



DEPARTMENT OF PUBLIC HEALTH  
CITY OF CHICAGO

July 19<sup>th</sup>, 2024.

ISSUED VIA EMAIL

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

**Subject: City of Chicago Class IVB Recycling Facility Permit (ENVREC104577)  
Metal Management Midwest, Inc. – 2500 S. Paulina  
Deficiency Letter**

Dear Ms. Hays,

This correspondence pertains to the application, including the supplemental information dated January 10, 2023, April 4, 2024, and May 14, 2024, submitted to the City of Chicago Department of Public Health (“CDPH”) by Metal Management Midwest, Inc. (the “Permittee”) for the operation of a Large Recycling Facility, Class IVB, situated within the corporate limits of the City of Chicago at 2500 S. Paulina Street (the “Facility”).

The public comment period for this application closed on June 21, 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<sup>3</sup>, 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.

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.”



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In accordance with the section above, CDPH has determined that the application is deficient and CDPH needs the following information to continue with the review process of the application:

1. Pursuant to Section 3.7. of the Rules for Large Recycling Facilities (“LRF Rules”), provide documentation evidencing the payment of real estate property taxes by providing copies of the most recent tax bill and check; or by providing a copy of the most recent tax bill that has been stamped paid by the Cook County Treasurer’s office, or payment receipts issued by said office, for the years 2023.
2. Pursuant to Section 3 of the LRF Rules, provide documentation submitted to other regulatory agencies, such as the IEPA and USEPA. This includes all relevant information and any stipulated requirements for the Permittee to develop and implement a control system designed to achieve an immediate and substantial reduction in uncontrolled emissions as required in *People of the State of Illinois, ex rel. Kwame Raoul v. Metal Management Midwest, Inc.*, case number 2021-CH-05279. Additionally, if any measures required by a regulatory agency are pending installation or construction, please provide the time frame for completing all these requirements.
3. Related to the request for continuance of the waiver requested for the Section 3.9 Noise Impact Assessment, to allow operations outside of the operating hours specified in Section 8.0 of the Recycling Facility Rules, provide a noise monitoring plan to continuously record sound pressure levels at the Facility and to collect the data required in 4.6.1 of the LRF Rules.
4. Pursuant to Section 3.10.9 of the LRF Rules, provide the waste characterization profile of the shredder fluff currently generated at the Facility. Describe any treatment that may be necessary to render the shredder fluff a non-hazardous waste prior to its shipment offsite.
5. Pursuant to 11-4-2530(I), provide an odor control plan that addresses the potential odors at the Facility. Such plan shall include, but may not be limited to, the following:
  - a. An inventory of odor-emitting activities.
  - b. The location, time, and duration of each odor-emitting activity.
  - c. An odor mitigation plan that includes specific administrative and/or engineering controls and best management practices for each odor-emitting activity.
  - d. Routine odor inspections around the Facility and nearby Sensitive Areas (as that term is used in the LRF Rules); and
  - e. Protocols for investigating odors discovered during routine inspections or as reported in an odor complaint.



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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 which will start after CDPH posts the SIMS response to this Deficiency Letter. 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](mailto:Abraham.Bradshaw@cityofchicago.org)

Sincerely,

Abraham Bradshaw  
Environmental Engineer III

Cc. Dave Graham, Director of Environmental Health and Safety Compliance, Department of Public Health, City of Chicago.