



CITY OF CHICAGO



CHICAGO DEPARTMENT OF PUBLIC HEALTH

December 16, 2024.

ISSUED BY EMAIL

Ms. Deborah Hays
Metal Management Midwest Inc.
2500 S. Paulina
Chicago, Illinois 60608

**Subject: City of Chicago Class IVB / Large Recycling Facility Permit (ENVREC104577)
Metal Management Midwest, Inc. – 2500 S. Paulina St.
Effective date: November 16, 2021, to November 15, 2024.**

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 /Large Recycling Facility located within the corporate limits of the City of Chicago at 2500 S. Paulina St. (“the Facility”).

Please carefully review all the conditions outlined in this permit. Incorporated into this permit by reference are the following: 1) the Large Recycling Application/Renewal request in November 2021, and 2) all other supplemental information submitted as part of this application including drawings, sheets, and specifications, including Permittee’s August 13, 2024, response to CDPH’s July 19, 2024, deficiency letter (“Permittee’s Application Materials”). In the event of a conflict with the Permittee’s Application Materials 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”); Article XX. Recycling Facility Permits Rules and Regulations (“Rules”); and the Large Recycling Facility Rules, issued June 5, 2020 (“LRF Rules”) (collectively “Chicago LRF Law”), as amended from time to time. The Permittee shall also fully comply with the Standard Conditions stated in Attachment A and the Special Conditions stated in Attachment B of this permit. In the event of any conflict between Chicago LRF Law and the Standard Conditions and Special Conditions of this permit, Chicago LRF Law shall apply.

This permit allows for the operation of the Facility from **November 16, 2021, to November 15, 2024; operations after November 15, 2024, are subject to Section 7.0 of the Rules.** If you have any questions concerning this permit, please contact me at **Abraham.Bradshaw@cityofchicago.org**

Sincerely,

Abraham Bradshaw
Environmental Engineer III

Cc. Dave Graham, Director of EHSC, Chicago Department of Public Health
Donavan Tietje, Director of Environmental Inspections, Chicago Department of Public Health

ATTACHMENT A STANDARD CONDITIONS

1. The Permittee shall comply with all applicable local, Illinois, and federal statutes, regulations, and standards (collectively, “Laws”) regarding the construction, operation, maintenance, and closure of the Facility, including but not limited to those Laws concerning noise, vibrations, and particulate emissions, including as Laws may be amended over time and those amendments are effective for the Facility during the period of this permit. To the extent Laws are amended or repealed which make any requirement for the Facility less stringent, the amendments or repeal shall be considered a proposed change to the permit, requiring advance notice to and approval by CDPH, as set forth below. Unless otherwise specified, all terms defined in the Ordinance, or any rules or regulations applicable to recycling facilities shall define the terms used in this permit.
2. Construction, operation, maintenance, and closure of the Facility shall be in accordance with all Laws; Permittee’s Application Materials; and the permit’s Standard Conditions and the Special Conditions.
3. Any proposed changes, modifications, or additions to the Facility’s permit or the approved plans and documentation, including the amendment or repeal of any of the Laws making requirements for the Facility less stringent, shall be submitted, in advance, to CDPH for review and CDPH must issue its approval before such changes, modifications, or additions may be implemented. Such a request shall be made by writing to CDPH via email to EnvWastePermits@cityofchicago.org.
4. All information provided in the Permittee’s Application Materials must be kept current. Any change in the required information shall be reported to CDPH no later than ten business days after such a change has occurred via email to EnvWastePermits@cityofchicago.org.
5. Issuance of this permit shall not transfer, assign, or otherwise affect any liability to the City of Chicago, including but not limited to CDPH, any City of Chicago employee, or agents of the City of Chicago as a result of the operation, maintenance, or closure of the Facility.
6. Issuance of this permit does not relieve the Permittee of any liability with respect to any person, legal entity, or government with regard to the Facility.
7. CDPH and its authorized representatives may enter and inspect the Facility, including but not limited to observe the Facility in person or otherwise, copy and require copies of Facility records, require the production of information, take photographs or videos, conduct interviews of Facility personnel, and obtain samples and physical objects as needed (collectively, “Inspection Activities”), without advance notice and at any reasonable time, including but not limited to time during which the Facility is operating, in order to ensure compliance with this permit and all Laws, including inspecting all conditions necessary to protect the public health, safety, and the environment. CDPH and its authorized representatives will conduct Inspection Activities in accordance with CDPH health and safety procedures and will follow the Permittee's reasonable Site safety protocols, to the extent the Permittee's protocols do not hinder or unduly delay the inspection.
8. CDPH may revoke this permit on the basis of any of the grounds set forth in Chicago LRF Law.
9. The Permittee shall immediately notify 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 Laws 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.

