

November 6, 2024

SUBMITTED VIA E-MAIL

Mr. Nathan Frank
Section Supervisor
United States Environmental Protection Agency
Region 5
Air Enforcement & Compliance Assurance Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Metal Management Midwest, Inc. – 2500 S. Paulina Street
June 17, 2024 Sampling Event

Dear Mr. Frank,

Metal Management Midwest, Inc. (Sims) operates a network of ambient air monitors at the company's Paulina Street facility in the Pilsen community of Chicago. The ambient air monitors perform continuous analysis of the ambient air for concentrations of particulate matter ten microns and smaller. Air sampling for Volatile Organic Compounds (VOCs) and certain metal compounds is conducted every three days at three of the monitor locations.

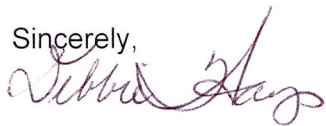
Sims has prepared this brief communication in response to our observation of and US EPA's related inquiry into a benzene data point of 13.23 ppb at the East Monitor on June 17, 2024. The associated air canister commenced sampling at approximately 3:00 PM on 6/17 and continued for 24-hours (into 6/18). The recorded wind direction over the associated sampling time was out of the South (at an average direction of approximately 190 degrees).

Based on the measured benzene concentration (13.23 ppb) and the associated wind direction (nearly due South), it was apparent to Sims that the benzene value could not be related to any stationary source activity at the facility (e.g., the detection could not be from the shredder). In investigating potential causes for the 6/17 benzene value, Trinity Consultants (i.e., the contractor for the ambient air monitoring network) reached out to the laboratory that performs analysis of the VOC sampling canisters. The laboratory informed Trinity that the concentrations of several chemicals in the sampled canister had concentrations at a ratio that matched the previous sample (from another facility) taken in that canister. The laboratory reported that the previous sample had very high concentrations of the associated pollutants and the Sims sample showed "carryover" from that previous sample. The laboratory practices batch cleaning activities for their canisters (i.e., 6-8 canisters are cleaned at once), and then selects one canister to analyze to certify that the batch has been fully cleaned. The canister used in the 6/17 sample was not the canister selected for certifying the quality of the batch cleaning. That is, our canister was not blank sampled to ensure that it was fully clean.

Based on the above details, including laboratory feedback, the benzene value from 6/17 at our East Monitor was not related to site activity. The detection represents carryover from the previous sample, not an actual concentration in ambient air. These findings align properly with the past two years of data.

Please let us know if you have any further questions regarding this information. I can be reached at (773) 254-1200 or at Debbie.hays@simsmm.com.

Sincerely,



Deborah Hays
Permitting & Compliance Specialist

CC: George Malamis (Sims)
Michael Trupin (Sims)