

Emissions Minimization Plan

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

Sims Metal Management (SMM) - Redwood City
District Site #5152
699 Seaport Boulevard
Redwood City, CA 94063
June 2021

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 Confidential Copy

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Attachments

- 1 Company Organizational Chart
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- 3 Process Flow Diagrams
- 4 Facility Layout / Floor Plan

Responsible Manager Certification

6-4-404.1

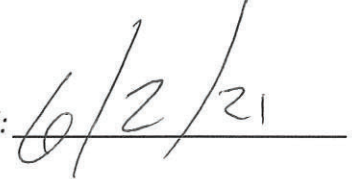
I, as the Responsible Manager of this facility, hereby certify that as of this date, this Emissions Minimization Plan contains all elements and information required of a complete EMP pursuant to District Regulation Section 6-4-403 and that the information contained in this EMP is accurate.

Certified by:



Gordon Pomp, Division Manager
SMM - Redwood City

Dated:



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 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 Management (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 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.

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: Gordon Pomp
Title: Division Manager, Redwood City
Division
Phone: 650-241-4305 (W), 510-230-7405 (M)
Email: Gordon.Pomp@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: Franciso Mejia
Title: MRP Manager
Phone: 650-722-0899 (M)
Email: Francisco.Mejia@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	<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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
402.4 Depollution Operations	<input type="checkbox"/> Yes <input checked="" 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		Scrap metal is received at the scale where it is inspected for prohibited materials. Scrap metal consists of end-of-life vehicles (ELV) and other light gauge steel items (e.g. appliances; Light Iron), collectively referred to as Feedstock Material, and thicker steel items (e.g. beams), referred to as HMS.	<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		Scrap metal is transported by truck to the Feedstock Material stockpiles.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water truck sprays all facility roadways. Sweeper truck cleans roadways. Roadways are paved/concreted.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
3	Collection		Feedstock Material is collected, sorted & stockpiled by commodity type (ELV, Light Iron, HMS).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water spray on Feedstock Material stockpiles.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
4	Sorting / Segregation		Feedstock Material is segregated by commodity type as per #3 above.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water spray on Feedstock Material stockpiles.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water spray at designated locations. Conveyors are covered. Water/foam injected into operating Shredder mill.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
6	Compilation		Shredded Feedstock Material separated by commodity type is placed into the shred stockpile or non-ferrous metal bins, respectively.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water spray from Dust Boss.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions.
7	Crushing		This facility operates no crushing equipment.	<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	
8	Shredding	1	See #5 above.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	3, 4, and 5	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water/foam injected at Shredder mill and other Shredder control as per the Air District permit. All conveyors are enclosed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Opacity and visible emissions.
9	Storage of metals		See #6 above.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water truck, Water spray from Dust Bosses.	<input type="checkbox"/> Yes <input checked="" 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	Light Iron, including appliances from Certified Appliance Recyclers, with MRSH removed by the CAR.
2	ELV
3	HMS
4	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	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
2	HMS	<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	
Storage of Unprocessed Material					
3	Shredder Feedstock Material	<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 In-process Material					
4	Non-ferrous metal-bearing material (referred to as "Zorba")	<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					
7	Shredded Steel	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Visible emissions	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
8	Non-ferrous metal commodities (e.g. Zorba)	<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	
Storage of Shredder Residue					
9	Treated SR storage stockpile	<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	

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		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	In line treatment using an alkaline activator (typically cement) and a poly-silicate chemical (Metabond) to chemically fixate SR Material as per DTSC requirements and use as alternative daily cover (ADC).
2	Treated Shredder Residue Building for Truck Loading		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visible emissions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3	Covered Screw conveyors for Conveyance to Building		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<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	

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 Redwood City (RWC) Facility of Sims is a Certified Appliance Recycler (#0395), at this time the Facility only receives appliances from other certified appliance recyclers (CARs) and does not engage in removal of Materials Requiring Special Handling (MRS) from received major appliances under its own CAR certification.

