



**FOUNTAINHEAD
ENGINEERING**
LIMITED

Universal Recycling, Inc. Class II Recycling Facility Chicago, Illinois

Fountainhead Engineering Ltd (FHE) was retained by the former Universal Recycling, Inc. to develop a permit application for operation of a Class II Recycling Facility meeting the minimum requirements of Chapter 11-4 Article XX of the Municipal Code of Chicago.

The primary use of this facility was for just-in-time "demolition" or disassemble of 30 foot sections of CTA elevated tracks (rail, support trestle and cross ties) as the sections were removed from service (during off peak hours – i.e. at night). The cross ties were removed and the ties were temporarily stockpiled and loaded onto trailers for shipment to an offsite disposal facility. The rail, painted support structures and related ferrous materials were reduced in size, stockpiled and prepared for offsite shipment (to steel mills for recycling). As part of this permit application a facility Plan of Operation was developed illustrating proposed traffic patterns, general process flow, storage of materials, site security, etc. A Supplemental Plan of Operation was required to specifically address procedures for mitigation of lead based paint and related fugitive dust control during trestle and rail deconstruction as well as required stormwater management. The site was decommissioned after this assignment consistent with the Special Conditions and the approved Plan of Operations. Universal Recycling, Inc. was subsequently acquired by Metal Management. See attached permit.



City of Chicago
Richard M. Daley, Mayor

Department of Environment

N. Marcia Jiménez
Commissioner

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October 1, 2003

Richard Schau
156 East US Highway 20
Chesterton, IN 46304

Subject: **Universal Recycling, Inc.
2601 W. Roosevelt Rd.
City of Chicago Recycling Facility Permit
October 1, 2003 to January 31, 2004**

Dear Mr. Schau:

A permit is hereby granted by the City of Chicago Department of Environment to Universal Recycling, Inc. ("the Permittee") to operate a Class II Recycling Facility located within the corporate limits of the City of Chicago at 2601 W. Roosevelt Rd. ("the Facility"). Incorporated into this permit by reference are the following: 1) the application submitted by Universal Recycling, Inc. dated August 26, 2003; 2) letter signed by Mr. Jim Parrilli of Fountainhead Engineering Limited and dated September 26, 2003; and 3) all other supplemental information submitted as part of this application including drawings, sheets, and specifications.

The Permittee shall fully comply with the Chicago Recycling Facility Ordinance, Chapter 11-4, Article XX of the Municipal Code of the City of Chicago. The Permittee shall also fully comply with the Standard Conditions of this permit set forth in Attachment A and the Special Conditions of this permit set forth in Attachment B.

This permit allows for the operation of the Facility from October 1, 2003 through January 31, 2004 upon which time the permit shall terminate by its own terms.

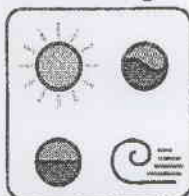
Please be advised that this permit does not release the Permittee from his or her obligation of obtaining or renewing any additional required licenses or authorization from the Department of Revenue and the Department of Zoning.

If you have any questions concerning this permit, contact Enrique Soriano at (312) 744-3645.

Sincerely,

N. Marcia Jimenez
Commissioner

C h i c a g o



Department of
Environment

Universal Recycling, Inc. - 2601 W. Roosevelt Rd.

Page 1 of 7



**ATTACHMENT A
STANDARD CONDITIONS**

1. The Permittee shall comply with all applicable local, State, and Federal regulations and standards regarding the construction, operation, maintenance, and closure of the subject Facility, including but not limited to those regulations and standards concerning noise, vibrations and particulate emissions.
2. Construction, operation, maintenance, and closure of the Facility shall be in accordance with the plans, drawings, and specifications referenced by this permit and included in these Standard Conditions and the Special Conditions.
3. Any changes, modifications, and additions to the Facility's permit or the approved plans and documentation shall be submitted to the Department of Environment for review and approval. Such a request shall be made in writing to the Department of Environment.
4. Issuance of this permit shall not transfer, assign or otherwise affect any liability to the City of Chicago, the Department of Environment, their employees, or agents as a result of the construction, operation, maintenance, and closure of this Facility.
5. Issuance of this permit does not relieve the Permittee of any liability with regards to the subject Facility.
6. The Department of Environment or its authorized representatives may inspect the Facility and the Facility records at any reasonable time to ensure compliance with this permit and all applicable rules, regulations, and standards, as well as all conditions necessary to protect the public health and safety.
7. The Department of Environment may revoke this permit upon finding: 1) the information contained in the permit application is intentionally misrepresentative or incomplete; 2) a violation of this permit has occurred; or 3) a violation of any applicable local, State, or Federal regulation has occurred.
8. The Permittee shall provide the Department of Environment with copies of all correspondence to or from the IEPA and USEPA pertaining to the Facility, including, but not limited to: notices of violation, letters, permit applications, reports, groundwater monitoring reports, and annual reports.
9. The Permittee shall comply with all requirements and conditions set forth in this permit. Should any portion of this permit be declared illegal or non-binding, the conditions of the remainder of the permit shall remain in effect.

