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May 15, 2024

Chicago Dept. of Public Health 2160 W Ogden Ave, Chicago, IL 60612 (312) 771-6252

ATTN: Abraham Perez Kiamber

Environmental Engineer III

RE: Metal Management Midwest, Inc., d/b/a Sims Metal

Refreshed Air Modeling

Dear Mr. Perez Kiamber,

At the direction of both the Illinois Environmental Protection Agency (Illinois EPA) and the Chicago Department of Public Health (CDPH), the Air Dispersion Modeling Study submitted with the Sims permit application for a Large Recycling Facility (November 2021) has been refreshed. As indicated in the modeling report, the modeling was originally performed utilizing meteorological data from 2012 to 2016. Sims was asked to refresh the modeling study with more recent meteorological data, provide a modeling analysis of the future, controlled shredder operating scenario, and update any other parameters as appropriate.

Attached to this letter is a brief memorandum that summarizes the results of the refreshed modeling effort. The results do demonstrate a decrease in PM10 concentrations in comparison to the 2021 modeling effort. In addition, the controlled operating scenario that was modeled demonstrated PM10 concentrations more than 65% below the modeling results from the existing uncontrolled configuration.

Air dispersion modeling generally provides conservative (high) concentration data in comparison to actual observations made in the field. The conservative nature of the models are why such evaluations are utilized for permitting, risk assessment and planning purposes. As Illinois EPA and CDPH are aware, Sims has been performing ambient air monitoring at the Paulina Avenue facility since September 2022. The typical 24-hour average PM10 concentrations observed at the facility, throughout the monitoring effort (and at all five monitors), are considerably below the "AERMOD Predicted Concentration" value provided in the attached memorandum for uncontrolled shredder operation. As the US EPA's website continues to document each month (with the exception of those impacted by Canadian wild fires), no 24-hour average PM10 concentrations have been seen above EPA's health-based PM10 standard of 150 ug/m3 over a 24-hour period.

Please let us know if you have any questions or comments regarding the attached memorandum or the modeling that was refreshed.

Sincerely,

Metal Management Midwest, Inc

Deborah Hays