



**City of Chicago
Department of Public Health**

**Response to Public Comments
on Metal Management Midwest, Inc. (d/b/a Sims Metal)
Large Recycling Facility Permit Application and Draft Permit**

December 16, 2024

I. Purpose

The purpose of this document is to summarize and respond to the comments submitted by commenters on (1) the permit renewal application submitted by Metal Management Midwest, Inc. (d/b/a Sims Metal), hereafter referred to in this responsiveness document as the “Applicant,” to the Chicago Department of Public Health (CDPH or Department) on November 12, 2021 for its large scrap metal recycling facility (Class IVB) at 2500 S. Paulina Street in Chicago, Illinois (Facility), and (2) the draft permit posted for public comment by CDPH on October 8, 2024.

II. Background and Timeline

The Applicant submitted its 2021-2024 permit renewal application on November 12, 2021. A few months later, on April 21, 2022, the United States Environmental Protection Agency (USEPA) ordered the Facility to install five high-grade air monitors to measure the pollutants of greatest concern at the Facility. CDPH continued consideration of the Facility’s permit renewal application until it was able to obtain and analyze data collected by the USEPA-required monitors, to ensure compliance with CDPH’s Rules for Large Recycling Facilities (LRF Rules), adopted on June 5, 2020, and other applicable laws and regulations.

As part of its permit review, CDPH was able to use actual historical operating data for the Facility to assess any potential impacts on the surrounding neighborhood. Based on air monitoring data collected September 2022-August 2024, the USEPA has determined that if the [monitoring data collected](#) shows typical levels, emissions from the Facility would not cause



either short- or long-term health effects for the community near the facility. CDPH concurred with USEPA's analysis, with the addition of enhanced special permit conditions to ensure that public health and the environment are protected, as described below.

In addition, pursuant to the October 20, 2021 Agreed Preliminary Injunction Order issued in *People of the State of Illinois v. Metal Management Midwest, Inc., d/b/a Sims Metal Management*, Case No. 2021-CH-05279 (Circuit Court of Cook County), the Facility is required to install new air pollution control equipment. Until the new equipment has been installed and confirmed to be operating properly, the USEPA has continued requiring air monitoring to ensure that Facility air emissions meet applicable standards. After installation of the new air pollution control equipment, the Facility is required by the Illinois Environmental Protection Agency (IEPA) to perform stack testing to assure that the new controls are effective and meet the control efficiency required by 35 Ill. Adm. Code Part 218, Subpart TT. After stack testing is completed and the test results have been reviewed by IEPA, the Facility is required to apply to the IEPA for a revision to its pending Federally Enforceable State Operating Permit (FESOP) application to incorporate the new air pollution control equipment and relevant terms and conditions.

Throughout the permit process, CDPH has centered community input by following its *Guidelines Regarding the Permitting Process for Consequential Large Recycling Facilities* ([Guidelines](#)) and by notifying the public of opportunities to formally comment on the contents of the applications and any potential draft permit during this process. The initial public comment period was opened with the original application submitted in 2021. Comments were updated and posted on the CDPH website from December 2021-October 2023 as part of this original process. CDPH opened a 30-day public comment period on the updated application submitted in April 2024. This public comment period was then extended for an additional 30 days. CDPH hosted two in-person meetings in summer 2024 to address community questions and concerns. CDPH issued a deficiency letter that resulted in part from the public comment period. Commenters had 30 days to then provide written public comments on the deficiency letter response once submitted. When



CDPH published a draft permit on October 8, 2024, another 30-day public comment period was opened.

All comments submitted over the last three years during public comment periods were reviewed and taken into consideration in weighing whether to issue a draft permit and what conditions to include, especially those that provide further protection against environmental impacts, such as impacts to air quality.

A full timeline of the events throughout this permit process is included below:

On November 30, 2018, CDPH renewed the Applicant's permit no. ENVREC104577 to operate a Class IVB Recycling Facility from November 16, 2018, to November 15, 2021.

