

## SIMS METAL MANAGEMENT

RAUL MORENO JR < >

Tue 11/1/2022 9:57 AM

To: envcomments <envcomments@cityofchicago.org>

📎 1 attachments (488 KB)

Sims fluff pictures.pdf;

[Warning: External email]

Dear Commissioner Arwady:

As you are well aware, Sims is currently operating a Large Recycling Facility (as defined by CDPH), without a permit to operate such a facility. You are also well aware that Sims' previous permit (a Class IVB Recycling Facility Permit) expired last November, almost a year ago. Yet, according to the City's online portal system, Sims hasn't been inspected by CDPH since September 2, nearly 2 months ago.

How can a facility with such a horrendous compliance history, a facility that is currently being sued by the Illinois Attorney General and a facility that also received numerous CDPH violation notices for allowing shredder fluff to migrate off site, continue operating without a valid permit and with such little ongoing oversight from CDPH? And how can CDPH inspectors continue to ignore the shredder fluff that is constantly blowing off site from Sims?

A review of CDPH inspection reports prior to September 2 indicates that Sims was inspected more than 10 times between March 24 and September 2. It was during the March 24 inspection that the CDPH inspector wrote "auto fluff was observed at the parking lot at the 2356 S. Ashland Avenue (Grainger)". Since the March 24 inspection, there hasn't been a single instance of off site shredder fluff being noted by a CDPH inspector. It defies logic that CDPH inspectors could have failed to notice offsite shredder fluff from Sims for over 7 months .

Nearly all of the CDPH inspections since March 24 indicate that the inspector was investigating dust or debris from Sims. For example, the September 2 inspection report states that the inspector "canvassed for dust and debris emissions from the site". But anyone that lives or works in the area around Sims knows that shredder fluff can easily be found throughout the neighborhood on any given day, without the need to investigate or "canvas" the area. In fact, a random visit last week to the same Grainger property referenced in the March 24 inspection report immediately revealed the presence of shredder fluff throughout the Grainger parking lot. Attached are pictures of shredder fluff that could easily be seen on Grainger's property, as well as other properties around Sims.

The lack of enforcement of Sims by CDPH has created the impression that you and/or your inspectors have decided, for whatever reason, to look the other way regarding ongoing environmental violations at Sims. If CDPH is going to allow a facility without a permit and without any pollution controls on its shredder to continue operating in an Environmental Justice area, while at the same time continuing to delay the permitting process for Sims, the people of Pilsen at least deserve to have CDPH enforce their own rules and regulations.

Thank You,

Raul Moreno JR

















*As of October 14, 2022, comments regarding Metal Management began being collected using an electronic form. Responses are displayed below. Comments via envcomments@cityofchicago.org ended on November 1, 2022. All comments moving forward are being collected online here: <https://www.surveymonkey.com/r/SIMSPublicComments>*

Date Comment Received	Comment
2022-10-25 12:40:30	When does CDPH plan to issue a deficiency letter or request for additional information to Sims? It's been almost a year since Sims submitted a Large Recycling Facility permit application to CDPH. It is inconceivable that CDPH could deem that application as sufficient and complete.
2022-10-25 09:15:55	1) What is the status of CDPH's review of the Sims LRF application? 2) Why has no information been shared with the public since the Sims LRF application was submitted almost a year ago? 3) Why were the Guidelines changed in July 2022, well after Sims submitted the LRF application?
2022-10-17 12:18:55	Why bother with this comment and fake involvement. You will do another study and make a political decision to deny because while CDPH may state follow the science it does not matter. Just deny and dont waste no ones time.