on this one

Dave Graham
City of Chicago Department of Public Health
Phone: 312 -745-4034
Cell: 312- 802-0181

----- Original message -----

From: "McQuillen, Deirdre"
Date: 3/11/20 10:06 AM (GMT-06:00)
To: Dave Graham , John Kryl , Renante Marante
Cc: "Armitage, Julie" , "Robeen, Ron" , "Mohr, Kent"
Subject: Sims Complaint

A2020-0310-002

Please let us know how you respond to this complaint.
Thanks.

From: EPA.Pollution.Complaints
Sent: Wednesday, March 11, 2020 9:43 AM
To: McQuillen, Deirdre
Cc: Robeen, Ron ; Frost, Brad
Subject: FW: Feedback from Pollution Complaint
Odors
From: IEXT2013_DONOTREPLY@illinois.gov <IEXT2013_DONOTREPLY@illinois.gov>
Sent: Tuesday, March 10, 2020 5:49 PM
To: EPA.Pollution.Complaints <EPA.Pollution.Complaints@Illinois.gov>
Subject: Feedback from Pollution Complaint
New [Feedback](#) has been received on the [Pollution Complaint](#) site.

Name: [REDACTED]
Street Address: [REDACTED]
City: [REDACTED]
County: [REDACTED]
State: Illinois
Zip Code: [REDACTED]
Home Phone:
Work Phone:
Cell Phone:

eMail Address:

Responsible Party:

Owner or Company Name: Sims Metal Management

Street Address of Those Responsible: 2500 S. Paulina

City of Those Responsible: Chicago

County of Those Responsible: Cook

Zip Code of Those Responsible:

Nature of Complaint:

1. Air (dust/particulates, open burning, and industrial emissions)

Complaint Other: smoke and bad smell

Problem Description: Scrap metal operation is spewing smoke from there shredder and dirt and debris is blowing off the property. Odors are bad when the wind is blowing toward our home.

Problem Timetable:

Health Issues:

1. Don't Know

Doctor Consulted:

1. No

Property Damage:

1. No

Property Damage Description:

Employed By Source:

1. No

Claim Against Those Responsible:

1. No

Contacted and Complained:

1. No

Complaint Outcome:

Will Testify:

This email was automatically sent from the SOI Feedback web part on the Pollution Complaint site. Responses are not monitored.

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From: [Frost, Brad](#)
To: [Bloomberg, David E.](#); [Armitage, Julie](#)
Subject: FW: [External] Air monitor monitor
Date: Thursday, July 1, 2021 3:15:05 PM

Comment on the Network Plan

-----Original Message-----

From: Maria Chávez [REDACTED]
Sent: Thursday, July 1, 2021 3:04 PM
To: Frost, Brad <Brad.Frost@Illinois.gov>
Subject: [External] Air monitor monitor

Hi Brad,

I hope all is well with you. I'm writing to find out who I need to contact to make a formal request for an air monitor near the Sims metal shredding facility , 2500 S Paulina street, 60608.

They had a recent air violation and have applied for a FEOSP that is under review by your agency.

Perro is interested in having the epa install a stationary air monitor that can detect PM and VOCs, on the roof top of the Benito Juarez high school if possible , since it is close to the Sims facility.

Thanks ,

María

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From: [REDACTED]
To: [Frost, Brad](#)
Subject: Re: [External] Air monitor monitor
Date: Thursday, July 1, 2021 3:55:51 PM

I will send a letter to the person listed on the link .
Thanks for your help. Have an exceptionally good rest of the day.
Maria

On Jul 1, 2021, at 3:48 PM, Frost, Brad wrote:

The Network Monitoring Plan that is currently out for public comment is the plan that says how many, what kind and where our monitors are located. It is approved by USEPA on an annual basis. The most appropriate time to request a new monitor is while we have the plan out for public comment, as now. Your e-mail below is sufficient but if you want to send any additional information or justification for the location of new monitors we would also take that into consideration at the end of the comment period prior to submitting the Plan to USEPA.

