Emissions Minimization Plan

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

Sims Metal Management (SMM) – Redwood City

699 Seaport Boulevard
Redwood City, CA 94063

Site # 5152

Table of Contents

Section	Page
Designation of Confidential Business Information	4
Company Description	5
Company Organization Chart	7
Schedule of Management Operators	8
Operations Subject to EMP	9
Contents of the EMP	10
Metal Management	12
Abatement and Control Equipment	15
Shredder Residue (SR) Management	16
Depollution Operations	18
Scrap Acceptance Policy	21
Management Practices to Reduce Fugitive Emissions	23
Description of Onsite Management	30
Schedule of Facility Operations	34
Technical Data	35
Process Flow Diagrams	36
Facility Layout/Floor Plan	37
Fugitive Emissions Reductions Previously Realized	38
Schedule for the Implementation of the EMP Elements (on or before May 1, 2014)	44
New or Future EMP Elements to Potentially be Implemented	45
Compliance Schedule for the EMP	46
APCO Recommendations to EMP and Determination of Approvability	47

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:* 12/21/15

James Banigan, Facility Manager, SMM – Redwood City

Responsible Manager

Designation of Confidential Business Information

Specify the information you designate is "CONFIDENTIAL" and include specific section(s) and corresponding page number(s). Describe the basis, e.g. the information is trade secret or otherwise exempt under law from public disclosure.

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

Company Description

The Sims Metal Management facility located in Redwood City is a metal recycling facility that is approximately 13 acres in size and is approximately 90 percent impervious (either paved or covered with buildings or other structures). The Facility is situated in an industrial area within the Port of Redwood City across Herkner Boulevard from Redwood Creek, a tributary to San Francisco Bay.

Operations at the facility include shredding of light iron products, including automobiles, appliances, and other recyclable light steel materials; preparation and sorting of recyclable ferrous metal; temporary storage of recycled metal products, incidental non-metal recyclable products and non-recyclable waste materials; and maintenance of facility equipment. Inbound scrap materials are delivered by both rail and truck to the facility, where they are inspected and sorted. Although the facility is a Certified Appliance Recycler (CAR), the facility accepts only major appliances which have had the materials requiring special handling (MRSH) removed. Depollution for incidental appliances identified during inspection/load check will be done in house by certified staff or outside vendor or sent to another SMM facilty for processing Non-ferrous metals are not specifically purchased at this facility but are separated into specification-grade commodities from the inbound scrap materials along with specification grade ferrous metal commodities. Incoming bulk scrap metal is separated into the following material streams:

- Shredder feed material, consisting of light iron products including automobiles, appliances and other recyclable light steel materials; and
- Standard grade Heavy Melting Steel (HMS) that will be transloaded to the Sims Metal Management facility in Richmond, CA.

At the shedder, light iron products are shredded to separate ferrous metals from nonferrous metals and residual non-metallic materials. The intermediate non-ferrous stream resulting from shredding operations, known as Aggregate, consists of both non-ferrous metal and non-metallic materials. Aggregate is processed further in the Materials Recovery Plant where non-ferrous metal is separated by metal type from non-metallic materials. Upon completion of the non-ferrous separation processes, the non-metallic shredder residue is then treated in accordance with California Department of Toxic Substances Control (DTSC) requirements. The treated shredder residue is transported by truck to off-site disposal locations for use as alternative daily landfill cover.

The processed ferrous scrap metal is stockpiled at the facility and is eventually loaded at the facility's shiploading conveyor that extends onto the Port of Redwood City into cargo ships for export. Non-ferrous metal is loaded into containers for sale/shipment.

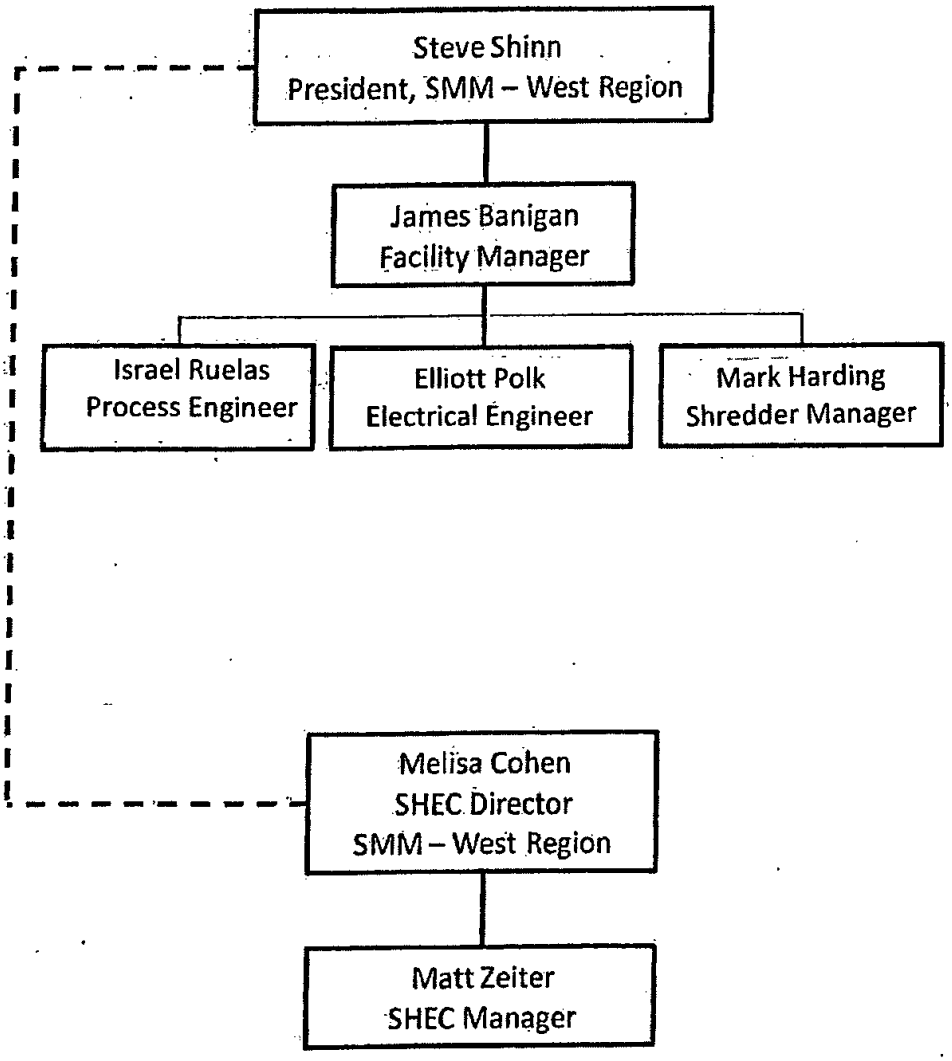
Company Organizational Chart and Schedule of Management Operators
6-4-403.1.3

A. *Company Organizational Chart-* Attach a copy of the organizational chart of the company, which describes the business structure and provides the titles of the positions within the organization.

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.