The Applicant submitted an application for a FESOP dated January 17, 2019, to the IEPA.

On January 31, 2020, the Applicant submitted to IEPA a supplement to its FESOP application, to address the volatile organic compound (VOC) emission factor determined as a result of the stack testing as required by the Administrative Consent Order with USEPA.

On November 30, 2020, CDPH issued new ([Guidelines](#)). The Guidelines were shared with stakeholders via email and posted to a dedicated City website.

On October 20, 2021, the Circuit Court of Cook County issued an Agreed Preliminary Injunction Order requiring the Applicant to develop and implement a control system designed to achieve an overall reduction in uncontrolled volatile organic material (VOM) emission of at least 81% from the hammermill shredder at the Facility.

On October 20, 2021, the Facility and CDPH entered into a settlement of citations issued by CDPH to the Facility between March 6, 2020, and July 2, 2020, in which Sims admitted no liability and agreed to pay \$18,000.



On November 12, 2021, CDPH received a Large Recycling Facility (LRF) permit renewal application from the Applicant (LRF Application). From December 31, 2021, through October 26, 2023, CDPH received public comments on the LRF Application and supplemental material.

On April 21, 2022, USEPA issued a request for information under Clean Air Act Section 114(a), 42 U.S.C. § 7414(a), requiring the Facility to install at least four high-grade air monitors and report the monitoring results to USEPA.

In July 2022, CDPH posted an updated version of the Guidelines.

On September 15, 2022, the Applicant received the Construction Permit from IEPA (I.D. No. 031600FFO), allowing the construction of the Cyclone, Venturi Scrubber, Valveless Regenerative Thermal Oxidizer (VRTO), Dry Sorbent Injection (DSI) Scrubber, Dry Sorbent Fabric Filter (DSFF) Baghouse, and lime storage silo with Ben Ven Filter.

On September 23, 2022, USEPA reviewed and approved the Applicant's monitoring and quality assurance plans, and the five monitors began operating.

From September 2022 to May 2024, the Applicant submitted the results of the monitoring plan to USEPA.

On October 07, 2022, the Applicant received CDPH's Air Pollution Control Permit (ENVAIR1741557) allowing installation of a control train for the Hammermill Shredder consisting of the following components that will be operated in series: a Cyclone, Venturi Scrubber, a natural gas-fired VRTO, and a DSI scrubber equipment with a DSFF Baghouse with associated lime storage silo.

On January 10, 2023, the Applicant submitted to CDPH a supplement to the November 2021 LRF Application, describing several improvements to the Facility, including the purchase and installation of six Dustboss® DB-100, rubberized curtains and metal sheeting around equipment



or areas with potential to emit dust, a second sweeper, and an enclosure for Automotive Shredder Residue (ASR).

On January 16, 2023, the Applicant supplemented its FESOP Application to IEPA, to incorporate the operation of the Bonfiglioli shear.

On January 12, 2024, CDPH issued a Certificate of Operation (ENVAIR113106) to the Applicant to operate equipment including the shear, shredder, compactor or baler, storage room, storage bin, screen, and air separators, in compliance with § 11-4670 of the Chicago Municipal Code of Chicago.

On April 3, 2024, CDPH issued an Air Pollution Control Permit (ENVAIR1741557) to the Applicant for the installation of the pollution control equipment required by October 20, 2021, Agreed Preliminary Injunction Order in *People of the State of Illinois v. Metal Management Midwest, Inc.*, Case No. 2021-CH-05279 (Circuit Court of Cook County).

On April 4, 2024, the Applicant submitted to CDPH another supplement to the LRF Application, updating policies and procedures, and providing new information related to additional controls for potential fugitive dust.

From April 22, 2024, through May 22, 2024, CDPH received public comments related to the LRF Application and to the supplemental materials dated January 10, 2023, and April 4, 2024.

On May 15, 2024, pursuant to the Guidelines and the significant public interest in this matter, CDPH hosted a community meeting at St. Pius V Church, located at 1919 S. Ashland Ave.

