

Emissions Minimization Plan

Regulation 6, Particulate Matter, Rule 4
Metal Recycling and Shredding Operations

Sims Metal Management (SMM) - Richmond
District Site #E3822
600 South 4th Street
Richmond, CA 94804
June 2021

- Public Copy
 Confidential Copy

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Attachments

- 1 Company Organizational Chart
- 2 Scrap Acceptance Policy
- 3 Process Flow Diagrams
- 4 Facility Layout / Floor Plan

Responsible Manager Certification

6-4-404.1

I, as the Responsible Manager of this facility, hereby certify that as of this date, this Emissions Minimization Plan contains all elements and information required of a complete EMP pursuant to District Regulation Section 6-4-403 and that the information contained in this EMP is accurate.



Certified by:

Dated: May 3, 2022

Andrew Marcelynas, Facility Manager
SMM – Richmond
Responsible Manager

Designation of Confidential Business Information

Describe the information you designate as “CONFIDENTIAL” that is trade secret or otherwise exempt under law from public disclosure. Specify what is “CONFIDENTIAL” and include specific section(s) and corresponding page number(s).

Name of Section / Page Number(s)	Description of Confidential Information
N/A	None

Company Description

The Sims Metal Management (SMM) Richmond California facility is a scrap metal recycling facility located in a portion of the City of Richmond utilized primarily for industrial and commercial uses. The Facility occupies approximately 18 acres, of which approximately 95 percent is impervious, covered by pavement/concrete or buildings (the Facility). The Facility is bordered to the north by Cutting Boulevard and Hoffman Boulevard and to the west by South Fourth Street and the Levin Richmond Terminal (LRT). To the east the Facility is bordered by the LRT storage yard, the LRT rail line, and South Eighth Street. The Facility is bordered to the south by the LRT rail line easement, Wright Avenue, a Cemex storage facility, and LRT (across from Wright Avenue). Various railroad tracks are located on all sides of the Facility.

The Facility accepts incoming scrap metal material from both commercial and peddler accounts. All material purchased at the scale is subject to the Sims Scrap Acceptance Policy. Scrap metal materials are delivered to the Facility by both rail and truck. Trucks with incoming scrap metal materials enter at the South 4th Street main gate where the material is weighed, inspected, and sent to the appropriate location for unloading based on commodity. Rail cars are brought in through the East Gate where they are initially staged and moved to proper commodity storage for unloading. Rail inspection is done upon arrival/staging as well as unloading. All non-conforming scrap metal materials are subject to rejection.

The Facility receives both ferrous and non-ferrous scrap metal materials (Ferrous and Non-Ferrous Inbound Material), respectively), some of which require mechanical processing or mechanical- or torch-cutting.

Ferrous Inbound Material bound for the Redwood City shredder is referred to as Feedstock Material. It is comprised of end-of-life vehicles (ELVs) and light gauge steel materials referred to as Light Iron. Thicker gauge steel materials are referred to as HMS. Ferrous Inbound Material is directed to appropriate stockpiles or processing areas depending on commodity type (e.g. ELVs, Light Iron, and HMS) and processing needs. Ferrous Inbound Materials are received and initially stored on the northern portion of the Facility, either in a Ferrous Inbound Material receiving area or in a stockpile near to the applicable processing equipment. Shearing, both stationary and mobile, is in the North and Northeast Portion of the Facility. Torch-cutting of HMS is conducted in the center of the Facility.

The Facility receives some ELVs that have not yet been “depolluted.” Depollution of those ELVs occurs on the eastern portion of the Facility.

The Light Iron stockpile is in the northeast portion of the Facility between the ELV Depollution Area and the Main Gate.

Processed Ferrous Inbound Material (Ferrous Product) is placed into various designated stockpiles in the center of the Facility.

Non-Ferrous Inbound Materials are received and stored at the west central portion of the Facility. Bin, trailer, and equipment storage areas are primarily at the south end of the Facility.

Inbound Material processing at the Facility includes Ferrous Inbound Material shearing (both mobile and stationary) and torch-cutting of HMS products, preparation, and sorting of Ferrous and Non-Ferrous Inbound Materials; baling or torch-cutting of some Non-Ferrous Inbound Materials; temporary storage of Ferrous and Non-Ferrous Products, ELV depollution and maintenance of Facility equipment.

Ferrous Product shipment is done via truck, rail, and export ship. HMS is loaded into ship-loading trucks that transport the material across South 4th Street to the terminal where it is loaded into cargo ships for export. At times, shredded steel is trucked to the Facility for ship-loading due to vessel limitations at the Port of Redwood City. Shredded steel is stockpiled and then loaded into ship-loading trucks for delivery to the terminal in the same manner as described above for HMS. Ship-loading is handled by the terminal operator (Levin Richmond Terminal). Light Iron and depolluted ELVs are loaded in trucks for shipment to the Sims Redwood City facility for shredding (as described in the Sims Redwood City EMP. Some Ferrous Products are shipped by truck or rail to domestic customers (e.g., steel turnings, baled cans and cast iron). Non-Ferrous Products typically are loaded into sea containers for delivery to the Port of Oakland for shipment via cargo container vessels, with some such Product containers loaded into railcars for domestic shipment.

Company Organizational Chart and Schedule of Management Operators

6-4-403.1.3

- A. Company Organizational Chart - Attach a copy of the organizational chart of the company, which describes the business structure and includes the name of the facility's Responsible Official. Label the attachment with the corresponding Attachment #.

Attachment # 1

- B. Schedule of Management Operators - Provide the names and contact information of the Onsite Responsible Manager(s) and Onsite Alternate Contact(s) and their duty schedule.

Onsite Responsible Manager(s)

Name: Andrew Marcelynas
Title: Facility Manager
Phone: 510-221-7390 (c)
Email: Andrew.Marcelynas@simsmm.com
Schedule/Shift: Monday - Friday/Variable

Name: Patrick Jackson
Title: Night Shift Supervisor
Phone: 510-260-5408
Email: patrick.jackson@simsmm.com
Schedule/Shift: Nights Mon-Fri

Onsite Alternate Contact(s)

Name: Bobby Clevenger
Title: Ferrous Ops Sup
Phone: 510-715-6462
Email: Bobby.clevenger@simsmm.com
Schedule/Shift: Days Mon-Fri

Name: Manny Ruiz
Title: SHECS Coordinator
Phone: 408-250-6206
Email: Manny.Ruiz@simsmm.com
Schedule/Shift: Variable

Operations Subject to EMP

6-4-402

The EMP shall address all of the following operations that are conducted at the metal recycling and shredding facility per 6-4-402 to reduce fugitive emissions.

Please check all facility operations that apply.

402.1 Roadways and Other Trafficked Surfaces	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
402.2 Metal Management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
402.3 Shredder Residue (SR) Management	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
402.4 Depollution Operations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Contents of the EMP

6-4-403

The owner or operator of the metal recycling and shredding facility subject to Regulation 6-4 shall prepare a complete and accurate EMP that details the management practices, measures, equipment, and procedures that are employed or scheduled to be implemented to minimize fugitive emissions for the operations subject to the EMP.

A. *Metal Recycling and Shredding Operations*

- I. Metal Management - List and provide a description of all process equipment, materials received, processed, or stored, abatement and control equipment and monitoring parameters to reduce fugitive emissions. Include a comprehensive list of all abatement and control equipment for operations subject to 6-4-402 and specify the source(s) that it abates.
- II. Shredder Residue (SR) Management - Identify the equipment or structures that are used in the management of shredder residue, including the treatment process used to reduce the leaching potential of residual soluble metals in the residue.
- III. Depollution Operations - Describe policies and procedures pertaining to 1) the safe removal of materials from major appliances and vehicles that require special handling prior to crushing or transferring to balers or shredders for recycling; and 2) special handling of these materials if discovered during the recycling process.

B. *Scrap Acceptance Policy (6-4-403.3)* - Provide and attach a copy of the facility's scrap acceptance policy.

C. *Management Practices to Reduce Fugitive Emissions* - List and provide descriptions of all management practices conducted, including preventative maintenance activities, pollution prevention, housekeeping, and source reduction measures to reduce fugitive emissions of particulates. Include the frequencies or circumstances when these measures and practices are undertaken (schedule of activity).

D. *Description of Onsite Management and Schedule of Facility Operations* - Describe the onsite management practices of metal recycling and shredding operations to reduce fugitive emissions, including those during business hours and after the close of business. Provide the approximate schedule of operations.

Metal Recycling and Shredding Operations

I. Metal Management

METAL MANAGEMENT

Provide a description of metal management operations which include the receipt, on-site transport, collection, sorting, segregation, separation, compilation, crushing, shredding, and storage of metals, metal-containing materials, and non-metallic materials at the metal recycling and shredding facility. Include all abatement and monitoring parameters that are employed.

