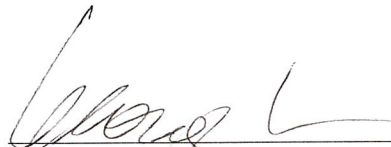


**METAL MANAGEMENT MIDWEST, INC.**  
**2500 S. Paulina Street, Chicago, IL 60608**

**SUPPLEMENT TO  
LARGE FACILITY RECYCLING PERMIT APPLICATION**

**AUGUST 2024**



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George Malamis  
Director of Operations

## INTRODUCTION AND SUMMARY

On July 19, 2024, the City of Chicago Department of Public Health issued a Deficiency Letter regarding several sections of Metal Management Midwest, Inc.'s (MMMI) application for a Large Facility Recycling Permit for its facility at 2500 S. Paulina, Chicago, Illinois. A copy of the Deficiency Letter is attached as **Exhibit 1**.

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The Deficiency Letter addresses the following areas of the permit application:

1. Pursuant to Section 3.7 of the Rules for Large Recycling Facilities (“LRF Rules”), provide documentation evidencing the payment of real estate property taxes by providing copies of the most recent tax bill and check; or by providing a copy of the most recent tax bill that has been stamped paid by the Cook County Treasurer’s office, or payment receipts issued by said office, for the years 2023.
2. Pursuant to Section 3 of the LRF Rules, provide documentation submitted to other regulatory agencies, such as the IEPA and USEPA. This includes all relevant information and any stipulated requirements for the Permittee to develop and implement a control system designed to achieve an immediate and substantial reduction in uncontrolled emissions as required in *People of the State of Illinois, ex rel. Kwame Raoul v. Metal Management Midwest, Inc.*
3. Related to the request for continuance of the waiver requested for the Section 3.9 Noise Impact Assessment, to allow operations outside of the operating hours specified in Section 8.0 of the Recycling Facility Rules, provide a noise monitoring plan to continuously record sound pressure levels at the Facility and to collect the data required in 4.6.1 of the LRF Rules.

4. Pursuant to Section 3.10.9 of the LRF Rules, provide the waste characterization profile of the shredder fluff currently generated at the Facility. Describe any treatment that may be necessary to render the shredder fluff a non-hazardous waste prior to its shipment offsite.
5. Pursuant to 11-4-2530(I), provide an odor control plan that addresses the potential odors at the Facility. Such plan shall include, but may not be limited to, the following:
  - a. An inventory of odor-emitting activities.
  - b. The location, time, and duration of each odor-emitting activity.
  - c. An odor mitigation plan that includes specific administrative and/or engineering controls and best management practices for each odor-emitting activity.
  - d. Routine odor inspections around the Facility and nearby Sensitive Areas (as that term is used in the LRF Rules); and
  - e. Protocols for investigating odors discovered during routine inspections or as reported in an odor complaint.

Attached are Supplements 1 through 5, addressing each area in the Deficiency Letter.

**1. SUPPLEMENT PURSUANT TO  
§ 3.7 OF THE RULES FOR  
LARGE RECYCLING FACILITIES**

**Evidence of Payment of Real Estate Taxes for 2023**

**August 2024**

1. Pursuant to Section 3.7 of the Rules for Large Recycling Facilities (“LRF Rules”), provide documentation evidencing the payment of real estate property taxes by providing copies of the most recent tax bill and check; or by providing a copy of the most recent tax bill that has been stamped paid by the Cook County Treasurer’s office, or payment receipts issued by said office, for the years 2023.

Attached are documents providing proof of payment of the real estate taxes for all tax parcels at the MMMI facility located at 2500 S. Paulina, Chicago, Illinois.