On May 22, 2024, by agreement with the community, CDPH extended the public comment period until June 21, 2024.

On June 21, 2024, CDPH hosted a second community meeting at St. Pius V Church.



On July 19, 2024, CDPH posted the Deficiency Letter for the LRF Application. This request related to 2023 real estate taxes, documentation shared with regulatory agencies, a noise monitoring plan, additional information related to ASR, and an odor control and mitigation plan.

On August 12, 2024, USEPA posted the data for May 2024, related to the data summaries from September 2022 to May 2024 (<https://www.epa.gov/il/sims-metal-management#lth-impacts>). Relating to VOC data, USEPA concluded that Sims would not cause either short- or long-term health effects for the community. Relating to the PM10 data, USEPA did observe a limited number of hourly values that were above 150 µg/m³, but determined this was not an exceedance of the health-based standard. And related to metals, USEPA concluded that concentrations of arsenic, chromium, lead, manganese, nickel, and mercury were detected below levels that would cause short-or long-term health impacts.

On August 13, 2024, the Applicant responded to the July 19, 2024, Deficiency Letter, providing the information requested by CDPH.

On August 19, 2024, pursuant to the Guidelines, CDPH posted the Applicant's response to the Deficiency Letter for public comment until September 18, 2024.

On October 8, 2024, pursuant to the Guidelines and after reviewing all the information sent by the Applicant, CDPH posted the draft permit for public comment until November 7, 2024.

III. Summary of Comments and the City's Responses

From December 31, 2021, through October 26, 2023, CDPH received public comments on the LRF Application and the January 10, 2023, supplement, and from April 22, 2024, through September 19, 2024, CDPH received public comments from individuals or entities regarding the Applicant's LRF Application, supplemental information, and response to the Deficiency Letter. From October 8, 2024, through November 7, 2024, CDPH received public comments on the draft permit posted on October 8, 2024. Approximately 360 public comments were received by CDPH during these multiple comment periods. Most of the comments were in the nature of



form letters or form emails. All written comments are available on the City's website at https://www.chicago.gov/city/en/depts/cdph/provdrs/environmental_health/svcs/community-environment-information.html#simscomments

The comment summaries below, followed by the City's responses, are arranged generally by theme or subject matter. In cases where CDPH received multiple comments expressing the same or similar sentiment, the comments have been consolidated and paraphrased.

HEALTH AND AIR QUALITY

Many commenters stated that negative health effects were being caused by toxic emissions from the Facility. Residents reported issues such as asthma, burning eyes, and other respiratory problems that they linked to the air pollution near the Facility. The commenters stated that there were high levels of harmful substances such as lead and manganese in the air due to the Facility.

CDPH Response:

CDPH shares the community's concerns about protecting public health and ensuring air quality, especially in neighborhoods near industrial facilities. Consequently, in April 2022, CDPH continued its consideration of the Applicant's Large Recycling Facility Permit renewal application until comprehensive air monitoring data could be obtained and reviewed.

USEPA Monitoring and Oversight:

Extensive air monitoring began on September 23, 2022, following USEPA's approval of the company's monitoring and quality assurance plans. USEPA also conducted an inspection of the Facility on October 4, 2022, in response to a citizen complaint and to ensure proper functioning of the air monitors. The Facility has since submitted monthly reports to the USEPA, including air quality data for PM10, metals, and VOCs, as well as operational data.

USEPA has reviewed this data, comparing pollutant concentrations to established health benchmarks such as the National Ambient Air Quality Standards (NAAQS) and Minimum Risk



Levels (MRLs). After evaluating over a year of data as of May 2024, USEPA concluded that, based on typical emission levels, there is no evidence that monitored concentrations of PM10, metals, or VOCs from the Facility would cause short- or long-term health effects for the surrounding community. CDPH has also reviewed this data and the accompanying air modeling updates, finding that the results align with applicable regulatory standards.