Section #	Operation	District S#	Description of Operation	Source Abated	District A#	Abatement Required by Permit	Type of Abatement	Abatement Monitored	Monitoring Parameters
1	Receipt		Ferrous Inbound Material is received at the scale where it is inspected for compliance with the Scrap Acceptance requirements.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Visual inspection of incoming loads and rejection as needed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Prohibited materials.
2	Transport		Ferrous and Non-Ferrous Products are transported by truck or rail. All roadways are paved/concreted.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	On-site roadways wetted as needed with water truck and swept with Tymco sweeper.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
3	Collection		Metal segregated by commodity type and whether it has been prepared or unprepared. All stockpiles sprayed with water as needed to control dust.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water truck, hose station, and portable dust control units apply water for dust suppression as needed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
4	Sorting / Segregation		Metal segregated by commodity type and whether it has been prepared or unprepared. All stockpiles sprayed with water as needed to control dust.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water truck, hose station, and portable dust control units apply water for dust suppression as needed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
5	Separation		Certain ELVs are depolluted. On occasion, as needed and under CAR requirements, Light Iron Appliances have MRSH removed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	ELVs (and on occasion appliances, as needed) are depolluted under cover on a paved/concreted surface. Water spray available as needed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
6	Compilation		Metal segregated by commodity type and whether it has been prepared or unprepared. All stockpiles sprayed with water as needed to control dust.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water truck, hose station, and portable dust control units apply water for dust suppression as needed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
7	Crushing		Facility operates a vehicle flattener for depolluted ELVs, which are then transported to the Sims Redwood City facility.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	ELV flattener is fully contained (internal receiver tank collects fluids and berm surrounds flattener)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
N/A	Shredding		None.	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	Not applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not applicable.
8	Storage of metals		Metal segregated by commodity type. Stockpiles sprayed with water as needed to control dust.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water truck, hose station, and portable dust control units apply water for dust suppression as needed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.

METAL MANAGEMENT

Provide a list of the metals received and/or processed at facility.

Section #	Name of Metal or Metal Alloy
1	Ferrous Inbound Material (including ELVs, Light Iron & HMS)
2	Various Non-Ferrous Inbound Materials (e.g., stainless steel, cast iron, copper, aluminum, smaller amounts of other non-ferrous metals, and related alloys)

METAL MANAGEMENT

Identify the storage piles and the types of metal and metal-containing material being stored. Indicate whether any monitoring is conducted and detail the monitoring parameters and equipment used to minimize fugitive emissions.

Section #	Description of Material	MONITORING			
		Monitoring Conducted	Monitoring Parameters	Monitoring Equipment	If Yes: Identify Monitoring Equipment Used
Storage of Delivered Scrap					
1	Light Iron stockpile, Appliances, ELV	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
2	HMS, Cast Iron, Busheling, plate & structural steel (P&S)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
3	Non-Ferrous Inbound Material in indoor containers & outdoor boxes	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
4	Shredded steel	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Storage of Unprocessed Material					
5	HMS/P&S Inbound Material	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
6	Non-Ferrous Inbound Material storage indoors in containers and outdoors in boxes	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
7	ELV	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
8	HMS & P&S Inbound Material to be sheared	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Storage of In-process Material					
9	ELV, and as needed appliances, to be depolluted	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
Storage of Finished Product					
10	HMS & P&S Products, Shred, other Ferrous Products	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
11	Non-Ferrous Products storage and loading area	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
12	Depolluted Light Iron & ELV	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
Storage of Shredder Residue					
	N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	

Metal Recycling and Shredding Operations

II. Shredder Residue (SR) Management (Not Applicable)

SHREDDER RESIDUE (SR) MANAGEMENT

Describe the equipment or structures used for conveyance, storage and treatment of shredder residue (SR) during the recycling process. Include measures to minimize fugitive emissions.

Section #	Equipment or Structure for Processing SR	District S#	SR Stored in an Enclosed Area	MONITORING		SR ADDITIVE	
				Monitoring Conducted	Monitoring Parameters	SR Additive Used	Type and Purpose of Additive
1	N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	

Metal Recycling and Shredding Operations

III. Depollution Operations

DEPOLLUTION OPERATIONS

List all materials that require special handling and removal in depollution operations.

Section #	Materials Requiring Special Handling or Removal
1	PCB and certain non-PCB capacitors
2	Mercury switches
3	CFCs, HCFCs, and other refrigerants & halogenated oil
4	Used oil
5	Used diesel & gasoline
6	Used motor oil
7	Brake & Transmission Fluid, Antifreeze & Radiator Fluid
8	Batteries

DEPOLLUTION OPERATIONS

Describe the policies and procedures pertaining to the safe removal of materials from major appliances and vehicles that require special handling prior to crushing or transferring to balers or shredders for recycling. Include the measures that are implemented when these materials are discovered during the recycling process.

- Depollution: Appliances

Sims - Richmond is a Certified Appliance Recycler (CAR) DTSC #0387 with certified personnel and proper equipment. Major Appliances received must have Materials Requiring Special Handling (MRSH) removed prior to processing (i.e., crushing/baling/shredding). MRSH typically includes but is not limited to: capacitors (PCB/Non- PCB); CFCs, HCFCs and other non-CFC refrigerants (Refrigerants); used oil; and mercury switches (Switches).

All customers delivering appliances to the Facility have signed or received copies of the Scrap Acceptance Agreement/Inbound Source Control Policy. Appliances that are received that have had the MRSH properly removed by another CAR may be placed directly in the Light Iron Stockpile. Other appliances which contain or potentially contain MRSH are rejected or staged in the Appliance Depollution Area.

In the Appliance Depollution Area, MRSH is removed from appliances under cover and on a concrete surface. MRSH is collected in appropriately labelled containers and removed by the vendor operating under the applicable CAR certificate. Once the MRSH is removed, the depolluted appliances are placed in the Light Iron Stockpile where they are loaded into trucks that transport them to SMM-RWC for shredding.

There are hose stations at both the Appliance Depollution Station and at the Light Iron Stockpile to manage any fugitive dust emissions generated from handling this material. Stockpiles and loads for shipment are wetted as necessary to control fugitive dust emissions.

- Depollution: ELV

Sims - Richmond receives ELV which require depollution before processing. Customers delivering ELV to the Facility have signed or received copies of the Scrap Acceptance Agreement/Inbound Source Control Policy. ELV requiring depollution are staged in the Auto Body Depollution Area for depollution.

Following the removal of certain items required to be removed, the ELVs are then lifted with a forklift onto the Depollution Rack which is a fully contained fluid management station for additional removal of materials required to be removed (e.g., gasoline, diesel fuel, motor oil, antifreeze, and radiator fluid). Appropriate handling of these fluids include storage in appropriate containers, properly marked, labeled, and stored in accordance with applicable requirements.

Depolluted ELV are then staged in the Depolluted Auto Body Area where they are subsequently flattened in the ELV flattener. The ELV flattener is a fully contained unit which has internal reservoirs for any residual fluids and is bermed on a concrete surface. Once the depolluted ELV are flattened, they are then staged adjacent to the ELV flattener to be loaded on trucks for shipment to SMM- RWC to be shredded. ELV are shipped either by flatbed trailer or on top of a Light Iron end dump trailer, each of which is tarped or netted.

There are hose stations at both the ELV Depollution Station and the ELV flattener to manage any fugitive dust emissions generated from handling this material. Stockpiles and loads for shipment are wetted down as necessary to control fugitive dust emissions.

Management Practices
to
Reduce Fugitive Emissions

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS - ROADWAYS AND OTHER TRAFFICKED SURFACES

List and describe facility's management practices to reduce fugitive emissions from roadways and other trafficked surfaces. Detail the schedule of activities conducted.

ROADWAYS AND OTHER TRAFFICKED SURFACES	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
	1	Facility roadways are paved/concreted.	N/A
	2	Facility roadways are regularly swept.	Frequently, over 8 hours per day, Monday through Saturday
	3	Watering of internal roads and Inbound Material stockpiles using water truck, hose station and portable dust control units.	In effect always
	4	Watering of internal roads and Ferrous Product stockpiles using water truck, hose station and portable dust control units.	Frequently as needed.
	5	Water spraying of Ferrous Product during loading of ship-loading transport trucks going to LRT terminal for shipping.	As needed.
	6	Speed limit of 5mph for equipment and trucks inside yard.	Whenever operating.
	7	Visual inspection of all onsite roads to confirm that sweeping is reducing road dust.	At least one complete inspection daily.
	8	Employee training: Inbound Source Control, Sweeping and Housekeeping, and Dust Control Measures.	Initially for new employees, and annual update for current employees.

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS – METAL MANAGEMENT

List and describe facility’s management practices to reduce fugitive emissions. Include practices for receiving processing and handling scrap and shredded materials to prevent fugitive emissions from these operations. Detail the schedule of activities conducted.

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
TRANSPORT	1	Speed limit of 5 mph. Signs posted.	During all hours of operation.
RECEIPT	2	Visual inspection of incoming truck loads to intercept and reject loads containing prohibited material. Annual training of scale operators and inspectors.	When receiving incoming trucks.
COLLECTION	3	Covered by other categories above and below.	As per above “Roadway” table.
SORTING	4	Scale operators and inspectors trained to direct incoming trucks to deposit loads at appropriate storage piles.	As per above “Roadway” table.
SEGREGATION	5	Materials entering facility are segregated into different storage piles before further processing, including HMS, HMS Unprepared (Materials-to-be-sheared) Storage Stockpile, HMS, and P&S Storage Stockpiles, ELV and Light Iron, Cast Iron, Busheling, and Non-Ferrous Storage stockpiles.	During hours of operation when receiving incoming trucks.
SEPARATION		ELV and Appliances depolluted.	
COMPILATION	6	Depolluted ELVs to the ELV flattener.	During hours of operation.
CRUSHING	7	Water available for dust control in ELV flattener area.	During hours of operation.
SHREDDING		Not applicable to this Facility.	
STORAGE OF METALS	SEE STORAGE PILE MANAGEMENT SECTION		
STORAGE OF METAL-CONTAINING MATERIAL	SEE STORAGE PILE MANAGEMENT SECTION		
STORAGE OF NON-METALLIC MATERIAL	SEE STORAGE PILE MANAGEMENT SECTION		

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS – SHREDDER RESIDUE MANAGEMENT

List and describe facility's management practices to reduce fugitive emissions from processing and handling shredder residue. Detail the schedule of activities conducted.