A. Company Organizational Chart

Organizational Chart
Sims Metal Management – Redwood City



B. Schedule of Management Operators

Onsite Responsible Manager(s)

Name: James Banigan
Title: Facility Manager
Phone: 650-241-4308 (W), 602-708-3872 ©
Email: James.Banigan@simsmm.com
Schedule/Shift: Monday through Saturday/Variable

Name: Mark Harding
Title: Shredder Manager
Phone: 650-421-4305 (W), 415-490-4131 C)
Email: Mark.Harding@simsmm.com
Schedule/Shift: Monday through Saturday/Variable

Onsite Alternate Contact(s)

Name: Israel Ruelas
Title: Process Engineer
Phone: 650-241-4316 (W), 510-374-9905 (C)
Email: Israel.Ruelas@simsmm.com
Schedule/Shift: Monday through Saturday/Variable

Name: Elliott Polk
Title: Electrical Engineer
Phone: 650-241-4310
Email: Elliott.Polk@simsmm.com
Schedule/Shift: Monday through Saturday/Variable

Name: Melisa Cohen
Title: Safety Health Environment & Community (SHEC) Director
Phone: 510-412-5307
Email: Melisa.Cohen@simsmm.com
Schedule/Shift: Variable due to regional responsibilities

Operations Subject to EMP
6-4-402

The EMP shall address all of the following operations that are conducted at a 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	X Yes ☐ No
402.2 Metal Management	X Yes ☐ No
402.3 Shredder Residue (SR) Management	X Yes ☐ No
402.3 Depollution Operations	X Yes ☐ No

Contents of the EMP
6-4-403

The owner or operator of the metal recycling and shredding facility subject to Section 6-4-401 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 to include 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 a 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 compliance with the Scrap Acceptance Agreement	X Yes ☐ No		☐ Yes X No	Visual inspection of incoming loads and rejection as needed.	X Yes ☐ No	Prohibited materials.
2	Transport		Scrap metal is transported by primarily truck though occasionally by rail. All roadways are paved.	X Yes ☐ No		☐ Yes X No	Water truck sprays all facility roadways. Sweeper truck cleans all roadways.	X Yes ☐ No	Visible emissions
3	Collection		Metal collected by commodity type (Tin/Light Iron/Appliance, Auto Bodies, HMS). All stockpiles sprayed with water as needed to control dust.	X Yes ☐ No		☐ Yes X No	Water spray reduction of potential dust creating material.	X Yes ☐ No	Visible emissions
4	Segregation		Metal segregated by commodity type (Light Iron/Tin, Auto Bodies, HMS). All stockpiles sprayed with water as needed to control dust.	X Yes ☐ No		☐ Yes X No	Water spray reduction of dust.	X Yes ☐ No	Visible emissions
5	Separation		MRP plant separates Non-Ferrous (Zorba, Aluminum, Copper, Stainless) from Aggregate. Separation equipment indoors and conveyors covered or wet down as needed to control dust	X Yes ☐ No		☐ Yes X No	Magnetic separation is preceded by thorough wetting as described above.	X Yes ☐ No	Visible emissions
6	Compilation		Materials compiled by type (Shredded Steel, Zorba, Copper, Aluminum, Stainless, Aggregate, and treated shredder residue). All stockpiles sprayed with water as needed to control dust.	X Yes ☐ No		☐ Yes X No	Water spray.	X Yes ☐ No	Visible emissions
7	Crushing		This facility operates no crushing equipment.	☐ Yes ☐ No		☐ Yes ☐ No	N/A	☐ Yes ☐ No	N/A
8	Shredding	1	Shredder (S-1) separates ferrous from Shredder Infeed and utilizes a water/foam system for dust control as well as permitted abatement devices (Multiple Cyclones (A-3, A-4) and Irrigated Cyclone Scrubber (A-5))	X Yes ☐ No	3, 4, and 5	X Yes ☐ No	Water spray system, two multiple cyclones (A3 and A4), and irrigated cyclone scrubber (A5).	X Yes ☐ No	Opacity as per BAAQMD PTO.
9	Storage of metals		Metal stored by commodity type (Auto Bodies, Light Iron/Tin, Shredded Steel, HMS, Non-Ferrous – Zorba, Aluminum, Copper, Stainless). All stockpiles sprayed with water as needed to control dust.	X Yes ☐ No		☐ Yes X No	Water truck, portable dust control units, and Rain Bird sprinklers apply water for dust suppression as needed.	X 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/ Tin
2	Auto Bodies
3	Appliances – Facility accepts appliances with MRSH removed
4	HMS
5	Non-ferrous metals as separated from inbound scrap metals (e.g. Zorba, copper, aluminum, stainless steel)

METAL MANAGEMENT

Identify the storage piles and the types of metal and metal-containing material being stored. Include 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 input pile-light iron/tin and auto bodies	X YES ☐ NO	Visible emissions	☐ YES X NO	
2	HMS for transport to SMM Richmond	X YES ☐ NO	Visible emissions	☐ YES X NO	
3	Incidental Appliances identified in inspection/load check to be depolluted – Refrigerators, washers, dryers, microwaves, water heaters	X YES ☐ NO	Visible emissions – Facility accepts only pre-processed appliances but incidental units may be found in load checks requiring MRSH removal	☐ YES X NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Unprocessed Material					
4	Shredder input pile-light iron/tin and auto bodies	X YES ☐ NO	Visible emissions	☐ YES X NO	
5	Incidental Appliances identified in inspection/load check to be depolluted – Refrigerators, washers, dryers, microwaves, water heaters	X YES ☐ NO	Visible emissions – Facility accepts only pre-processed appliances but incidental units may be found in load checks requiring MRSH removal	☐ YES X NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of In-process Material					
6	Aggregate (non-ferrous metal and non-metallic materials)	X YES ☐ NO	Visible emissions – All aggregate containing non-ferrous is stored in Building E.	☐ YES X NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Finished Product					
7	Shredded steel storage	X YES ☐ NO	Visible emissions	☐ YES X NO	
8	Non-Ferrous commodities from shredding	X YES ☐ NO	Mainly stored under cover	☐ YES X NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Shredder Residue					
9	Treated shredder residue storage pile	X YES ☐ NO	Visible emissions—All shredder residue stored under cover.	☐ YES X 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	Use of SR Additive	Type and Purpose of Additive
1	Treated Shredder Residue Building for Storage and Treatment (Blg. A)		X Yes ☐ No	X Yes ☐ No	Visible emissions	X Yes ☐ No	In line treatment using an alkaline activator (typically cement) and a polysilicate chemical (Metabond) to chemically fixate as per DTSC requirements and use as alternative daily cover (ADC).
2	Treated Shredder Residue Building for Truck Loading (Blg. A)		X Yes ☐ No	X Yes ☐ No	Visible emissions	☐ Yes X No	
3	Covered Belt Conveyors for Conveyance to Building (Blg. A)		X Yes ☐ No	X Yes ☐ No	Visible emissions	☐ Yes X No	
			☐ Yes ☐ No	☐ Yes ☐ No		☐ Yes ☐ No	
			☐ Yes ☐ No	☐ Yes ☐ No		☐ 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 non-PCB capacitors
2	Mercury switches
3	CFCs, HCFCs, etc, refrigerants/halogenated oil
4	Used oil
5	Batteries

DEPOLLUTION OPERATIONS

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

Sims Metal Management Redwood City (RWC) is a Certified Appliance Recycler (CAR) #0395. However, the facility currently only accepts appliances that have had the Materials Requiring Special Handling (MRSH) removed. All MRSH is required to be removed prior to processing (i.e. shredding). MRSH typically includes but is not limited to: Capacitors (PCB/Non-PCB); CFCs, HCFCs and other non-CFC (Refrigerants); Halogenated Oil, used oil; and mercury switches and temperature control devices (switches).