Ongoing Actions to Protect the Community:

To ensure continued protection for the community, CDPH has incorporated several measures into the draft permit renewal:

1. *Mandatory Air Monitoring:* The Facility is required to maintain and operate PM10 monitors, providing ongoing data to CDPH.
2. *Enhanced Special Conditions:* The permit includes strict operational controls to minimize emissions and ensure compliance with health and safety standards.
3. *Regular Inspections:* CDPH inspectors will conduct routine site inspections, guided by the enhanced permit conditions.

CDPH is committed to maintaining transparency and accountability as it monitors the Facility's operations and addresses community concerns. CDPH will continue working with USEPA to review new data and enforce robust measures to safeguard air quality and public health.

ENVIRONMENTAL JUSTICE

Commenters stated that the Facility is located in a community that is already burdened by pollution and stated that allowing it to operate without strict pollution controls exacerbates environmental injustices. Commenters stated that vulnerable populations live near the Facility, including multiple schools and residences, and stated that the Facility presents a particular risk to children.

CDPH Response:



CDPH understands and shares the community's concerns regarding the potential impact of industrial facilities on vulnerable populations. We are deeply committed to upholding Chicago's Environmental Justice (EJ) principles, which focus on addressing environmental disparities and protecting communities that are disproportionately affected by industrial pollution.

To ensure public health and safety, CDPH has implemented the following measures in the Facility's permit process:

1. *Enhanced Permit Conditions:* The Facility's permit includes special conditions designed to ensure strict pollution controls and require reports from PM10 Monitors to monitor air emissions, enhanced odor and dust controls, and strict requirements related to record-keeping that will support regular inspections.
2. *Air Quality Monitoring:* The Facility is required to operate and maintain PM10 air monitors to detect particulate matter. CDPH continuously reviews this monitoring data to ensure emissions remain below thresholds that could harm public health.
3. *Accountability and Enforcement:* CDPH enforces compliance with these permit conditions through regular inspections. Any violations or risks identified will result in immediate corrective action to protect the community.

Consistent with Chicago's EJ policy, CDPH aims to prioritize transparency, accountability, and equity. The Department will continue to strengthen measures to address community health concerns, improve industrial oversight, and ensure that residents, especially children and other vulnerable populations, are safeguarded from potential health risks.

We welcome continued community engagement and are committed to addressing these issues comprehensively and collaboratively.



COMPLIANCE HISTORY

Many submissions state that the Facility has a history of violating environmental laws and regulations, including the Clean Air Act, and has incurred fines imposed by federal and state agencies. Commenters state that the Facility should not be granted a permit renewal until it fully complies with all applicable environmental laws and regulations.

CDPH Response:

CDPH recognizes the community's concerns regarding the Facility's compliance history and prior violations of environmental laws and regulations. As part of the permit review process, CDPH has conducted a thorough evaluation of the Facility's compliance record and the corrective measures undertaken.

1. *Legal and Regulatory Review:* On October 20, 2021, the Facility and CDPH entered into a settlement of citations issued by CDPH to the Facility between March 6, 2020, and July 2, 2020, which is outside the 3-year compliance review period under Section 4.0 of CDPH's March 2014 Rules and Regulations for Recycling Facilities (2014 Rules). CDPH is also aware of the enforcement action initiated by the Illinois Attorney General in *People of the State of Illinois v. Metal Management Midwest, Inc.*, Case No. 2021-CH-05279 (Circuit Court of Cook County) alleging failure to demonstrate overall reduction in uncontrolled emissions of at least 81%, and the amended complaint filed by the Illinois Attorney General in 2023 adding counts relating to the construction of a stationary shear without obtaining a construction permit from IEPA. In July 2024, CDPH issued a Deficiency Letter requesting detailed documentation from the Applicant, including records submitted to the IEPA and the USEPA. The documentation provided by the Applicant in response to the Deficiency Letter included evidence of corrective actions and control systems implemented to address previous alleged violations.
2. *Corrective Measures and Compliance:* CDPH reviewed the materials submitted in response to its Deficiency Letter in coordination with IEPA and USEPA. Based on the