At this time, the Facility also only receives previously depolluted ELVs. In the event that the Facility subsequently commences in ELV depollution operations, it expects to engage in the following sequence of steps: (a) Stage incoming ELV requiring depollution in the vehicle depollution area (fully paved and including a building for storage of automotive fluids, with used and waste fluids and other removal hazardous materials (ELV Haz Mats) in appropriately labeled containers for proper recycling or disposal); (b) removal of ELV Haz Mats; (c) place the depolluted vehicles in the Depolluted ELV Stockpile where they would be staged for shredding. While the Facility would not expect fugitive emissions generated from depollution operations, it would engage in sweeping and application of water for dust control.

In the event that this Facility engages in MRS 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	1	Facility roadways are paved/concreted	N/A
	2	Facility roadways are regularly swept	Frequently, over 8 hours per day, Monday through Saturday
	3	Speed limit of 5 mph for equipment and trucks inside the Facility	In effect at all times
	4	Employee training	Initially for new employees, annual update for current employees.
	5	Facility roadways are regularly watered	Frequently, as needed.
	6	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	2	Visual inspection of incoming truck loads to intercept and reject loads containing prohibited material. Annual training of inspectors.	When receiving incoming trucks.
COLLECTION	3	Watering of internal roads and scrap metal stockpiles using water truck, portable dust control units, and sprinklers.	As per above "Roadway" table.
SORTING	4	All inspectors trained to direct incoming trucks to unload Feedstock Material at appropriate storage stockpiles.	As per above "Roadway" table.
SEGREGATION	5	Materials entering facility are segregated into different storage piles before further processing, including Shredder Infeed Pile (Light Iron segregated from ELVs), and HMS stockpiles.	During hours of operation when receiving incoming trucks.
SEPARATION	6	Water/foam injected at Shredder mill. Conveyors are covered. Dust Bosses spray water mist at the material recovery plant (MRP) – the plant which separates out the non-ferrous metal products.	During hours of Shredder & MRP operation, respectively.
COMPILATION	7	Addressed by other categories above and below.	During hours of operation.
CRUSHING	8	No crushing is conducted at this facility.	N/A
SHREDDING	9	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	1	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.
	3	SR mostly is stored and loaded into trucks in treated SR building.	Routinely.
	4	If additional treated SR is incidentally stored outdoors, it is covered with a tarp and temperature is monitored with an infrared camera.	As needed.

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	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
<p style="text-align: center;"><i>Storage of Delivered Scrap</i></p>	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
<p style="text-align: center;"><i>Storage of Unprocessed Material</i></p>	2	Unprocessed Feedstock Material storage stockpiles are watered during unloading and material handling.	As per above.
<p style="text-align: center;"><i>Storage of In-process Material</i></p>	3	In-process material storage piles are watered during unloading and material handling.	Whenever needed during facility operation.
<p style="text-align: center;"><i>Storage of Finished Product</i></p>	4	Shredded steel product stockpile is watered as needed.	Whenever needed during facility operation.
<p><i>Storage of Shredder Residue</i></p>	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 limits Feedstock Material and SR Material stockpile heights and footprints, requires creating fire breaks, and segregation of ELV from Light Iron Materials, among other requirements. The Fire PPP specifies other measures to prevent and control combustion of stockpiled materials, including requirements for addressing incipient fires.

The Fire PPP incorporates the Facility's Inbound Source Control Standard which requires training of operations employees in identification and other procedures regarding Prohibited Materials (see above Prohibited Materials List). Feedstock Material and HMS 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 scrap metal during and after unloading at the Feedstock Material and HMS 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 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 screw 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.