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
SHREDDER RESIDUE MANAGEMENT	Not applicable		

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS – DEPOLLUTION ACTIVITIES

List and describe facility's management practices to reduce fugitive emissions from processing and handling materials during depollution activities. Detail the schedule of activities conducted.

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
DEPOLLUTION ACTIVITIES	1	CAR using a CAR-certified vendor to remove MRS. Appliances with MRS are rejected.	Daily.
	2	Depollution for appliances conducted by certified subcontractors when support necessary.	Occasional activity.
	3	Appliance area is paved/concreted and covered.	On-going fixed feature.
	4	Appliance area is swept and cleaned.	Daily.
	5	Appliance area employees trained: Inbound Source Control, Sweeping and Housekeeping, Dust Control Measures.	Initial, annual, and daily tool box talks (TBTs).
	6	Appliance inspection.	Daily for each delivered load.
	7	ELV depollution unit is located on concrete and covered.	On-going fixed feature.
	8	ELV flattener is self-contained, and area is bermed	On-going fixed feature.
	9	Depollution unit cleaned.	Daily/weekly/monthly activities.
	10	ELV area swept and cleaned	Daily.
	11	ELV area employees trained: Inbound Source Control, Sweeping and Housekeeping, Air Pollution/Dust Control Measures.	Initial, annual, and daily TBTs.
	12	ELV inspection.	Daily for each delivered load.

METAL MANAGEMENT – STORAGE PILE MANAGEMENT

List and describe the facility’s storage pile management practices to reduce fugitive emissions from stored materials. Detail the schedule of activities conducted.

Types of Storage	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
<p style="text-align: center;"><i>Storage of Delivered Scrap</i></p>	1	Delivered Infeed Material stockpiles sprayed with water manually, with misting systems, or a water truck as needed during unloading and material handling.	During all hours of operation when receiving incoming trucks as needed.
<p style="text-align: center;"><i>Storage of Unprocessed Material</i></p>	2	Infeed Material storage stockpiles sprayed with water manually, with misting systems, or a water truck as needed during unloading and material handling.	During all hours of operation as needed.
<p style="text-align: center;"><i>Storage of In-process Material</i></p>	3	Ferrous Infeed Material storage piles sprayed with water both manually and by water truck as needed during unloading and material handling.	During all hours of operation as needed.
<p style="text-align: center;"><i>Storage of Finished Product</i></p>	4	Product stockpiles sprayed with water, both manually and by water truck, as needed during unloading and material handling.	During all hours of operation as needed.
<p><i>Storage of Shredder Residue</i></p>	SEE SHREDDER RESIDUE MANAGEMENT SECTION (not applicable)		

METAL MANAGEMENT – STORAGE PILE MANAGEMENT

Describe facility's storage pile management practices to minimize and prevent emissions from stored materials (i.e., limiting size of piles, creating fire breaks, segregation of materials, etc.). Specifically include policies and measures to prevent and control combustion of storage pile materials.

The Facility has an Inbound Source Control Standard which requires training of operations employees in identification and other procedures regarding Prohibited Materials (see attached Prohibited Materials List). Inbound Material suppliers/customers must sign the Scrap Acceptance Agreement which includes the requirement to not include Prohibited Materials in inbound scrap metal. Loads or parts of loads are subject to rejection if they do not conform to these requirements. By taking steps to keep Prohibited Materials out of accepted scrap metal, the Facility reduces the risk of fires and fugitive emissions related to such Prohibited Materials. This Standard also includes inspection of inbound loads of Inbound Material during and after unloading at the applicable stockpiles.

***Description of Onsite Management
And
Schedule of Facility Operations***

ONSITE MANAGEMENT PRACTICES

Provide a description of the facility's onsite management practices to reduce fugitive emissions.

BMPs for reduction of fugitive emissions are listed in the above-presented tables. Certain BMPs are noted below:

1. The Facility implements the Inbound Source Control Standard and requires suppliers to sign a Scrap Acceptance Agreement to keep out Prohibited Materials, some of which may result in the generation of fugitive emissions.
2. Facility roadways are paved/concreted, which serve to reduce fugitive emissions from incoming and outgoing truck transport.
3. Facility roadways are routinely swept using sweepers and wetted with the water truck.
4. Fugitive emissions in Facility operating areas and stockpiles are controlled by means of applying water or mist by means of a water truck, sprinklers and other dust control units.
5. Employee training includes initial and annual refresher training and toolbox talks including training on dust control measures.

DESCRIPTION OF ONSITE MANAGEMENT

Identify if staff are designated to observe visible emissions from metal shredding and recycling operations during business hours and after the close of business. Specify if staffing is Visible Emissions Evaluation (VEE) Certified. If onsite staffing is designated to observe visible emissions after the close of business, include a description of the duties to ensure visible emissions are minimized from storage piles of material.

Section #	Operations	Onsite Personnel DURING Business Hours to Observe Visible Emissions	Staffing to Observe Visible Emissions	Onsite Personnel AFTER Business Hours to Observe Visible Emissions	Staffing to Observe Visible Emissions	If onsite staffing is designated after the close of business to observe visible emissions, describe the specific duties to manage storage piles to prevent and minimize visible emissions.
1	Roadways and Other Trafficked Surfaces	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Number of Staff Designated supervisory & management personnel Visible Emissions Certified <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		The Facility installed a perimeter security system with thermal cameras directed at the Light Iron stockpile as well as the area where unprepared ELVs are stored. This system continuously monitors the stockpile/auto body area temperature and sends alarms notifications if any unusual temperature changes occur in those areas. When the facility is closed, the thermal cameras are monitored at the vendor offsite location.
2	Metal Management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
3	Transport	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
4	Receipt	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
5	Collection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
6	Sorting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
7	Segregation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
8	Separation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
9	Compilation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
10	Crushing	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
11	Shredding	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
12	Storage of Metals	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
13	Storage of Metal-Containing Material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
14	Storage of Non-Metallic Material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	Shredder Residue Management (Not Applicable)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
15	Depollution Activities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

DESCRIPTION OF ONSITE MANAGEMENT

Identify any employee training provided pertaining to management practices and work practice standards to minimize fugitive emissions from recycling and shredding operations.

Section #	Employee Training
1	New employees receive an initial training session, and current operating employees receive annual update training on operations, including BMPs for fugitive dust control.
2	Operators, supervisors, and managers receive the same training.
3	Inbound source control
4	Sweeping and Housekeeping
5	Dust Control Measures
6	Annual Training
7	Toolbox Talks (TBT)

SCHEDULE OF FACILITY OPERATIONS

Provide the facility's schedule and hours of operation. Schedule of operations should include all shifts with specific operations identified.

Material Receiving: Monday through Friday 6am to 3:30pm, Saturday 8am - 12:30pm, as needed

Ship loading: As needed, usually a couple of days per month, shift 1: 6:00am to 4:30pm, Shift 2: 4:30pm to 2:00am.

Metal Processing: Shearing: 6:00am to 10:00pm, Monday through Friday

Metal Processing: Torch Cutting: 6:00am to 4:00pm, Monday through Friday, extended to 10:00pm, as needed.

Note: Operation shift times and days of week can vary.

Technical Data

6-4-403.1

- A. *Process Flow Diagram* - Facilities must indicate all operations in Section 6-4-402, the flow of materials used, and identify all monitoring and the processes, abatement, and controls to minimize emissions beginning from material receipt to achievement of final product. Identify all equipment by source numbers according to District Permit or as exempt from District Permit. Include the abatement and control devices. Label the attachment with the corresponding Attachment #.

Attachment # 3

- B. *Facility Layout / Floor Plan* - Facilities must indicate all relative locations of processing equipment and monitoring and controls, all permitted and exempt sources identified in the process flow diagram per Section 6-4-403.1.1 and any other source(s) that may contribute to particulates. Include all building walls, partitions, doors, windows, vents and openings and indicate all areas that have abatement for particulates. Note roadways and other trafficked surfaces and indicate the types and locations of pervious and impervious surfaces. Identify all metal recycling and shredding equipment by the facility's District Permit source number or as exempt from District permit requirements and include abatement and control devices. Label the attachment with the corresponding Attachment #.

Attachment # 4

Five-Year Review of the EMP: Schedule for Implementation of the EMP Elements and Fugitive Emissions Reductions 6-4-408

- A. Provide a list of existing or current EMP elements in place during the 5-year review period (March 1, 2016 – February 28, 2021). Include a list of equipment, processes and procedures installed or implemented to reduce fugitive emissions and indicate the permit status if applicable. Specify the purpose for implementation and detail any employee training that was conducted. Any associated training materials shall be made available for Air District review upon request.

- B. Provide a list of new or future EMP elements to be implemented following APCO approval of the EMP. Include a description, the purpose and schedule of the element(s) to be implemented.

