



**REGION 5**

CHICAGO, IL 60604

November 22, 2024

Ms. Deborah Hays  
Permitting & Compliance Specialist  
Metal Management Midwest, Inc.  
2500 South Paulina  
Chicago, Illinois 60608

Dear Ms. Hays:

The U.S. Environmental Protection Agency has reviewed Metal Management Midwest, Inc.'s (Sims's) November 6, 2024, letter in response to EPA's request that you investigate the benzene measurement from the east monitor on June 17, 2024. Your investigation determined that the elevated benzene measurement resulted from the insufficient cleaning of the sampling canister by the analytical laboratory—not from high concentrations of benzene at your facility. Going forward, Sims must continue to prioritize the air monitoring which is required under EPA's Clean Air Act 114(a) information request, as well as verify and validate all data prior to reporting it to EPA.

EPA required air monitoring at Sims to understand if levels of pollutants emitted from the facility—particulate matter, volatile organic compounds and metals, like lead—were harmful before Sims finished installing new controls that will reduce emissions. As you are aware, EPA and many other stakeholders closely review this data. The data must be collected and analyzed in accordance with the quality assurance requirements that are specified in the information request. If data quality issues do arise, EPA expects Sims to fully evaluate them in a timely manner and, if appropriate, properly null impacted measurements before submitting the data to EPA. Sims must also compile and maintain any records supporting these decisions.

Thank you for your attention to this matter. If you have any questions, please contact either me or Michael Compher, Air Monitoring and Analysis Section Supervisor, at (312) 886-5745.

Sincerely,

Nathan Frank  
Supervisor  
Air Enforcement and Compliance Assurance Section (IL/IN)