In the event MRSH is observed in any appliance, such as through the inspection and load check program, MRSH may be removed onsite. Sims has three employees that are certified to remove MRSH. Sims can also transfer appliances requiring depollution to another SMM facility such as SMM San Jose, SMM Hayward, or SMM Richmond for processing or an outside CAR vendor can be brought in if sufficient units require depolluting.

Appliances identified in inspections/load checks requiring special handling are staged in the appliance depollution area. This area is fully paved and includes a building for depollution activities as well as storage of MRSH and other Universal Wastes either generated by the facility or discovered in load checks. MRSH is collected in appropriately labelled containers and recycled or disposed properly based Universal Waste requirements. Once the MRSH is removed, the depolluted appliances will be placed in the Light Iron Stockpile where they are staged for shredding. Typically the depollution process does not create fugitive emissions, but water is available for dust control as well as the area is continuously swept with the regenerative Tymco sweeper.

Scrap Acceptance Policy

SCRAP ACCEPTANCE POLICY

Attach a copy of facility's Scrap Acceptance Policy.

SIMS METAL MANAGEMENT

MATERIAL ACCEPTANCE POLICY

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

1) Non-Recyclable Materials of any kind, including asphalt, concrete, debris, dirt, rags, tires, trash.

2) Non-Hazardous Free-flowing Liquids including water.

3) Hazardous Free-flowing liquids including gasoline, motor oil, hydraulic fluids, anti-freeze, oil paint or other lubricants or petroleum products, except as contained in whole vehicles SMM purchases for vehicle depollution.

4) Flammable and Combustible Materials.

5) Corrosive Materials such as soda ash or broken batteries. Whole batteries may be accepted for recycling at some facilities.

6) Radioactive Materials of any type (e.g., military scrap, medical scrap, thickness measuring devices)

7) Explosive Materials or potentially explosive materials of any type, such as munitions scrap (e.g., ammunition, shells).

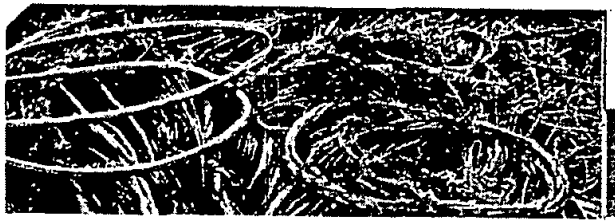
8) Chemicals or Poisons in solid, powder, liquid, or gaseous form (e.g., fertilizers).

9) Infectious Materials (e.g. in red bags or marked by the infectious symbol).

10) Pressurized Containers or Cylinders including propane tanks, compressed gas tanks, aerosol cans, or extinguishers, except if the closed cylinder has been vented or if accepted under special arrangement.

11) Closed Containers including bulk storage tanks and process vessels.

12) Containers that formerly contained hazardous materials including drums, bulk storage tanks, process vessels, paint cans and/or aerosol cans except if the containers are certified as empty per applicable law, properly cut open for inspection to verify that they are empty.



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

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

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

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

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

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

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

REQUIREMENTS FOR CERTAIN COMMODITIES ACCEPTED BY SIMS METAL MANAGEMENT

Processed Automobiles must have the following removed prior to delivery:

1) Fluids -
   - Oils (motor oil, transmission fluid, power steering and brake fluid from reservoirs)
   - Fuel
   - Coolant
   - Refrigerant
   - Any other fluids required by state/local law (e.g., washer fluid, axle fluid)
2) Batteries and leaded battery cable ends (Except as a seperated 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)

SIMS METAL MANAGEMENT

600 South 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 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 (212) 500-7430 for more information.

SIMS METAL MANAGEMENT

POLÍTICA PARA LA ACEPTACIÓN DE MATERIALES

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

1) Materiales no reciclables de cualquier tipo, incluyendo asfalto, concreto, escombros, tierra, harapos, neumáticos, basura.

2) Líquidos de flujo libre no peligrosos, incluyendo el agua.

3) Líquidos de flujo libre peligrosos, incluyendo gasolina, aceite para motores, fluidos hidráulicos, anti-congelantes, pinturas a base de aceite y otros lubricantes o productos derivados del petróleo, excepto los contenidos en vehículos completos que SMM compra para descontaminación de vehículos.

4) Materiales inflamables y combustibles.

5) Materiales corrosivos tales como carbonato de sodio o baterías dañadas. Algunos centros probablemente acepten las baterías enteras para su reciclado.

6) Materiales radioactivos de cualquier tipo (ej.: desechos militares, desechos médicos, dispositivos de medición de espesor).

7) Materiales explosivos o materiales potencialmente explosivos de cualquier tipo, tales como desechos de municiones (ej.: municiones, casquillos).

8) Químicos o venenos en estado sólido, en polvo, líquido o gaseoso (ej.: fertilizantes).

9) Materiales infecciosos (ej.: en bolsas rojas o etiquetados con el símbolo de contagioso).

10) Recipientes o cilindros presurizados, incluyendo tanques de propano, tanques de gas comprimido, latas de aerosol o extintores de incendio; excepto si el cilindro cerrado ha sido ventilado o si se acepta bajo un acuerdo especial.

11) Recipientes cerrados, incluyendo tanques de almacenamiento a granel y recipientes de procesamiento.

12) Recipientes que anteriormente contenían materiales peligrosos, incluyendo tambores, tanques de almacenamiento a granel, recipientes de procesamiento y/o latas de aerosol, excepto si los recipientes están certificados como cerrados según la ley correspondiente, abiertos adecuadamente para su inspección para verificar que estén vacíos.

13) Cualquier material que contenga CFC, HCFC o sustitutos de refrigerantes no exceptuados que no hayan sido depuestos, excepto los que contienen los artefactos enteros que SMM compre para la descontaminación de aparatos.

14) Materiales que contengan plomo, excepto cuando se los compre como materias primas hechas de plomo.

15) Materiales que contengan PBC (ej.: capacitores, balastos y transformadores).

16) Materiales que contengan esbestos (ACM, por sus siglas en inglés), tales como aislamientos de tuberías y materiales de superficie.

17) Materiales que contengan mercurio (ej.: interruptores, luces/apliques/focos fluorescentes o de vapor de mercurio, termostatos), excepto el que contienen los artefactos/vehículos que SMM compra para descontaminación de vehículos/artefactos.