Different devices monitor for VOM and PM but many sites have more than one monitoring device, see pages 43 – 46, <https://www2.illinois.gov/epa/topics/air-quality/air-quality-reports/Documents/2019AnnualAirQualityReportFinal.pdf>

From: M. Chavez
Sent: Thursday, July 1, 2021 3:36 PM
To: Frost, Brad
Subject: Re: [External] Air monitor monitor

I am unsure of the proper route or what it takes to have an air monitor installed. Would a letter of request be helpful ? Who should I send it to?
Is there a monitor that can measure or detect both PM and VOCs?
Thanks

On Jul 1, 2021, at 3:14 PM, Frost, Brad <Brad.Frost@illinois.gov> wrote:

Maria,
Good to hear from you. As you may know, Illinois' Network Monitoring Plan is currently open for public comment. Information on the Plan can be found at <https://www2.illinois.gov/epa/topics/air-quality/outdoor-air/air-monitoring/Pages/network.aspx>

I will include your request for a monitor as a comment on the Plan. We will review all comments on the Plan.

Let me know if you have any questions.

Brad

Brad Frost

Manager, Office of Community Relations

217/782-7027

-----Original Message-----

From: Maria Chávez [REDACTED]

Sent: Thursday, July 1, 2021 3:04 PM

To: Frost, Brad <Brad.Frost@Illinois.gov>

Subject: [External] Air monitor monitor

Hi Brad,

I hope all is well with you. I'm writing to find out who I need to contact to make a formal request for an air monitor near the Sims metal shredding facility, 2500 S Paulina street, 60608.

They had a recent air violation and have applied for a FEOSP that is under review by your agency.

Perro is interested in having the epa install a stationary air monitor that can detect PM and VOCs, on the roof top of the Benito Juarez high school if possible, since it is close to the Sims facility.

Thanks,

María

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From: [REDACTED]
To: [Metz, Cassandra](#)
Subject: [External] Air plan comments and request from PERRO
Date: Thursday, July 15, 2021 1:38:12 PM

To whom it may concern at the EPA,

On behalf of the Pilsen Environmental Rights and Reform Organization ,aka PERRO, I am contacting you to request that the EPA place a stationary air monitor near the SIMS/MMM metal shredding company. The facility is located at 2500 S Paulina street in the Pilsen community.

We are asking that the air monitor be installed on the Benito Juarez high school rooftop or another appropriate nearby site, to inform the community of the pollutants in the emissions originating from the SIMS shredding and recycling facility. We are specifically requesting the installation of an air monitor that has the ability to detect and measure VOCs and PM. Benito Juarez school is approximately two blocks downwind from the Sims metal shredding facility. The close proximity of this school to Sims makes it an ideal site for an air monitor. Installing an air monitor would send a strong message to the community that the EPA shares their concerns and is willing to act.

It is important to note the close presence of children in this area because children are even more at risk of being negatively impacted by hazardous pollutants than most adults.

Pilsen already bears a disproportionate burden of pollution and Sims significantly contributes to this problem by being a significant source of local pollutants. The Pilsen community is a designated Environmental Justice area and no barriers exist to separate or distance residents from industrial facilities. Area homes, schools, and parks are literally located adjacent to the industrial corridor and the local population and environment are directly impacted by hazardous releases-pollutants. Everyone has the right to know if toxic pollutants are in the air they breathe and to determine the sources of those emissions.

In 2017 the USEPA issued a Notice of Violation to Sims metals for allowing fugitive emission to cross their property lines and into the community. Based on the response provided by Sims, the hammermill alone has the potential to emit 25 tons or more of VOMs per year and has a maximum theoretical emissions rate of more than 100 tons of VOMs per calendar year. The NOV found was found that Sims did not have any pollution (emissions) or control equipment to prevent residents from being exposed to their emissions. Sims has shown they can not be trusted to self-regulate and adhere to air pollution laws and regulations without external monitoring.