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10. The Permittee shall immediately provide CDPH with copies of all correspondence and documents submitted to or received from the Illinois Environmental Protection Agency (“IEPA”) and the U.S. Environmental Protection Agency (“EPA”) pertaining to the Facility, including, but not limited to notices of violation, letters, permit applications, reports, emission test results, groundwater monitoring reports, and annual reports (collectively, “State/Federal Records”). Any notices of violation must be provided to CDPH within two business days of receipt; all other State/Federal Records must be provided within no more than five business days or earlier upon request by CDPH. For publicly available documents, the Permittee may comply with this Standard Condition by directing CDPH to the location where those documents are available online.

11. 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 / Large Recycling Facility located at **2500 S. Paulina St.:**

OPERATING HOURS

1. The Permittee should operate from 5:00 a.m. to 10:00 p.m. Monday through Friday, and from 5:00 a.m. to 5 p.m. on Saturdays and Sundays. CDPH reserves the right to amend the Permittee's operating hours and days of operation if the facility operation causes a nuisance to neighborhood uses.
2. Pursuant to Section 8.0 of the Rules and Section 4.2 of the LRF Rules, the Commissioner hereby renews the previously issued written waiver allowing the Facility to operate up to twenty-four hours per day as needed to prevent excessive stockpiles. The previously issued waiver is continued subject to the following conditions:
3. On any day that this waiver is used to operate other than the hours in Special Condition No. 1, the Permittee shall send a report to CDPH within 24 hours. This report must include a detailed explanation of why the waiver must be relied upon, the amount of material received during the waiver period, and the amount of material Processed during the waiver period.
 - a. This waiver should not be used to extend operating hours on more than two consecutive days and should not become regular practice at the facility.
4. CDPH reserves the right to cancel this waiver if the Permittee does not comply with Special Condition No. 2 and/or the Facility's operation causes a nuisance to neighborhood uses.

MATERIAL HANDLING

5. The Facility is permitted to accept and handle the following Type A and Type C Recyclable Materials: ferrous metal scrap; non-ferrous metal scrap; batteries; propane tanks/cylinder tanks; 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 whose contents cannot be verified without opening, Municipal 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 Materials. 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-fed area for Unauthorized Materials.

6. When transporting material to and from the Facility, the material shall fit entirely within the truck or trailer. Additionally, any truck or trailer attempting to enter the Facility shall have its tailgates in place, and the load must be covered with a tarp sufficient to control dust or loss of material. All loads containing Auto Shredder Residue ("ASR") must be tarped or covered to prevent fugitive dust or ASR fiber from escaping. The Permittee shall prevent any fluids or material from spilling into areas outside of the Facility.
7. The Permittee shall handle all Unauthorized Materials inadvertently admitted into the Facility as follows:
 - a) The Permittee shall separately containerize Special Waste, including Hazardous Waste, non-hazardous Special Waste, and PCB-contaminated Waste, and arrange for the immediate

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removal of such Waste by a Waste hauler authorized to accept such Wastes for transport to a disposal facility that has obtained all necessary authorization under the Laws.

- 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 CDPH.
 - c) The Permittee shall isolate all Municipal 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”).
 - 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.
8. The Permittee may accept regulated or prohibited Recyclable Materials, as defined in Chicago LRF Law, in compliance with Laws, including specifically, under the following conditions:
- a) The regulated or prohibited material is consistent with the types of Recyclable Materials authorized under Special Condition No. 5;
 - 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 Rules.
 - d) The Permittee complies with the documentation requirements set forth in Sections 4.16 and 4.17 of the LRF Rules.