18) Tubos de rayos catódicos (CRT, por sus siglas en inglés), pantallas de cristal líquido (LCD, por sus siglas en inglés) o cualquier dispositivo que contenga CRT o LCD (ej.: monitores de computadoras, pantallas de laptops o televisores), excepto en áreas específicamente designadas para dejar equipos electrónicos.

19) Cualquier otro material que contenga desechos peligrosos o sustancias tóxicas.

REQUISITOS PARA CIERTAS MATERIAS PRIMAS ACEPTADAS POR SIMS METAL MANAGEMENT

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

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

SIMS METAL MANAGEMENT

600 South 4th Street

Richmond, CA 94804

(510)412-5300

CÓMO EVITAR EL ROBO DE METALES

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

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

1) SMM se reserva el derecho de negarse a cualquier transacción que crea que pueda suponer una violación a la ley o que pueda contener materiales robados.
2) Todos los vendedores deben proporcionar una identificación.
3) Se documentarán todas las transacciones, 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 Davos, Suiza; escalando 52 posiciones en los rankings llegando a la posición número 11.

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

Sims Metal Management está comprometido con la comunidad mediante el apoyo de educadores, escuelas, organizaciones de caridad, comunitarias y medioambientales locales en todo el mundo.
Nos tomamos muy en serio nuestros esfuerzos de ser un buen socio comunitario y a favor del medio ambiente. Todos los días, los empleados de Sims Metal Management ejercen un impacto positivo sobre el medio ambiente.

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

May 2012

GRACIAS POR RECICLAR CON EL RECICLADOR DE SERVICIO COMPLETO MUNDIAL.
AGRADECEMOS SU PREFERENCIA.
www.simsmm.com/us/scrapacceptance o llame al (212) 500-7430 para más información.

SIMS METAL MANAGEMENT	SAFETY, HEALTH, ENVIRONMENT & COMMUNITY (SHEC) INBOUND MATERIAL CONTROL	
	Exhibit A – PROHIBITED MATERIALS LIST	
West Region	Rev: August 2013 Supercedes: 2012	Page 1 of 1

The following Materials are prohibited from acceptance at all SMM Facilities *except as otherwise noted below*:

1	Non-Recyclable Goods of any kind, including asphalt, concrete, debris, dirt, rags, tires, trash[1].
2	Free-flowing liquids including hazardous (e.g., gasoline, motor oil, and other lubricants, hydraulic fluids, anti-freeze, oil paint, anti-freeze)[2] and non-hazardous materials (e.g. water)[1]
3	Flammable and Combustible Material or other petroleum products, including diesel fuel and gasoline[2].
4	Corrosive Material such as lead acid batteries[3]
5	Radioactive Material of any type (e.g., military scrap, medical scrap, thickness measuring devices)
6	Explosives or potential explosives of any type, such as munitions scrap (e.g., ammunition, shells).
7	Poisons, Infectious Goods or Chemicals in solid, powder, liquid, or gaseous form (e.g., fertilizers).
8	Containers or Cylinders (Pressurized, Closed, or Formerly Containing Hazardous Material) (e.g. propane tanks, compressed gas tanks, aerosol cans, bulk storage tanks, fire extinguishers, storage tanks, process vessels.)[4]
9	Materials or Containers Containing Hazardous Substance Residue, including: A Asbestos–containing materials (ACM), such as pipe insulation or surfacing materials (except as provided for in the Agreement with respect to FAPM). B Aerosol cans that contained paint, water sealer, pesticides or other hazardous or toxic substances. C Non-aerosol containers that contained paint, water sealer, pesticides or other hazardous or toxic substances. D Air conditioning and refrigeration units containing CFCs, HCFCs or non-exempt refrigerant substitutes. E PCB-containing materials, such as capacitors, ballasts and transformers. F Lead-containing materials[5] G Mercury-containing materials (e.g. switches, fluorescent or mercury vapor lights/fixtures/bulbs, thermostats). H Liquid crystal displays (LCDs)[1]
10	Any Material Containing Hazardous or Toxic Substances or Wastes[1].
11	Automobiles must have all fluids drained to the extent practicable or otherwise required by law, and their batteries, leaded battery cables, and mercury convenience light switches, and air bags, as required by law, removed[2].

[1] / Except to the extent that the Facility is authorized and has agreed to accept such materials.

[2] / Except to the extent that the Facility is authorized and has agreed to depollute applicable vehicles with respect to such materials.

[3] / Except to the extent that such batteries are accepted at designated Facilities and then only if not cracked, broken, burned, or with missing caps.

[4] / Except empty containers certified as "empty," per applicable law and approved in advance by Facility and otherwise properly prepared in accordance with Sims's empty container requirements.

[5] / Except if accepted by the Facility as a specific commodity (e.g. lead acid batteries and leaded battery terminals, lead wheel weights, or electronic scrap materials such as cathode ray tubes (CRTs) or a commodity containing a CRT – such as a computer monitor or CRT television set.)

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
ROADWAY AND OTHER TRAFFICKED SURFACES	1	All roadways are paved - sweeping of internal paved roads.	Continuous sweeping during business hours.
	2	External paved road (Seaport Boulevard) swept during normal business hours.	Continuous sweeping during business hours.
	3	Speed limit of 5 mph for equipment and trucks inside yard.	At all times
	4	Employee training – Inbound Source Control, Sweeping and Housekeeping, Air Pollution/Dust Control Measures. (Upon completion of the EMP annual training will also be included.)	Initially for new employees, Daily Tool Box Talks (TBTs), and annual update for current employees.
	5	Watering of internal roads and scrap metal stockpiles using water truck, portable dust control units, and sprinklers.	Frequently as needed.
	6	Water spray bar deluge system of all incoming commercial trucks prior to unloading.	All commercial trucks
	7	Visual inspection of all onsite roads to assure sweeping is reducing road dust sufficiently	At least one complete inspection daily.

