

**SIMS Metal Management Comments (11/3/2022 – 1/6/2023)**

Date Comment Received	Comment	Attachment
2023-01-06 9:51 a.m.	<p>I was reading through the comments sent to CDPH about the Sims Large Recycling Facility Permit application and I came across a March 23, 2022 comment in which the person asked when Sims would have to comply with the Operating Standards (Section 4) of the new LRF rules. Section 5 of the LRF Rules states that “The requirements in Section 4 (Operating Standards) shall take effect no later than the TIMELINE SPECIFIED IN THE OPERATING PERMIT issued for an application submitted pursuant to Section 3, but NO LATER THAN SIX MONTHS FROM THE DATE THE PERMIT IS REISSUED, unless an extension for good cause is granted by the Commissioner.” The question about whether Sims, as a Large Recycling Facility, is operating in accordance with the Operating Standards of the LRF Rules is even more relevant today than it was last March based on the following facts: 1) Sims' previous (non-LRF) permit with CDPH expired well over a year ago, on November 15, 2021, and 2) CDPH clearly has no intention of issuing an LRF Permit to Sims anytime soon based on the fact that CDPH is still accepting comments on the LRF Permit application and an initial community meeting has STILL not been scheduled by CDPH. While anyone that has read the LRF Rules would likely agree they are VERY poorly written, CDPH needs to clarify what standards Sims is currently complying with and if/when CDPH began enforcing those standards. As the March 23, 2022 commenter accurately points out, the requirements in Section 5 can't really be applied to ANY Large Recycling Facility since CDPH is yet to issue an LRF Permit to ANY recycling facility in the City of Chicago. Since CDPH has not issued an LRF Permit to Sims, or any other recycling facility, a "timeline specified in the operating permit" does not exist. And without CDPH ever issuing an initial LRF Permit, a "reissued" permit for Sims, or any other facility, cannot exist either. Despite the ambiguous language in the LRF Rules, logic suggests that if CDPH were to reissue a permit to Sims it would have been the Class IVB Recycling Permit which expired on November 15, 2021. Assuming that the term of a renewed Class IVB Recycling Permit would have started on or about the expiration date of the previous permit, Sims' recycling permit would have been reissued on November 15 or 16, 2021. Based on the fact that "the requirements in Section 4 shall take effect NO LATER THAN SIX MONTHS FROM THE DATE THE PERMIT IS REISSUED", Sims should, therefore, have begun complying with the LRF Operating Standards on or about May 15, 2022, unless "an extension for good cause" was granted by the Commissioner. Given that CDPH continues to allow Sims to operate a metal shredder at maximum levels and with no pollution controls, CDPH owes it to the people of Pilsen to answer the following questions AS SOON AS POSSIBLE: 1) Has Sims been operating in accordance with the requirements in Section 4 of the LRF Rules since May 15 or May 16, 2022? If so, please provide evidence. 2) If Sims has not been operating in accordance with the Operating Standards in Section 4, did the Commissioner grant an extension to Sims for good cause? If so, please provide a copy of the extension and evidence of good cause.</p>	None
2023-01-04 10:07 a.m.	<p>While searching the CDPH website for the status of the Sims Large Recycling Facility Permit application submitted to CDPH over a year ago, I found a propaganda piece titled “2022 Year In Review – CDPH Environmental Protection Accomplishments”. After reviewing the list of CDPH’s “accomplishments”, I felt compelled to point out one of the major flaws in CDPH’s self-serving assessment of its performance, specifically the statements made on Page 2 under USED HEALTH IMPACT ASSESSMENT TO INFORM DECISION-MAKING. In that section, CDPH congratulates itself for having “Conducted an eight-month Health Impact Assessment including public meetings to understand neighborhood concerns about a proposed large recycling facility on the Southeast Side. Ultimately, CDPH denied the permit to protect the environment and public health.” How can CDPH point to this as an accomplishment for the City’s health OR environment while failing to mention that CDPH is allowing the only other large recycling facility in the City (Sims) to continue operating a shredder with NO means of controlling emissions in an Environmental</p>	None