Any prohibited material received in a retail transaction (as that term is defined in 11-4-2625(a) of the Ordinance) shall not be shredded, dismantled, or be removed from the Facility for a period of three business days after the date the material was accepted by the Permittee. Prohibited materials include, and are not limited to, any material of the type typically owned or maintained by a governmental entity such as:

- a. Stop signs and other street signs.
 - b. Utility hole covers, including sewer lids, “manhole cover” and grates.
 - c. Fire hydrant parts, including caps and nozzles.
 - d. Water meters, and parts of water meters including meter lids.
 - e. Gas meters, and parts of gas meters.
 - f. Electric meters and parts of electric meters.
 - g. Exterior telephone wires.
 - h. Transformers.
 - i. Metal streetlamp posts, signposts, and flag poles; and
 - j. City streetlights, including viaduct lights.
9. The Facility may receive and Process no more than 3,000 tons per day of recyclable materials as specified in Special Condition No. 5. If the Permittee desires additional capacity to receive or Process, the Permittee must submit a revised application to CDPH for approval. A revised application must demonstrate that the Facility adequately handles the currently permitted volumes and is sufficiently sized and staffed to accept, store, and Process the desired quantity of material in compliance with all

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Laws. Notwithstanding the first sentence of this Special Condition No. 7, the Permittee must not exceed any lower limit on receipt or Processing quantities imposed by the IEPA and/or EPA on end-of-life-vehicles (“ELVs”) or on any other recyclable metallic materials fed into and Processed by the metal shredder.

10. The Permittee is authorized to operate processing equipment and air pollution control devices as listed in its CDPH air permit (No. ENVAIR113106).
11. 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, forklifts, and cranes. The Permittee is also authorized to operate the equipment and Process areas listed in Table One.

Table One

Equipment and Process Area Description	Number of Items
SHEAR	1
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

USED VEHICLES

12. The Permittee shall not Process any ELV that has not been depolluted. For purposes of this requirement, depollution shall mean the:
 - a) Removal or neutralization of potentially explosive items that could damage Facility Process, environmental control, or other equipment or injure a person.
 - b) Removal of fluids from the engine, fuel tank, transmission, radiator, differential, window washing fluid tank, heater core, and all lines and hoses.
13. Removal of mercury switches and components that may contain mercury.
14. The Permittee shall take steps to have all ELVs drained of all fluids before receipt by the Facility. The Permittee is responsible for ensuring that all fluids are drained from the ELV upon receipt of the ELV by the Facility. If an ELV is not drained of all fluids before receipt, the Permittee should thoroughly drain and separately collect all fluids from incoming used vehicles as soon as possible, including but not limited to 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 all Laws.

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TIRES

15. 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; all tires shall be dated and protected from rain. No water accumulation is allowed inside the tires. If the Facility has 100 or more tires onsite at any one time, the Facility shall comply with the requirements for tire facilities stated in Section 4-228-305(a)(1) and (2) of the Municipal Code of Chicago; to be clear, the exceptions stated in Section 4-228-305(b) do not apply to this Recycling Facility.

REFRIGERANTS

16. To ensure compliance with EPA regulations and prevent the release of refrigerants into the atmosphere, this condition outlines the procedures and requirements for managing refrigerants recovered from End-of-Life Vehicles (ELVs) or other sources during the recycling process, the Permittee shall comply with the following:

13.1. Verification of Refrigerant Evacuation:

13.1.1. Pre-Processing Verification:

Prior to shredding or dismantling, the Facility must verify that all refrigerants have been properly evacuated from ELVs or other components containing refrigerants (e.g., air conditioning systems). This verification must be conducted by a certified technician in compliance with 40 CFR Part 82, Subpart F ("Protection of Stratospheric Ozone: Recycling and Emissions Reduction").

13.1.2 Documentation:

The Facility must maintain records verifying that refrigerants were evacuated prior to arrival. Documentation should include:

- Source of the vehicle/component.
- Certification from the entity performing the evacuation.
- Volume and type of refrigerant evacuated.

13.1.3. Inspection Procedures:

If documentation is incomplete or unavailable, the Facility must inspect the component to determine if refrigerants remain. This inspection must include:

- Visual examination of system connections.
- Use of EPA-approved leak detection equipment to identify the presence of refrigerants.

13.2. On-Site Evaluation and Evacuation

13.2.1. Handling of Components Containing Refrigerants:

- If refrigerants are determined to be present upon arrival, the Facility must:
 - Segregate the components containing refrigerants.
 - Use EPA-certified recovery equipment to safely evacuate refrigerants in accordance with 40 CFR § 82.158.