VOM and PM can and do have detrimental effects to human health and the environment. Every community has the right to know what they are breathing so they can use that information to protect themselves if necessary. This is why it is vital that Sims emissions be continuously monitored by the EPA.

The Sims facility has a history of odor and emissions complaints . Area residents and workers have filed multiple complaints and concerns with the EPA and deserve the ability to have data available to them from air monitoring of this facility. We hope that the EPA takes this opportunity to act and protect the Pilsen community from potential serious health problems

and negative ecological effects by installing an air monitor that can detect releases from the Sims metal shredding facility.

We look forward to hearing positive news.

Sincerely,
Maria Chavez
Pilsen Environmental Rights and Reform Organization
(PERRO)

From: [REDACTED]
To: [Marr, Bill](#)
Subject: [External] Re: SIMS /MMM FESOP
Date: Wednesday, July 28, 2021 5:26:33 PM

Hello Bill,

I'm writing to try to get an answer of where the process is for the Sims metals shredder FESOP. I sent you the email below about 8 months ago and wanted to remind you that this company has and is operating without a permit and the Pilsen community is taking on the burden of the additional metal shredding that the former General Iron used to process. When do you anticipate the next step if the application?

Thank you,

Maria Chavez

> On Dec 15, 2020, at 9:12 AM, M. Chavez [REDACTED] wrote:

>

> Hello Bill,

> I spoke with you last week about the FEOP for SIMS metal shredder.

> I am a member of the Pilsen Environmental Rights and Reform organization, aka PERRO, and would like to know where in the process the EPA is on this company's permit request.

> SIMS has been operating without any pollution controls for many years and even with this pandemic, they are operating without a permit. Our community is in an Environmental justice area so it's even more concerning and urgent for residents to see more controlled emissions with limits.

> I would appreciate it you would please provide us a timely update or any news related to this permit and facility .

> Sincerely,

> Maria Chavez

From: [Wozniak, Maureen](#)
To: [Robertson, Daniel L.](#)
Subject: RE: [External] Re: Metal Management Midwest (Sims Metal Management) Meeting Request
Date: Monday, August 2, 2021 11:07:28 AM

Right now Tuesday at 1 works for us

From: Robertson, Daniel L.
Sent: Monday, August 2, 2021 11:04 AM
To: Wozniak, Maureen
Cc: Haas, Arlene
Subject: Fw: [External] Re: Metal Management Midwest (Sims Metal Management) Meeting Request
Hi Maureen, please see the conference call options for the Sims pre-filing meeting below. The only option that works for Arlene and me is August 10 at 1pm. Does this time work for IEPA?

From: Mark LaRose <mlarose@laroseboscology.com>
Sent: Monday, August 2, 2021 8:10 AM
To: Robertson, Daniel L. <Daniel.L.Robertson@Illinois.gov>
Cc: Haas, Arlene <Arlene.Haas@Illinois.gov>
Subject: Re: [External] Re: Metal Management Midwest (Sims Metal Management) Meeting Request

Good Morning Daniel,

My clients are available on the following dates:

- Tuesday, August 10, 2021, 1:00 p.m. CDT
- Thursday, August 12, 2021, 9:00 a.m. CDT
- Thursday August 12, 2021, 10:00 a.m. CDT

Please let us know if any of these dates work for you. Thank you.

Mark

Mark A. LaRose

LaRose & Bosco, Ltd.

200 North LaSalle, Suite 2810

Chicago, IL 60601

(312) 642-4414

Fax (312) 642-0434

mlarose@laroseboscology.com

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On Thursday, July 29, 2021, 10:15:44 AM CDT, Robertson, Daniel L. <daniel.l.robertson@illinois.gov> wrote:

Thank you for looking into that so promptly. Unfortunately I will be in court at that time. Is there another time that works?

For the week of August 9, I know at least for myself that 8/10 before noon, and 8/11 before 11am will not work. If you're able to present 2-3 options for times that would be ideal since I

don't know IEPA's full schedule for that week either.