	<p>Justice area (Pilsen)? As CDPH is well aware, the proposed SE Side recycling facility would have operated its metal shredder, from the beginning, with advanced systems for controlling emissions of particulate matter, metals and volatile organic compounds. These were the same emission controls in place at General Iron prior to its shutdown in 2020. However, with General Iron no longer operating, and with CDPH denying the SE Side recycling facility permit, scrap metal has been processed for the last TWO YEARS STRAIGHT by Sims, a company with an extensive history of environmental violations. All residents in and around Pilsen should be deeply offended that CDPH would claim to be protecting Chicago's environment or public health without soliciting feedback or listening to the concerns of residents that live OUTSIDE Chicago's Southeast Side, particularly before making a decision to deny a permit to the only other large recycling facility in the City. CDPH was fully aware that with the denial of the SE Side recycling facility permit, and with no other large recycling facility in the City, Sims would end up processing scrap metal at a significantly higher rate with NO controls on its shredder. The fact that Sims' previous CDPH recycling facility permit expired OVER A YEAR AGO and CDPH has STILL not even scheduled a community meeting to understand neighborhood concerns about Sims adds further insult to injury. If CDPH were truly concerned about protecting the environment and public health of ALL Chicago residents, particularly residents living near Sims, the City would shut down Sims and deny their permit for a Large Recycling Facility!</p>	
<p>2023-01-03 11:50 a.m.</p>	<p>Has anyone from CDPH reached out to the Pilsen Environmental Rights and Reform Organization (PERRO) to get their input on Sims and their Large Recycling Facility Permit application? Troy Hernandez raises some great points in his May 2, 2022 blog (see link below): <a href="https://troyhernandez.com/2022/05/02/were-finally-talking-about-sims/">https://troyhernandez.com/2022/05/02/were-finally-talking-about-sims/</a></p>	<p>None</p>
<p>2022-12-27 1:15 p.m.</p>	<p>If, and when, the City ever decides to hold a community meeting to address concerns about Sims and their application for a LARGE RECYCLING FACILITY PERMIT, please have someone explain why CDPH continues to spread misinformation and why the department continues to downplay the fact that Sims applied to CDPH for a Large Recycling Facility Permit, NOT simply renewal of an existing permit. As CDPH is well aware, the website where the Sims application is posted (Public Health - Community Information) STILL states that "On November 12, 2021, CDPH received a PERMIT RENEWAL APPLICATION from Metal Management Midwest, Inc., doing business as Sims Metal Management ("Sims"). The application is for a RENEWAL OF THE CLASS IVB RECYCLING PERMIT for the facility located at 2500 S. Paulina Street." Yet upon review of the permit application submitted by Sims to CDPH well over a year ago, Sims did not make a SINGLE request for either 1) renewal of an existing permit, or 2) issuance of a Class IVB Recycling Permit. Not only are there ZERO references in the Sims application to "permit renewal" or "Class IVB Recycling Permit", the Introduction section of the application actually states: "Metal Management Midwest, Inc. (d/b/a Sims Metal) owns and operates a scrap metal processing facility located at 2500 S. Paulina Street in Chicago (Paulina Facility). Sims Metal is submitting this Application for a LARGE RECYCLING FACILITY PERMIT pursuant to Condition 3 of the City of Chicago Rules for Large Recycling Facilities (RLRF), effective June 5, 2020." If Sims is willing to acknowledge that their application is, in fact, for a Large Recycling Facility Permit, and Sims did not state ANYWHERE in their application that they were applying for renewal of a Class IVB Recycling Permit, why is CDPH still claiming that the Sims application is for a permit renewal? The people of Pilsen deserve answers to this question and they also deserve to know if this is an attempt to distract people from the very real hazards of Sims being allowed by CDPH to continue operating a shredder with no pollution controls on its shredder in an Environmental Justice community!!! The truth is that Sims is NOT simply applying for renewal of a Class IVB Recycling Permit and CDPH knows it!!! Continuing to push a false narrative that Sims is merely applying for renewal of their Class IVB Recycling Permit, A PERMIT WHICH EXPIRED OVER A YEAR AGO, is misleading at best, and a blatant lie at worst!!!</p>	<p>None</p>