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 Visible Emissions Certified <input type="checkbox"/> Yes, # <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Number of Staff 1 (third-party security personnel) Visible Emissions Certified <input type="checkbox"/> Yes, # <input checked="" type="checkbox"/> No	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.
2	Metal Management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
3	Transport	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
4	Receipt	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
5	Collection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
6	Sorting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
7	Segregation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
8	Separation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
9	Compilation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
10	Crushing	<input type="checkbox"/> Yes <input type="checkbox"/> No				
11	Shredding	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
12	Storage of Metals	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
13	Storage of Metal-Containing Material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
14	Storage of Non-Metallic Material	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
15	Shredder Residue Management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
16	Depollution Activities	<input type="checkbox"/> Yes <input 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 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 3 pm

Feedstock Material Shredding: Monday through Friday, 5 am to noon and 6 pm to midnight.

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: 4 am to 4 pm; Shift 2: 4 pm to 4 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
			<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):			
1	Metal Management	Extended telestacker conveyor over shredded steel product stockpile to reduce need for movement of product by dozer.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	2016	Minimize mobilization of particulate matter	Initial and annual update training in tailgate sessions.
2	Roadways and other Trafficked Surfaces	Hard surfacing of operating area of Facility (paving/concrete)	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	2018	Minimize mobilization of particulate matter by reduced exposure of soil to wind and tracking during operations	N/A
3	Metal Management	Dust Bosses installed at Feedstock Material stockpile, replacing Rain Bird sprinklers.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	2020	Minimize mobilization of particulate matter	Initial and annual update training in tailgate sessions
4	Metal Management	Enclosed non-ferrous metal separation operations (Buildings B, C, D, E, F) and in 2021 extended building enclosures to the ground	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	1/2021	Minimize mobilization of particulate matter	Initial and annual update training in tailgate sessions
5	Metal Management	Replaced autoloader installed in 2012 with Sleeve Loader to load non-ferrous metal product into shipping containers	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	1/2021	Minimize mobilization of particulate matter	N/A
6	Metal Management	Upgraded Foam Injection System installed in 2013 to provide for upgraded foam delivery.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	1/2021	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions
7	Metal Management	Reconfigured double-decker conveyor system which moves material to MRP.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	2/2021	Minimize mobilization of particulate matter.	N/A
8	Metal Management	Relocated covered non-ferrous metal product bunkers/bays and product loader & replaced product loader with enclosed loader.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	3/2021 (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.
9	Metal Management	Relocated Non-ferrous bunkers for ZBM from southeast to southwest corner for proximity to production and shipping points.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable):	3/2021	Minimize mobilization of particulate matter in a more wind-protected area.	N/A.

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	Enclosed post-Shredder magnet.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable): 3/2021	Minimize mobilization of particulate matter	N/A
2	Metal Management	Installed vibratory conveyor to transfer in-process material to MRP, replacing belt conveyor and trommel.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable): 3/2021	Minimize mobilization of particulate matter	N/A
3	Metal Management	Installed screw conveyor to transfer in-process material, replacing belt conveyor.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable): 3/2021	Minimize mobilization of particulate matter	N/A
4	Metal Management	Dust Boss installed on MRP Tower.	<input type="checkbox"/> A/C <input type="checkbox"/> P/O <input type="checkbox"/> N/A	Application # (if applicable): 5/2021	Minimize mobilization of particulate matter	Initial and annual update training in tailgate sessions.
			<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	Install upgraded conveyors to transfer in-process material	10/2021	Three enclosed conveyors	Minimize mobilization of particulate matter.
2	Metal Management	Upgrade enclosure and particulate matter (PM) controls for Shredder	2022-23 (subject to permitting, etc.)	Replace wet scrubber system with alternative PM controls	Minimize mobilization of particulate matter.
3	Metal Management	Install post-magnet cyclone	2022	Cyclone	Minimize mobilization of particulate matter.
4	Metal Management	Install upgraded conveyors transferring in-process material from Shredder and between MRP operations	2022	Enclosed conveyors	Minimize mobilization of particulate matter.
5	SR Management	Upgrade rollup doors for and expand treated SR storage building	2021 & 2023, respectively (subject to permitting, etc.)	Building expansion	Minimize mobilization of particulate matter.

