Emissions Minimization Plan

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

Sims Metal (Sims) - Redwood City
District Site #5152
699 Seaport Boulevard
Redwood City, CA 94063
September 2024

☒ Public Copy
☐ Confidential Copy

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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:* _____

Kyle Heidebrink, Division Manager
Sims - Redwood City

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 facility located at 699 Seaport Blvd. in Redwood City, California (the Facility) comprises approximately 13.5 acres and is owned by the City of Redwood City, through the Port of Redwood City (the Port), and operated by Sims Group USA Corporation, d/b/a Sims Metal (Sims). The Standard Industrial Classification (SIC) Code is 5093 (Scrap Recycling and Waste Recycling Facilities) and the North American Industry Classification System (NAICS) Code is 423930 (establishments primarily engaged in the merchant wholesale distribution of recyclable materials). The Facility is located at coordinates of 37.51514N & 122.22513W. The Facility is approximately 85% concrete, asphalt paved or covered with buildings or other structures.

Facility operations include (a) receiving, handling, and stockpiling of end-of-life vehicles (ELV) and other light gauge steel items such as end-of-life appliances (Light Iron), collectively referred to as Feedstock Material, and thicker steel items (e.g. beams), referred to as heavy melting steel (HMS); (b) operation of the metal shredder (Shredder) and the downstream Materials Recovery Plant (MRP) to separate and produce specification-grade ferrous and non-ferrous metal commodities (Products) from Feedstock Materials; (c) treating and separating metal from the primarily non-metallic material remaining post-MRP (SR Material); (d) storing/stockpiling, loading and shipping of recycled Products and treated SR; and (e) ancillary activities including management and storage of waste collected incident to Facility operations, as well as equipment fueling and maintenance. Shredded ferrous metal Product (Shred) is loaded in bulk as described below onto ocean-going vessels for shipment to steel mill customers. Non-ferrous metal Products (either separate Products or a mixed non-ferrous metal Product referred to as Zorba) are loaded into containers for shipment to customers via the Port of Oakland. HMS is loaded onto trucks and shipped to another Sims facility for processing and shipping. Feedstock Material includes Light Iron received from Materials Recovery Facilities (MRFs), which are facilities that receive recyclable material from households, curbside pickups or commercial establishments, separated either prior to receipt at the MRF or by the MRF for sale to metal recyclers (MRF Material).

The Facility is located in an industrial area within the Port a short distance east of and across Herkner Road from the Port's ship-loading berths located on Port wharves along Redwood Creek, a tidally influenced industrial shipping and recreational channel that flows to the San Francisco Bay. Sims engages in ship-loading operations on a periodic basis at one of those wharves, which is shared by multiple Port tenants. Ship-loading operations consist of the transfer of Shred from the Shred stockpile area at Facility directly into the hold of bulk cargo vessels by means of a ship-loading conveyor and enclosed chute.

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: Kyle Heidebrink
Title: Division Manager, Redwood City Division
Phone: 918-500-0479 (M)
Email: kyle.heidebrink@simsmm.com
Schedule/Shift: Monday through Friday, Variable

Name: Jeff Shell
Title: Project Manager & Electrical
Phone: 916-769-2289 (M)
Email: Jeff.Shell@simsmm.com
Schedule/Shift: Monday through Friday, Variable

Onsite Alternate Contact(s)

Name: Jerico Tuazon
Title: Shredder Manager
Phone: 650-468-3905 (M)
Email: Jerico.Tuazon@simsmm.com
Schedule/Shift: Monday through Friday, Variable