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13.2.2. Certification Requirements:

- Evacuation must be performed by personnel certified under 40 CFR § 82.161 to handle refrigerants.
- The recovered refrigerants must be properly stored in labeled, EPA-approved containers for recycling or disposal.

13.2.3. Volume Measurement and Reporting:

- The volume of refrigerants evacuated on-site must be measured and recorded. Records must include:
 - Type of refrigerant.
 - Volume evacuated.
 - Final disposition (e.g., recycled or sent for disposal).

13.3. Management of Non-Evacuated Systems.

13.3.1. Refrigerants Discovered During Processing:

17. If refrigerants are discovered during processing (e.g., shredding or dismantling), operations must immediately cease, and the following steps must be taken:
18. Isolate the refrigerant-containing component.
 - Evacuate the refrigerant using certified equipment and personnel as outlined in Section 13.2.1

13.3.2. Incident Reporting:

- Any discovery of non-evacuated refrigerants during processing must be reported to the facility manager and documented. The report must include:
 - Description of the incident.
 - Corrective actions taken.
 - Volume and type of refrigerant recovered.
19. The Permittee shall not accept any appliance or item that previously has been evacuated of CFCs without the proper documentation in Special Condition No. 13 above.

BATTERIES

20. The Permittee shall manage all batteries, mercury-containing devices, and other universal waste received at the Facility in accordance with 35 Illinois Administrative Code (“IAC”) Part 733 – Standards for Universal Waste Management.
21. The Permittee shall properly dispose of or recycle all batteries offsite within one calendar year of their receipt at the Facility.
22. All batteries, except lithium ion batteries, shall be stored inside a building, isolated from sources of heat, spark, and open flame, and isolated from incompatible materials. Lithium ion batteries can be stored outside of an enclosed building but must be stored within a structure, isolated from sources of heat, spark, open flame, and incompatible materials, including water, and made safe from all-weather impacts.

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23. The Permittee shall store all types of 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.
24. 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.
25. The Permittee shall store vehicle 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. 35.
 - 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.
26. 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 and labeled appropriately.
 - b. Spilled acids shall be neutralized with an appropriate base solution, and disposed of properly.

MERCURY SWITCHES AND SENSORS

27. 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 rules on <https://epa.illinois.gov/topics/forms/air-permits/mercury-rules.html>); the End-of-Life Vehicle Solutions (ELVS) website https://elvsolutions.org/?page_id=319%22; or pertinent auto manuals.
28. 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 ("mercury switch bucket"). 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.
29. The Permittee shall send the mercury switch bucket, whether full or not, to a properly permitted recycler off site 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.
30. The Permittee shall maintain mercury spill kits at areas of the Facility where mercury leaks and spills can occur.

MATERIAL STORAGE

31. 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.
32. The Permittee shall maintain a minimum aisle width of 36 inches, or wider to accommodate workers,

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equipment, cleaning, and emergency response.

33. 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.
34. 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.
35. 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.
36. The Permittee shall store newsprint, paper, corrugated paper and cardboard in closed containers.
37. 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 materials other than that specified on the receptacle.
38. 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.
39. 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 20 feet in height as shown by a pile height marker, The Facility shall maintain height markers up to 30 feet, with gradations marked at one-foot intervals, at all outdoor stockpile locations to indicate the current height of material stockpiles, 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. CDPH reserves the right to further limit the footprint and height of Facility stockpiles if the above authorized areas and height limits contribute to offsite visible fugitive dust migration or otherwise causes a public nuisance.
40. 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.
41. The Permittee shall not allow the discharge of storm water or wastewater into the waterway without and in accordance with a valid National Pollutant Discharge and Elimination System (NPDES) permit issued by IEPA.
42. The Permittee shall remove for offsite disposal Post-Processed ASR stored in the ASR storage shed when the capacity of the shed is reached. The Permittee shall empty the shed before conducting any operation requiring ASR storage. The Facility shall document the date and time of day when the ASR storage shed reaches capacity; such documentation shall be kept at the Facility and available for inspection by and copies for CDPH upon request.
43. The Permittee shall collect waste characterization samples of Post-Processed ASR bound for disposal, directly from the ASR storage shed, unless otherwise required by the disposal facility. In such situations, the Applicant must submit to CDPH written correspondence from the disposal company stating an alternate method must be used and fully describing the alternate method to be used.
44. 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 products or raw material in the manufacturing of new, reused or reconstituted products. All the storage materials recycled shall be dated.
45. The Permittee shall store all Waste materials in such a way as to ensure adequate site safety. Flammable

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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 away from each other.