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 #.

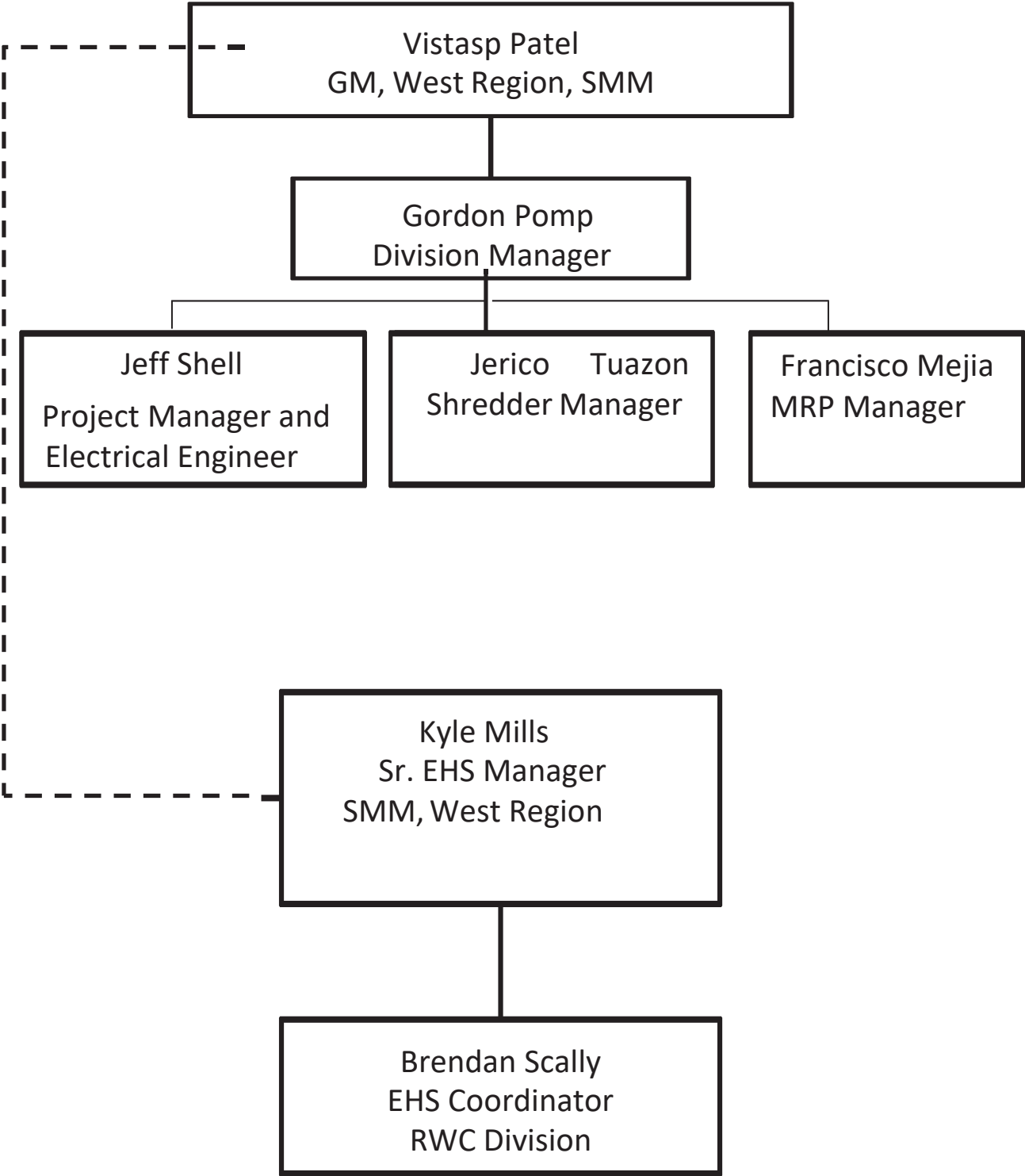
In the table below, list each Attachment # and provide the Page # and Section # (if applicable) of the EMP where the material is referenced.