Name: Brendan Scally
Title: MRP Manager
Phone: 650-422-1505 (M)
Email: Brendan.Scally@simsmm.com
Schedule/Shift: Monday through Friday, 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	☒ Yes ☐ No
402.2 Metal Management	☒ Yes ☐ No
402.3 Shredder Residue (SR) Management	☒ Yes ☐ No
402.4 Depollution Operations	☐ Yes ☒ 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		Recyclable Material is received at the scale where it is inspected for prohibited materials. Recyclable Material consists of Feedstock Material and HMS (e.g., beams). Feedstock Material consists of ELVs, MRF Material and other Light Iron (e.g., appliances).	☒ Yes ☐ No		☐ Yes ☒ No	Visual inspection of incoming loads and rejection as needed.	☒ Yes ☐ No	Prohibited materials
2	Transport		Recyclable Material is transported by truck to the Feedstock Material stockpiles.	☒ Yes ☐ No		☐ Yes ☒ No	Water truck sprays all facility roadways. Sweeper truck cleans roadways. Roadways are paved/concreted.	☒ Yes ☐ No	Visible emissions.
3	Collection		Feedstock Material is collected, sorted & stockpiled by commodity type (ELV, Light Iron, MRF Material), with the MRF Material stockpile added in order to reduce the risk of fires.	☒ Yes ☐ No		☐ Yes ☒ No	Water spray on Feedstock Material stockpiles. Fire breaks between stockpiles and stockpile size limitations.	☒ Yes ☐ No	Visible emissions; potential for fire.
4	Sorting / Segregation		Feedstock Material is segregated by commodity type as per #3 above.	☒ Yes ☐ No		☐ Yes ☒ No	Water spray on Feedstock Material stockpiles. Fire breaks between stockpiles and stockpile size limitations.	☒ Yes ☐ No	Visible emissions; potential for fire.
5	Separation	1	Feedstock Material is separated into shredded steel product (Shred), in-process non-ferrous metal material, non-ferrous metal Product and SR Material.	☒ Yes ☐ No		☐ Yes ☒ No	Water spray at designated locations. Conveyors are covered. Water/foam injected into operating Shredder mill.	☒ Yes ☐ No	Visible emissions.
6	Compilation		Shredded Feedstock Material separated by commodity type is placed into the shred stockpile or non-ferrous metal bins, respectively. Non-ferrous material is stored under cover.	☒ Yes ☐ No		☐ Yes ☒ No	Water spray from Dust Boss.	☒ Yes ☐ No	Visible emissions.
7	Crushing		This facility operates no crushing equipment.	☐ Yes ☐ No		☐ Yes ☐ No		☐ Yes ☐ No	
8	Shredding	1	See #5 above.	☒ Yes ☐ No	3, 4, and 5	☒ Yes ☐ No	Water/foam injected at Shredder mill and other Shredder control as per the Air District permit. All conveyors are enclosed.	☒ Yes ☐ No	Opacity and visible emissions.
9	Storage of metals		See #6 above.	☒ Yes ☐ No		☐ Yes ☒ No	Water truck, water spray from Dust Bosses.	☐ Yes ☒ 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	Light Iron, including appliances from Certified Appliance Recyclers, with material requiring special handling (MRSH) removed by the CAR.
2	ELV
3	MRF Material
4	HMS
5	Feedstock Material is processed, including by separation into shredded steel and non-ferrous metal Products.

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	Shredder Feedstock Material (including ELVs and MRF Material and other Light Iron)	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
1	HMS	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
1	Shredder Feedstock Material (including ELVs and MRF Material and other Light Iron)	☒ YES ☐ NO	Stockpile temperature	☒ YES ☐ NO	Infrared cameras
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Unprocessed Material					
1	Shredder Feedstock Material (including ELVs and MRF Material and other Light Iron)	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
1	Shredder Feedstock Material (including ELVs and MRF Material and other Light Iron)	☒ YES ☐ NO	Stockpile temperature	☒ YES ☐ NO	Infrared cameras
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of In-process Material					
4	Non-ferrous metal-bearing material (referred to as "Zorba")	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Finished Product					
7	Shredded Steel	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
8	Non-ferrous metal commodities (e.g. Zorba)	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Shredder Residue					
9	Treated SR storage stockpile (also referred to as CTMSR - chemically treated metal shredder residue)	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	

ABATEMENT AND CONTROL EQUIPMENT

Provide a comprehensive list of all District-permitted abatement and control equipment to reduce emissions.

Section #	Abatement Equipment	District A#	Name of Source(s) Abated and District Source #(s)
1	Multiple cyclone	A3	S1 Shredder
2	Multiple cyclone	A4	S1 Shredder
3	Irrigated cyclone scrubber	A5	S1 Shredder

Metal Recycling and Shredding Operations

II. Shredder Residue (SR) Management

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	Treated Shredder Residue Building for Storage and Treatment		☒ Yes ☐ No	☒ Yes ☐ No	Visible emissions	☒ Yes ☐ No	In line treatment using an alkaline activator (typically cement) and a poly-silicate chemical (e.g., Metabond) to chemically fixate SR Material as per DTSC requirements for use as alternative daily cover (ADC).
2	Treated Shredder Residue Building for Truck Loading		☒ Yes ☐ No	☒ Yes ☐ No	Visible emissions	☐ Yes ☒ No	
3	Covered conveyors for Conveyance to Building		☒ Yes ☐ No	☒ Yes ☐ No	Visible emissions	☐ Yes ☒ No	
			☐ Yes ☐ No	☐ Yes ☐ No		☐ Yes ☐ 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 and halogenated oil
4	Used oil
5	Used gasoline
6	Batteries
7	Wiper solution
8	Coolant

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.