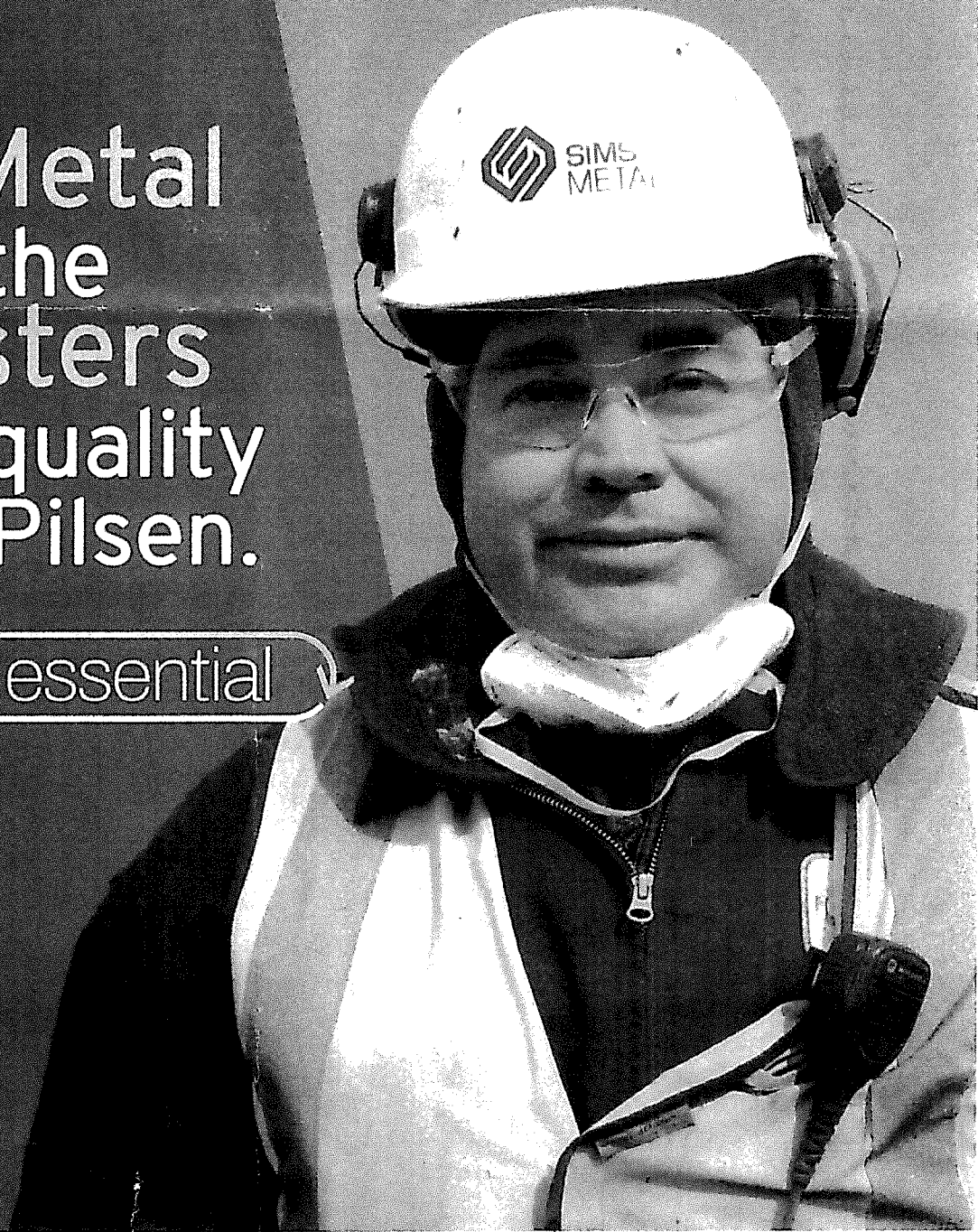
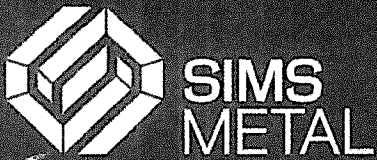
<p>2022-12-15 3:15 p.m.</p>	<p>Has your Department asked to see what "advanced controls" Sims is supposedly installing that will cost \$15 million? Sims has been passing out flyers (attached) with propaganda about upgrades that "will allow us to continue to be a good neighbor"? If Sims really cared about being a good neighbor, they would have installed pollution controls YEARS AGO, without being forced to do so by the Illinois Attorney General, the Illinois EPA and the U.S. EPA. The only other shredder in Chicago (General Iron) installed a pollution control system to control emissions of particulate matter and metals nearly a decade ago. In addition, General Iron installed a thermal oxidizer and wet scrubber to control volatile organic material over three years ago. General Iron has been shut down for nearly TWO YEARS, and yet Sims is still operating a shredder with NO POLLUTION CONTROL EQUIPMENT!!! With Sims' extensive history of violating federal, state and local environmental regulations, and their obvious strategy to avoid installing pollution controls as long as possible, CDPH should question whether Sims' claim of spending \$15 million is legitimate, or whether it's just their latest ploy to fool the people of Pilsen into believing that Sims cares about the neighborhood!!! CDPH must deny Sims' application to operate a Large Recycling Facility (LRF) just like they denied the LRF permit to Southside Recycling. And if the City doesn't shut down Sims just like they forced the shut down of General Iron, then the message is clear that your administration cares far more about the wealthy residents of Lincoln Park than the low-income, minority residents of Chicago's southwest and southeast sides!!!</p>	<p>Appendix A</p>
<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>Appendix B</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." <a href="https://www.epa.gov/il/sims-metal-management">https://www.epa.gov/il/sims-metal-management</a> 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</p>	<p>None</p>