46. 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 Chicago, state, and federal requirements; and
 - e. Are provided with secondary containment complying with all Chicago, state, and federal requirements.

SITE REQUIREMENTS

47. The Facility shall be entirely surrounded by a solid fence, with a minimum of eight feet in height that obscures 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.
48. The Permittee shall adequately pave and maintain all material handling areas, driveways, and access/haul roads to prevent migration of contaminants offsite. The acceptable paving material shall include, but not be limited to, asphalt, concrete or gravel. CDPH reserves the right to require any additional or alternate paving as deemed necessary by CDPH.
49. 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

50. 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. In addition, Facility pavements subject to vehicle traffic shall be swept so that no more than four hours elapses between each sweeping unless such pavements are free and clear of any material transported to or from the Facility or emitted by Facility operations. If the Permittee cannot sweep because of an emergency or inclement weather (i.e., pavements are inaccessible due to snow cover), the Permittee shall note such reasons in the sweeping log.
51. The Permittee shall always make a water source available for purposes of Facility cleaning, dust control, and fire safety.
52. The Permittee shall not allow any visible fugitive dust to travel beyond the boundaries of the Facility. The Permittee shall control and suppress dust and other air-borne materials created by Facility activities so that the offsite 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

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- c. Enclosing and containerizing materials that are susceptible to becoming wind-borne.
53. The Permittee shall conduct once-daily observations of Fugitive Dust around all sides of the Facility when there has been less than 0.1 inches of precipitation within the previous 24 hours.
54. The Permittee shall not cause or allow the emission of any fugitive dust within the Facility at any material pile, transfer point, roadway or parking area that, for a period or periods aggregating more than three minutes in any one hour, exceeds an opacity of 10% based on a visual reading in accordance with the measurement method specified in 35 IAC 212.109.
55. Quarterly testing shall be conducted to ensure compliance with the opacity limit set forth in 4.7.4 of the LRF Rules. Such testing must be conducted by a professional trained and certified to read opacity in accordance with the measurement method specified in 35 IAC Part 212.109. Opacity readings should be taken under the representative weather and operating conditions.
56. The Permittee is not authorized to use water from the Chicago Area Waterway System, unless such use is consistent with Laws.
57. The Permittee shall promptly (within 48 hours) repair damaged or broken pavements to sustain their integrity, prevent standing water, and minimize the generation of dust and mud. The Permittee shall promptly (within 24 hours) fill all potholes and depressions at the Facility with aggregate or suitable filling material. Potholes occurring in graveled surfaces shall be backfilled with CA-6 aggregate, and potholes occurring in concrete or hot mix asphalt (“HMA”) pavements shall be patched using suitable methods and properly repaired. If the Permittee requires more time, the Permittee shall close the area for any use until the problem is resolved and notify CDPH within the above-prescribed timelines, with a valid justification and a proposed plan and date for completion of the repair, subject to CDPH approval
58. At least semi-annually from the date of this permit, the Permittee shall perform a complete washdown of all equipment and paved areas at the Facility. Such washdown shall consist of power washing or scrubbing surfaces clean, followed by a thorough, sweeping of all paved areas using a PM-10-efficient mechanical sweeper certified by the California South Coast Air Quality Management District (“SCAQMD”) under its Rule 1186 or Canada’s Environmental Technology Verification Program.
59. The Permittee shall install and maintain filter inserts in all Facility catch basins and storm water inlets to keep sediments, oily liquids, and floatable from discharging into the City of Chicago sewer system.
60. The Permittee shall promptly contain and clean up spilled or leaked fluids within 30 minutes. 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, including but not limited to all loading and unloading areas, storage area, and vehicle maintenance areas. Such kits shall be fully stocked with appropriate materials such as socks, brooms, adsorbent material, and proper personal protective equipment.
61. The Permittee shall routinely remove oil and grease stains from Facility pavements, walls, and equipment by steam cleaning, pressure washing, or scrubbing these surfaces clean. Such cleaning shall be conducted at least once per week and as needed.
62. The Permittee shall place any 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.
63. The Permittee shall inspect and clean all Facility catch basins in order to remove all dust and debris that could impede stormwater drainage or cause standing water to occur. The Permittee shall not locate material piles over any stormwater inlet unless the Permittee provides alternate means of drainage as necessary and ensures that piled material will not fall in the inlet opening and cause sedimentation or blockage in the detention pond or stormwater system.