While the Facility is a Certified Appliance Recycler (#0395), at this time the Facility only receives major appliances from other CARs and does not engage in removal of MRSH from received major appliances under its own CAR certification.

At this time, the Facility also only receives previously depolluted ELVs.

In the event that this Facility engages in MRSH removal operations from major appliances or ELV depollution operations, it will amend this EMP accordingly.

Scrap Acceptance Policy

SCRAP ACCEPTANCE POLICY

Attach a copy of facility's Scrap Acceptance Policy. Label the attachment with the corresponding Attachment #.

Attachment # 2

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.

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
ROADWAYS AND OTHER TRAFFICKED SURFACES		Facility roadways are paved/concreted	N/A
		Facility roadways are regularly swept	Frequently, over 8 hours per day, Monday through Saturday
		Speed limit of 5 mph for equipment and trucks inside the Facility	In effect at all times
		Employee training	Initially for new employees, annual update for current employees.
		Facility roadways are regularly watered	Frequently, as needed.
		Facility roadways are regularly inspected for fugitive emissions.	At least one inspection daily.

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 hours of operation.
RECEIPT	1	Visual inspection of incoming truck loads to intercept and reject loads containing prohibited material. Annual training of inspectors.	When receiving incoming trucks.
COLLECTION	1	Watering of internal roads and recyclable metal stockpiles using water truck, portable dust control units, and sprinklers.	As per above "Roadway" table.
SORTING	1	All inspectors trained to direct incoming trucks to unload Feedstock Material at appropriate storage stockpiles.	As per above "Roadway" table.
SEGREGATION	1	Materials entering facilty are segregated into different storage piles before further processing, including Shredder Feedstock Material stockpiles (separate ELV, MRF Material and other Light Iron stockpiles), and HMS stockpiles. The Facility uses fire breaks between stockpiles. The Facility inspects Recyclable Material when placed into stockpiles per the Inbound Material Control Program to identify and remove Prohibited Materials, such as small batteries.	During hours of operation when receiving incoming trucks.
SEPARATION	1	Water/foam injected at Shredder mill. Conveyors are covered. The majority of metal separation is done inside a structure.	During hours of Shredder & MRP operation, respectively.
COMPILATION	1	Addressed by other categories above and below.	During hours of operation.
CRUSHING	1	No crushing is conducted at this facility.	N/A
SHREDDING	1	As noted above and as per the Air District permit for the Shredder.	During hours of Shredder operation.
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	2	Water added to the Shredder is absorbed by the SR.	During hours of Shredder operation.
	2	SR treatment occurs in covered screw conveyor in a building.	During SR treatment activity.
	2	SR is stored and loaded into trucks in treated SR building.	Routinely.

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	3	Not applicable at this time.	

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
Storage of Delivered Scrap	1	Delivered Feedstock Material stockpiles are watered during unloading and material handling.	During all hours of operation when receiving incoming trucks as needed.
	1	Feedstock Material stockpile height is limited per the Facility's Fire Prevention and Preparedness Plan (Fire Prevention SOP).	Daily
	1	Facility attempts to shred substantially all stockpiled Feedstock Material each day of Shredder operation.	Daily
	1	Feedstock Material is inspected for items that may contain batteries. If batteries are observed, they are removed from the stockpile and stored separately.	During all hours of operation when receiving incoming trucks as needed.
	1	MRF Material is segregated into a separate stockpile with a fire break between each Feedstock Material stockpile (MRF Material stockpile, ELV stockpile and Light Iron stockpile). In total, three stockpiles are now separated and located at the Shredder infeed (ELV stockpile, Light Iron stockpile, and MRF Material stockpile).	During all hours of operation when receiving incoming trucks as needed.
Storage of Unprocessed Material	1	Unprocessed Feedstock Material storage stockpiles are watered during unloading and material handling.	As per above
	1	Feedstock Material stockpiles are inspected for items that may contain small batteries. If batteries are observed, they are removed from the stockpile and stored separately.	During all hours of operation when receiving incoming trucks as needed.
	1	Stationary infrared cameras are currently used to monitor the ELV and MRF and other Light Iron stockpiles.	Every day, around the clock
Storage of In-process Material	1	In-process material storage stockpiles are watered during unloading and material handling.	Whenever needed during facility operation.
Storage of Finished Product	1	Shredded steel product stockpile is watered as needed.	Whenever needed during facility operation.
Storage of Shredder Residue	SEE SHREDDER RESIDUE MANAGEMENT SECTION		

