

SIMS Metal Management Comments (11/3/2022 – 12/7/2022)

Date Comment Received	Comment
<p>2022-12-06 1:22 p.m.</p>	<p>Why is Sims not receiving any more tickets for all the auto fluff that blows off their property? Do your inspectors not look at other properties near Sims? Or do they not know what fluff looks like? It is constantly blowing all over the neighborhood. Is this not a violation of City rules anymore? Please show the inspectors these pictures that were just taken so they know what to look for. Fluff is everywhere around Sims!</p>
<p>2022-11-22 11:27 a.m.</p>	<p>As CDPH is aware, Sims was ordered by the U.S. EPA to conduct air pollution monitoring to “help EPA assess the company’s compliance with the Clean Air Act” and because Sims “is located in an area of Chicago with environmental justice concerns, and EPA has an agency-wide commitment to advance environmental justice and deliver benefits to underserved and overburdened communities.” https://www.epa.gov/il/sims-metal-management According to the above U.S. EPA website, “EPA reviewed and approved the company’s monitoring and quality assurance plans and the monitors began operating on September 23. EPA inspected Sims on October 4, 2022 to address a citizen complaint and check on the air monitors. On October 31st, EPA received Sims’ monitoring and sampling data for September 23 - 30, 2022. After reviewing the September metal HAP and PM10 data, EPA has concerns that the monitoring equipment did not work as designed. Specifically, EPA is concerned that the monitoring equipment may have pulled in either too much or too little air, potentially invalidating the results. Air flow rate is important for accurate monitoring results because it is used to calculate the final concentrations of pollutants.” The September air monitoring data referenced by EPA covers a period of only 8 days, yet Sims is already having difficulty collecting data. It remains to be seen whether the cause of the air monitoring equipment pulling in too much or too little air was an intentional act or not or whether the air flow issues resulted in data readings that were lower than actual pollutant concentrations. In any event, it is difficult to imagine how air monitors that were just recently installed, and which are maintained by a supposedly reputable third-party consultant (Trinity Consultants), are already having air flow issues. In addition to the air flow “problems” with Sims’ air monitors, EPA observed during the October 4 inspection that one of the monitors was installed incorrectly. According to EPA’s inspection report “In accordance with the PM Dust Monitoring Plan submitted by Sims, for the east monitoring station (AQ2), “[t]o limit the influence of obstructions adjacent to the site, this station will be placed on an elevated platform. The distance of the inlet of the PM samplers to the adjacent building will be at least twice the differential from the inlet to the top of the building.” The PM inlet was observed to be approximately 6 feet from the ground and was not placed on an elevated platform.” Again, it is difficult to comprehend how Sims could already be violating EPA-approved monitoring and quality assurance plans, particularly since those plans were prepared by Trinity Consultants. The above facts clearly demonstrate Sims’ inability to properly implement and conduct an air pollutant monitoring program. So how can CDPH trust that Sims will be able to comply with the Operating Standards of the Rules for</p>

	<p>Large Recycling Facilities (LRFs), which not only include requirements for continuous air monitoring, but which also include notification to CDPH within 15 minutes of exceeding a Reportable Action Level? In fact, how can CDPH trust that Sims will be able to comply with ANY of the Operating Standards of the LRF Rules given the past and ongoing violations of federal, state and CDPH rules and regulations at Sims? CDPH should also note that, according to the October 4 inspection report, Sims' shredder operates "at a rate of 180 to 190 tons per hour for approximately 8 hours per day." However, the Staff Interview portion of the EPA inspection report states "The shredder operates from about 6 AM to 4 PM Monday through Friday and 6 AM to 12 PM on Saturday if they are running." Based on these hours of operation and based on the fact that Sims has NO pollution controls on its shredder, Sims' could be operating its shredder more than 2,900 hours per year and the shredder could be processing more than 550,000 tons of metal per year. At an emission rate of 0.5 pounds of Volatile Organic Materials (VOMs) per ton of metal shredded, Sims could be emitting nearly 1,000 pounds of VOMs per day, and well over 100 tons of VOMs per year. CDPH should also note that according to EPA, VOMs are photochemical oxidants associated with a number of detrimental health effects, which include birth defects and cancer, as well as environmental and ecological effects. In the presence of sunlight, VOMs are influenced by a variety of meteorological conditions and have the ability to create photochemical smog. VOMs react with oxygen in the air to produce ground-level ozone. Based on Sims' obvious inability, both past and present, to comply with federal, state and city environmental rules and regulations, along with the potential harm caused to the people of Pilsen every day that Sims is allowed to continue operating, CDPH should shut down Sims immediately! And whenever CDPH finally decides to hold a community meeting to discuss Sims, CDPH MUST explain why Sims has been allowed to operate continuously for over a year since their previous recycling permit expired, particularly in an overburdened Environmental Justice community.</p>
<p>2022-11-09 10:42 a.m.</p>	<p>Where can I read the actual "Statement" referenced in a recent Chicago Tribune article about CDPH's decision to defer the October 19 meeting for the Sims permit application? The Chicago Department of Public Health said in a statement Saturday that the department decided to defer the Oct. 19 meeting "in consultation with the community." The department "had always intended" to consider this data in its final decision on the permit, according to the statement. If CDPH "had always intended" to consider data from EPA monitors as the Tribune article indicates, CDPH clearly doesn't plan on making a decision until after the EPA data becomes available. So why then was it necessary to postpone the October meeting? A number of the points raised in the attached email to the Tribune's Maddie Ellis helps shed some light on the issue.</p>
<p>2022-11-08 4:03 p.m.</p>	<p>Has anyone from the City reached out to Emma Lozano since the protest she organized at Sims last month? Ms. Lozano may be able to provide the City with some constructive criticism regarding the LRF permitting process based on some points raised in the attached email.</p>

2022-11-07 5:03 p.m.

Has anyone at the City reached out to the NATURAL RESOURCES DEFENSE COUNCIL (NRDC) or the ENVIRONMENTAL LAW AND POLICY CENTER (ELPC) to get their feedback on the Sims' Large Recycling Facility (LRF) Permit application? CDPH clearly listened to anything and everything NRDC and ELPC had to say about Southside Recycling, but I haven't seen a single comment or statement made by either group about Sims. It is interesting, to say the least, that both NRDC and ELPC had so much to say about Southside Recycling, yet neither group has ANYTHING to say about the only other metal shredding facility in the City (Sims), particularly given Sims' history of environmental violations in an Environmental Justice (EJ) area. If NRDC and ELPC truly cared about the environment, or the health of minority populations, both organizations would be speaking up against Sims, and for the people of Pilsen. But as long as NRDC and ELPC continue, for whatever reason, to turn a blind eye to this issue, perhaps CDPH could at least review the Sims LRF application with the same level of scrutiny with which they reviewed the Southside Recycling LRF application. The people of Pilsen at least deserve that much!