A. 6-4-408 SCHEDULE FOR IMPLEMENTATION OF THE EMP ELEMENTS AND FUGITIVE EMISSIONS REDUCTIONS REALIZED WITHIN THE LAST 5 YEARS (MARCH 1, 2016 – FEBRUARY 28, 2021)

Section #	Identify Type of Operation per Section 6-4-402	Description of Equipment, Processes or Procedures Implemented Between March 1, 2016 and February 28, 2021	Permit Status		Implementation Date	Purpose of Implementation	Description of Employee Training
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			
1	Metal Management	Removed conveyor and spray system to reduce emissions at Shear	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	2019	Operator controlled so water can be sprayed as needed. A hose station is located in shearing area.	Covered in initial orientation training and annual training on dust control measures.
2	Metal Management	Pole-mounted sprinkler spray system above Light Iron stockpile	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	2020	Reduce potential fugitive emissions from Ferrous area	Covered in initial orientation training and annual training on dust control measures.
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			

B. 6-4-408 NEW OR FUTURE EMP ELEMENTS TO BE IMPLEMENTED					
Section #	Identify Type of Operation per Section 6-4-402	List Specific Elements to be Implemented Following APCO Approval of the Updated EMP	Projected Implementation Date	Description of Elements to be Implemented	Purpose of Implementation
1	Metal Management	Fire Suppression System at ELV Depollution Area	10/2021	Tower-mounted water mist turbine	General suppression of incidental fugitive dust where needed
2	Roadways and other Trafficked Surfaces	Replace crane with Electric Crane	TBD	Replace diesel-powered crane with electric-powered crane	Eliminate air emissions from diesel-powered crane

APCO Recommendations to EMP and Determination of Approvability (12-13-405)

Provide determination of acceptance to APCO recommendations. Include the determination of acceptance by the facility's Responsible Manager and the basis for rejecting any APCO recommendations. If recommendation is accepted, include measures to implement APCO recommendation and the proposed date of implementation.

Section #	(AIR DISTRICT USE ONLY) APCO Recommendation	Acceptance of APCO Recommendation	If NO: Basis for Rejecting APCO Recommendation	If YES: Measures to Implement Recommendation	Proposed Date of Implementation	(AIR DISTRICT USE ONLY) Approval of Response
1	If feasible, operate the dust boss machines (water sprays) using the electrical grid like the Redwood City location, rather than using diesel generators.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The constant increase and decrease of the piles' footprint forces operations to adjust and relocate the water spray units to ensure maximum efficiency. This becomes especially critical during ship loading operations. The diesel generator used provides portability allowing for the flexibility of assuring maximum dust suppression.			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2	Conduct daily monitoring of the depollution area to ensure flammable materials are properly contained and removed offsite regularly.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Standard operating procedure is to, by end of day, or earlier, if necessary, that all flammable materials are properly contained. Additionally, all "wastes" will be re-moved in accordance with regulatory requirements.	05/02/2022	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3	Continue to obtain and maintain visible emissions evaluation (VEE) certification(s) through California Air Resource Board in accordance with US EPA Method 9 and provide training to onsite staff.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		According to all affiliated with the site it has never created visible dust emissions. We do agree that it would be prudent that we provide for the proper training of VEE's in order to assess emissions and modify any operations that may cause visible emissions.	07/01/2022	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Appendix

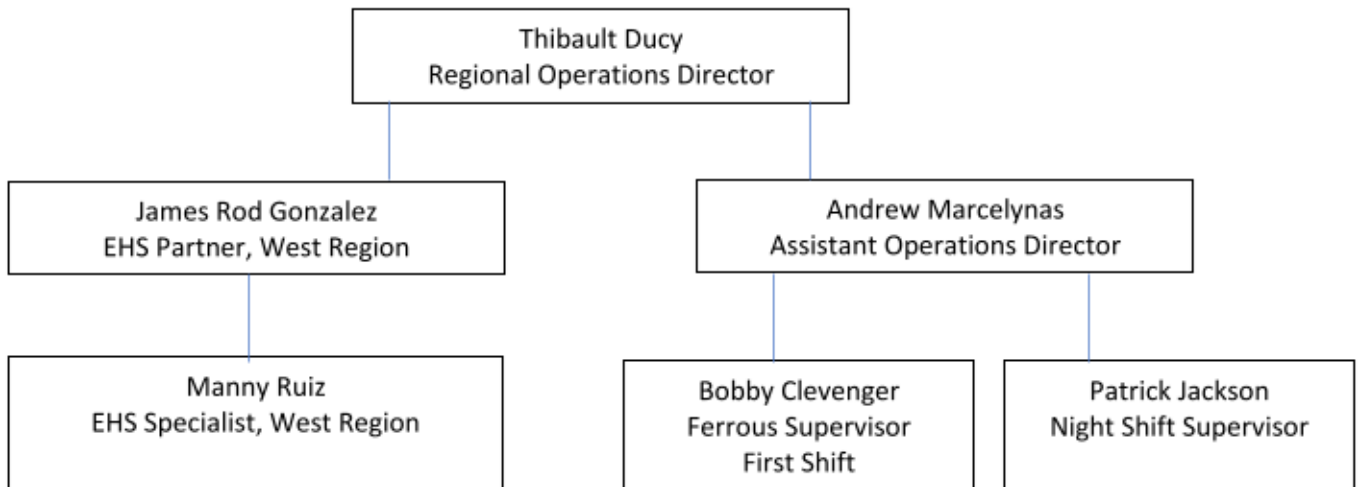
Insert any attachments and supplemental information within the corresponding sections of the EMP or at the end of this document. Label each attachment with the corresponding Attachment #.

In the table below, list each Attachment # and provide the Page # and Section # (if applicable) of the EMP where the material is referenced.

Attachment #	Title	Reference to Page # and Section # of EMP
1	Company Organizational Chart	Page #7, Section # Introduction
2	Scrap Acceptance Policy	Page #25, Section # III
3	Process Flow Diagrams	Page #42, Section # III
4	Facility Layout/Floor Plan	Page #42, Section # III
		Page # , Section #

ATTACHMENT 1
COMPANY ORGANIZATIONAL CHART

Organizational Chart Sims Metal Management – Richmond



ATTACHMENT 2
SCRAP ACCEPTANCE POLICY



EXHIBIT A PROHIBITED MATERIALS

Date of Most Recent Revision: September 2016

Page 1 of 1

- The following materials are prohibited from acceptance at SMM Facilities, *except by special arrangement with SMM*:
- 1 Non-Recyclable Materials of any kind**, including asphalt, concrete, debris, dirt, rags, tires, trash;
 - 2 Non-Hazardous Free-flowing Liquids** including water;
 - 3 Hazardous Free-flowing Liquids** including gasoline, diesel fuel, motor oil, hydraulic fluids, anti-freeze, oil, paint, anti-freeze or other lubricants or petroleum products, except as typically contained in whole automobiles purchased by SMM for processing following vehicle depollution;
 - 4 Flammable and Combustible Materials**;
 - 5 Corrosive Materials** such as soda ash or lead-acid batteries;
 - 6 Radioactive Materials** of any type (e.g., military scrap, medical scrap, thickness measuring devices);
 - 7 Explosive Materials** or potentially explosive materials of any type, such as munitions scrap (e.g., ammunition, shells);
 - 8 Chemicals or Poisons** in solid, powder, liquid, or gaseous form (e.g., fertilizers);
 - 9 Infectious Materials** (generally placed in red bags or marked by the "infectious" symbol);
 - 10 Pressurized Containers or Cylinders** including propane tanks, compressed gas tanks, aerosol cans, or extinguishers, except if the cylinder has been certified as properly vented;
 - 11 Closed Containers Formerly Containing Non-Hazardous Materials**, including bulk storage tanks and process vessels;
 - 12 Containers Formerly Containing Hazardous Materials** including drums, bulk storage tanks, process vessels, paint cans and/or aerosol cans except if the containers are certified as empty per applicable law and cut open and can be inspected to verify that they are empty in accordance with SMM's empty container requirements.
 - 13 Any Materials Containing CFCs, HCFCs or Refrigerant Substitutes**;
 - 14 PCB-containing materials** (e.g., capacitors, ballasts and transformers);
 - 15 Asbestos-containing materials (ACM)**, such as pipe insulation or surfacing materials.
 - 16 Mercury-containing materials** (e.g. switches, fluorescent or mercury vapor lights/fixtures/bulbs, thermostats), except as contained in whole cars SMM purchased for vehicle depollution.
 - 17 Cathode ray tubes (CRTs)**, liquid crystal displays (LCDs) or any device containing a CRT or LCD (e.g. computer monitor, laptop screen or television set), except at a designated Electronic Material receiving area.
 - 18 Hazardous Waste** – Any Material containing hazardous or toxic substances or wastes.

REQUIREMENTS FOR CERTAIN COMMODITIES ACCEPTED BY SIMS METAL MANAGEMENT

Automobiles must have the following removed prior to delivery (except whole automobiles purchased by SMM for processing following vehicle depollution): fluids (e.g., fuel, motor oil, coolant, refrigerant, hydraulic fluids) to the extent practicable or otherwise required by law, batteries, leaded battery cable ends, mercury convenience light switches, other mercury containing devices as required by law (e.g., in certain states mercury headlamps, back lit displays), and air bag canisters as required by law.

Lead Acid Batteries are accepted at most SMM facilities unless cracked, broken, burned or with missing caps.

California – certain "Materials Requiring Special Handling" may remain in certain appliances if the SMM facility is serving as **Certified Appliance Recycler** for those materials.

Electronic Material – Each State has its own requirements regarding which of this material may be accepted and under what requirements, e.g. in California a facility may accept certain "electronic devices" as "Universal Waste."