Thank you,

Daniel

From: Mark LaRose <mlarose@laroseboscolaw.com>

Sent: Thursday, July 29, 2021 10:05 AM

To: Robertson, Daniel L. <Daniel.L.Robertson@Illinois.gov>

Cc: Haas, Arlene <Arlene.Haas@Illinois.gov>

Subject: Re: [External] Re: Metal Management Midwest (Sims Metal Management) Meeting Request
Good Morning Daniel,

I have checked with my clients and **Wednesday, August 11, 2021 at 9:00 a.m. CDT** works for a call. Right now, in addition to myself, Debbie Hays (SHEC Director of Sims), Scott Miller (Chief Corporate Counsel for Sims) and LaDonna Driver (Outside Counsel for Sims) plan to attend the call. If anything changes, we will let you know. Thank you.

Mark

Mark A. LaRose

LaRose & Bosco, Ltd.

200 North LaSalle, Suite 2810

Chicago, IL 60601

(312) 642-4414

Fax (312) 642-0434

mlarose@laroseboscolaw.com

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On Wednesday, July 28, 2021, 12:58:33 PM CDT, Robertson, Daniel L. <daniel.l.robertson@illinois.gov> wrote:

Thank you for the prompt response. Arlene Haas and I will both be handling this matter. Our direct lines are 312-814-3532 (me) and 312-814-3153 (Arlene). Please note that due to the ongoing pandemic we are generally working remote so email will be the fastest way to get in touch.

From our end the conference call participants will likely be me and Arlene from the AGO, and Maureen Wozniak (Dept. of Legal Counsel) and Kevin Mattison (Bureau of Air) from Illinois EPA, but we will let you know ahead of time who all will be there. We will also circulate a call-in number once we have confirmed a date and time.

Regards,

Daniel

From: Mark LaRose <mlarose@laroseboscolaw.com>

Sent: Wednesday, July 28, 2021 12:36 PM

To: Robertson, Daniel L. <Daniel.L.Robertson@Illinois.gov>

Cc: Haas, Arlene <Arlene.Haas@Illinois.gov>

Subject: [External] Re: Metal Management Midwest (Sims Metal Management) Meeting Request
Good Afternoon Daniel,

Thanks for your email. I will be representing Sims in this matter. I will be the primary contact as outside counsel. I will circle back with my client regarding availability on the weeks of August 2 and August 9th to hold an initial conference call. Please let us know who will attend the call on behalf of the AG's office and the IEPA, and we will do the same.

Is Arlene Haas the Assistant Attorney General who will be handling this matter?

In the meantime, it will be helpful to have your direct phone number so we can communicate by phone.

Very truly yours,

Mark

Mark A. LaRose

LaRose & Bosco, Ltd.

200 North LaSalle, Suite 2810

Chicago, IL 60601

(312) 642-4414

Fax (312) 642-0434

mlarose@larosebosc law.com

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On Wednesday, July 28, 2021, 12:54:42 PM EDT, Robertson, Daniel L. <daniel.l.robertson@illinois.gov> wrote:

Good morning Mr. LaRose,

Our office received a referral from the Illinois Environmental Protection Agency for alleged violations of the Environmental Protection Act and Illinois Pollution Control Board regulations by Midwest Management Midwest d/b/a Sims Metal Management at its Paulina Street, Chicago location. We understand that the company has communicated to Illinois EPA an interest in entering an order to resolve the alleged violations.

Are you representing Sims in this matter? If yes, could you let us know availability for yourself and a company representative for the weeks of August 2 and August 9 to hold an initial conference call? We would plan for us and representatives of Illinois EPA to be in attendance.

Thank you for your assistance, please let us know if you have any questions in the interim.