information provided, the Applicant is working to meet all requirements, including implementing control systems to achieve significant reductions in emissions, and has obtained a construction permit for the shear and filed the correct reporting. According to the December 12, 2024, status report filed by the Facility in *People of the State of Illinois v. Metal Management Midwest, Inc.*, Case No. 2021-CH-05279 (Circuit Court of Cook County), all three sections of the Regenerative Thermal Oxidizer have been installed, erection of the particulate matter control equipment has been completed, and erection of the baghouse, lime silo, stack, reactor, and ductwork are complete, among other work. According to the status report, final work on installing the remaining sensors and auxiliary systems is targeted for completion by the end of December 2024, and completion of the mechanical and electrical work is anticipated by early January. The December 12, 2024, status report states that compliance testing is to be conducted in March 2025. Additionally, USEPA's review of air quality monitoring data over the past year (as of August 2024) confirmed that pollutant levels, including PM10, metals, and VOCs, are below health benchmarks such as the NAAQS and MRLs.

3. *Regulatory Framework and Risk Assessment*: Under CDPH's 2014 Rules, Section 4, the Commissioner evaluates compliance history and potential material threats to ongoing compliance. This evaluation considers evidence such as monitoring data, laboratory results, and corrective actions. Based on this thorough review, CDPH has determined that the Facility does not pose a material threat to compliance with environmental laws and regulations, pursuant to Section 4 of the 2014 Rules.
4. *Future Oversight and Accountability*: To ensure ongoing compliance, CDPH has imposed stringent conditions in the permit, including enhanced monitoring, regular inspections, and clear accountability measures. These requirements are designed to prevent future violations and protect the health and safety of the surrounding community.

CDPH is committed to transparency and accountability in this process and will continue to monitor the Facility closely to ensure it operates in full compliance with environmental



standards. We value community input and will remain vigilant in safeguarding public health and the environment.

REQUEST FOR FULL FACILITY ENCLOSURE

Several comments call for the Facility to be fully enclosed to prevent the release of airborne pollutants. Commenters state that the current lack of enclosure around the shredder is a major issue, and express concerns about dust, debris, and hazardous emissions impacting the surrounding community.

CDPH Response:

Focusing on enclosing the shredder machine area captures the most significant sources of air emissions while keeping the Facility efficient and manageable. Shredder enclosure is recommended as the best practice for metal recycling facilities to mitigate their environmental footprint. *See* USEPA “Best Practices for Metal Shredding Facilities in Clean Air Act Permitting,” August 2024, https://www.epa.gov/system/files/documents/2024-09/metal-shredders-best-practices_08-2024.pdf

In the supplemental information provided for the LRF application, the Applicant informed CDPH that the ASR discharge area from the Metal Recovery Plant (MRP) has been enclosed on three sides and covered with a roof. Additionally, the ASR storage area is also under a roof and enclosed on three sides.

These improvements will significantly help contain ASR materials within the Facility, reducing the risk of dispersion into the surrounding environment. To further ensure the containment of ASR and address potential incidents, CDPH has established special conditions in the permit. These conditions require the applicant to promptly clean and manage any materials that escape from the Facility, maintaining compliance with environmental standards and safeguarding the community. And of course, the PM10 monitors now required by the facility permit will continuously monitor air impacts at the facility to make sure that these pollution control



measures are effective and properly maintained, in addition to compliance inspections undertaken by CDPH inspectors.

POLLUTION CONTROL MEASURES

Commenters state that the Facility has not completed the installation of the pollution control equipment required by the Agreed Preliminary Injunction Order. Commenters state that this has led to ongoing air pollution, and many commenters request that the City halt the permit process until all control measures are fully installed and operational.

