



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

September 16, 2022

Mr. Scott A. Dawson, P.G., R.G
Civil & Environmental Consultants, Inc.
1230 East Diehl Road, Suite 200
Naperville, Illinois 60563

**Subject: Application for Waste Handling Facility Permit Expansion and Modification
Lakeshore Recycling Systems, LLC, 2141 S. Packers Ave
Deficiency Letter and Request for Additional Information**

Dear Mr. Dawson,

The Chicago Department of Public Health ("the CDPH") received Lakeshore Recycling Systems, LLC's ("the Applicant") long form permit application dated April 29, 2022 ("the Application"). The Application seeks an expansion of the permitted capacities and physical boundaries of the site at 2141 S Packers Avenue ("the Facility"). The Application also seeks a permit modification to make capital improvements, including the construction of a new MSW building,

Based on CDPH review pursuant to requirements set forth in the rules for Landfills, Liquid Waste Handling Facilities and Transfer Stations last updated April 3, 1998 ("the Rules") and Section 11-4-1525 of the Code, CDPH requires the following information to complete its review:

1. Pursuant to 12.3 of the Rules, provide the plans and drawings by Hutter Architects, LTD that were referenced in the Zoning Board of Appeals (ZBA) Minutes of Meeting (CAL. No. 435-21-S) dated October 15, 2021, or confirm that the plans and drawings provided as Drawings A000, A201, A200, and L100 in the Application are substantively the same as those referenced in said Minutes of Meeting.
2. Pursuant to 12.4.11.3, provide an operating and maintenance plan for all structures and fixed equipment. Such plan shall include best management practices (BMPs) that ensure the safe operation of these structures and equipment, and minimizes impacts to the environment and surrounding properties, including compliance with applicable noise, air, and water quality standards. The plan must also provide standard operating procedures (SOPs) in the routine cleanout of floatables and settled solids from the Stormtrap detention system.

The Applicant may submit the current plan for its existing operations at the Facility. CDPH will later require the submittal of an updated plan for the expanded operations and new site improvements, as a special condition of the permit.

3. Pursuant to 12.4.17.1 and 12.4.17.2 of the Rules, provide a description and specifications of the fencing surrounding the Facility (e.g., height, material, etc.).
4. Pursuant to 14.4, provide the make and model of the mechanical street sweeper. Such street sweeper shall be equipped with a water spray and vacuum system. The Applicant may propose sweepers incorporating newer technologies that use less water or are waterless and are PM10-certified by Canada's Environmental Technology Verification, the South Coast Air Quality Management District of California, or other certifications approved by the Commissioner.
5. Pursuant to 14.14 of the Rules, provide a maintenance plan that ensure the long-term integrity and effectiveness of site pavements in controlling mud and dust.
6. Pursuant to 14.17 of the Rules, to assess potential noise impacts, provide a list of all activities that may be conducted outdoors between the hours of 8:00 p.m. to 8:00 a.m. In addition, provide the following information for each outdoor mechanical equipment/device, including but not limited to air pollution control devices, blowers, fans, pumps, motors, and generators that may be operated over the above hours:
 - brief description, make and model number;
 - physical dimensions in meters,
 - sound power, or sound pressure reading and measurement distance,
 - location in UTM coordinates, and
 - installation height in meters.
7. Pursuant to 14.18 of the Rules, provide details on the Facility's odor control system, including the location of all spray nozzles, storage tank, and pumps. In addition, provide a demonstration that the system is appropriately sized and capable of neutralizing odors at the Facility. Finally, demonstrate that any odor-neutralizing chemical used is not harmful to workers and the environment, as applied at the Facility.
8. Pursuant to 14.19 of the Rules, provide a dust plan for the prevention or minimization of dust emissions occurring both on and off-site. If handling or storing any materials outdoors, such plan shall include measures to control and suppress dust such as dust cannons or other fine misting systems, full or partial enclosures, and/or wind screens. In addition, the dust plan shall describe measures for controlling dust during freezing temperatures, or alternatively, use dry systems that capture and filter dust without water.

9. Pursuant to 15.8 of the Rules, provide a demonstration that the transfer building is adequately ventilated for worker health, safety, and comfort, particularly when overhead doors are closed to prevent the escape of dust or odors. Such demonstration shall include a documentation that the building complies with all pertinent building code requirements pertaining to natural or forced air ventilation, and a worker personal sampling plan to be conducted post-operation, to confirm compliance with OSHA standards for maximum dust levels in an occupied space.
10. Pursuant to 15.9 of the Rules, provide a demonstration that the internal roads are designed to withstand the expected loads at the Facility. In addition, confirm CDPH's understanding that all outdoor areas will be paved with concrete.

The CDPH may require further additional information based on your responses to this information request, or to address specific neighborhood concerns. If you have any questions regarding this deficiency letter, please call me at (312) 745-3136.

Sincerely,



Renante Marante
Environmental Engineer III
Permitting and Inspections Program