



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

August 26th, 2024.

ISSUED BY EMAIL

Mr. James Bracken
Stockyards Materials, LLC
4031 S Ashland Avenue
Chicago, Illinois 60609

**Subject: City of Chicago Class V Recycling Facility Permit (ENVREC934539)
Renewal Application
Stockyards Materials, LLC – 4031 S Ashland Avenue
Deficiency Letter.**

Dear Mr. Bracken,

This correspondence pertains to the permit renewal application, dated April 18th, 2024, submitted to the City of Chicago Department of Public Health (“CDPH”) by Stockyards Materials, LLC. (the “Permittee”) for the operation of a Large Recycling Facility, Class IVB, situated within the corporate limits of the City of Chicago at 4031 S Ashland (the “Facility”), also related to the Deficiency Letter sent to the Permittee on May 28th, 2024, and the response received by CDPH on June 14th, 2024.

The public comment period for this application was closed on July 28th, 2024. We issue this communication based on “CDPH Guidelines Regarding Permitting Process for Consequential Large Recycling Facilities, Reprocessable Construction/Demolition Material Facilities, and Waste Handling Facilities,” updated in July 2022 (“Guidelines”), Section 4(a), that states:

“If, within sixty (60) days of posting of the application or any supplemental application, CDPH finds any deficiency in the application, CDPH may either deny the permit or request more information, depending on the extent of the deficiencies. If CDPH has questions during its review of the application, CDPH may notify the applicant and request a written response, supplementary information, or both, as deficiencies are identified. CDPH will post each such notification on the City’s website. Within ten (10) business days from receipt of the applicant’s response, CDPH will post the response (minus any designated CBI) on the City’s website. Each posting of a supplemental application will trigger a new thirty (30) day written comment period.”

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Footnote 3 in the Guidelines provides that a supplemental application “is a revised application submitted in response to an inquiry or deficiency letter from CDPH.”

In accordance with the section above, CDPH has determined that the application is deficient and CDPH needs the following information, according to the Large Recycling Facility Rules (“LRF Rules”), to continue with the review process of the application:

- 1) **Section 3.9.5.1:** All drawings must be on a legible scale, not less than one inch equals 100 feet. Please submit the drawings adhering to this scale.
- 2) **Section 3.9.5.2:** We require all dimensions of the buildings and structures in the layout, including the service garage, office, cover pulverized, and scales.
- 3) **Section 3.9.5.8:** Please include the location of all fire suppression equipment in the layout.
- 4) **Section 3.9.5.11:** We need the number of parking spots in the layout and the maximum number of vehicles that can be queued simultaneously in the designated queuing area.
- 5) **Section 3.9.5.13:** Provide the location of all first-aid equipment and other emergency supplies in the layout.
- 6) **Section 3.9.17.1:** The barrier must be at least 8 feet high. The current layout specifies a fence height of 6 feet. Please revise accordingly.
- 7) **Section 3.9.20:** Submit evidence of approval by the State Fire Marshall's Office or provide explanations if approval is not required.
- 8) **Section 3.9.21.1:** An Air Quality Impact Assessment is required by ordinance. Since the facility plans to process more than 1,000 tons per day (1,250 tons) and qualifies as a Class V and Consequential Facility, the facility must provide CDPH with emissions and air dispersion modeling studies. If is not changes from the last renewal, the Facility could send the last one.
- 9) **Section 3.10.3.2:** Provide a health and safety plan that includes job hazard assessments and a description of OSHA-required safety devices or procedures for all processing equipment, including electric lockout devices, guarding, emergency stopping devices, and explosion-proof switches and controls.
- 10) **Section 3.10.3.3:** Submit descriptions and results of any OSHA-required worker air and noise exposure sampling for facility activities such as welding, torching, sanding, crushing, and grinding. To the extent applicable, these documents should comply with Health Insurance Portability and Accountability Act (HIPAA) requirements.



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- 11) **Section 3.10.4.4:** Submit details and specifications of a fire detection system for the Facility.
- 12) **Section 3.10.4.7:** Submit a stockpile monitoring protocol as required under the LRF Rules.
- 13) **Section 3.10.8.2:** Confirm the quantity of each type of vehicle listed in the application.
- 14) **Section 3.10.10.3:** Provide all information related to the street sweeper as required under the LRF Rules.
- 15) **Section 3.10.10.6:** Explain how records will be kept with respect to daily cleaning activities.

The CDPH may request additional information based on information submitted in the new application and pertinent public comments received over the new 30-day public comment period that will start after CDPH posts the Permittee's response to this Deficiency Letter, as set forth in the Guidelines. To expedite permit review, provide backup calculations to all stated values and provide narrative discussions to all attachments explaining in detail what information is provided, where the information is located, and how it satisfies the LRF Rule requirements.

If you have any questions concerning this request, please contact me at Abraham.Bradshaw@cityofchicago.org

Sincerely,

Abraham Bradshaw
Environmental Engineer III
Direction of Environmental Health and Safety Compliance

Cc. Dave Graham, Director of EHS Compliance, Department of Public Health, City of Chicago
Donavan Tietje, Director of Environmental Inspections, Department of Public Health, City of Chicago