Regards,

Daniel Robertson

Assistant Attorney General

Environmental Bureau

Illinois Attorney General's Office

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Sims Metal in Pilsen

Cristian Estrada 

Mon 2/28/2022 4:10 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lightfoot:

From what I have heard the City will only meet with the public if there is enough interest about their permit application. Your administration is preaching transparency and yet seems to only be holding a meeting if there is enough squeaky wheels. The people of Pilsen matter. I can assure you that just because Pilsen doesn't get the attention that the SE side gets because of General Iron, there is a great deal of interest about the Sims permit application as well as the continuing environmental problems at Sims. The attached documents show that many people are concerned about the environment in Pilsen, including a UIC professor and they have been trying to get Illinois EPA to regulate Sims more. Unfortunately the people of Pilsen and local environmental groups don't get much attention from the media but if you truly care about transparency and the people of Pilsen, the City needs to have a public meeting to discuss Sims and their continuing environmental problems.

Thank you,

Cristian F. Estrada Ruiz

Shredder permit

Agustin Gonzaga 

Mon 2/28/2022 4:28 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To department of health and doctor arwady

With the recent denial of the permit of the south side the city took a stance for environmental justice even though no health issues were found

Yet in pilsen the operation is violating the clean air act and city of Chicago ordinance. I read and can see they have no pollution system to control emissions. The citizens deserve you to protect the environment and not just make decisions for votes. Deny the permit.

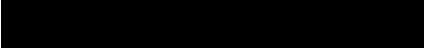
If new state of the art operations don't get to recycle, how can you let this one in Pilsen

It's your job to protect the environment and health if the citizens. How can you reject a new facility and allow one with no safe measures.

Do the right thing.

Sent from my iPhone Agustin

Sims Permit

Mario Fabian 

Mon 2/28/2022 5:23 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Dear Mayor Lightfoot

How can you give them a permit when they are a habitual offender with no pollution control and deny Southside recycling who has all the best pollution control? They are close to schools and grocery stores and bad for Pilsen

Mario Fabián

Sent from my iPhone

SIMS Metal Management Permit

Vanessa Cruz [REDACTED]

Mon 2/28/2022 6:35 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

Hello - I'm reaching out to express my concerns in the renewal of SIMS Metal Managements permit. I have general questions regarding their current shredding operations and want to know how they will fall in line with the new more stringent EPA guidelines.

The City over the last couple of years has shown a great interest in the current scrap recycling companies and I'm curious to know if the rules apply across the board.

I hope that the City takes the time to fully investigate the current establishment and its surrounding entities and takes note of the community all being effected by the hazardous fumes, dust and pollution being blown into the air by SIMs current shredding operation.

The Pilsen Community deserves better than what the City is deeming safe for their neighborhood currently.

Thanks,

[Sent from Yahoo Mail for iPhone](#)

Permit Renewal Application for Metal Management Midwest, Inc. d/b/a Sims Metal Management ("Sims")--COMMENTS

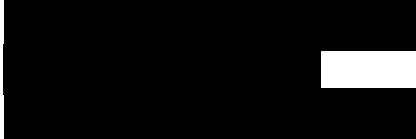
PATRICIA WALTER [REDACTED]

Mon 2/28/2022 7:21 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

To: Chicago Department of Public Health
From: Patricia Walter



Subject: Permit Renewal Application for Metal Management Midwest, Inc. d/b/a Sims Metal Management ("Sims")--COMMENTS

I am a life-long citizen of Chicago and am very concerned about air and water quality for all citizens that reside in or near our wonderful city.

My comments are:

1. Air monitors must be established both around the company, inside the company, and throughout the community.
2. Emissions must follow the rules established by the EPA as [National Emission Standards for Hazardous Air Pollutants \(NESHAP\)](https://www.epa.gov/compliance/national-emission-standards-hazardous-air-pollutants-compliance-monitoring) are stationary source standards for hazardous air pollutants. Hazardous air pollutants (HAPs) are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. See: <https://www.epa.gov/compliance/national-emission-standards-hazardous-air-pollutants-compliance-monitoring>
3. This location of this company at 2500 S. Paulina Steet is in violation of the:

"National Compliance Initiative: Creating Cleaner Air for Communities by Reducing Excess Emissions of Harmful Pollutants"