CDPH Response:

As previously referenced, comprehensive air monitoring at the Facility began on September 23, 2022, with monthly reports submitted on PM10, metals, VOCs, and operations. Following over a year of data analysis, the USEPA concluded in May 2024 that emissions were consistently below health benchmarks, posing no short- or long-term health risks. CDPH reviewed this data and updated air modeling and confirmed alignment with regulatory standards.

The Facility is also progressing in the construction authorized by IEPA on September 15, 2022, by the Construction Permit from IEPA (I.D. No. 031600FFO), including the construction of the Cyclone, Venturi Scrubber, Valveless Regenerative Thermal Oxidizer (VRTO), Dry Sorbent Injection (DSI) Scrubber, Dry Sorbent Fabric Filter (DSFF) Baghouse, and Lime Storage Silo with Ben Ven Filter, and also by Air Pollution Control Permit (ENVAIR1741557) issued by CDPH on April 3, 2024.

Moreover, the renewed permit contains stringent special conditions designed to mitigate and monitor any potential environmental impacts the Facility may cause. These conditions will require the implementation of enhanced cleaning procedures and robust pollution control measures, including continuous air monitoring through PM10 monitors. By setting these requirements, CDPH ensures that the Facility operates in full compliance with environmental



standards, effectively managing emissions and minimizing any risks to air quality and public health in the surrounding community.

DATA RELIABILITY

Commenters express concern about the reliability of air quality monitoring data submitted by the Facility, with allegations of conflicts of interest. They state that the monitors are inadequate, and some commenters question the accuracy of the data being used to make decisions about the permit.

CDPH Response:

Comprehensive air monitoring at the Facility required by the USEPA commenced on September 23, 2022, following USEPA's approval of the Facility's monitoring and quality assurance plans. On October 4, 2022, the USEPA also conducted an inspection of the Facility in response to a citizen complaint and to verify the proper functioning of the air monitoring systems. Since that time, the Facility has submitted monthly reports to the USEPA, which include detailed air quality data on PM10, metals, and VOCs, as well as operational data from the Facility.

The USEPA has reviewed this data, comparing the concentrations of pollutants to established health benchmarks such as the NAAQS and MRLs. After analyzing over a year of data through May 2024, the USEPA determined that, based on typical emissions, there is no evidence to suggest that the monitored levels of PM10, metals, or VOCs would result in any short- or long-term health risks for the surrounding community. CDPH has also reviewed the air monitoring data and updated air modeling, confirming that the results are consistent with applicable regulatory standards.

To ensure continued protection of the community, CDPH has incorporated several safeguards into the draft permit renewal. These measures include mandatory ongoing air monitoring, with the Facility required to operate and maintain PM10 monitors that will provide continuous data to CDPH for further evaluation.



NOISE AND ODOR COMPLAINTS

Commenters living near the Facility state that noise and odors from the shredding operations are disruptive and harmful to their quality of life, in addition to their health concerns relating to Facility emissions.

CDPH Response:

CDPH acknowledges the concerns raised by the community regarding noise and odor emissions from the Applicant's Facility. In response to these concerns, and in accordance with the LRF Rules and Municipal Code of Chicago § 11-4-2530(I), CDPH issued a Deficiency Letter to the Applicant on July 19, 2024. This letter requested that the Facility submit two specific plans: (i) a noise monitoring plan to continuously record sound pressure levels at the Facility and collect data in compliance with Section 4.6.1 of the LRF Rules, and (ii) an odor control plan to address potential odors generated at the Facility.

After thoroughly reviewing the plans submitted by the applicant in response to the Deficiency Letter, CDPH has incorporated the use of these plans into the permit as mandatory conditions. These conditions are designed to ensure that the Facility operates in a manner that minimizes both noise and odor impacts on the surrounding community. The permit now includes stronger, more stringent requirements for noise and odor controls, reflecting CDPH's commitment to protecting public health and ensuring the Facility's operations are in compliance with local environmental standards.