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64. 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.
65. The Facility's personnel shall patrol properties, including sidewalks, parkways, and public and private areas, within 660 feet of the Facility for Waste, including ASR Fibers, at least once per week. During the patrols, the Permittee shall immediately remove and dispose of any Waste, including ASR Fibers, that is observed at any affected off-Facility areas, including from private property with the owner's permission. In the event ASR Fibers are found, the Permittee shall extend the above patrol by 660 feet and do any necessary cleanup.-The Permittee shall extend the patrol and do any necessary cleanup until no more ASR Fibers are observed.
66. The Permittee shall follow applicable requirements in 35 IAC Part 722 regarding standards applicable to generators of Hazardous Waste such as, but not limited to, spilled battery acids, mercury-containing Waste, and spent oils or chemicals.
67. The Permittee shall conduct daily screening for odors in accordance with the Facility's Odor Control Plan, which was submitted as part of the Permittee's Application Materials.
68. CDPH may require the Permittee to conduct air sampling and monitoring for VOCs if CDPH attributes offsite odors to the Facility. Such monitoring and sampling may be required even when detected odors do not exceed 35 IAC Part 245 levels. Air monitoring shall be conducted using instruments capable of detecting VOCs in the parts-per-billion range; air sampling shall be performed using EPA TO-15 method, or other methods approved by CDPH.
69. Battery Storage Inspection and Logging Requirements:
 - a. The Permittee shall conduct inspections of all battery storage areas at least twice per week. These inspections are to identify potential safety, environmental, or operational concerns, including but not limited to leaks, corrosion, physical damage, improper storage, or other signs of deterioration.
 - b. A comprehensive log shall be maintained for each inspection, documenting the following:
 1. Date and time of the inspection.
 2. Name of the individual conducting the inspection.
 3. Condition of the batteries and storage area.
 4. Any issues identified, including environmental risks or hazards.
 5. Recommended improvements or corrective actions.
 6. Confirmation of completed corrective actions, including the date of completion and the individual responsible.
 - c. The log shall be readily available for review by regulatory agencies upon request and retained for a minimum of three (3) years.

CONSEQUENTIAL FACILITY AIR MONITORING AND NOTIFICATION

70. The Permittee shall install, operate, and maintain a weather station and continuous PM₁₀ monitors in accordance with the Facility's Dust Monitoring Plan, which was submitted as part of the Permittee's Application Materials.
71. The fifteen-minute Reportable Action Level ("RAL") for the Facility is 150 ug/m³. The Permittee shall perform all investigative, mitigative, and record-keeping actions as described in the contingency plan as part of the Facility's Dust Monitoring Plan and in compliance with the LRF Rules.

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72. CDPH reserves the right to require amendments to the RAL and to the Dust Monitoring Plan at any time if CDPH finds either to be ineffective, unreliable, or insufficient.
73. The Permittee shall notify CDPH within 15 minutes of an RAL episode. Such notification shall be sent by email to envwastepermits@cityofchicago.org with the following subject line: "RAL Alert Condition – ENVREC104577" and shall include the following information in the main body of the email:
 - a) The date and time of the RAL exceedance.
 - b) The average wind speed and wind direction recorded over a 15-minute period.
 - c) The concentrations of PM₁₀ recorded by all monitors over the same 15-minute period; and
74. The latitude and longitude coordinates in decimal degrees of all monitoring locations.
75. Within 24 hours of an RAL episode, the Permittee shall record the following information in the Operating Record:
 - a) The date and time of the exceedance.
 - b) The recorded wind speed and PM₁₀ concentration(s) at the time of the RAL.
 - c) The onsite and/or offsite source(s) of the emission.
 - d) A description of the mitigative action(s) taken.
 - e) A description of any operational impact as a result of the RAL incident; and
 - f) A description of any preventive measure(s) taken to reduce or eliminate future occurrences.
76. The Permittee must maintain and demonstrate compliance of the efficiency of its air pollution control equipment according to Laws. Test results relating to the efficiency of the Permittee's air pollution control equipment shall be submitted to CDPH-within 2 weeks after the Permittee receives results. If efficiency falls below the required minimum under Laws, the Permittee must notify CDPH within 24 hours and provide a corrective action plan. The Permittee shall send all communications related to this Special Condition to envwastepermits@cityofchicago.org.