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 maintains and implements a Fire Prevention and Preparedness Plan (Fire PPP) which is designed to reduce the risk of fires at the Facility but which also serves to minimize emissions from stored materials. The Fire PPP outlines many components that support minimization of emissions. Some key Fire PPP requirements are described below.

The Fire PPP limits Feedstock Material and Treated SR Material stockpile heights and footprints, requires fire breaks and the watering of stockpiles, and segregation of ELV, MRF Material and other Light Iron, among other requirements. The Fire PPP specifies other measures to prevent and control fires in stockpiled materials, including requirements for addressing incipient fires.

The Facility's Inbound Material Control Program requires training of operations employees in identification of Prohibited Materials (see Prohibited Materials List) among other things. Feedstock Material and HMS suppliers must sign the Recyclable Material Acceptance Agreement which includes the requirement to exclude Prohibited Materials in inbound Recyclable Material. 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 stockpiles, the Facility reduces the risk of fires and fugitive emissions. This Program also includes inspection of inbound loads of Recyclable Material during and after unloading at the Feedstock Material and HMS stockpiles. Furthermore, the inspection program emphasizes the inspection for and removal of smaller batteries/items with batteries, to further reduce the risk of fire.

The Fire PPP also discusses the use of infrared cameras, which are fixed on the ELV, Light Iron, and MRF Material stockpiles and operate around-the-clock, every day to address identfied stockpile hot spots. Operators monitor the feed from the infrared cameras during each day of operation. If a camera is obeserved to be non-operational, facility management, electrician and/or the camera vendor are immediately notified. The facility electrician and/or vendor will begin trouble-shooting the situation as soon as possible. If needed, hand-held infrared cameras are available at the site.

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 Material Control Program and requires suppliers to sign a Recyclable Material Acceptance Agreement obligating them to keep out Prohibited Materials, some of which may result in the generation of fugitive emissions or increase fire risk.

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 portable dust control units (e.g. Dust Boss).

5. Water and foam are injected into the Shredder mill, resulting in reduced fugitive emissions during and downstream of shredding.

6. Most in-process material operations are conducted in buildings or other structures with external conveyors covered or enclosed.

7. SR Material is transferred to a building in an enclosed conveyor where it is treated per DTSC requirements and loaded into trucks in a building and tarped for off-site shipment.

8. Shredded steel Product is transferred from stockpile to vessel by means of a covered ship-loading conveyor with a telescoping chute to minimize fugitive emissions during ship-loading.

9. Employee training includes initial and annual refresher training and toolbox talks including training on dust control measures and fire prevention.

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.
	Roadways and Other Trafficked Surfaces	☒ Yes ☐ No	Number of Staff	☒ Yes ☐ No	Number of Staff 1 (third-party security personnel	No on-site Facility staff to observe after hours. A third-party security company (contracted by the Port of Redwood City) provides one person responsible for observing visible emissions after hours (i.e., M-F 9 pm – 5 am, and 24 hours during weekend). Facility supervisory staff when present during operations from 9 pm onward also observe for visible emissions.
1	**Metal Management**	☒ Yes ☐ No		☒ Yes ☐ No		
1	Transport	☒ Yes ☐ No		☒ Yes ☐ No		
1	Receipt	☒ Yes ☐ No	Visible Emissions Certified	☒ Yes ☐ No		
1	Collection	☒ Yes ☐ No		☐ Yes ☐ No	Visible Emissions Certified	
1	Sorting	☒ Yes ☐ No	☐ Yes, #	☒ Yes ☐ No		
1	Segregation	☒ Yes ☐ No	☒ No	☒ Yes ☐ No	☐ Yes, #	
1	Separation	☒ Yes ☐ No		☒ Yes ☐ No	☒ No	
1	Compilation	☒ Yes ☐ No		☒ Yes ☐ No		
1	Crushing	☐ Yes ☐ No		☒ Yes ☐ No		
1	Shredding	☒ Yes ☐ No		☒ Yes ☐ No		
1	Storage of Metals	☒ Yes ☐ No		☒ Yes ☐ No		
1	Storage of Metal-Containing Material	☒ Yes ☐ No		☒ Yes ☐ No		
1	Storage of Non-Metallic Material	☒ Yes ☐ No		☒ Yes ☐ No		
2	**Shredder Residue Management**	☒ Yes ☐ No		☒ Yes ☐ No		
3	**Depollution Activities**	☐ Yes ☐ No		☐ Yes ☐ 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 initial training and current operating employees receive an annual update training on operations, including BMPs for fugitive dust control.