MATERIAL ACCEPTANCE POLICY

The following materials are prohibited from acceptance at Sims Metal Management (SMM) Facilities, except by special arrangement with SMM:

- 1) Non-Recyclable Materials of any kind, including asphalt, concrete, debris, dirt, rags, tires, trash.
- 2) Non-Hazardous Free-flowing Liquids including water.
- 3) Hazardous Free-flowing liquids including gasoline, motor oil, hydraulic fluids, anti-freeze, oil paint or other lubricants or petroleum products, except as contained in whole vehicles SMM purchases for vehicle depollution.
- 4) Flammable and Combustible Materials.
- 5) Corrosive Materials such as soda ash or broken batteries. Whole batteries may be accepted for recycling at some facilities.
- 6) Radioactive Materials of any type (e.g., military scrap, medical scrap, thickness measuring devices)
- 7) Explosive Materials or potentially explosive materials of any type, such as munitions scrap (e.g., ammunition, shells).
- 8) Chemicals or Poisons in solid, powder, liquid, or gaseous form (e.g. fertilizers).
- 9) Infectious Materials (e.g. in red bags or marked by the infectious symbol).
- 10) Pressurized Containers or Cylinders including propane tanks, compressed gas tanks, aerosol cans, or extinguishers, except if the closed cylinder has been vented or if accepted under special arrangement.
- 11) Closed Containers including bulk storage tanks and process vessels.
- 12) Containers that formerly contained hazardous materials including drums, bulk storage tanks, process vessels, paint cans and/or aerosol cans except if the containers are certified as empty per applicable law, properly cut open for inspection to verify that they are empty.

13) Any Materials Containing CFCs, HCFCs or non-exempt refrigerant substitutes that have not be evacuated, except as contained in whole appliances SMM purchased for appliance depollution.

14) Lead-containing materials, except when purchased as a lead bearing commodity.

15) PCB-containing materials (e.g., capacitors, ballasts and transformers).

16) Asbestos-containing materials (ACM), such as pipe insulation or surfacing materials.

17) Mercury-containing materials (e.g. switches, fluorescent or mercury vapor lights/fixtures/ bulbs, thermostats), except as contained in whole vehicles/appliances SMM purchases for vehicle/appliance depollution.

18) Cathode ray tubes (CRTs), liquid crystal displays (LCDs) or any device containing a CRT or LCD (e.g. computer monitor, laptop screen or television set), except at specifically designated electronics drop-off areas.

19) Any other material containing hazardous wastes or toxic substances.

REQUIREMENTS FOR CERTAIN COMMODITIES ACCEPTED BY SIMS METAL MANAGEMENT

Processed Automobiles must have the following removed prior to delivery:

- 1) Fluids -
 - Oils (motor oil, transmission fluid, power steering and brake fluid from reservoirs)
 - Fuel
 - Coolant
 - Refrigerant
 - Any other fluids required by state/local law (e.g., washer fluid, axle fluid)
- 2) Batteries and leaded battery cable ends (Except as a separated commodity)
- 3) Mercury-containing convenience light switches and any other mercury containing components as required by law
- 4) Air bag deployment canisters
- 5) No trash, dirt or wastes of any type
- 6) Tires (except as specifically allowed by the facility)

PREVENTING METAL THEFT

Sims Metal Management does not purchase stolen materials. If Company Personnel suspect materials of being stolen, they may turn away the customer, and may notify local law enforcement.



Sims Metal Management follows all federal, state and local regulations that apply to the purchase of scrap vehicles and other scrap metal to assist in the preventing the purchase of stolen metals. If you have specific questions about these local and State regulations, please contact your local SMM representative or SMM scale personnel.

- 1) SMM reserves the right to refuse any transaction it believes may be in violation of the law or that may contain stolen materials
- 2) All sellers of metal must supply identification.

- 3) All transactions will be documented, and in some cases depending on the location, loads and certain materials will be photographed.
- 4) Please note that recyclers are often the victims of metal theft. SMM reserves the right to conduct video surveillance of our facilities and business operations.

OUR COMMITMENT TO THE SAFETY, HEALTH, ENVIRONMENT AND THE COMMUNITY (SHEC)

In January of 2012, Sims Metal Management was recognized as one the World's Top 100 Most Sustainable Corporations at the 2012 World Economic Forum in Davos, Switzerland for the third year in a row – moving up 52 spots in the rankings to number 11.

Sims Metal Management has a strong commitment to the environment, sustainability and the health of the communities in which we do business. In all aspects of the business, Sims strives to implement best practices and Fulfill the ideals of our Safety, Health, Environment and Community (SHEC) Policy.

Sims Metal Management is committed to the community, supporting local educators, schools, charity, community and environmental organizations throughout the globe. We take seriously our efforts to be a good community and environmental partner. Everyday Sims Metal Management employees make a positive impact on the environment.

In Fiscal 2011, Sims Metal Management's global carbon footprint was more than 300,000 metric tons, a reduction of 2% over Fiscal Year 2010. That compares to the 13 million metric tons of carbon emissions estimated as saved by Sims' recycling of steel alone (compared with the mining of ore and manufacture of raw material for steel production) – a ratio of 1 to 42.



THANK YOU FOR RECYCLING WITH THE WORLD'S FULL SERVICE RECYCLER. WE APPRECIATE YOUR BUSINESS.

www.simsmm.com/us/scrapacceptance or call (212) 500-7430 for more information.

POLÍTICA PARA LA ACEPTACIÓN DE MATERIALES

Se prohíbe aceptar los siguientes materiales en las Instalaciones de SIMS Metal Management (SMM), excepto por un acuerdo especial con SMM:

- 1) Materiales no reciclables de cualquier tipo, incluyendo asfalto, concreto, escombros, tierra, harapos, neumáticos, basura.
- 2) Líquidos de flujo libre no peligrosos, incluyendo el agua.
- 3) Líquidos de flujo libre peligrosos, incluyendo gasolina, aceite para motores, fluidos hidráulicos, anti-congelantes, pinturas a base de aceite y otros lubricantes o productos derivados del petróleo, excepto los contenidos en vehículos completos que SMM compra para descontaminación de vehículos.
- 4) Materiales inflamables y combustibles.
- 5) Materiales corrosivos tales como carbonato de sodio o baterías dañadas. Algunos centros probablemente acepten las baterías enteras para su reciclado.
- 6) Materiales radioactivos de cualquier tipo (ej.: desechos militares, desechos médicos, dispositivos de medición de espesor).
- 7) Materiales explosivos o materiales potencialmente explosivos de cualquier tipo, tales como desechos de municiones (ej.: municiones, casquillos).
- 8) Químicos o venenos en estado sólido, en polvo, líquido o gaseoso (ej.: fertilizantes).
- 9) Materiales infecciosos (ej.: en bolsas rojas o etiquetados con el símbolo de contagioso).
- 10) Recipientes o cilindros presurizados, incluyendo tanques de propano, tanques de gas comprimido, latas de aerosol o extintores de incendio; excepto si el cilindro cerrado ha sido ventilado o si se acepta bajo un acuerdo especial.
- 11) Recipientes cerrados, incluyendo tanques de almacenamiento a granel y recipientes de procesamiento.
- 12) Recipientes que anteriormente contenían materiales peligrosos, incluyendo tambores, tanques de almacenamiento a granel, recipientes de procesamiento y/o latas de aerosol, excepto si los recipientes están certificados como cerrados según la ley correspondiente, abiertos

adecuadamente para su inspección para verificar que estén vacíos.

- 13) Cualquier material que contenga CFC, HCFC o sustitutos de refrigerantes no exceptuados que no hayan sido depuestos, excepto los que contienen los artefactos enteros que SMM compra para la descontaminación de aparatos.
- 14) Materiales que contengan plomo, excepto cuando se los compra como materias primas hechas de plomo.
- 15) Materiales que contengan PBC (ej.: capacitores, balastos y transformadores).
- 16) Materiales que contengan asbestos (ACM, por sus siglas en inglés), tales como aislamientos de tuberías y materiales de superficie.
- 17) Materiales que contengan mercurio (ej.: interruptores, luces/apliques/focos fluorescentes o de vapor de mercurio, termostatos), excepto el que contienen los artefactos/vehículos que SMM compra para descontaminación de vehículos/artefactos.
- 18) Tubos de rayos catódicos (CRT, por sus siglas en inglés), pantallas de cristal líquido (LCD, por sus siglas en inglés) o cualquier dispositivo que contenga CRT o LCD (ej.: monitores de computadoras, pantallas de laptops o televisores), excepto en áreas específicamente designadas para dejar equipos electrónicos.
- 19) Cualquier otro material que contenga desechos peligrosos o sustancias tóxicas.

REQUISITOS PARA CIERTAS MATERIAS PRIMAS ACEPTADAS POR SIMS METAL MANAGEMENT

A los automóviles procesados primero se le deben retirar los siguientes antes de entregarlos:

- 1) Fluidos -
 - Aceites (aceites del motor, fluido de la transmisión, líquido de dirección asistida y de freno de los depósitos)
 - Combustible
 - Enfriamiento
 - Refrigerante
 - Cualquier otro fluido requerido por la ley estatal/local (ej.: líquido de lavado, líquido del eje)
- 2) Baterías y terminaciones de baterías con plomo
- 3) Interruptores de luces que contengan mercurio y cualquier otro tipo de componentes que contengan mercurio según lo requiera la ley.
- 4) Cartuchos de despliegue de los air-bags.
- 5) Ningún tipo de basura, mugre o desechos.
- 6) Neumáticos (excepto aquellos específicamente permitidos por la instalación).

CÓMO EVITAR EL ROBO DE METALES

Sims Metal Management no compra materiales robados. Si alguna persona de la empresa sospecha que algún material es robado, puede evidenciar al cliente, y puede dar aviso a las autoridades locales.



Sims Metal Management respeta todas las regulaciones federales, estatales y locales que aplican a la compra de vehículos fuera de uso y el metal fuera de uso para ayudar en la prevención de la compra de metales robados. Si tiene preguntas específicas acerca de estas regulaciones locales y estatales, comuníquese con su representante local de SMM o con el personal de SMM.

- 1) SMM se reserva el derecho de negarse a cualquier transacción que crea que pueda suponer una violación a la ley o que pueda contener materiales robados.
- 2) Todos los vendedores deben proporcionar una identificación.
- 3) Se documentarán todas las transacciones,

en algunos casos, dependiendo de la ubicación, se tomarán fotografías de ciertas cargas y materiales.