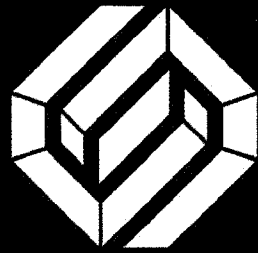
	<p>EPA-approved monitoring and quality assurance plans, particularly since those plans were prepared by Trinity Consultants. The above facts clearly demonstrate Sims' inability to properly implement and conduct an air pollutant monitoring program. So how can CDPH trust that Sims will be able to comply with the Operating Standards of the Rules for 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>	
2022-11-09 10:42 a.m.	<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>	Appendix C
2022-11-08 4:03 p.m.	<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>	Appendix D
2022-11-07 5:03 p.m.	<p>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</p>	None

	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!	
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Sims Metal  
and the  
Teamsters  
provide quality  
jobs for Pilsen.

Recycling is essential





**SIMS  
METAL**

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has been a good neighbor  
in Pilsen for 30 years.

↻ Recycling is essential ↻





October 18, 2022

Dear Neighbors,

**Recycling is essential!** In case you haven't heard of us, we are Sims Metal, a recycling facility on Paulina Street between Blue Island Avenue and the Chicago River. We recycle metal that otherwise might end up in landfills or abandoned on roadsides or in vacant lots. In fact, 80% of the metal we handle is dropped off by local peddlers who value recycling. We recycle smaller scrap metal items along with larger ones, such as end-of-life cars and appliances, all of which are eventually transformed into new products.

Our company has also been a longtime contributor to the local economy by supplying good-paying, union jobs through Teamsters Local #731 and by supporting our local recycling suppliers. And we support our community by investing time and money in local charitable causes, such as a local food pantry, neighborhood churches, and Chicago Public Schools.

At Sims Metal, we take pride in being a sustainable business. We are stewards of our natural resources, and we are focused on adhering to federal, state, and local regulations. We welcome the City of Chicago's new rigorous operational regulations for recycling facilities, and we are committed to meeting each requirement.

Our plans to use state-of-the-art emission controls on our metal shredder will be an environmental win for Pilsen and for recycling.

Air quality is important to all Chicagoans – that includes Sims Metal and our employees. That's why we are investing \$15 million in advanced emissions controls, a project that has been approved by the Illinois Environmental Protection Agency. Plus, we added five air monitors around our facility to measure dust, metals, and volatile organic compounds. These significant upgrades to our environmental control systems will not only improve how we recycle, but they will also allow us to continue being a good neighbor.

We are seeking a renewal of our three-year recycling permit from the City of Chicago, and we have already submitted our application to bring these changes to our operations. But this renewal is different; the Chicago Department of Public Health has issued brand new enhanced regulations for "large recycling facilities," and Sims Metal agrees that these regulations are good for our community.

We are deeply invested in doing the right thing *and* in being a good community partner. Please visit our website [simsmm.com/pilsen](http://simsmm.com/pilsen) to learn more.

Sincerely,

George Malamis  
General Manager at Sims Metal



Octubre 18, 2022



Estimados vecinos,

¡Reciclar es fundamental! En caso de que no haya oído hablar de nosotros, somos Sims Metal, una instalación de reciclaje en Paulina Street entre Blue Island Avenue y el Río Chicago.