REQUEST FOR DELAY IN PERMIT APPROVAL

Many comments suggest that the permit decision should be delayed until more comprehensive data is available, and the Facility has demonstrated full compliance with environmental standards. They state that issuing a permit before these steps are completed is premature and could further harm the community.

CDPH Response:



On April 21, 2022, the USEPA directed the Facility to install a minimum of four high-quality air monitoring devices to measure emission levels and required the Facility to submit the resulting air quality data to the USEPA for further evaluation. Five monitors were ultimately installed. Consequently, CDPH continued consideration of the renewal of the Facility's LRF permit until it obtained sufficient air monitoring data from the USEPA, to assess both the short-term and long-term health impacts associated with the Facility's emissions. After receiving supplemental information related to the application from the Applicant on April 4, 2024, CDPH and the USEPA reviewed and posted the updated air quality data for May 2024. This data includes summaries from September 2022 to May 2024, which are available at the [USEPA's official page](#). Based on the data, the USEPA concluded the following:

- **VOCs:** There is no evidence to suggest that the emissions from the Facility would cause short- or long-term health effects for the surrounding community.
- **PM10:** While a limited number of hourly values exceeded $150 \mu\text{g}/\text{m}^3$, these levels do not surpass the health-based standard.
- **Metals:** Concentrations of arsenic, chromium, lead, manganese, nickel, and mercury were all detected below levels that would pose short- or long-term health risks.

CDPH has followed and completed the review process set forth in the Guidelines. In response to comments received during this process, additional control measures have been included in the permit conditions. Moving forward, CDPH will enhance inspections and closely monitor the Facility to identify and address any potential violations of the permit or other applicable laws or regulations, with the ultimate goal of safeguarding the health and safety of the surrounding community.

TRANSPARENCY IN PERMIT PROCESS

Commenters state that the permit approval process lacked transparency and state that the community has not been given adequate information or opportunities to provide meaningful



input. Commenters also express concerns about insufficient notice for public meetings related to the Facility's permit.

CDPH Response:

The Chicago Department of Public Health (CDPH) has prioritized transparency throughout the permit application process, ensuring compliance with all requirements outlined in the Municipal Code and the Guidelines. To provide the community with ample opportunities to participate and share feedback, CDPH facilitated the following:

1. Public Comment Periods for the Application and Supplementals:

- Four opportunities were offered for public comments:
 - December 31, 2021 – October 26, 2023
 - April 22, 2024 – May 22, 2024
 - May 22, 2024 – July 11, 2024 (extension)

2. Public Comment Period for the Draft Permit:

- This took place from October 8, 2024 – November 7, 2024.

3. Community Meetings:

- While the Guidelines require only one community meeting, CDPH conducted two meetings to address community requests:
 - May 15, 2024
 - June 21, 2024

In addition to these efforts, CDPH has ensured that all relevant documents and updates have been made accessible to the public via our website. For individuals experiencing difficulty accessing information online, CDPH has provided alternative communication channels, including email and text alerts through our “Environmental Updates” platform.



We encourage community members to stay informed by subscribing to our updates and to report any Facility-related concerns through the City's 311 system. CDPH remains committed to maintaining open communication and supporting community vigilance regarding the Facility.

ECONOMIC AND EMPLOYMENT CONSIDERATIONS

Some commenters support the permit renewal on the grounds that the Facility provides jobs and economic benefits to the community. They state that the company is working to meet environmental standards and has made significant investments in emission control technology.

CDPH Response:

The Department appreciates the engagement and input of commenters who expressed support for the Facility. However, CDPH's decision on the application is not influenced by the relative volume of support or opposition to a project. Rather, CDPH must evaluate the legal and technical aspects of the application pursuant to the requirements set forth in the Chicago Municipal Code, the 2014 Rules, LRF Rules, and other applicable laws and regulations. While the commenters' points are important in other contexts, the Department's permitting authority, as set forth in the Municipal Code, does not extend to consideration of non-technical matters such as job creation, civic participation, or a company's investment in a project.