The attachment includes copies of the 2023 First Installment Property Tax Bills for the following PINs and proof of timely payment for all:

<u>Property Index Number (PIN)</u>	<u>Amount</u>	<u>Date of Payment</u>
17-30-210-039-0000	\$4,976.05	2/8/2024
17-30-210-009-0000	\$12,594.33	2/8/2024
17-30-210-019-0000	\$1,711.25	2/8/2024
17-30-210-010-0000	\$8,653.96	2/8/2024
17-30-210-033-0000	\$12,008.25	2/8/2024
17-30-210-035-0000	\$49,734.95	2/8/2024
17-30-210-045-0000	\$20,085.97	2/8/2024
17-30-210-034-0000	\$28,394.69	2/8/2024
17-30-210-047-0000	\$20,528.73	2/8/2024
17-30-210-032-0000	\$23,323.95	2/8/2024
17-30-400-003-0000	\$12,482.59	2/8/2024

**2. SUPPLEMENT PURSUANT TO  
§ 3 OF THE RULES FOR  
LARGE RECYCLING FACILITIES**

**DOCUMENTS SUBMITTED TO  
REGULATORY AGENCIES:**

**IEPA, USEPA, ILLINOIS ATTORNEY GENERAL'S OFFICE**

**August 2024**

2. Pursuant to Section 3 of the LRF Rules, provide documentation submitted to other regulatory agencies, such as the IEPA and USEPA. This includes all relevant information and any stipulated requirements for the Permittee to develop and implement a control system designed to achieve an immediate and substantial reduction in uncontrolled emissions as required in *People of the State of Illinois, ex rel. Kwame Raoul v. Metal Management Midwest, Inc.*

Attached are correspondences/documentation/filings from MMMI and/or its attorneys and consultants to:

- IEPA (from January 17, 2019 (FESOP application) to present)
- USEPA (April 21, 2022 USEPA Request for Information and submittals to present)
- Illinois Attorney General's Office (Agreed Preliminary Injunction Order entered October 20, 2021 and correspondence from November 22, 2022 to present)

**3. SUPPLEMENT PURSUANT TO  
§ 3.9 OF THE RULES FOR  
LARGE RECYCLING FACILITIES  
REGARDING NOISE IMPACT ASSESSMENT**

**August 2024**



3. Related to the request for continuance of the waiver requested for the Section 3.9 Noise Impact Assessment, to allow operations outside of the operating hours specified in Section 8.0 of the Recycling Facility Rules, provide a noise monitoring plan to continuously record sound pressure levels at the Facility and to collect the data required in 4.6.1 of the LRF Rules.

Attached is the Noise Impact Assessment and Noise Monitoring Plan.

**4. SUPPLEMENT PURSUANT TO  
§ 3.10.9 OF THE RULES FOR  
LARGE RECYCLING FACILITIES**

**WASTE PROFILE FOR ASR**

**August 2024**

4. Pursuant to Section 3.10.9 of the LRF Rules, provide the waste characterization profile of the shredder fluff currently generated at the Facility. Describe any treatment that may be necessary to render the shredder fluff a non-hazardous waste prior to its shipment offsite.

Attached are:

1. Waste Profile and analytical results for October 2023 (Attachment A);
2. Waste Profile Update and Analytical Reports for June – July 2024 (Attachment B).

The ASR generated at the Main Yard is sampled and analyzed quarterly for PCB, TCLP metals, and hazardous waste characteristic testing. All sampling and analysis conducted confirms that the material is non-hazardous. Therefore, no treatment is required to make it non-hazardous.

The material is stored in a covered permanent concrete bunker near the MRP. It is loaded into dump trailers, covered, and shipped as Illinois Special Waste under uniform manifest to regional special waste landfills.

**5. SUPPLEMENT PURSUANT TO  
CITY OF CHICAGO  
ORDINANCE 11-4-2530(I)**

**ODOR CONTROL PLAN**

**August 2024**

5. Pursuant to 11-4-2530(I), provide an odor control plan that addresses the potential odors at the Facility. Such plan shall include, but may not be limited to, the following:
  - a. An inventory of odor-emitting activities.
  - b. The location, time, and duration of each odor-emitting activity.
  - c. An odor mitigation plan that includes specific administrative and/or engineering controls and best management practices for each odor-emitting activity.
  - d. Routine odor inspections around the Facility and nearby Sensitive Areas (as that term is used in the LRF Rules); and
  - e. Protocols for investigating odors discovered during routine inspections or as reported in an odor complaint.

Attached is the Odor Control Plan pursuant to City of Chicago Code § 11-4-2530(I).