See: <https://www.epa.gov/enforcement/national-compliance-initiative-creating-cleaner-air-communities-reducing-excess>

4. SIMS Metal has a history of violations, including one with a settlement in Rhode Island in 2020 as: "A company that shreds scrap metal has agreed to pay the **largest fine ever imposed under Rhode Island's air pollution**

rules, Under a legal settlement announced Wednesday, **Sims Metal Management will pay \$875,000** and install pollution control equipment at its facility in Johnston Rhode Island Attorney General Peter Neronha's office says the company didn't get a necessary permit for the metal shredder, and has been operating it without the proper pollution safeguards since 2013."

See: <https://www.insurancejournal.com/news/east/2020/08/14/579151.htm>

5. Reporting must be done immediately after any specific event that would affect nearby public locations, such as the schools. The permit only mentions monthly reports from the air monitoring equipment as:
7. Reporting "Summary reports of the validated data will be provided to the City monthly per Section 4.7.7.9 of the City Rule. Summary reports will be completed within 14 days of the end of the month being reported and submitted to CDPH by email to envwastepermits@cityofchicago.org."
See: Permit Part 4.2, part 7, page 410.

Comment of the application for permit renewal by Sims Metal Management

Tue 3/1/2022 4:31 PM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (38 KB)

Feldman CFPH comment 20220301.pdf;

[Warning: External email]

Dear Staff at the Chicago Department of Public Health,

I submit here my comment of the application for permit renewal by Sims Metal Management. The comment is contained in the attached pdf and is sent below in plain text.

Sincerely,

Barry Feldman

Chicago Department of Public Health

333 S. State Street, Suite 200

Chicago, IL 60604

envcomments@cityofchicago.org

Re: Metal Management Midwest , Inc. (d/b/a Sims Metal Management) permit renewal application

To Whom It May Concern:

As a resident of Chicago who is committed to confronting environmental racism in our city and fostering environmental justice; and as a member of, and as speaking in the name of, Extinction Rebellion Chicago, a citizen organization dedicated to stopping global climate catastrophe; I am eager to provide comments on the Metal Management Midwest, Inc. (d/b/a Sims Metal Management) permit renewal application.

My overriding concern is that there should be no consideration of the renewal of the Sims Metal Management operating permit until the issues brought forward below are properly and completely resolved.

The Sims Metal Management permit renewal application does not provide the public with the minimally necessary information for informed comment on whether it meets applicable rules for the safe operation of recycling facilities. The absence of such information is consistent with a troubling history of obfuscation and bad faith on the part of Sims. This troubling history calls for far greater explanation of their existing and planned operations before any of us can assess whether those plans are consistent with the letter and the spirit of the City's rules and with the rights of the primarily Latinx residents in the neighborhoods affected by the Sims metal shredder's operations to a safe and healthy environment.

Under an administrative consent order resulting from a 2018 U.S. EPA action, Sims is required to obtain a federally enforceable operating permit (FESOP) from the State of Illinois. But Sims submitted data from a Rhode Island facility instead of its Pilsen site in its initial FESOP application in January 2019! Its amended permit in January 2020 presented emissions data from independent testing of the Chicago site that was far higher than the Rhode Island data originally presented. There is reason to suspect that even that amended permit data is unreliable. A May 2021 emissions capture test, requested by the Illinois EPA pursuant to its review of Sims's FESOP application, indicated that more than half of the emissions from the shredder were not being captured at the measurement

point, suggesting that true emissions could be twice as high as reported emissions. For all we know the true emissions level could be even higher.

Data from this same questionable emissions testing were used to build the current permit application's Air Dispersion Model for the Air Quality Impact Assessment required by Chicago's Rules for Large Recyclers. Due to errors in that data, we must expect the modeling analysis itself to be biased toward underestimating emissions. The public is asked to provide comments on Sims's request to continue operations of a metal shredder, but the most we can say given the data we have been presented in the permit application is that we do not know if Sims has been, or can in the future, operate this facility safely. The path that led to this point of uncertainty gives ample cause for heightened scrutiny and I therefore urge the CDPH not to consider the Sims permit renewal application until reliable testing produces accurate emissions data and valid air quality modeling analysis that can be the basis of informed, transparent, meaningful community input into this important decision.