Reciclamos metal que, de lo contrario, podría terminar en vertederos, abandonado en los bordes de las carreteras o en lotes baldíos. De hecho, el 80% del metal que manejamos lo entregan los vendedores ambulantes locales que valoran el reciclaje. Reciclamos artículos de chatarra al final de su vida útil, desde los más pequeños a los más grandes, como automóviles y electrodomésticos, todos los cuales eventualmente se transforman en nuevos productos.

Nuestra empresa también ha contribuido durante mucho tiempo a la economía local al generar empleos sindicales bien remunerados a través de Teamsters Local #731 y apoyando a nuestros proveedores locales de reciclaje. Y entregamos apoyo a nuestra comunidad invirtiendo tiempo y dinero en causas benéficas, como una despensa de alimentos, iglesias vecinales y contribuciones en las Escuelas Públicas de Chicago.

En Sims Metal, nos enorgullecemos de ser una empresa sostenible. Somos protectores de nuestros recursos naturales, y estamos enfocados en adherirnos a las leyes federales, estatales y locales y todos los reglamentos. Damos la bienvenida a las nuevas y rigurosas normas operativas de la Ciudad de Chicago para instalaciones de reciclaje, y estamos comprometidos a cumplir con cada requisito.

Nuestros planes de utilizar controles de emisión de última generación en nuestra trituradora de metal serán una victoria ambiental para Pilsen y para el reciclaje.

La calidad del aire es importante para todos los habitantes de Chicago, eso incluye a Sims Metal y a nuestros empleados. Por esto mismo, estamos invirtiendo \$15 millones en controles avanzados de emisiones, un proyecto que ha sido aprobado por la Agencia de Protección Ambiental de Illinois (IEPA). Además, agregamos cinco monitores de aire alrededor de nuestras instalaciones para medir el polvo, los metales y los compuestos orgánicos volátiles. Estas mejoras significativas a nuestros sistemas de control ambiental no solo mejorarán la forma en que reciclamos, sino que también nos permitirán seguir siendo un buen vecino.

Estamos buscando una renovación de nuestro permiso de reciclaje de tres años con la Ciudad de Chicago, y ya hemos enviado nuestra solicitud para traer estos cambios a nuestras operaciones. Pero esta renovación es diferente: el Departamento de Salud Pública de Chicago ha emitido nuevas y mejoradas regulaciones para "grandes instalaciones de reciclaje" y Sims Metal está de acuerdo en que estas regulaciones son buenas para nuestra comunidad.

Estamos profundamente comprometidos en hacer lo correcto y en ser un buen socio de la comunidad. Para obtener más información, visite nuestro sitio web [simsmm.com/pilsen](http://simsmm.com/pilsen)

Sinceramente,

**George Malamis**  
Gerente General de Sims Metal













**From:** Ellis, Madeline [REDACTED]  
**To:** RAUL MORENO JR [REDACTED]  
**Sent:** Wednesday, November 2, 2022 at 12:34:51 PM CDT  
**Subject:** Re: SIMS METAL MANAGMENT

Hi Raul,

Thank you for writing, I appreciate it. I am continuing to cover this situation and am currently looking into city hall action, what these calls for a cumulative impact study mean in practice and what current timelines are/mean for the community.

I am grateful for you reading and sharing feedback.

Best,

Maddie

On Wed, Nov 2, 2022 at 12:00 PM RAUL MORENO JR [REDACTED] wrote:

I appreciate you covering the ongoing controversy regarding Sims Metal Management in your article "***Demonstrators cheer on news public meeting about Sims Metal operating permit postponed until air quality data released from EPA***". However, your article failed to mention the following facts:

- Sims was/is operating under a Class IVB recycling facility permit, which expired on November 15, 2021.
- Sims is considered a Large Recycling Facility (LRF) under LRF Rules adopted by the Chicago Department of Public Health (CDPH) in June 2020.
- Sims submitted an application for an LRF Permit to CDPH on November 12, 2021.
- Almost one year later, CDPH, in violation of their own guidelines, has not held a community meeting or provided any information regarding their review of the Sims LRF application.
- Despite their extensive history of past and ongoing violations of federal, state, and city environmental regulations, Sims is currently operating an LRF under an expired Class IVB permit.

The last fact listed above, that Sims is still currently operating an LRF without an LRF Permit and nearly one year past the date its Class IVB Permit expired, is the most important point omitted from your article.