4) Tenga en cuenta que los recicladores generalmente son víctimas de robo de metales. SMM se reserva el derecho de contar con vigilancia de video de nuestras instalaciones y operaciones comerciales.

NUESTRO COMPROMISO CON LA SEGURIDAD, SALUD, MEDIO AMBIENTE Y LA COMUNIDAD (SHEC, por sus siglas en inglés)

En enero de 2012, Sims Metal Management fue reconocida por tercer año consecutivo como una de las 100 Corporaciones más aptas del Mundo en el Foro Económico Mundial 2012 que se llevó a cabo en Davos, Suiza; escalando 52 posiciones en los rankings llegando a la posición número 11.

Sims Metal Management tiene un fuerte compromiso con el medio ambiente, la sostenibilidad y con la salud de las comunidades en las cuales hacemos negocios. Sims se esfuerza en implementar las mejores prácticas y cumplir con los ideales de nuestra Política de Seguridad, Salud, Medio Ambiente y Comunidad (SHEC, por sus siglas en inglés) en todos los aspectos del negocio.

Sims Metal Management está comprometido con la comunidad mediante el apoyo de educadores, escuelas, organizaciones de caridad, comunitarias y medioambientales locales en todo el mundo.

Nos tomamos muy en serio nuestros esfuerzos de ser un buen socio comunitario y a favor del medio ambiente. Todos los días, los empleados de Sims Metal Management ejercen un impacto positivo sobre el medio ambiente.

Durante el año fiscal 2011, la huella de carbono mundial de Sims Metal Management fue de más de 300.000 toneladas métricas, una reducción del 2% respecto del año fiscal 2010. Esto se compara con los 13 millones de toneladas métricas de emisiones de carbono estimadas como ahorradas por el reciclaje únicamente de acero de Sims (comparado con la minería de minerales y la fabricación de materias primas para la producción de acero); una proporción de 1 a 42.



GRACIAS POR RECICLAR CON EL RECICLADOR DE SERVICIO COMPLETO MUNDIAL. AGRADECEMOS SU PREFERENCIA.

www.simsmm.com/us/scrapacceptance o llame al

(212) 500-7430

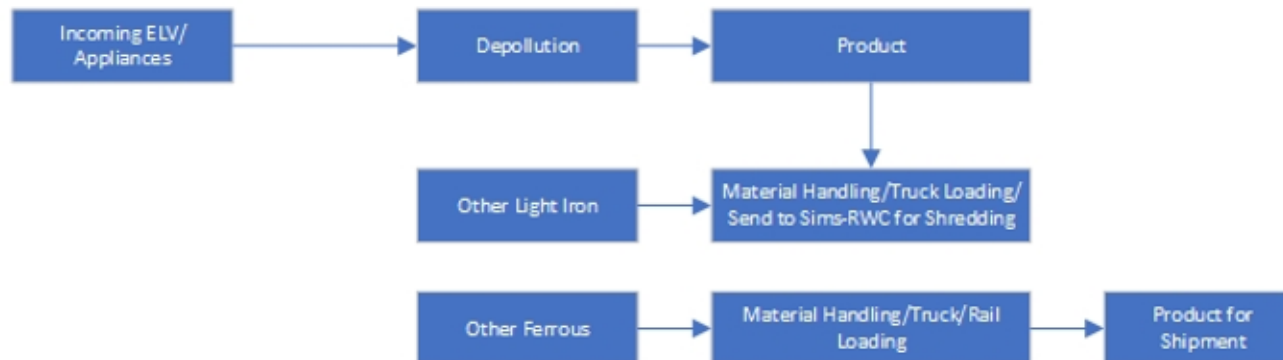
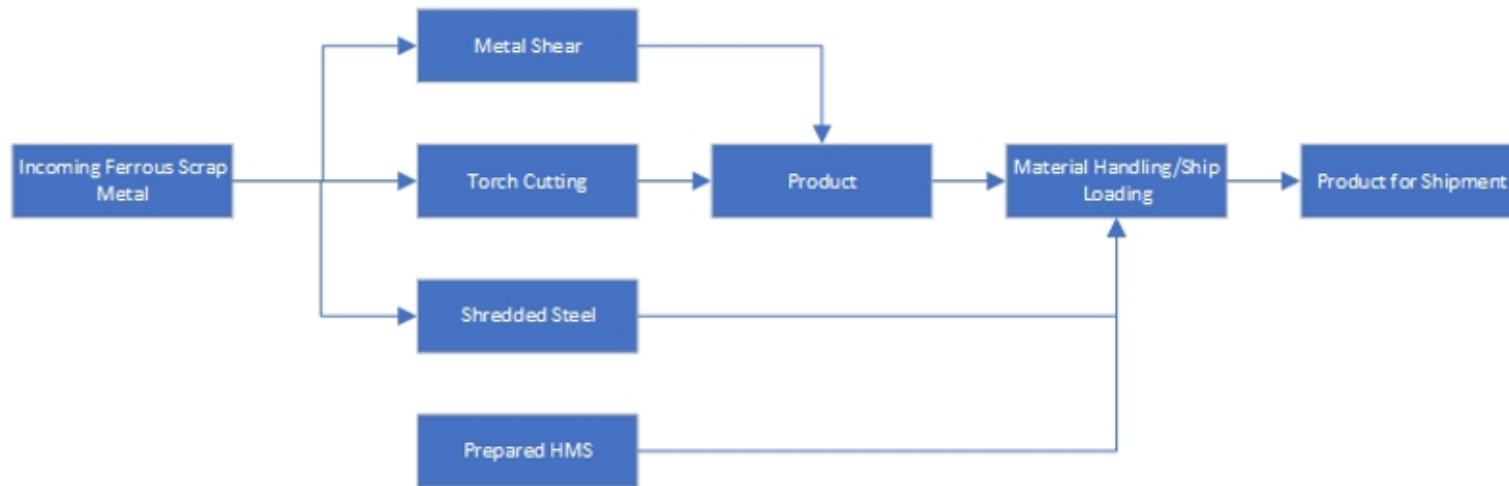
para más información.