Finally, the City's momentous decision, just last week, to deny an operating permit for the RMG/General Iron metal shredder sets a new standard and framework for permitting of facilities generating toxic emissions. In making that decision, the City considered not just the air but the people who would be breathing it, who have been raising their voices against environmental racism and corporate corruption for years. Residents of Pilsen and Little Village have shouldered the burden of lead contamination from H. Kramer & Co. and BNSF Railway, the infamous dust cloud from the Hilco smokestack implosion, and decades of pollution from coal-fired power plants. Under Chicago's cumulative impact and health equity principles, we cannot demand that they also endure the uncertain contamination from ongoing operations of the Sims facility.

Like RMG/General Iron, Sims Metal Management has not demonstrated that its facility will operate in a manner that prevents public nuisance and protects the public health, though it has been given opportunities in multiple public processes to do so. The guiding principles applied to the Southeast Side apply to Pilsen and Little Village as well: Chicagoans who have been made vulnerable by the concentration of polluting industries in their backyards should not be asked to absorb an unknown cost of further environmental risks from an industry that has failed to take seriously their own responsibility to the communities in which they operate.

Sincerely,

Barry Feldman
in my name and in the name of Extinction Rebellion Chicago

Water is Life
Life is Sacred
Remember the Ancestors
Remember the Victims and Heroes and Martyrs
Honor the Elders
Live for the Children
Love Each Other
Black Lives Must Matter
Brown Lives Must Matter
Red Lives Must Matter
Trans Lives Must Matter
Female Lives Must Matter
Poor Peoples' Lives Must Matter
All Lives Must Matter in order to
Stop Lines 3 and 5 and to
Stop the whole Death Machine

www.caarpr.org

www.honorearth.org

www.stopline3.org

www.northsidefriends.org

www.extinctionrebellion.us

March 1, 2022

Chicago Department of Public Health

333 S. State Street, Suite 200

Chicago, IL 60604

envcomments@cityofchicago.org

Re: Metal Management Midwest , Inc. (d/b/a Sims Metal Management) permit renewal application

To Whom It May Concern:

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The public is asked to provide comments on Sims's request to continue operations of a metal shredder, but the most we can say given the data we have been presented in the permit application is that we do

not know if Sims has been, or can in the future, operate this facility safely. The path that led to this point of uncertainty gives ample cause for heightened scrutiny and I therefore urge the CDPH not to consider the Sims permit renewal application until reliable testing produces accurate emissions data and valid air quality modeling analysis that can be the basis of informed, transparent, meaningful community input into this important decision.

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Sincerely,

Barry Feldman

in my name and in the name of Extinction Rebellion Chicago

Deny Sims the Permit

MADOLYN M TRANT 

Wed 3/2/2022 12:58 PM

To: envcomments <envcomments@cityofchicago.org>

[Warning: External email]

I understand that Sims received numerous tickets from the Public Health Department, and paid an \$18,000 fine to settle the matter, yet residents of Pilsen and department of health inspectors are still observing the same environmental issues including noxious odors and auto fluff blowing off site. I also understand that Sims has received many violations from Illinois EPA and USEPA (and paid significant penalties) and Sims is currently being sued by the Illinois Attorney General. Perhaps the City needs to be reminded that the people of Pilsen are already living in a highly burdened area from an environmental perspective and most of Pilsen, including a large high school, happen to be only a few blocks downwind from Sims and the pollution they continually put out from their operation. By allowing Sims to continue operating, the City is showing that the principals of environmental justice only apply to those groups with the wealthiest residents (Lincoln Park) or the loudest backers (SE Side of Chicago). Allowing Sims to continue operating in Pilsen is a true example of environmental racism. Sims should be shut down and their permit should be denied!