SITE SAFETY

77. 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 lit after dark.
78. The Permittee shall provide training to all Facility employees on fire prevention, emergency procedures, and hazardous material identification and handling procedures.
79. The Permittee shall install and maintain fire suppressant equipment in accordance with the Municipal Code of Chicago.
80. The Permittee shall correct all violations identified in inspections by the Chicago Fire Department, including its Fire Prevention Bureau ("CFD"). Failure to comply with these violations may result in the revocation of this permit.
81. The Permittee shall ensure that non-empty gas cylinders, fuel tanks, or other materials that may cause explosions are not placed inside the shredder.
82. The Permittee shall monitor all material piles for "hotspots" in accordance with the Facility's procedures and equipment for detecting hotspots.
83. 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

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an upright position and properly secured to avoid accidental jarring or impact.

84. In the case of a fire at the Facility, the Permittee must contact CDPH immediately after contacting CFD. CDPH may require the Permittee to take response actions in addition to those in its plans required under the LRF Rules.
85. The Permittee shall conduct all operations in accordance with the Facility's Health and Safety Plan, as submitted with the Permittee's Application Materials. Within 180 days from the date of this permit, the Permittee shall submit to CDPH results of the personal noise and air sampling conducted to comply with OSHA 1910.95 and 1910.134 standards.
86. The Permittee shall install, operate, and maintain a noise monitor in accordance with the Facility's Noise Monitoring Plan at the Facility.
87. The Permittee shall notify CDPH of any and all shredder explosions. Such notification shall be submitted within one business day by email to envwastepermits@cityofchicago.org. The notification shall include raw sound pressure levels and one-band octaves of the explosion and cover the one-hour prior period prior to and after the explosion.

RECORD KEEPING

88. 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.
89. The Permittee shall keep a log of Liquid Waste pickups that document 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 Liquid Waste disposal.
90. The Permittee shall maintain a log of all vehicles transporting Recyclable Materials or Post-Processed material, 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, and whether the transport is to or from the Facility.
91. 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.
92. The Permittee shall keep a log of liquid waste and refrigerant pickups that document the dates, and the volumes removed and disposed of or recycled offsite. Further, the Permittee shall keep all disposal receipts, manifests, or shipping records documenting shipment and final disposition offsite.
93. The Permittee shall document the results of all odor patrols.
94. The Permittee shall maintain a street sweeping log to document compliance with the sweeping pavement frequency requirement under Special Condition No.45. Such log shall record the starting and final odometer readings of the mechanical street sweeper each operating day.
95. 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. For the purpose of this requirement, emergencies are any events that trigger the Facility's emergency response plan; any event resulting in police, fire, or ambulatory response; or any unintended shut-down or cessation of operations lasting more than one hour. The Permittee shall notify CDPH each day that the Facility is affected by the emergency. Such notification shall be sent by email to

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envwastepermits@cityofchicago.org.

96. The Permittee shall maintain a log documenting all inspections, maintenance and repair performed on all Facility air pollution control devices.
97. The Permittee shall maintain an inventory of all vehicles and equipment powered by a non-road diesel engine. Such inventory shall include the year, make, model, EPA Tier rating, leasing or ownership information, and the date the vehicle or equipment was first put into service at the Facility.
98. The Permittee shall timely comply with the requirements contained in Chapter 11-5, Reduction and Recycling Program of the Municipal Code of Chicago. The Permittee shall submit semi-annual reports to the Department of Streets and Sanitation (“DSS”) Recycling Coordinator, on forms provided by the DSS.
99. The Permittee shall maintain copies of all load ticket receipts. This log shall indicate the date, time, vehicle type, hauling company name if any, and the material type and quantity being transported. The Permittee shall timely provide this information to CDPH upon request. Such information shall be provided in an Excel spreadsheet electronic file format.
100. All logs, receipts, and other documentation required under this permit shall be kept at a minimum of three years and shall be made available to CDPH and the CPD upon request; provided, however, that all records and documents pertain to the acceptance of prohibited and regulated materials, including catalytic converters, shall be kept at the Facility in accordance with Laws.
101. The Permittee shall submit to CDPH monthly PM₁₀ and meteorological data collected under Special Condition No. 65. Such data shall be submitted by email to envwastepermits@cityofchicago.org within 14 days following the end of each month.
102. The Permittee shall submit to CDPH on a monthly basis a Noise Report that includes the raw data collected by the data logger and the results of any scheduled noise instrument calibration tests. Such reports shall be sent to envwastepermits@cityofchicago.org within two weeks of the end of the reporting period month.
103. Within 45 days from the end of each calendar quarter, the Permittee shall submit to CDPH the quarterly report required pursuant to Section 4.17 of the LRF Rules. Such information shall include any waste characterization sampling report completed over the reporting quarter, including waste characterizations of the Post-Processed ASR Waste.