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
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #

ATTACHMENT 1
COMPANY ORGANIZATIONAL CHART

Organizational Chart

Sims Metal Management, Redwood City Division



ATTACHMENT 2
SCRAP ACCEPTANCE POLICY



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).
- B) 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 been 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 light 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 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 separate 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]
- 7) Electronic Waste

SIMS METAL MANAGEMENT

600 S 4th Street

Richmond, CA 94804

(510)412-5300

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 of 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.

May 2012

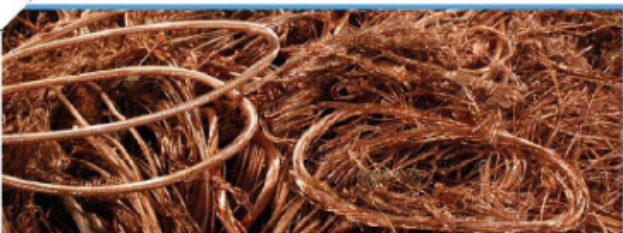
THANK YOU FOR RECYCLING WITH THE WORLD'S FULL SERVICE RECYCLER. WE APPRECIATE YOUR BUSINESS.

www.simsmm.com/us/scrapacceptance or call **(510) 412-5300** for more information.

POLITICA PARA LA ACEPTACION 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, concrete, 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 las contenedos 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) Osmosis o venenos en estado sólido, en polvo, líquido o gaseoso (ej.: fertilizantes).
- 9) Materiales infecciosos (ej.: en balsas 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 o cerrojo ha sido ventilado a sí se acepta bajo un acuerdo especial.
- 11) Recipientes cerrados, incluyendo tanques de almacenamiento a granel y recipientes de procesamiento.
- 12) Recipientes que anteriormente contengan 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 están vacíos.

- 13) Cualquier material que contenga CFC, HCFC o sustitutos de refrigerantes no exceptuados que no hayan sido depuestos, excepto las 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, termóstatos), excepto el que contienen los artefactos/vehículos que SMM compra para descontaminación de vehículos/artefactos.
- 18) Tubas 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 computadora, 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 las autómviles procesados primero se le deben retirar las siguientes antes de entregarlos:

- 1) Fluidos -
 - Aceites (aceites del motor, fluido de la transmisión, líquido de dirección asistida y de Freno de las depósitos)
 - Combustible
 - Enfríasamiento
 - 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)
- 7) Residuos Electrónicos

SIMS METAL MANAGEMENT

600 S 4th Street

Richmond, CA 94804

COMO 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, y 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 Davao, 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 las 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 ya 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 las 13 millones de toneladas métricas de emisiones de carbono estimadas como ahorradas por el reciclaje único 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

(510) 412-5200

para más información.



**ENVIRONMENT, HEALTH & SAFETY (EHS) INBOUND
MATERIAL CONTROL**

**Exhibit A –
PROHIBITED MATERIALS LIST**

West Region

Rev: September 2016

Page 1 of 1

The following materials are prohibited from acceptance at SMM Facilities, *except for certain materials by special arrangement, in writing, 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** (including diesel fuel and gasoline);
- 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.