ATTACHMENT 3
PROCESS FLOW DIAGRAMS

Overall Process Diagram

Sims Metal Management – Richmond

Ferrous Metal Processing

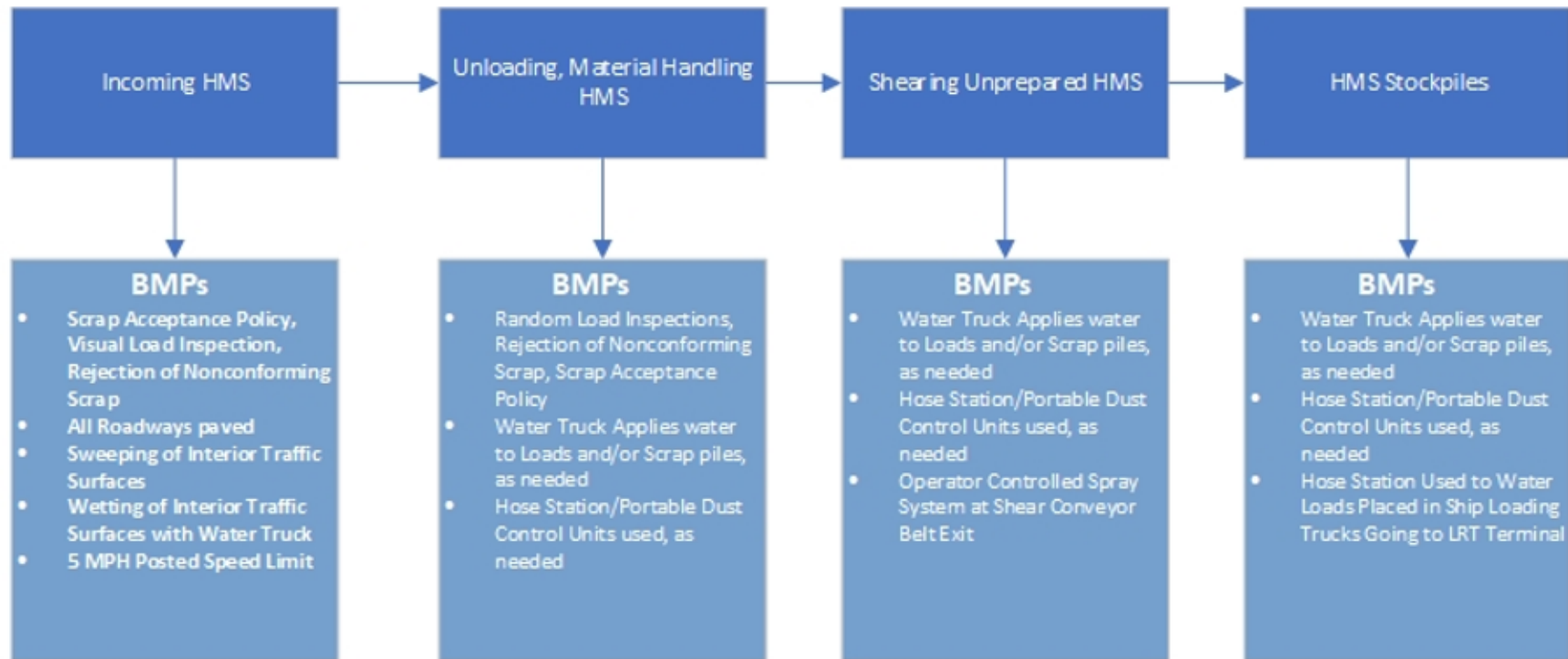


Non-Ferrous Metal Processing



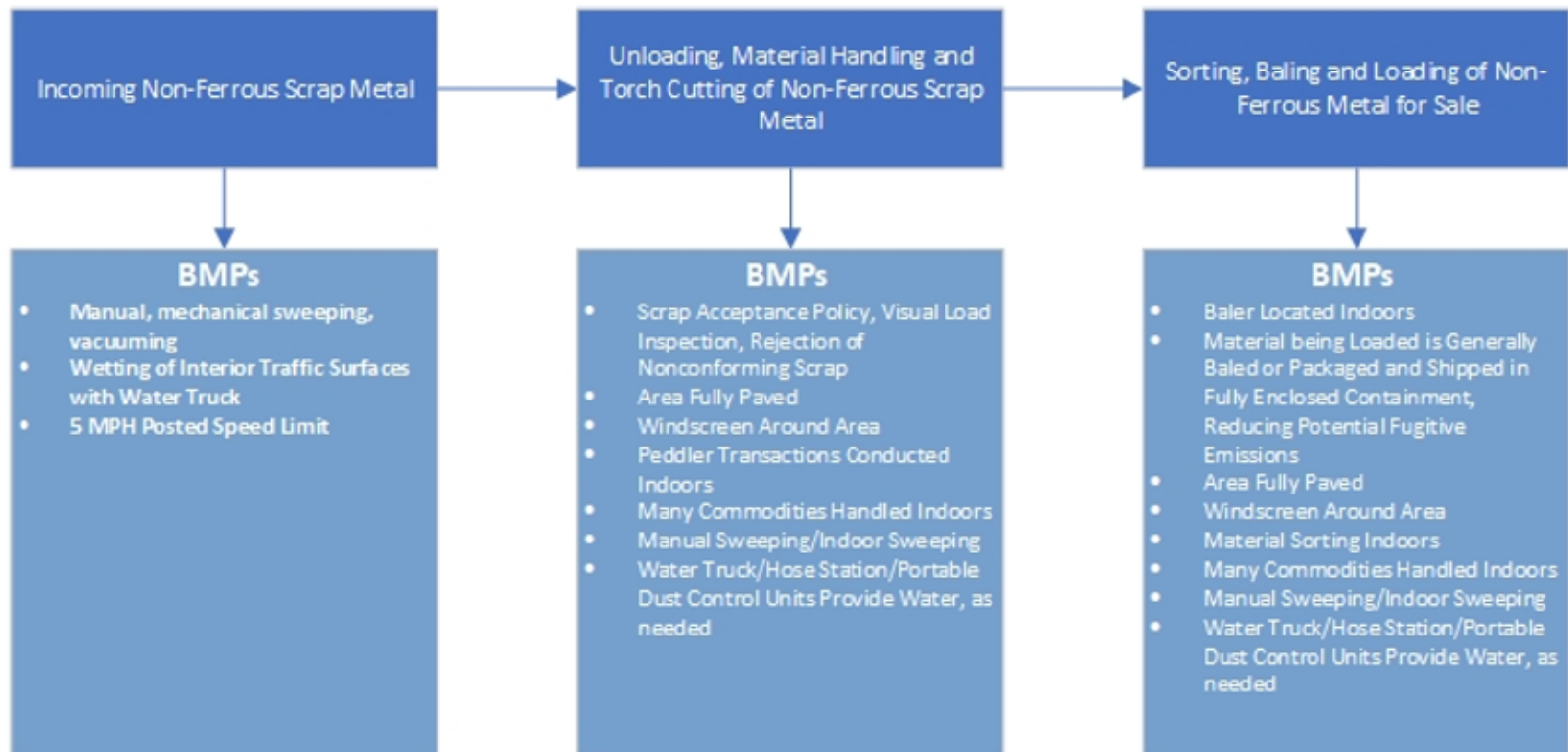
Shearing Processing Diagram with BMPs

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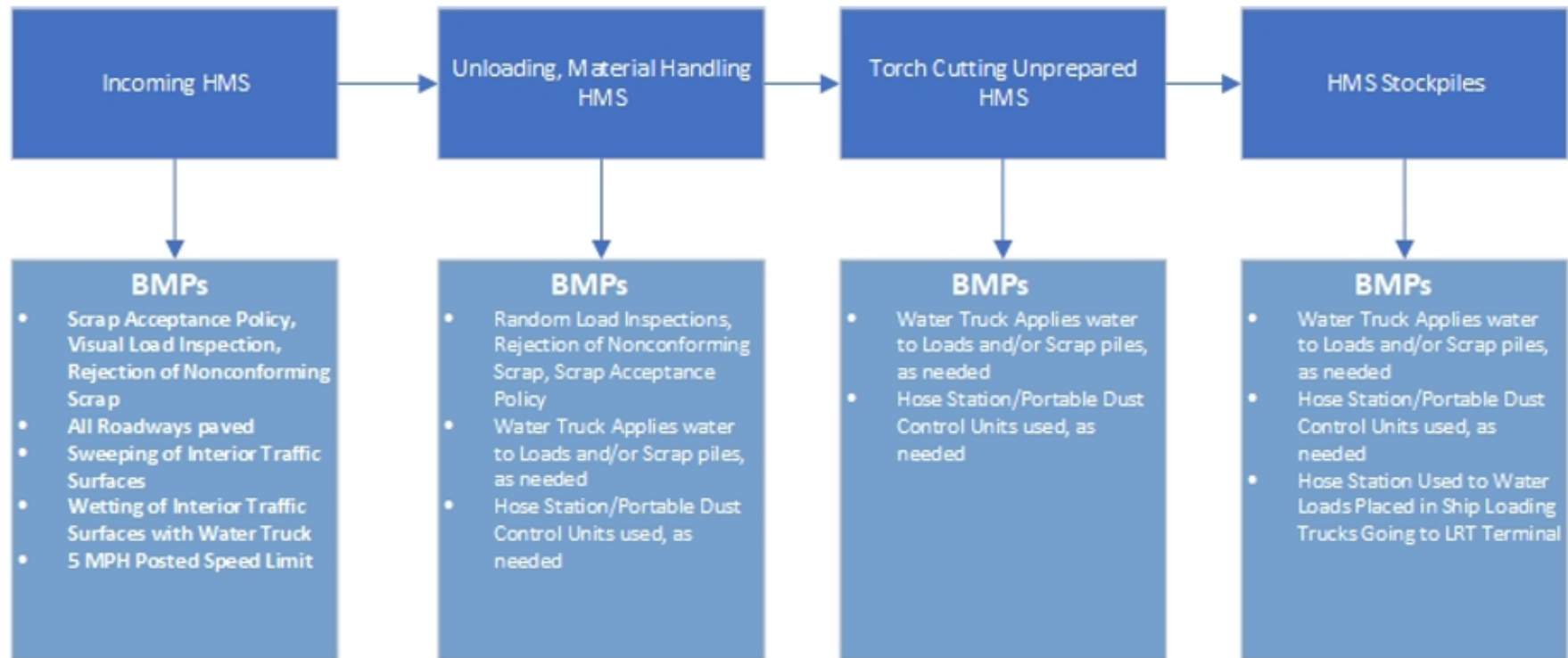
Non-Ferrous Metal Receiving and Processing Diagram with BMPs

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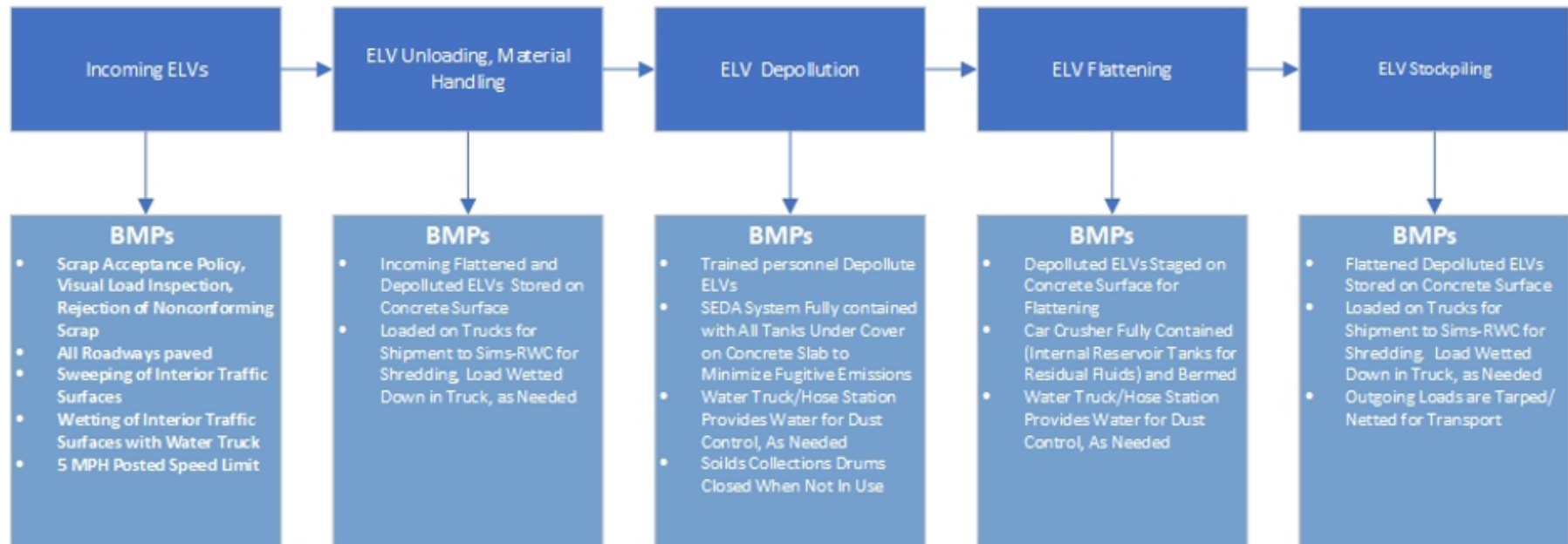
Ferrous Metal Torch Cutting Process Diagram with BMPs