PERMITS

104. The Permittee shall maintain an active Certificate of Operation from 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.
105. The Permittee shall acquire all necessary permits and approvals for the Facility including but not limited to those required by CDPH, Department of Business Affairs and Consumer Protection, Zoning Board of Appeals, the Chicago Department of Transportation, the Metropolitan Water Reclamation District of Greater Chicago, IEPA, and EPA. The Permittee shall provide copies of all such permits and approvals to CDPH upon request.
106. Failure to secure or maintain the permits, approvals, or authorizations under this subsection is grounds for suspension or revocation of this permit.
107. The Permittee shall acquire and maintain an air pollution control construction or operating permit, as applicable, from IEPA. In the event the Permittee fails to possess a valid IEPA air pollution control

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construction or operating permit, as applicable, then the Permittee shall immediately cease operations at the Facility unless and until it obtains such a permit.

VEHICLES

108. 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.
109. In all cases that apply, additional and replacement vehicles or equipment kept and used at the Facility must comply with the engine-Tier ratings under federal and state New Source Performance Standards "NSPS"), or Department of Transportation Regulations (DOT).
110. All inbound and outbound trucks carrying dirt, aggregate (including ores, minerals, sand, gravel, shale, coal, clay, limestone, or any other ore or mineral which may be mined), garbage, refuse, or other similar material susceptible to becoming windborne shall be sealed or tarped. All leaking containers and torn tarps shall be decommissioned and replaced or repaired.
111. All trucks owned and operated by the Permittee at this Facility shall comply with federal requirements for the Control of Emissions from New Heavy-Duty Motor Vehicles (40 CFR Part 1037). Proof of compliance shall be made available to CDPH upon request.

VARIANCES

112. In lieu of the solid fencing specified in Special Condition No. 42, 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

113. 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 most recently submitted to and reviewed by EPA 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.), for the first month operating under this permit.
 - 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 Contingency Plan that describes mitigating actions that will be taken when the monitors detect PM₁₀ or other parameters that exceed the RAL under the LRF Rules or this permit. The response activities should consist of a range of increasingly aggressive measures appropriate to different levels of exceedance and consider whether the source is determined to be onsite or offsite. Also, this Contingency Plan shall include the Permittee's planned response to the disruption of any utility service, including a plan to provide backup capacity, procedures for safe operation of emergency equipment, and diversion of materials to other facilities during the disruption.
114. The Permittee shall report to CDPH via email at envwastepermits@cityofchicago.org, by the end

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of every month, the status of the construction process related to the development and implementation of the 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.*, in the Circuit Court of Cook County, Case No. 2021-CH-05279.

115. The Permittee shall report to CDPH via email at envwastepermits@cityofchicago.org, providing the waste characterization profile of the shredder fluff currently generated at the Facility, describing any treatment that may be necessary to render the shredder fluff a non-Hazardous Waste prior to its shipment offsite. This report shall be sent to CDPH semi-annually, by the first week of every January and July.
116. Within 120 calendar days of the issuance of this permit, the Permittee shall begin streaming air monitoring and weather station data to CDPH in real time. The data shall be sent via SFTP to [sftp.envirosuite.com](ftp://sftp.envirosuite.com) using the comma-separated-value (CSV) templates provided. The filename for the air monitoring data shall be the permit number, suffixed by "S1_" and timestamp (e.g., ENVREC104577S1_20151020135000). For the weather station data filename, substitute "S1_" with "M1_" (e.g., ENVREC104577M1_20151020135000). Please contact CDPH to set the point of contact with Envirosuite. This streaming does not relieve the Permittee of any reporting required under this permit.

CLOSURE

117. If the Permittee permanently closes or ceases operations at the Site ("closure"), the Permittee must submit a written closure notification to 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.