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS – METAL MANAGEMENT

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

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
TRANSPORT	1	Speed limit of 5 mph. Signs posted.	During all hours of operation.
RECEIPT	2	Visual inspection of incoming truck loads to intercept and refuse loads containing excessive soil. Thorough physical and visual inspections of random selected incoming loads. Annual training of all inspectors, including decision of where incoming material will be unloaded.	During all hours of operation when receiving incoming trucks.
COLLECTION	3	Watering of internal roads and scrap metal stockpiles using water truck, portable dust control units, and sprinklers	During all hours of operation when receiving incoming trucks.
SORTING	4	All inspectors trained to direct incoming trucks to deposit loads at appropriate storage piles.	During all hours of operation when receiving incoming trucks.
SEGREGATION	5	Materials entering facility are segregated into different storage piles before further processing, including Shredder Infeed Pile (light iron segregated from auto bodies), and HMS piles.	During all hours of operation when receiving incoming trucks.
SEPARATION	6	Materials being separated after shredding are wetted by initial shredding process. This residual moisture content helps to reduce fugitive emissions from separation processes. Multiple conveyors in the Materials Recovery Plant are covered and have belly pans to reduce fugitive emissions during the separation process. Oscillating, elevated Dust BOSS used to mist in the Materials Recovery Plant to minimize fugitive emissions from separation processing. Skirting at the trommel conveyors, and at the #1 elevating conveyor. Skirting at the #1 and #2 magnets at the shredder. Materials Recovery Plant process equipment is fully enclosed, including SGM eddy current system and MTD air system.	During all hours of operation
COMPILATION	7	Covered by other categories above and below.	
CRUSHING	8	No crushing is conducted at this facility.	N/A
SHREDDING	9	Redundant control devices used to reduce particulate emissions, including water spraying, cyclone separation and collection, and foam injection system.	During all hours of operation when receiving incoming trucks.
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	Employee training: Inbound Source Control, Sweeping and Housekeeping, Air Pollution/Dust Control Measures. (Upon completion of the EMP, annual training will also be included.)	Initially for new employees, Daily Tool Box Talks (TBTs), and annual update for current employees
	2	Water is added to the shredder. The aggregate portion exiting the shredder retains sufficient moisture to continue to reduce fugitive emissions during further processing.	Water is added to the scrap being processed whenever the shredder is operating.

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	Certified Appliance Recycler (CAR #0395) uses certified equipment (Pumps-MicroVac2/Promax5410) to remove Materials Requiring Special Handling (MRSH).	Occasional activity when units require depolluting, or transferred to alternate feeder yard for depollution.
	2	Subcontracted depollution is conducted by certified subcontractors holding DTSC and EPA permits (i.e. "Certified Appliance Recyclers") when additional support necessary due to accumulation of appliances containing MRSH. Activity would be conducted on site by certified vendor technicians	Occasional activity when units require depolluting, or transferred to alternate feeder yard for depollution.
	3	Appliance area is paved and covered.	On-going fixed feature
	4	Appliance area is swept and cleaned.	Daily
	5	Appliance area employees trained (EPA 608 certification, MRSH training, Inbound Source Control, sweeping and housekeeping, Air Pollution/Dust Control Measures)	Initial, annual, and daily tool box talks (TBTs)
	6	Appliance scrap acceptance and inspection.	Daily for each delivered load

METAL MANAGEMENT – STORAGE PILE MANAGEMENT

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

Types of Storage	Section #	Management Practices to Reduce Emissions	Schedule of Activity
Storage of Delivered Scrap	1	Delivered scrap stockpiles are watered during delivery, unloading and material handling by a combination of an automatic overhead deluge system and continuos water spray by a Rain Bird.	During all hours of operation when receiving incoming trucks as needed.
	2	Light Iron/Tin and Auto Bodies piles are monitored daily with a thermal image camera to look for hot spots when piles are present.	During all hours of operation when receiving incoming trucks as needed.
	3	Shredder Infeed piles maintained by dimension/approx. tons and fire breaks required as per Fire Prevention SOP.	During all hours of operation when receiving incoming trucks as needed.
Storage of Unprocessed Material	4	Unprocessed material storage piles are watered during unloading and material handling by a Rain Bird.	Whenever needed during facility operation.
	5	Light Iron/Tin and Auto Bodies piles are monitored daily with a thermal image camera to look for hot spots when piles are present.	Whenever needed during facility operation.
	6	Shredder Infeed piles maintained by dimension/approx. tons and fire breaks required as per Fire Prevention SOP.	Whenever needed during facility operation.
Storage of In-process Material	7	In-process material storage piles are watered during unloading and material handling by Rain Bird and a Dust Boss DB60s.	Whenever needed during facility operation.
	8	Light Iron/Tin and Auto Bodies piles are monitored daily with a thermal image camera to look for hot spots when piles are present.	Whenever needed during facility operation.
	9	Shredder Infeed piles maintained by dimension /approx. tons and fire breaks required as per Fire Prevention SOP.	Whenever needed during facility operation.
Storage of Finished Product	10	Finished product stockpiles are watered during unloading and material handling by a Rain Bird and a Dust Boss DB60.	Whenever needed during facility operation.
	11	Pile sizes of finished metal products not limited by pile size.	Whenever needed during facility operation.
	12	Aggregate and Treated Shredder Residue piles stored indoors.	Whenever needed during facility operation.
	13	Aggregate and Treated Shredder Residue piles are monitored daily with a thermal image camerato look for hot spots when piles are present.	
Storage of Shredder Residue	SEE SHREDDER RESIDUE MANAGEMENT SECTION		

METAL MANAGEMENT

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

The facility has an Inbound Source Control SOP which requires training of all Employees as well as customers on prohibited items. Prohibited items include: Non-Recyclable materials of any kind, free flowing liquids, flammable and combustible material, corrosive material, radioactive material, explosives, poisons, infectious materials or chemicals, containers or cylinders (pressurized, closed, or previously containing hazardous materials), materials or containers containing hazardous substance residue, and any material containing hazardous or toxic substances or wastes. Customers must have signed the Scrap Acceptance Policy to conduct business or, if a peddler, must sign the certification on their transaction ticket that their materials conform to our policy. All loads or parts of loads are subject to rejection if they do not conform to the policy. By minimizing non-conforming items such as dirt/debris/trash, fugitive dust emissions are also reduced. In addition, by ensuring prohibited items that may create a fire hazard such as batteries/closed cylinders, are precluded from entering the yard, fire danger is greatly reduced.

All loads are inspected at the gate as well as during unloading. Incoming scrap is segregated by commodity type. Pile sizes of shredder infeed depend on the commodity being stored. Auto Bodies and Light Iron/Tin are stored separately and apart. Fire breaks are created based on commodity and pile size based on site Fire Prevention and Management SOP looking at pile footprint and estimated tonnage. Shredded Steel product is is not limited in pile size as it contains very limited non-metallics. Scrap destined for the Shredder (Auto Bodies and Tin) is processed as quickly as possible with the intent to shred to the ground prior to facility closure.

The site maintains a Fire Prevention and Preparedness SOP which is intended to minimize the risk of fires which may result from activities engaged in at the facility including the stockpiling of scrap metal. The plan covers stockpiling (i.e. pile heights/sizes, depending on commodity type) as well as procedures regarding security, hot work, housekeeping, safety inspections, storage and use of combustible and flammable materials, vehicle depollution, equipment fueling, maintenance of electrical systems, smoking policy and training. The plan includes requirements for Plant and Fire Protection Equipment and specifies locations, inspection and maintenance schedule, and training. All Employees are trained on preventing preparing for and responding to fires. The Facility also maintains an Emergency Action Plan which references the SOP as well as a Fire Response Plan.Last, the facility installed a perimeter security system with thermal cameras directed at the "light iron" scrap metal material stockpile as well as the area where unprepared scrap auto bodies are stored. This system continuously monitors the stockpile/auto body area temperature and sends alarm notifications if any unusual temperature changes occur in those areas. When the facility is closed, the thermal cameras are monitored at the vendor offsite location. .