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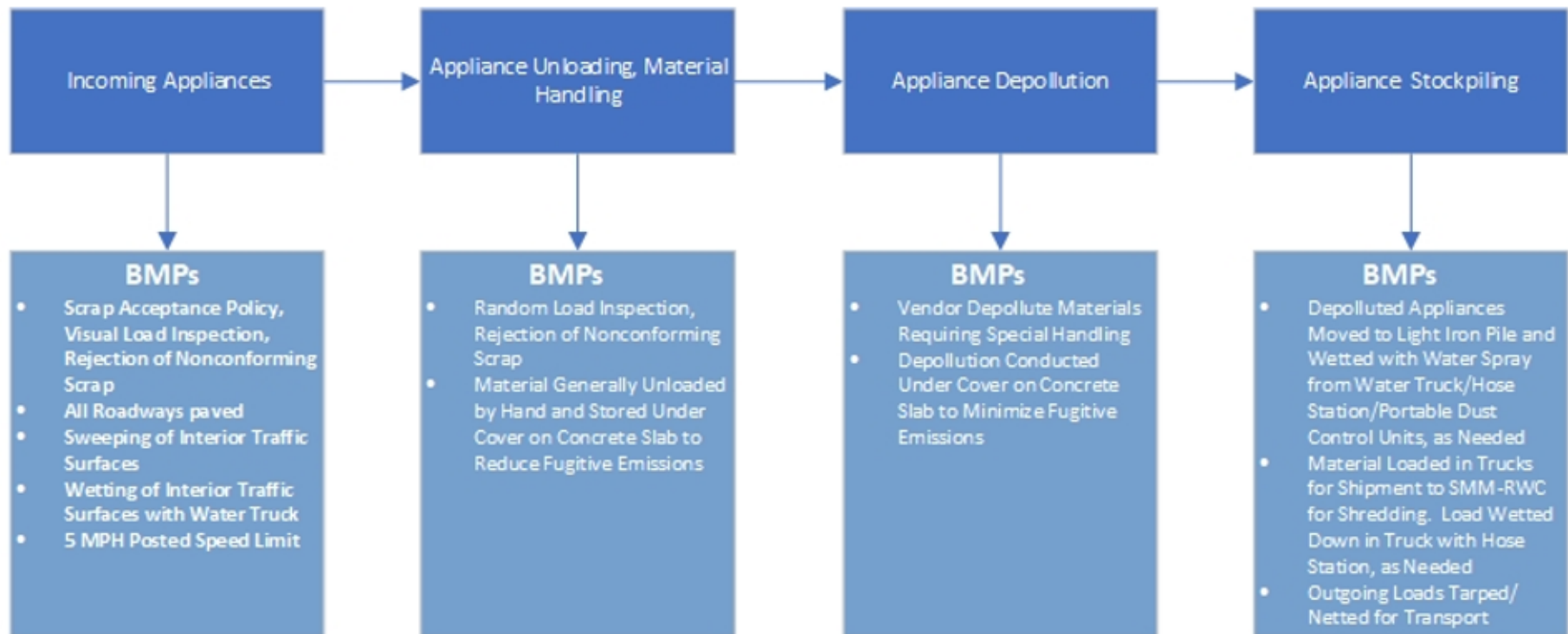
ELV Depollution Diagram with BMPs

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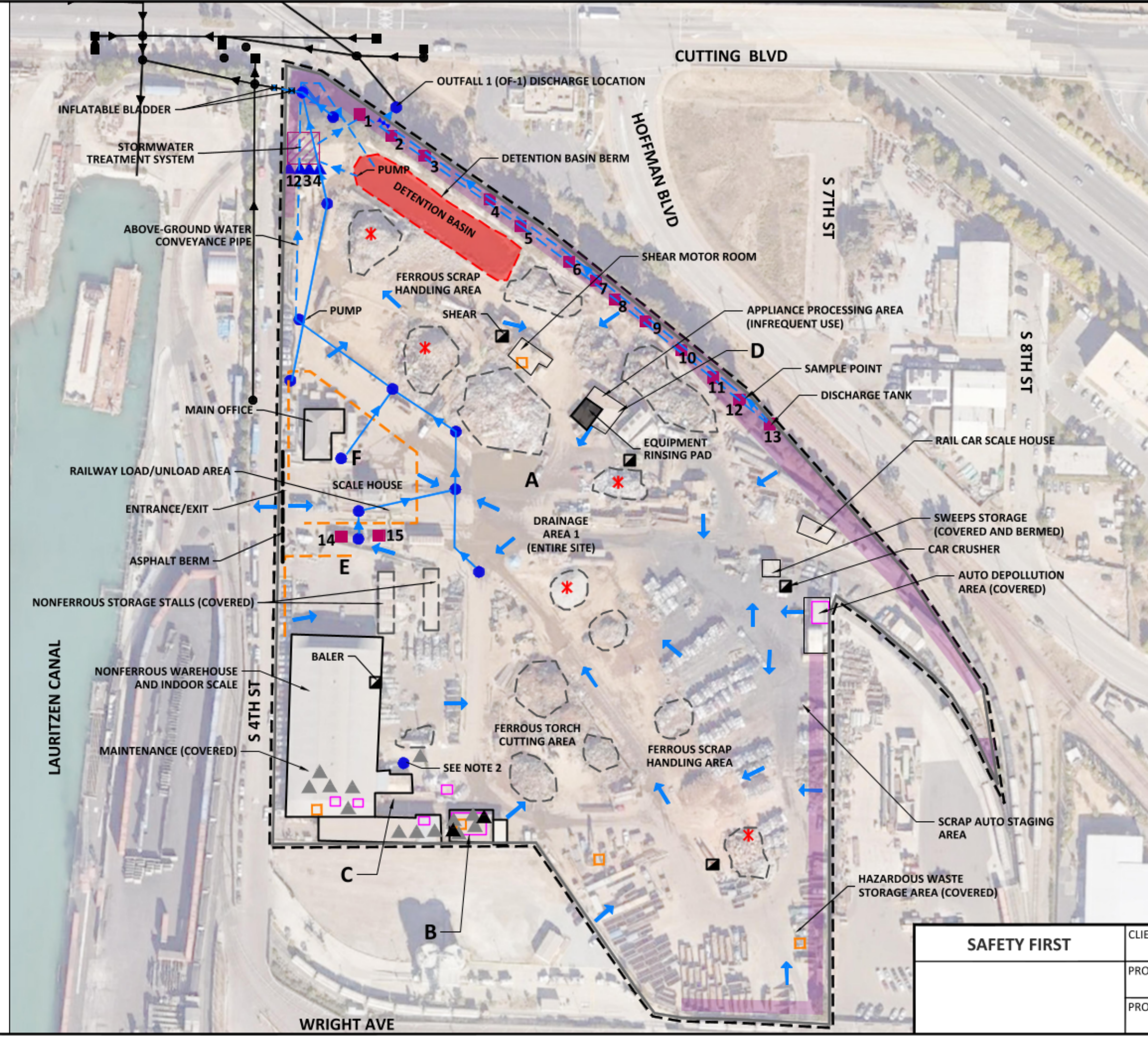
Appliance Depollution Diagram with BMPs

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ATTACHMENT 4
FACILITY LAYOUT / FLOOR PLAN

J:\CADD FILES\0012 Sims Metal Management\002 Richmond\Maps 2\SWPPP Maps EA.dwg Drawn by: XXX ; Checked by: XXX



LEGEND

- SURFACE FLOW DIRECTION
- STORMWATER DRAIN INLETS
- BELOW GROUND STORM DRAIN PIPE SYSTEM AND FLOW DIRECTION
- ABOVE GROUND STORM DRAIN PIPE SYSTEM AND FLOW DIRECTION
- STORMWATER TREATMENT BAKER TANK
- BERM
- STORMWATER HOLDING TANK
- FERROUS SCRAP METAL STOCKPILE AREA
- SITE BOUNDARY
- SPILL KITS
- BERMED DETENTION BASIN
- SECONDARY CONTAINMENT
- BUILDING OUTLINE
- MATERIAL STOCKPILES
- ABOVE GROUND STORAGE TANK
- OIL STORAGE AREA
- OIL FILLED EQUIPMENT RESERVOIR
- CONCRETE CURBS OR BERMS
- OFFSITE STORM DRAIN PIPE SYSTEM AND FLOW DIRECTION
- UNPAVED AREA/LANDSCAPING
- VALVE
- INFLATABLE BLADDER

SWEEPING PLAN DESIGNATIONS:

- A** PAVED YARD AREA
- B** COVERED FUEL STORAGE AREA
- C** MAINTENANCE ALLEY
- D** APPLIANCE PROCESSING AREA
- E** NON-FERROUS AREA
- F** OFFICE/SCALE

- NOTES**
1. SURFACE PONDING IS CONVEYED TO DETENTION BASIN, AS NEEDED, USING MOBILE PUMPS AND TANKS PRIOR DRAIN INLET WITH VALVE. PIPE WAS GROUTED CLOSED AND DRAIN IS NO LONGER OPERATIONAL.
 - 2.



SAFETY FIRST	CLIENT:	Sims Metal Management	Facility Map
	PROJECT:	Richmond SWPPP	
	PROJECT NUMBER:		
			Figure 1