



Odor Control Plan

(Paulina Facility)

DATE: August 2024
Rev: 1

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1.0 OBJECTIVE:

- The Chicago Department of Public Health has referenced Section 11-4-2530(l) as the regulatory driver for requiring the development, submittal and execution of an "odor control plan that addresses potential odors at the Facility".
- While the Sims facility is not a Class V recycling facility, which is required to demonstrate compliance (within the application process) with an obligation to control odor, we offer the following information with regards to odor control plans for our Paulina Street facility.

2.0 RESPONSIBILITY:

- 2.1 Yard Management is responsible for Daily Odor Inspections.
- 2.2 All employees are responsibility to notify their manager or EHS if an unusual odor is detected in their work area.

3.0 TRAINING:

- 3.1 Prior to the start of this program, select personnel will be given appropriate training on potential odor emitting activities; BMPs to employ addressing real or potential odor issues, performing inspections; performing investigations for odor issues.

4.0 PROGRAM ELEMENTS:

3.1 Inventory of Odor-emitting activities:

The recyclable metal materials purchased and received by Sims are not considered odoriferous in nature. These are generally metal materials that include end of life vehicles, white goods (e.g., laundry machines, dryers, dish washers, etc.), and a variety of household and business/industry related end of life, metal containing products. As such, Sims does not anticipate the generation of odor at a concentration, intensity or persistence to qualify as a nuisance condition. However, Sims is including a listing of recycling process activities at the facility (that may have the potential to be considered odor-emitting by some portion of the population):

- 4.1.1 Material Acceptance (Scale activity and Shredder Stockpile)
- 4.1.2 Shredding and related downstream activities
- 4.1.3 Nonferrous Shredder Aggregate (DNF) and Residue (ASR)
- 4.1.4 Nonferrous processing
- 4.1.5 Yard Activities, including cutting

4.2 Location, time and duration of odor-emitting activity:



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	Noted Activities	Location(s)	Typical Time of Day	Duration	Odor Related Controls and/or BMPs
1	Material acceptance (Scale activity and Shredder stockpile)	Scale Area; Shredder Infeed Stockpile (near Infeed Conveyor)	1 st shift	No sustained odors are anticipated during material acceptance. Material composition is heterogenous.	Inbound material inspection and identification of potential odor causing materials; Refuse acceptance of potentially problematic materials; Use of odor neutralizer in aerosolized water (mist). Odor neutralizer as additive to water truck to spray piles if needed.
2	Shredding and Related Downstream Activities	Shredder; Shredder Downstream	1 st shift	No sustained odors are anticipated during shredding downstream separation activities. Material composition is heterogenous.	Potential odors related to the process of shredding will be eliminated through the RTO. If odors are noted at the discharge pile, an odor neutralizer will be sprayed on pile as needed.
3	Nonferrous Shredder Aggregate (DNF) and Residue (ASR) stockpiles	Various stockpile locations throughout the yard	1 st shift; partial 2 nd shift	ASR is stored under roof, odors are not anticipated. DNF is processed readily, reducing the possibility for odors.	Use of odor neutralizer in aerosolized water (mist); Reduce stockpile volumes (via continued processing or disposal)
4	Nonferrous processing	Warehouse and small outside area	1 st shift	Operations are predominantly indoors. Odors of any noticeable duration are not anticipated.	Use of odor neutralizer in aerosolized water (mist); Odor neutralizer as additive to water truck
5	Yard activities including cutting	Various locations; Southern most parcel	1 st shift	Periodic activities; Odor is not anticipated, but would be material dependent and therefore short-lived.	Ensure materials and cutting environment are properly prepared for activities; Consider halting activities due to wind direction and intensity; Use of odor neutralizer in aerosolized water (mist); Odor neutralizer as additive to water truck



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- 4.3 Odor Mitigation Strategies
 - 4.3.1 See Table above