The story of a neighborhood celebrating the delay of a planned October 19 CDPH community meeting makes for a good headline. And developments that seem to move in the direction of neighborhood demands for the completion of a cumulative health impact study prior to CDPH's issuance of a recycling facility permit to Sims and/or the denial of the Sims recycling facility permit altogether make for a good story.

Unfortunately, these narratives also distract from the unfortunate fact that residents of Pilsen continue to be exposed to emissions of particulate matter, metals, and volatile organic compounds every day that Sims operates its shredder with no emission controls. They also distract from the fact that CDPH is clearly dragging out the permit process, while simultaneously conducting less frequent inspections of the Sims facility.



The people of Pilsen also deserve know who is benefitting from certain decisions and whether Pilsen's interests are truly being represented. Facts presented in the following blog help shine a light on some of the people leading the "fight" against Sims:

<https://troyhernandez.com/2022/05/02/were-finally-talking-about-sims/>

If Pilsen residents were aware of the facts presented here and in the linked blog, they would likely come to the conclusion that Sims and CDPH would prefer to delay the permit process as long as possible. Sims gets to continue operating indefinitely without spending any money to control shredder emissions, while the City gets to delay a potentially controversial and politically harmful decision until after the mayoral election.

ThankYou,

Raul Moreno JR

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Maddie Ellis  
The Chicago Tribune





**From:** RAUL MORENO JR [REDACTED]  
**To:** [REDACTED]  
**Sent:** Wednesday, October 26, 2022 at 07:12:02 PM CDT  
**Subject:** To Pastor Emma Lozano

Dear Pastor Lozano:

Let me begin by stating that I sincerely appreciate the efforts of you and your organization in bringing attention to the Sims Metal Management facility located at 2500 S. Paulina in Chicago, including their history of environmental compliance problems dating back years, if not decades. I truly believe that your organization has the best interests of the community in mind. That being said, I feel there is one issue that should be getting more attention, which is that Sims is still spewing uncontrolled emissions of particulate matter, metals and volatile organic compounds, with no end in sight, less than a quarter mile from Pilsen's residents and students.

In my humble opinion, the neighborhood would be better served if there was more focus on demanding that CDPH shut down the Sims operation, and less emphasis on either demanding that the City complete a cumulative health impact study prior to CDPH's issuance of a recycling facility permit to Sims or demanding that the City deny the Sims recycling facility permit. While these two delayed scenarios may eventually lead to a positive outcome for Pilsen, they also distract people from the fact that Sims continues to operate on a daily basis in violation of federal, state and city environmental regulations. They also take the spotlight away from CDPH's failure to effectively regulate Sims.

You are likely aware that it's been nearly a year since Sims submitted a permit application for a Large Recycling Facility to CDPH and that the frequency and thoroughness of inspections of Sims by CDPH over the last two years has steadily decreased. However, you may not be aware that CDPH is currently in violation of their own published rules and guidelines for Large Recycling Facilities with regard to the Sims permit application (attached).

Between CDPH's failure to effectively regulate Sims and their failure to abide by their own rules and guidelines, along with the fact that CDPH doesn't plan to complete its cumulative impact study until the end of 2023, Pilsen residents should know that CDPH has set the stage to allow Sims to continue operating, for at least another year, with a shredder that has no means of controlling harmful emissions including Volatile Organic Materials (VOMs) and Particulate Matter. 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. And Particulate Matter, especially fine particulates, contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. According to EPA, particulate matter exposure contributes to, irritation of the airways, coughing, and difficulty breathing; decreased lung function; aggravated asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease.

On the surface, it is understandable that, to some people, the delay of a planned October 19 CDPH community meeting regarding the Sims permit application might seem like a victory. However, I can assure you that Sims and CDPH were beyond thrilled that the meeting was postponed since it allows Sims to continue operating a noncompliant facility, for an indefinite period of time, and the City has a better chance of delaying any potential controversy regarding Sims until after the Mayoral election.

On another note, I am also wondering if you or anyone in your organization have reached out to any of the large national advocacy groups such the National Resources Defense Council, the Sierra Club or the Environmental Law and Policy Center for assistance in your fight against Sims. The involvement of these well-funded organizations, among others, appears to have been instrumental in the City's denial of the Southside Recycling facility permit on the Southeast Side but I have not seen any evidence that any of these high profile groups have spoken up against Sims or on behalf of Pilsen's citizens.

[Sent from Yahoo Mail on Android](#)