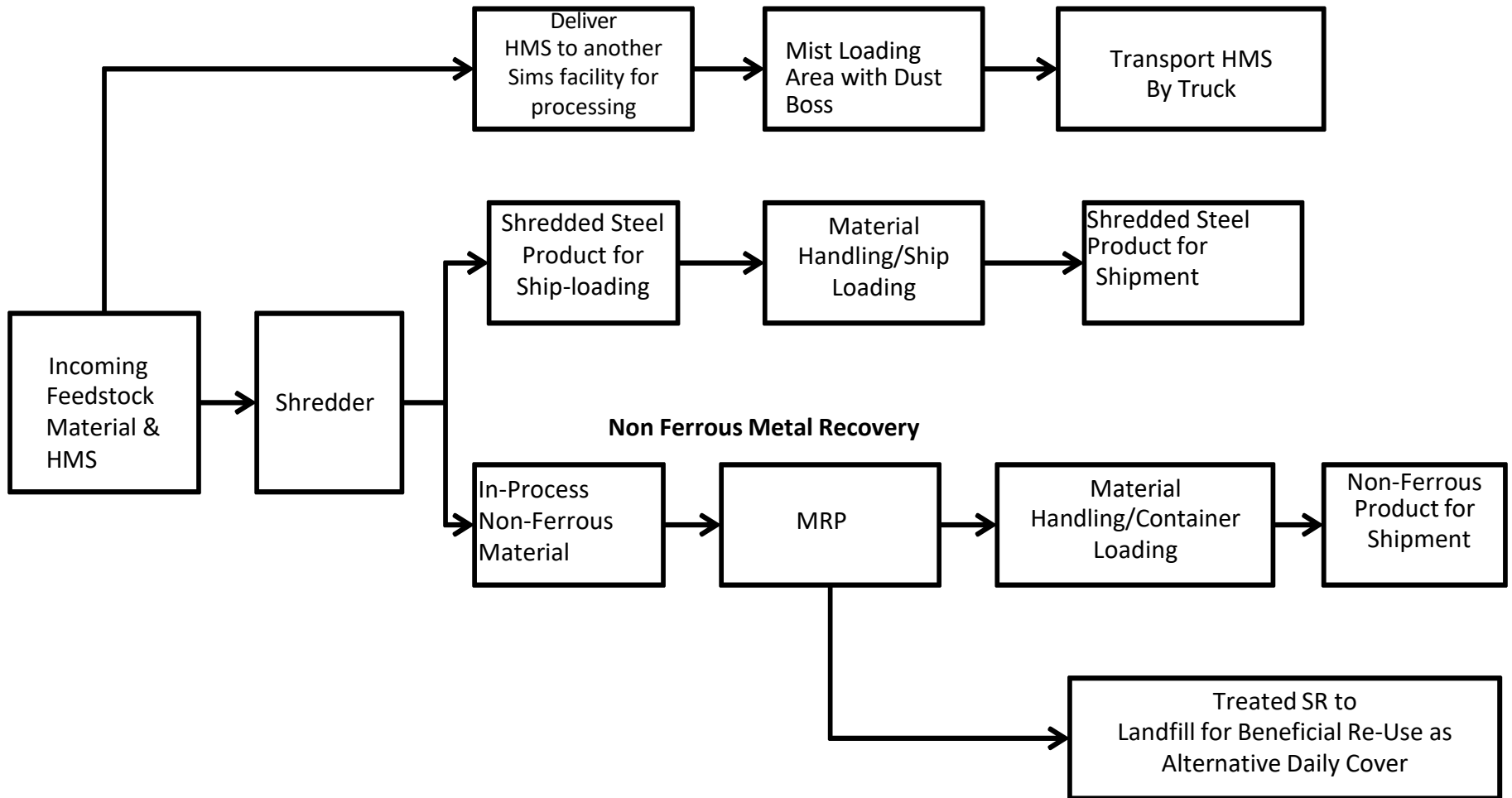
California – certain “Materials Requiring Special Handling” may remain in certain appliances if the SMM facility is serving as **Certified Appliance Recycler** for those materials.

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.”