**ATTACHMENT B
SPECIAL CONDITIONS**

The following Special Conditions are attached to the operating permit for the Universal Recycling, Inc. Class II Recycling Facility located at 2601 W. Roosevelt Rd.:

Material Handling:

1. The Facility is permitted to handle recyclable material consisting of ferrous metal scrap as defined in Section 11-4-2510 of the Municipal Code of the City of Chicago. The Facility is not authorized to handle materials which include, but are not limited to, special waste, reactive metals, sealed drums, charred wire, municipal solid waste, and stolen goods, including recyclables intended for collection by the City of Chicago Department of Streets and Sanitation (Blue Bags).
2. The Permittee shall handle all unauthorized waste as follows:
 - a. The Permittee shall separately containerize special waste, including hazardous waste, non-hazardous special waste, and PCB waste, and arrange for the immediate removal of such waste by a waste hauler authorized to accept such wastes for transport to a disposal facility that has obtained all necessary Federal, State and local authorization.
 - b. The Permittee shall isolate reactive metals upon discovery and place such material in a sealed, waterproof container. The Permittee shall arrange for proper disposal of the reactive metals and shall immediately notify the Department of Environment.
 - c. The Permittee shall not accept charred wire unless it is accompanied by proper documentation stating that the material was obtained from a properly licensed company that uses adequate emission control devices for removing the wire coating.
 - d. The Permittee shall isolate all municipal solid waste and properly store such waste in an enclosed waste receptacle for disposal at a properly permitted facility.
 - e. The Permittee shall isolate all stolen property upon discovery and immediately notify the City of Chicago Police Department.
 - f. After unauthorized waste has been removed from the Facility, the Permittee shall, if required, thoroughly clean the affected area in a manner consistent with the type of unauthorized waste managed.
3. All railroad ties must be disposed at Newton County Landfill, Indiana. The Permittee must keep disposal receipt to document proof of proper disposal.
4. The Permittee shall inspect all loads entering the Facility for unauthorized wastes. Loads containing waste other than recyclable materials as defined in Special Condition No. 1 shall not be accepted at this Facility.

**ATTACHMENT B
SPECIAL CONDITIONS
CONTINUED**

5. All processing and storage of trestle must be conducted on a impervious paved surface.
6. The Permittee must collect and properly dispose at a State permitted disposal facility all paint chips generated by the process including those that fall into the soil.
7. **The Permittee must install the lined area as described in line number 5 of the letter signed by Mr. Jim Parrilli of Fountainhead Engineering dated September 26, 2003 prior to processing the trestles. The Permittee shall notify DOE's Enrique Soriano by faxing a notice that the installation is completed. The fax shall be sent to (312) 744-3645.**
8. The Facility may receive and process no more than an annual average of 50 tons per day of ferrous metal scrap. If additional permitted capacity is desired, the Permittee must submit a revised application to the Department of Environment for approval. A revised application must demonstrate that the Facility is adequately handling the currently permitted volumes and is sufficiently sized and staffed to process the desired quantity of material.

Operating Hours:

9. The Permittee may operate between the hours of **6:30 a.m. to 5:00 p.m.**, Monday through Sunday. DOE reserves the right to amend the Permittee's operating hours and days of operation if the facility operation causes a nuisance to neighborhood uses.

Material Storage:

10. The Permittee shall store all waste materials in such a way as to ensure adequate site safety. Flammable materials should be stored away from sources of heat, sparks and open flames, and in accordance with applicable fire codes.
11. The Permittee shall clearly mark all material storage receptacles with the type of recyclable material to be stored. No material other than that specified on a receptacle shall be deposited therein.
12. The Permittee may not store unprocessed, recyclable materials at the Facility for a period longer than 90 days. The Permittee shall maintain records which indicate the date, quantity, and type of recyclable materials received. Such records shall be open to inspection by the commissioner or his authorized agent during normal business hours and at other times upon reasonable notice.

**ATTACHMENT B
SPECIAL CONDITIONS
CONTINUED**

Site Modifications:

13. The Permittee shall appropriately pave all material handling areas, driveways and access/haul roads to prevent migration of contaminants off-site. Acceptable paving material shall include, but not be limited to, asphalt, concrete or gravel. The Department of Environment reserves the right to require any additional paving as deemed necessary.
14. The Facility shall be entirely surrounded by a solid fence eight feet in height which is so constructed as to completely obscure all material stored or kept within the boundaries thereof, unless said facility operations occur within the confines of an enclosed building. Such fence shall be located at least eight feet from all public ways surrounding the property and none of said material shall be piled nearer than six inches to, nor higher than said fence. Where such an existing fence is erected nearer than eight feet to a public way, such fence may be permitted to remain but none of said material shall be piled nearer than eight feet to such public way.