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 throughout the previous charts of this document. Employee training includes initial training, annual refresher and various toolbox talk topics on Inbound Source Control, Sweeping and Housekeeping, Air Pollution and Dust Control Measures. The facility utilizes the Scrap Acceptance Policy to minimize materials entering the facility which may create fugitive emissions. Commercial trucks delivering scrap metal arrive with tarps and go through a water spray deluge before unloading. The facility roadways are fully paved to reduce fugitive emissions from incoming and outgoing transport. Roadways are swept using sweepers and wet down with the water truck as needed. The water truck, sprinklers throughout the facility as well as portable dust control units are utilized to control fugitive emissions while conducting material handling processing and stockpiling. Water and foam are injected into the shredder to reduce fugitive emissions during shredding. The Non-Ferrous Process minimizes fugitive emissions due to the high moisture content in the aggregate. Much of the non-ferrous process is conducted in buildings as well as various conveyors have covers, belly pans and skirting. ASR is conveyed to a building in a closed screw conveyor where it is treated as per DTSC requirement and loaded into trucks in a closed building for shipment in trucks with tarps. Shredded scrap is loaded on a contained ship loading conveyor with a telescoping chute to minimize fugitive emissions from ship loading. All scrap shipped by truck is done so in an enclosed container or tarped truck.

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 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**	X Yes ☐ No	Number of Staff 0	☐ Yes X No	Number of Staff 0	Note: The facility utilizes a technology-based security monitoring program with thermal imaging cameras to detect heat in storage piles..
2	**Metal Management**	X Yes ☐ No		☐ Yes X No		
3	Transport	X Yes ☐ No		☐ Yes X No		
4	Receipt	X Yes ☐ No	Visible Emissions Certified	☐ Yes X No	Visible Emissions Certified	
5	Collection	X Yes ☐ No		☐ Yes X No		
6	Sorting	X Yes ☐ No	X Yes, 1 No	☐ Yes X No	☐ Yes, 0 X No	
7	Segregation	X Yes ☐ No		☐ Yes X No		
8	Separation	X Yes ☐ No		☐ Yes X No		
9	Compilation	X Yes ☐ No		☐ Yes X No		
10	Crushing	☐ Yes ☐ No		☐ Yes ☐ No		
11	Shredding	X Yes ☐ No		☐ Yes X No		
12	Storage of Metals	X Yes ☐ No		☐ Yes X No		
13	Storage of Metal-Containing Material	X Yes ☐ No		☐ Yes X No		
14	Storage of Non-Metallic Material	X Yes ☐ No		☐ Yes X No		
15	**Shredder Residue Management**	X Yes ☐ No		☐ Yes X No		
16	**Depollution Activities**	X Yes ☐ No		☐ Yes X No		

Description of Onsite Management

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

Section #	Employee Training
1	New employees receive an initial training session.
2	All operators, supervisors, and managers receive the same training.
3	Inbound Source Control
4	Sweeping and Housekeeping
5	Air Pollution/Dust Control Measures (Upon completion of EMP annual training will be included.
6	Annual Training
7	Daily Tool Box Talks (TBT's)

Schedule of Facility Operations

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

Material Receiving: Monday through Saturday, 5am to 5 pm

Shiploading: As needed, typically a few days each month, Shift 1: 4 am to 4 pm, Shift 2: 4 pm to 4 am.

Metal Processing: Shredding: 5 am to noon and 6 pm to midnight, Monday through Friday

Material Processing: Materials Recovery Plant: Shift 1: 5 am to 2:30 pm, Shift 2: 2:30 pm to midnight. Both shifts Monday through Friday

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

Technical Data

6-4-403.1

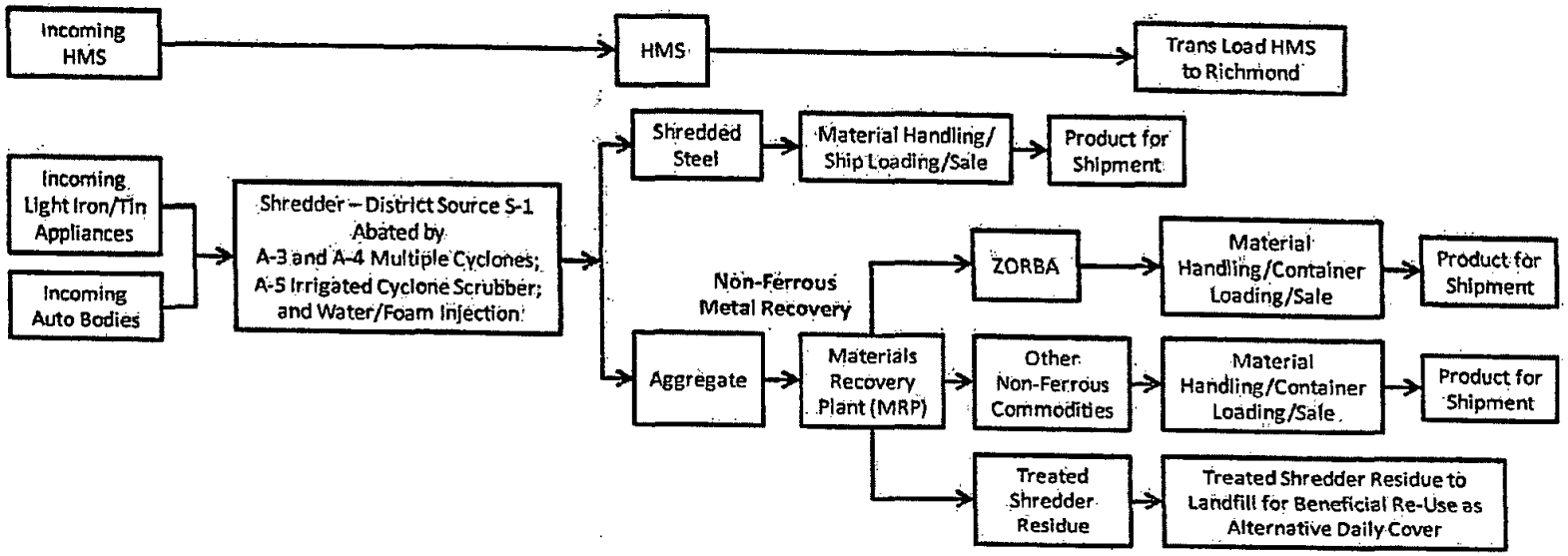
A. *Process Flow Diagram* - Facilities must indicate all operations in Section 6-4-402, the flow of materials used and identify all monitoring and the processes, abatement and controls to minimize emissions beginning from material receipt to achievement of final product. Identify all equipment by source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

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.