ATTACHMENT 3
PROCESS FLOW DIAGRAMS

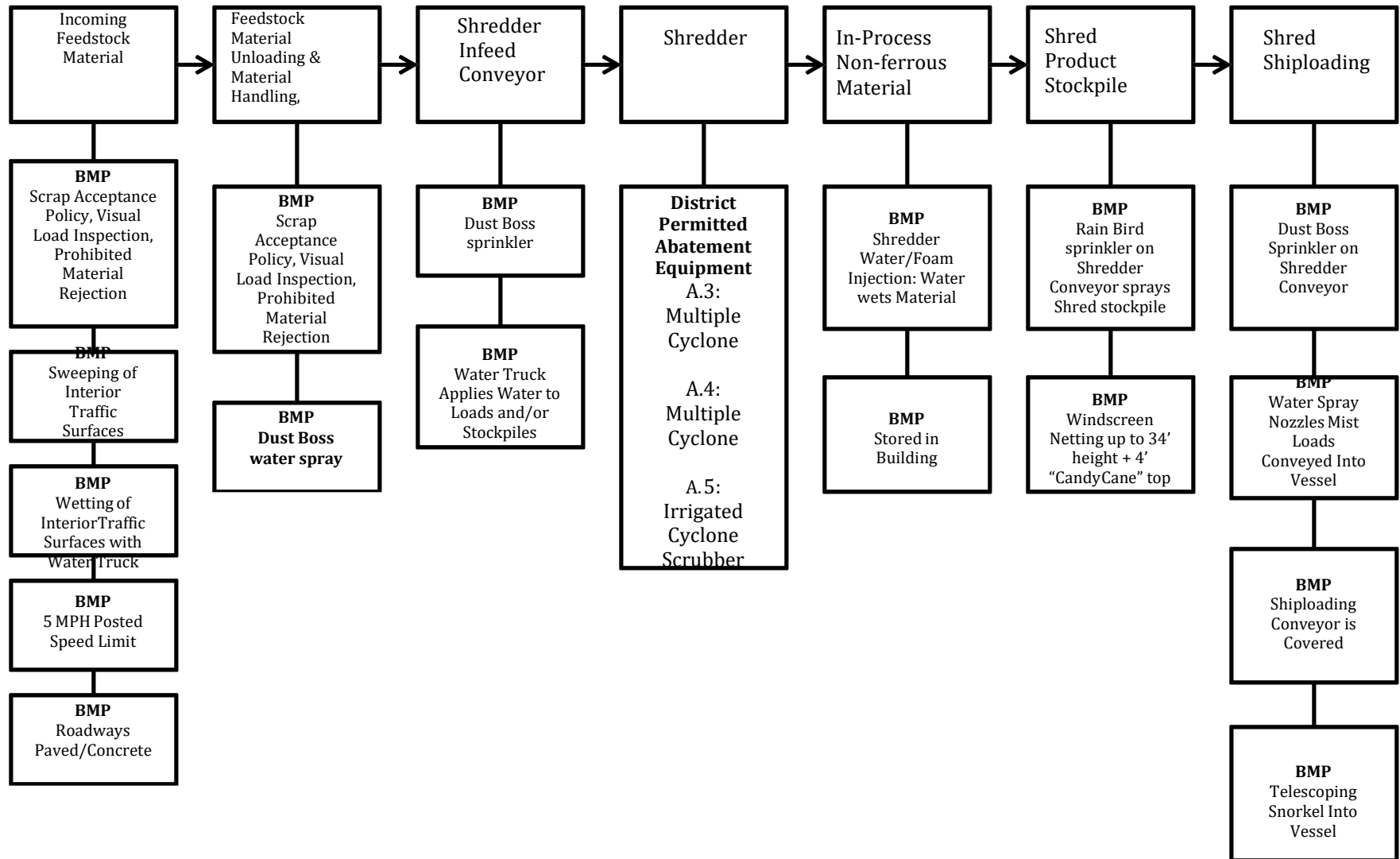
Overall Process Diagram

Sims Metal Management, Redwood City

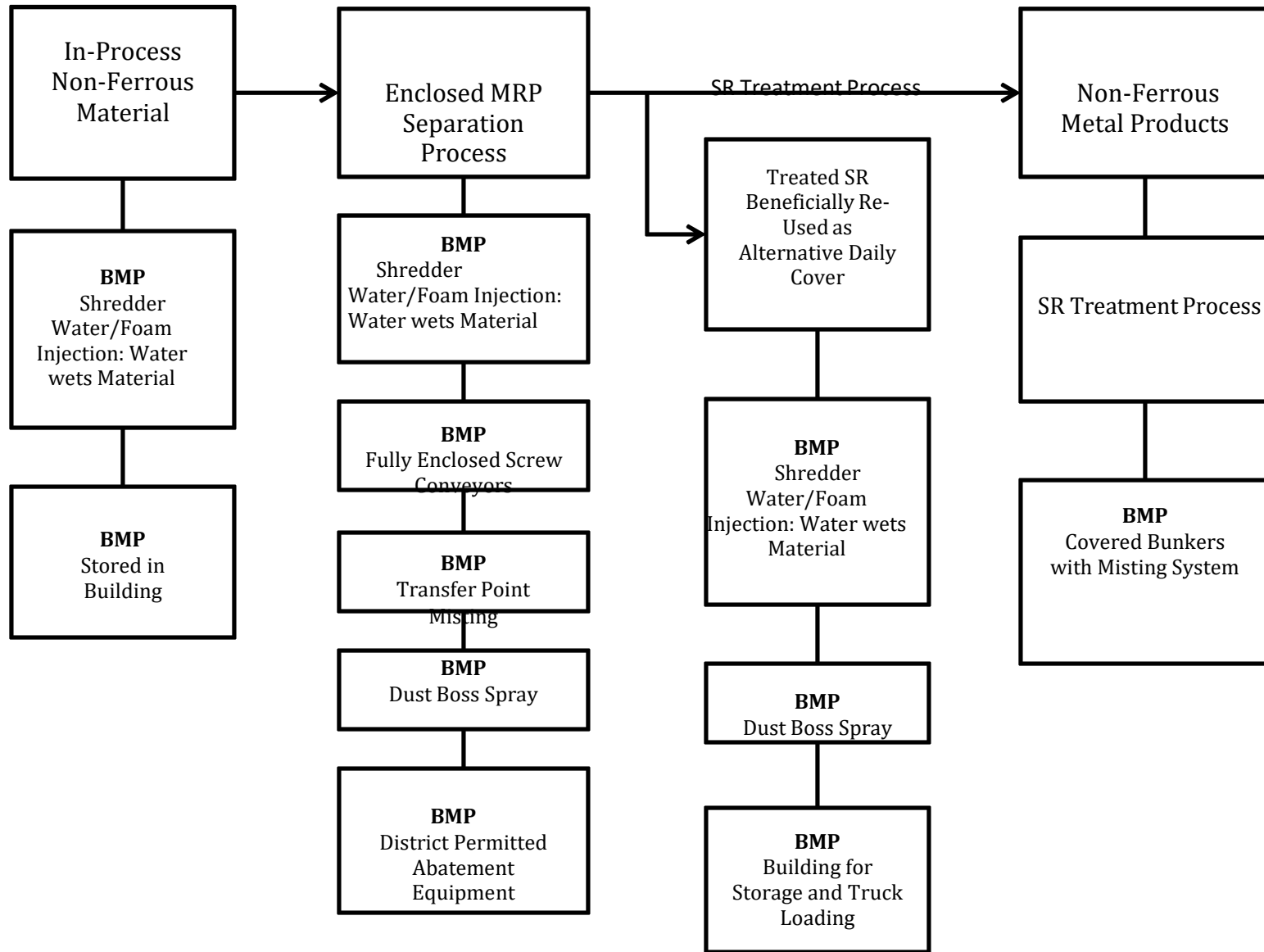


Shredding Process Diagram (with BMPs)

Sims Metal Management, Redwood City



Materials Recovery Plant Separation Process Diagram (with BMPs) Sims Metal Management, Redwood City



ATTACHMENT 4
FACILITY LAYOUT / FLOOR PLAN

Emissions Minimization Plan

Sims Metal Management, Redwood City CA
Site# 5152