SCHEDULE OF FACILITY OPERATIONS

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

Feedstock Material Receiving: Monday through Friday, 3 am to 7 pm

Feedstock Material Shredding: Monday through Friday, 8 am to 3p and 9 pm to 2a.

In-Process Material Processing (MRF): Monday through Friday, Shift 1: 5 am to 2:30 pm; Shift 2: 2:30 pm to midnight.

Ship-loading: As needed, typically a few days each month, around the clock. Shift 1: 5 am to 5 pm; Shift 2: 5 pm to 5 am.

Note: Operation shift times and days of week may 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**
1	Metal Management	Extended telestacker conveyor over shredded steel product stockpile to reduce need for movement of product by dozer.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	2016	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions.
	Roadways and other Trafficked Surfaces	Hard surfacing of operating area of Facility (paving/concrete).	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	2018	Minimize mobilization of particulate matter by reduced exposure of soil to wind and tracking during operations.	N/A
1	Metal Management	Dust Bosses installed at Feedstock Material stockpile, replacing Rain Bird sprinklers.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	2020	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions.
1	Metal Management	Enclosed non-ferrous metal separation operations (Buildings B, C, D, E, F) and in 2021 extended building enclosures to the ground.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	01/2021	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions.
1	Metal Management	Replaced autoloader installed in 2012 with Sleeve Loader to load non-ferrous metal product into shipping containers.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	01/2021	Minimize mobilization of particulate matter.	N/A
1	Metal Management	Upgraded Foam Injection System installed in 2013 to provide for upgraded foam delivery.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	01/2021	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions.
1	Metal Management	Reconfigured double-decker conveyor system which moves in-process material to MRP.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	02/2021	Minimize mobilization of particulate matter.	N/A
1	Metal Management	Relocated covered non-ferrous metal product bunkers/bays and product loader & replaced product loader with enclosed loader.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	03/2021 (relocated)	Minimize mobilization of particulate matter by placing bays and product loading in more wind-protected area and by replacing loader with one with enclosed loading operation.	Initial and annual update training in tailgate sessions.
1	Metal Management	Relocated other non-ferrous metal bunkers from southeast to southwest corner.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	03/2021	Minimize mobilization of particulate matter in a more wind-protected area.	N/A

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	Installed upgraded conveyors to transfer in-process Recyclable Material (completed)	2023-24	Three enclosed conveyors	Minimize mobilization of particulate matter.
1	Metal Management	Upgrade Shredder emissions capture system and particulate matter (PM) controls for Shredder	2025-26 (subject to permitting, etc.)	Upgrade emissions capture system pick-up points and cyclone/wet scrubber system with alternative emissions capture/PM controls.	Minimize mobilization of particulate matter.
1	Metal Management	Installation of a misting system above the infeed conveyor at the shredder structure.	2024	Installation of a misting system above the infeed conveyor at the shredder structure.	To reduce
1	Metal Management	Installed upgraded conveyors transferring in-process Recyclable Material from Shredder and between MRP operations	2023-24	Enclosed conveyors	Minimize mobilization of particulate matter.
2	SR Management	Upgraded rollup doors for Treated SR in Treated SR storage building	2023	Added high-speed rollup doors	Minimize mobilization of particulate matter.
1	Metal Management	Separation of MRF Material from ELV & Light Iron Feedstoc Material Stockpiles	05/2024	Additional stockpile breakout in the Infeed storage area	Minimize the potential of a fire

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 #	Reference to Page # and Section # of EMP
1	Page #7, Section # Introduction
2	Page #23, Section # III
3	Page #40, Section # III
4	Page #40, Section # III
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