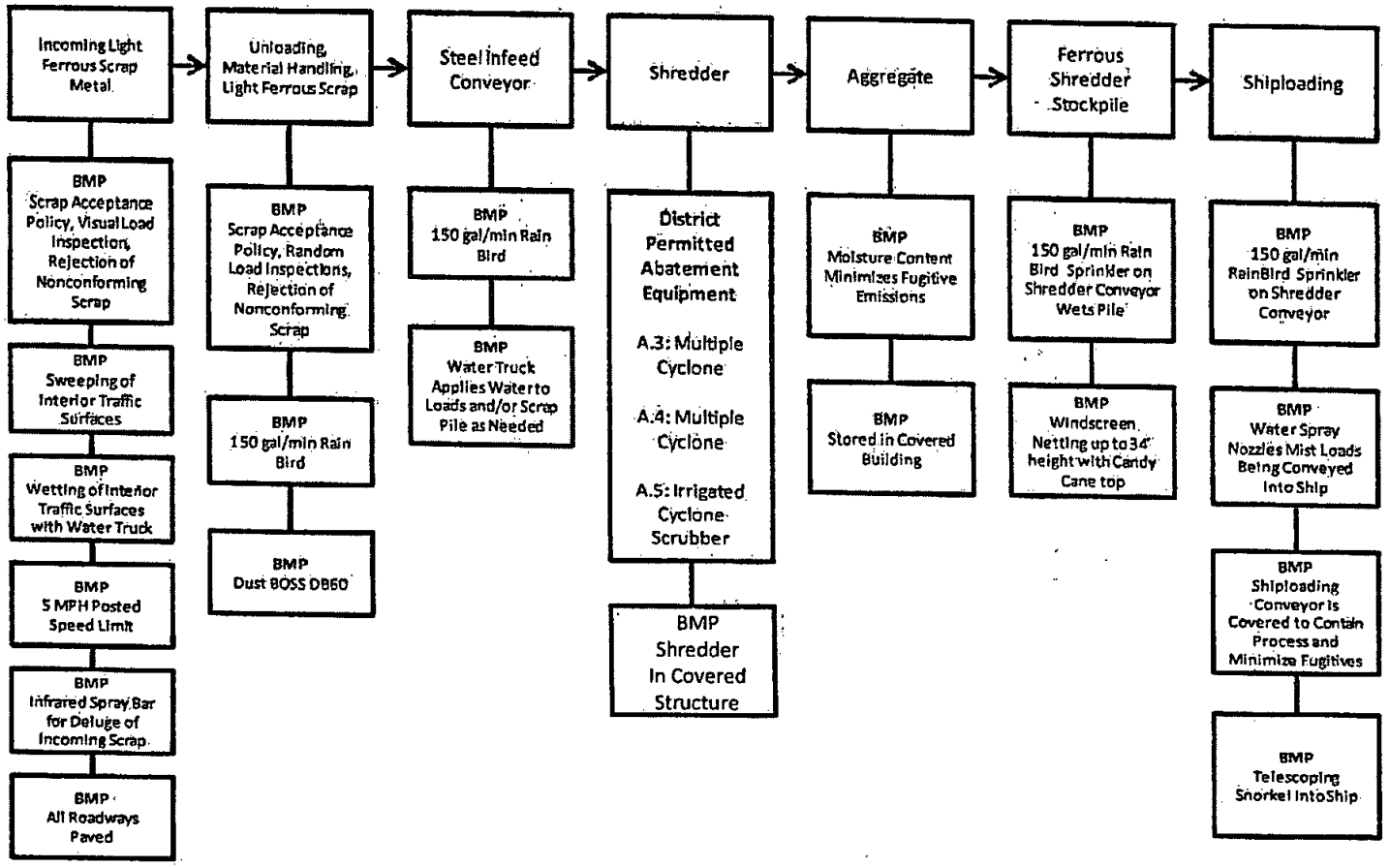
A. Process Flow Diagram

Attach Process Flow Diagram

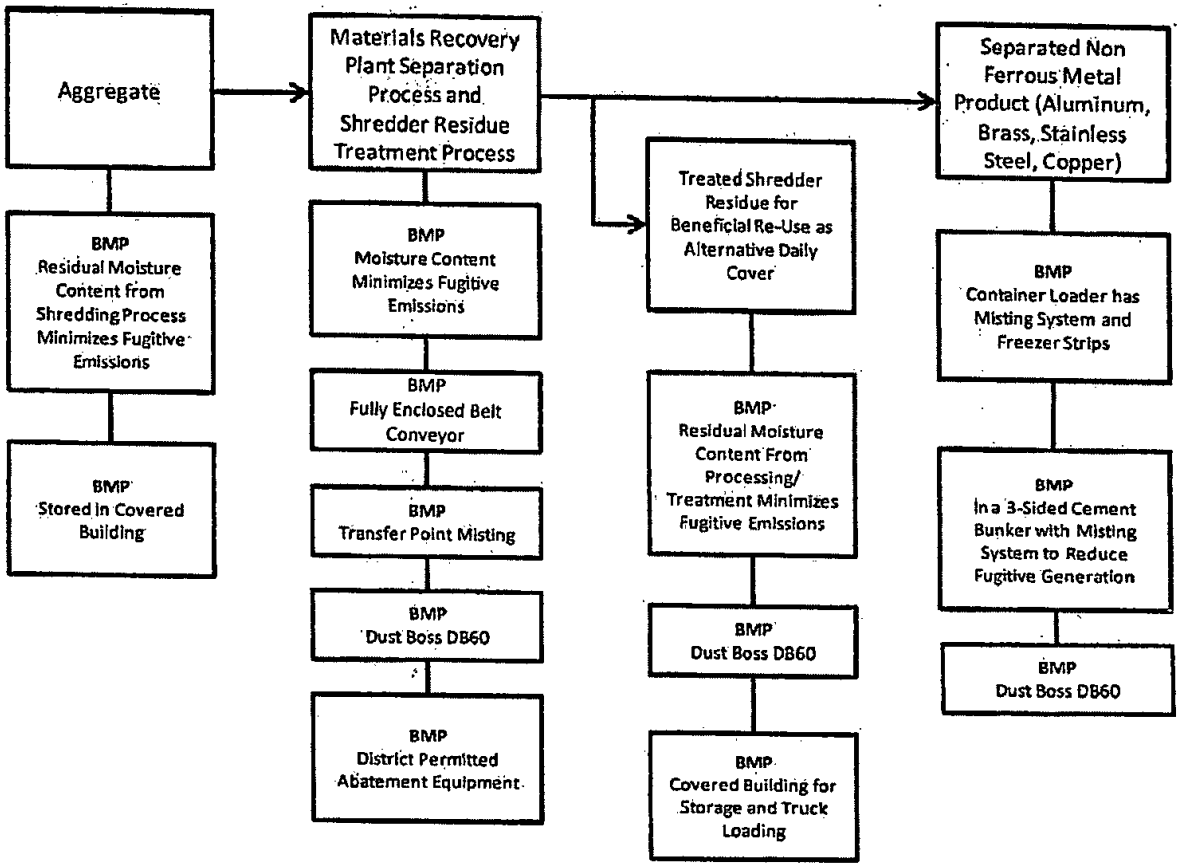
Overall Process Diagram
Sims Metal Management – Redwood City



Shredding Process Diagram with BMPs
Sims Metal Management – Redwood City



Materials Recovery Plant Separation Process Diagram with BMPs
Sims Metal Management – Redwood City