Housekeeping, Dust Control, Maintenance:

15. The Permittee shall make a water source available at all times for purposes of Facility cleaning, dust control and fire safety.
16. The Permittee shall clean all Facility areas, including, but not limited to, the area on which recyclables are handled, processed, or stored, each operating day. Spot cleaning of the Facility shall be performed on an as-needed basis. The Permittee shall clean all dirt and mud track out from the facility. The Department of Environment reserves the right to require additional cleaning as deemed necessary.
17. The Permittee shall control and/or suppress dust and other air-borne materials created by Facility activities so that off-site migration of these materials does not occur. This control and/or suppression shall include, but not be limited to:
 - a. Employing watering methods as often as needed; and
 - b. Ensuring that all recycling activities are conducted in the material handling area.
18. The Permittee shall maintain the streets, sidewalks and sewers adjacent to the Facility, free and clear at all times of all material and debris transported to or from, processed or stockpiled at the Facility.
19. The Permittee shall properly maintain site pavements in order to minimize dust and mud debris occurring both on and off-site. The Permittee shall maintain these areas as often as necessary to sustain their integrity and to minimize the generation of dust and mud.

**ATTACHMENT B
SPECIAL CONDITIONS
CONTINUED**

20. The Facility shall be operated to insure proper drainage to minimize flooding, and to prevent standing water.
21. Stockpiled materials on-site shall not exceed 20 feet in height, as measured from the base of the pile.
22. The Facility shall have personnel for patrolling the site and adjacent properties for litter. The Permittee shall promptly remove and dispose of any litter that is observed on-site as well as any off-site affected areas.
23. The Permittee shall personally inspect the Facility for vectors twice per month or retain the services of a vector control specialist to conduct said inspections. The Permittee shall employ vector control measures which include, but are not limited to, bait stations and traps, as often as necessary. The Permittee shall maintain on-site a written record of all inspections and installations including date, time and a detailed description of each inspection and any installations or applications to control vectors. The Permittee shall make available such records for review by the Department of Environment.
24. The Permittee shall undertake all necessary steps to ensure that the Facility is secure from unauthorized entry, is sufficiently screened from the surrounding area and is adequately lighted after dark.

Site Safety:

25. The Permittee shall provide training to all Facility employees on fire prevention, emergency procedures and hazardous material identification and handling procedures.
26. The Permittee shall install and maintain fire suppressant equipment in accordance with the Municipal Code of the City of Chicago.
27. The Permittee shall correct any violations identified by the City of Chicago Fire Department inspections. Failure to comply with these actions may result in revocation of this permit.
28. Gas cylinders used for cutting or welding purposes shall be stored in an upright position and properly secured to avoid accidental jarring or impact.
29. The Permittee shall maintain a written record of emergencies occurring at the Facility, including date(s), time(s), and a detailed description of each incident. These records shall be kept on site for inspection by the Commissioner of the Department of Environment or his designee. The Permittee shall notify the Department of Environment each day that the Facility is affected by the emergency.

**ATTACHMENT B
SPECIAL CONDITIONS
(CONTINUED)**

Vehicles:

30. All trucks making deliveries or pick ups must be stage on the permitted facility.
31. The Permittee shall maintain an onsite record of all vehicles entering the Facility and shall make such records available for inspection upon request by the Department of Environment or local police precinct. This record shall indicate the date, vehicle type, and hauling company name. Further, the Permittee shall maintain all load ticket receipts on site and shall make such records available for inspection upon request by the Department of Environment.

Permits:

32. The Permittee shall acquire all necessary permits and approvals for the Facility including but not limited to those required from the Department of Environment, Department of Zoning, Department of Revenue, Zoning Board of Appeals, Metropolitan Water Reclamation District of Greater Chicago and the Illinois Environmental Protection Agency. The Permittee shall provide copies of all such permits and approvals to the Department of Environment.
33. The Permittee shall maintain copies of all Facility permits on site at all times and shall make these available for inspection upon request by the Department of Environment.

Miscellaneous:

34. The Permittee shall maintain with the Department of Environment proof of financial responsibility as required by Section 11-4-370 of the Municipal Code of the City of Chicago.
35. The Permittee shall comply with all applicable landscape provisions as specified in Chapter 10-32 of the Municipal Code of the City of Chicago as well as Article 10.16 of the Chicago Zoning Ordinance.

Closure:

36. After all recycling operations at the facility has ceased, clean up of the site must commence immediately. Clean up must be completed within thirty (30) days.
37. The Permittee shall notify DOE in writing by faxing (312) 744-7201 a notice to Enrique Soriano that the clean up required by Special Conditions number 36 at the facility has been completed.