- 4.4 Routine Odor Inspections around the Facility and nearby Sensitive Areas:
 - 4.4.1 Sims will perform daily odor inspection along the fence line of each yard within the Paulina facility during operating days in which any of the Noted Activities (in the Table above) are performed.
 - 4.4.1.1 See Daily Log in Appendix A
 - 4.4.2 If an odor is detected, call 2 other team members to area to see if they also detect an odor.
 - 4.4.3 Fenceline odor inspections will be expanded to nearby Sensitive Areas in the event that the fence line inspections detect odors of notable intensity.
 - 4.4.4 Prior to performing expanded odor inspections, Sims will:
 - 4.4.4.1 Investigate area of operation to see if the root cause of the odor can be identified.
 - 4.4.4.1.1 Investigation will include a notation of wind direction to help determine if an off-site source could potentially be causing the odor.
 - 4.4.4.1.2 consult plant manager/supervisor to determine if something unusual was brought in or had been processed.
 - 4.4.4.2 If a cause of odor is identified, we will employ the appropriate engineering controls and/or best management practices as listed in the Table above.
 - 4.4.4.2.1 See Appendix B for Investigation Form
 - 4.4.5 The expanded odor inspections (for nearby Sensitive Areas) will then include S. Blue Island Avenue for notable odors at the Northern border of the facility, S. Ashland Avenue for notable odors at the Eastern border of the facility, and S. Wood Street for notable odors at the Western border of the facility.
 - 4.4.6 In the event of notable odors at the Southern border of the facility, Sims will perform expanded odor inspections within the Canalport Riverwalk Park (depending on the time of day, park hours and in consideration of employee safety).
In the event that expanded odor inspections in Sensitive Areas uncovers an off-site root cause to odor, Sims will notify the City Department of Public Health
 - 4.4.7 A log of expanded odor inspections, outside of the facility fence line, will be maintained at the facility (see Appendix B). The log will contain a description of the noted odor, wind direction, any potential off-site issues that may play a role in the odor issue. The log will also include a listing of potential odor emitting activities being performed at the



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facility during the particular odor event, a review of which activities are assumed to be causing the offsite impact and the controls/BMPs employed at said activity.

- 4.4.8 Odor complaints: If a member of the general public calls 3-1-1 with an odor complaint specific to Sims Metal, we will do our best to investigate. However, without having their information (i.e. exact time, area of facility, description of odor) immediately, being able to identify the root cause of the odor will be problematic.

5.0 ODOR NEUTRALIZER:

- 5.1 Prior to the start of this program, Sims will work with Vendors who specialize in Odor Control Products. The Neutralizer purchased will be based on recommendations offered by vendor.
- 5.2 Safety Data Sheets (SDS) will be maintained on products used at this facility.

6.0 PROGRAM REVIEW

- 6.1 Annually this program will be reviewed by Sims to determine what worked and what may need to be revised. We will use the findings of this review to build upon the program, if deemed necessary.
- 6.2 Any changes to this program will be reviewed and approved by Chicago Department of Public Health.



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Appendix A – Daily Odor Inspection Form

DAILY ODOR INSPECTIONS																						
Month/Yr: _____																						
Dates:																						
	Monday			Tuesday			Wednesday			Thursday			Friday			Saturday			Sunday			
	Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			
Time:		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No	
Yard:	North																					
	West																					
	South																					
	East																					
Reviewed by:																						
Dates:																						
	Monday			Tuesday			Wednesday			Thursday			Friday			Saturday			Sunday			
	Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			
Time:		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No	
Yard:	North																					
	West																					
	South																					
	East																					
Reviewed by:																						
Dates:																						
	Monday			Tuesday			Wednesday			Thursday			Friday			Saturday			Sunday			
	Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			
Time:		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No	
Yard:	North																					
	West																					
	South																					
	East																					
Reviewed by:																						
Dates:																						
	Monday			Tuesday			Wednesday			Thursday			Friday			Saturday			Sunday			
	Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			Odor Detected?			
Time:		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No		Yes	No	
Yard:	North																					
	West																					
	South																					
	East																					
Reviewed by:																						



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Appendix B - Odor Investigation Form

Date: _____ Time: _____ Wind Direction: _____

Odor Investigation team members: _____

Where was the odor detected? _____

How was the odor identified? _____

Who identified the odor? _____

What process was occurring in the area where the odor was detected?

How many on the Odor Investigation Team were also able to detect this odor?

Give a description of the steps taken to identify the cause of the odor (on-site or off-site) as well as steps taken to eliminate the odor, if necessary.

Based on these findings, will an expanded odor inspection be performed? If yes, complete below.

Expanded results-based on wind direction and area of facility odor noted.

East: Ashland Street	Odor detected: YES	NO
West: Wood Street	Odor detected: YES	NO
North: Blue Island	Odor detected: YES	NO
South: Canalport Riverwalk	Odor detected: YES	NO

Results and Actions taken:

