



May 22, 2020

R19439-1

Chicago Department of Public Health
Attn: Environmental Permitting and Inspections
333 South State Street, Room 200
Chicago, IL 60604

**General III, LLC Comments on the CDPH's May 13, 2020
Revised Proposed Rules for Large Recycling Facilities**

Dear Sir or Madam:

The following identifies General III, LLC (GIII) comments from review of the May 13, 2020, copy of the Chicago Department of Public Health's (CDPH) revised Proposed Rules for Large Recycling Facilities.

No.	Section of Rule	Comment
1.	Definitions	The definition of "Staging" should be revised to allow temporary storage of materials for more than five business days in the event that a mechanical breakdown prevents the processing of materials on a timely basis.
2.	Section 3.9.17.3	This section should be revised to state "For New and Expanding Facilities, the barrier must be constructed of durable material such as concrete, cinder block, brick, <u>metal</u> , or another material approved by the Commissioner in the permit conditions."
3.	Section 3.9.17.3	This section should be revised to state "Applicants seeking approval to use other types of materials must demonstrate that the proposed material meets zoning requirements and is comparable in terms of durability, maintenance requirements, visual-screening, and noise <u>mitigating</u> performance relative to the above-listed materials."
4.	Section 3.9.18.3	This section should be revised to state "The description shall Demonstrate that the BMPs are designed and will be maintained such that the pollutants described in 3.9.18.2 <u>will meet applicable water discharge standards.</u> "

No.	Section of Rule	Comment
5.	Section 3.9.21.2.3	<p>The revised rule requires a baseline metals assessment for metallic HAPs.</p> <p>The scope of the assessment is not identified. This is important to identify so that data generated and submitted by affected facilities is consistent.</p> <p>How will the baseline metals data be used? The purpose of these data will affect the scope of the 'baseline metals assessment' and the number, frequency and location of baseline samples required.</p> <p>A monitor that is capable of measuring continuous PM₁₀ concentrations will not provide a particulate matter sample that can be analyzed for metals. If the intended metals assessment is to include particulate matter samples for a facility, the sampling and analysis methods as well as the number, frequency and locations of samples must be identified to ensure consistency of the data generated by affected facilities.</p>
6.	Section 4.7.2	<p>This section should be revised to state "The owner or operator shall comply with the following requirements for Fugitive Dust."</p>
7.	Section 4.7.2.3	<p>The rule requires quarterly opacity readings be taken under conditions "conducive to the generation of fugitive dust (i.e. hot, dry, windy weather)." How should this be interpreted?</p> <p>If a facility routinely sweeps, vacuums, or applies water to roadways (pursuant to a Fugitive Dust Operating Program), the opacity readings should be taken at a time that is representative of the controlled emissions resulting from these routine implementation of these controls? Requiring that opacity readings be taken under worst case conditions (without implementation of fugitive dust controls) guarantees that the 10% opacity requirement will be exceeded. This requirement should be more clearly defined.</p>
8.	Section 4.7.3.5	<p>The revised rule allows CDPH to require an alternate RAL. This could be an issue if the monitors that are purchased and implemented are not capable of measuring down to the concentration in an alternate RAL concentration specified by CDPH after initial operation of the monitors. CDPH should specify the minimum concentration of PM₁₀ that an approved monitor must be capable of measuring.</p>
9.	Section 4.7.3.9	<p>This section is not clear. Does CDPH mean to say that "Within 24-hours of an RAL <i>exceedance</i>, the Operator shall....."?</p>

No.	Section of Rule	Comment
10.	Section 4.7.3.11	This requirement as modified does not specify what responses must be taken when an RAL exceedance is attributed to an offsite source. Can this change be interpreted such that when the cause of an RAL exceedance is attributed to an offsite source, no response is required?
11.	Section 4.7.3.13	It is not clear if the exemption applies if any one of the criteria in Paragraphs a thru c is satisfied or if all of the criteria must be satisfied for the exemption to apply. Also, the section number of the requirements to which the exemption applies is not identified.
12.	Section 4.12	This section should be revised to require Existing Facilities to enclose shredders that process vehicles or have potentially explosive feedstock materials. Attached are USEPA inspection reports of an existing metal shredding facility in Chicago which demonstrate the potential and unavoidable health and safety hazards associated with unenclosed shredders. As revealed in the enclosed inspection reports, a metal shredder that is not equipped with an enclosure poses a significant threat to the public due to the obvious reality that shrapnel and other debris is more than capable of being discharged out the top of the shredder.
13.	Section 4.14.2	This section should be revised to address the only real concern regarding water accumulation, which is <u>stagnation</u> .

If you have any questions or need any additional information, please do not hesitate to contact Jim Kallas of GIII at 847-508-9170 (jimkallas@general-iron.com) or me or at 630-393-9000 (jpinion@rka-inc.com).

Yours very truly,
RK & Associates



John G. Pinion
Principal Engineer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: **OCT 26 2016**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Metal Management Midwest, Inc., Chicago,
Illinois

FROM: Scott Connolly, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Metal Management Midwest

Facility Location: 2500 S Paulina St, Chicago, IL

Date of Inspection: September 7, 2016

Lead Inspector: Scott Connolly, Environmental Engineer, US EPA

Other Attendees:

1. Ken Ruffatto, Environmental Engineer, US EPA

Purpose of Inspection: To address citizen dust complaints

Facility Type: Metal Recycling and scrap yard

Arrival Time: 8:54 am

Departure Time: 9:30 am

Inspection Type:

- Unannounced Inspection
 Announced Inspection

OPENING CONFERENCE

- Credentials Presented
- CBI warning to facility provided

Company Ownership: The Company is listed as Metal Management Midwest, Inc., but is doing business as Sims Metal Management.

Process Description:

The facility crushes and shreds cars, and other scrap metal in their shredder to obtain scrap sizes that can be melted down for reuse.

Staff Interview: We did not enter the facility but spoke with a citizen, named Jim, who prefers not to give his last name. He works at the City of Chicago Streets and Sanitation Facility directly east of the Sims Metal Management property. The garages where he works are about 300 meters from the shredder and there is an approximately 12 foot high wall separating the properties. Jim stated that dust and smoke from the shredder and car crusher blows over into the garages and creates dust clouds and haze over the area. He says that dust accumulates on the cars, trucks and windows. He has noticed that he and his coworkers have had increased respiratory stress during periods when the dust is worse. On the day of the visit he mentioned that the smoke was worse before we arrived and had improved a little since we arrived.

TOUR INFORMATION

EPA toured the facility: No

Data Collected and Observations:

Significant amounts of dust and smoke were observed exiting the top of the shredder. Clouds of smoke floated up out of the shredder and over the fence south of the Streets and Sanitation parking area. Not all smoke exiting the shredder seemed to be crossing the property line, and it seemed that gusts of wind were variable.

Field Measurements: were not taken during this inspection.

Concerns: Dust crossing the property line is a concern and there was significant amounts of PM observed exiting the shredder uncontrolled.

SIGNATURES

Lead Inspector: *Ditt Curry* Date: 9/14/16
Section Chief: *Math B* Date: 10/29/16

Facility Name: Metal Management Midwest
Facility Location: 2500 S Paulina St. Chicago, IL
Date of Inspection: September 7, 2016

APPENDICES AND ATTACHMENTS

- Appendix A: Photos

Facility Name: Metal Management Midwest
Facility Location: 2500 S Paulina St. Chicago, IL
Date of Inspection: September 7, 2016

APPENDIX A: FIELD MEASUREMENT DATA

Photos can be assessed at: G:\Air Enforcement And Compliance Branch\IL and IN\SConnolly

Photo No.	Date and Time	Description
IMG_0001	September 7, 2016 at 8:53PM	Dust and Smoke exiting the Shredder
IMG_0002	September 7, 2016 at 8:53PM	Dust and Smoke exiting the Shredder
IMG_0003	September 7, 2016 at 8:53PM	Dust and Smoke exiting the Shredder
IMG_0004	September 7, 2016 at 8:54PM	Dust crossing the property line over the boundary fence
IMG_0005	September 7, 2016 at 8:55PM	Dust and Smoke exiting the Shredder
IMG_0006	September 7, 2016 at 8:56PM	Dust crossing the property line over the boundary fence
IMG_0007	September 7, 2016 at 8:56PM	Dust and Smoke exiting the Shredder
IMG_0008	September 7, 2016 at 8:57PM	Dust and Smoke exiting the Shredder
IMG_0009	September 7, 2016 at 8:58PM	Dust and Smoke exiting the Shredder



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: JAN. 3 2017

SUBJECT: CLEAN AIR ACT INSPECTION
REPORT
Metal Management Midwest, Inc., Chicago
Illinois

FROM: Scott Connolly, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Metal Management Midwest, Inc.

Facility Location: 2500 South Paulina St. Chicago, Illinois

Date of Inspection: December 2, 2016

Lead Inspector: Scott Connolly, Environmental Engineer, US EPA

Other Attendees:

1. Sara Loiacono, Environmental Scientist, US EPA
2. Debbie Hays, Central Region SHEC Director, SIMS Metal Management
3. George Malamis, Regional Ferrous Manager, SIMS Metal Management
4. Sam Flores, Plant Supervisor SIMS Metal Management

Purpose of Inspection: To inspect the facility's compliance with the Illinois SIP, to investigate if emission testing at the facility is possible and to address many citizen complaints.

Facility Type: Scrap yard that prepares post-consumer metal for recycling

Arrival Time: 11:00 am

Departure Time: 12:07 pm

Inspection Type:

- Unannounced Inspection
- Announced Inspection

OPENING CONFERENCE

- Credentials Presented
- CBI warning to facility provided

The following information was obtained verbally from Debbie Hays or George Malamis unless otherwise noted.

Company Ownership: The Company owned by Metal Management Midwest, Inc., but is doing business as Sims Metal Management (SIMS).

Process Description:

The facility processes post-consumer metals for recycling in steel mills and other foundries. Scrap metal arrives at the facility mostly by truck, but sometimes by barge. Cars, sheet iron, appliances and sheet fencing are normally the main items processed in the shredder. Cranes are used to load scrap metal onto the conveyer that feeds the hammer mill shredder. The shredder breaks apart the metal into small pieces that can be easily transported. The shredder is equipped with a water spray system that increases the spray depending on the power sent to the motor. Shredded scrap exits the shredder unit and is transferred on two open conveyors to the magnetic separator. The separator removes ferrous from non-ferrous materials and sends each to separate bins for storage. The SIMS facility operates a Z-box air cyclone system that sucks lighter materials and dust out of the scrap to maintain the consistency of the scrap. This system uses recirculating air which results in no emission point.

Staff Interview: Facility staff stated the shredder usually operates about 4-6 hours per day and starts operations after 6 am when the employees arrive. Ms. Hays stated that the facility keeps a log of start and stop times of the shredder and the amount of water used. Mr. Malamis stated that the facility processes mostly white goods or post-consumer scrap and about 35-40% cars. SIMS has contracts with the car decommissioning companies that provide the bulk of the scrap automobiles to SIMS. These contracts require the companies to certify that they remove fluids, refrigerants, and engines from car husks before sending them to SIMS. When SIMS receives scrap from non-contracted sources Ms. Hays stated that facility staff remove fluids and refrigerants from the decommissioning station on site. I asked about explosions occurring in the shredder because they were a component of the community complaints, and facility staff stated that they are very rare occurrences that have not happened in a long time. The operator of the shredder is supposed to maintain a log of explosions, which the company calls "energy releases," that includes time of occurrence.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

We toured the facility to specifically view the shredder Z-box system and water spray application. During our tour, fully shredded scrap metal was exiting a closed conveyor belt, which deposited it into piles. The piles and point of contact of the scrap metal stream appeared to be smoking and emitting some steam. The facility lists the Z-box system as control equipment for its shredder, but there are two uncovered conveyors that shredded scrap travels on before it enters the ferrous metal separator and Z-box system. During observation of shredder operations, we observed a smoky haze that drifted down from the steam plume exiting the top of the shredder. The haze lingered for several minutes before dissipating, and haze events were observed several times. At times during operations, we observed metal scrap flying out of the top of the shredder. At 11:58 am we observed an explosion in the hammer mill that resulted in a fire and brown smoke rapidly exiting the top of the shredder. The entire event lasted about 30-45 seconds and caused vibrations that could be felt from at least 100 meters from the shredder. We also noted that there were large amounts of painted scrap in the material sent into the shredder.

Field Measurements: were taken during this inspection.

The hammer mill shredder was observed and recorded with the FLIR infrared camera. Using the FLIR infrared camera, we observed hydrocarbons exiting the top and bottom of the shredder and three videos were taken.

CLOSING CONFERENCE

Concerns: We observed hydrocarbons exiting different parts of the hammer mill shredder and pointed this out to facility staff. We also observed particulate matter emissions exiting the shredder in clouds that faded to a haze before it was blown east away from the equipment. Additionally, we observed an explosion in the shredder that resulted in flames, metals, and brown smoke shooting out of the top of the shredder.

SIGNATURES

Lead Inspector: *Seth Curry* Date: 12/16/16

Section Chief: *Nathan A. [Signature]* Date: 1/3/17

Facility Name: Metal Management Midwest
Facility Location: 2500 S Paulina Ave, Chicago, IL
Date of Inspection: December 2, 2016

APPENDICES AND ATTACHMENTS

- Appendix A: FLIR Videos

Facility Name: Metal Management Midwest
Facility Location: 2500 S. Paulina Ave. Chicago, IL
Date of Inspection: December 2, 2016

APPENDIX A: FLIR VIDEOS

Videos can be assessed at: G:\Air Enforcement And Compliance Branch\IL and IN\SConnolly

Photo No.	Date and Time	Description
MOV_1722	December 2, 2016 at 9:12 AM	Steam and Hydrocarbons exiting the top of the Shredder as seen from the east
MOV_1723	December 2, 2016 at 11:46 AM	Steam and Hydrocarbons exiting the top of the Shredder as seen from the west
MOV_1724	December 2, 2016 at 11:48 AM	Hydrocarbons exiting the side of the Shredder as seen from the west