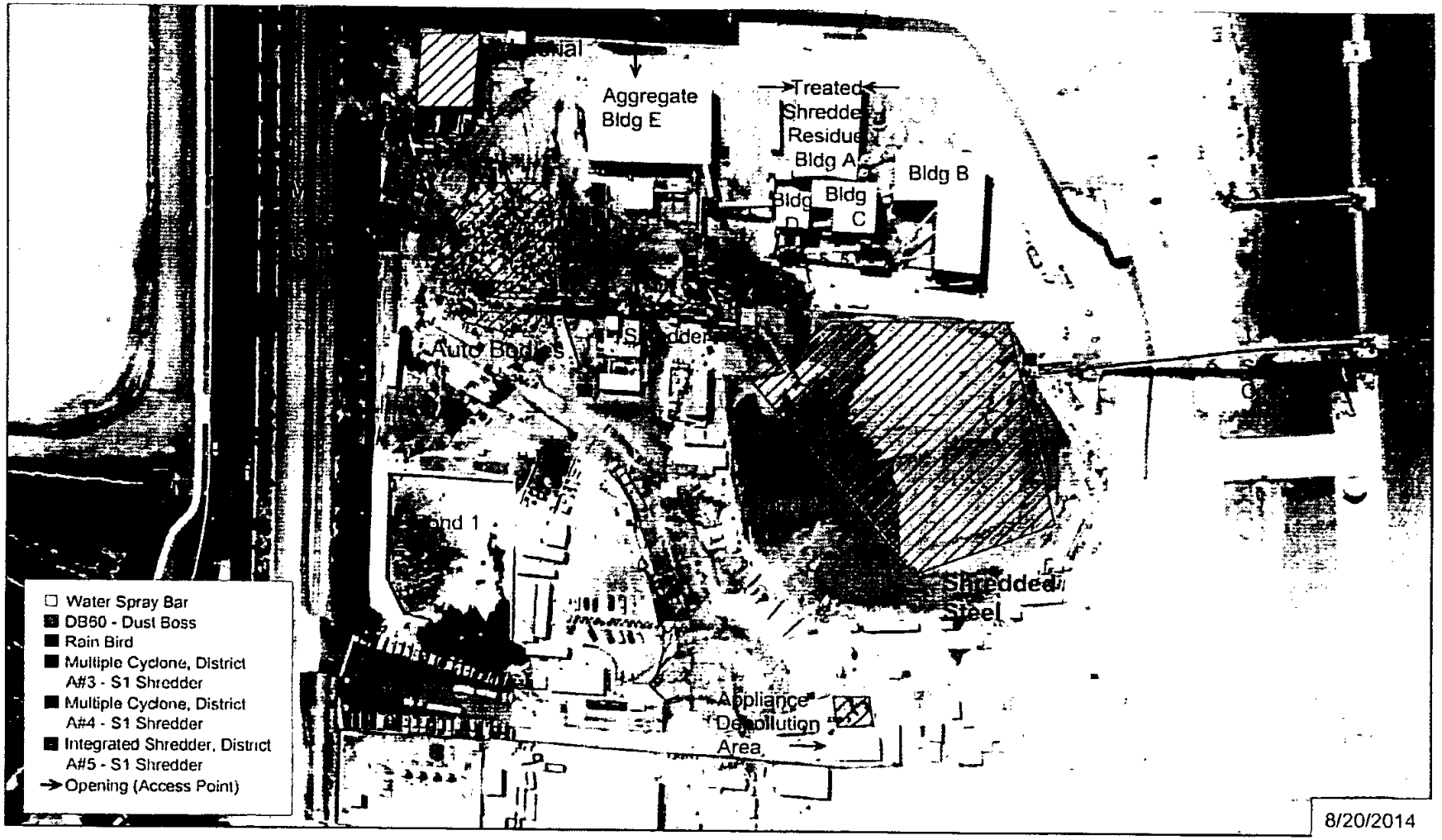


B. Facility Layout / Floor Plan

Attach Facility Layout/ Floor Plan

Sims Metal Management - 699 Seaport Blvd - Redwood City, CA 94063

Emission Minimization Plan



Fugitive Emissions Reductions Previously Realized

6-4-403.2

Facilities must provide a description of the equipment, processes and procedures installed or implemented within the last five years that primarily or secondarily reduce fugitive emissions from facility operations. Include the purpose for implementation and detail any employee training that was conducted for that equipment, process or procedure and the frequency of the training.

6-4-403.2 FUGITIVE EMISSIONS REDUCTIONS PREVIOUSLY REALIZED

Section #	Identify Type of Operation per Section 6-4-402	Description of Equipment, Processes or Procedures Previously Realized	Implementation Date	Purpose of Implementation	Employee Training Conducted	Description of Employee Training and Frequency of Training
1	Roadways and other Trafficked Surfaces	Tymco 435 Sweeper and Leyman Sweeper	2007	Minimize trackout of dust on to city streets	X Yes ☐ No	Initial and annual update training in tailgate sessions.
2	Roadways and other Trafficked Surfaces	Complete cleaning of dock and pier regularly.	4/2011	Reduce silt on dock and pier surface that can be entrained as fugitive particulate emission.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
3	Roadways and other Trafficked Surfaces	Facility Speed Limit, 5 mph.	2007 (estimated)	Slower speed reduces generation of fugitive dust.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
4	Roadways and other Trafficked Surfaces	Increased extent of covered plant area from 70% to 90% (i.e., paved or a building).	2013	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
5	Metal Management	Two Dust BOSS Mist Turbines were purchased to water the shredder infeed pile and the container loading area. 1 portable Buffalo Turbine also was purchased to relocate as needed.	Approximately 2011	The turbine mist captures already entrained dust and reduces the dust generated by handling material by loaded into and removed from storage piles.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
6	Metal Management	Water Truck used to wet roadways when material handling.	2006	Minimizes particulate generation during material handling.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
7	Metal Management	Ship loading conveyor covered/contained.	4/2012	Reduce potential for windblown fugitives while shiploading.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
8	Metal Management	Purchased/Installed Remote Control, Rain Bird sprinkler on tower at Shred Pile/Shred Shiploading Conveyor.	2011	Fixed, elevated sprinkler that can be operated by remote control. Elevated platform allows for better coverage of shred stockpile.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
9	Metal Management	High-volume sprinklers (Rain Bird) at infeed pile and shred pile.	2011	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.

6-4-403.2 FUGITIVE EMISSIONS REDUCTIONS PREVIOUSLY REALIZED

Section #	Identify Type of Operation per Section 6-4-402	Description of Equipment, Processes or Procedures Previously Realized	Implementation Date	Purpose of Implementation	Employee Training Conducted	Description of Employee Training and Frequency of Training
10	Metal Management	Installation of a water spray bar to deluge each incoming truck prior to unloading.	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
11	Metal Management	"Candy cane" top installed on eastern boundary fence.	2013	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
12	Metal Management	Constructed an "air tunnel" at the conveyor pit, consisting of a roof and 4 hp blowers)	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
13	Metal Management	Completely enclosed non-ferrous metal separation operations (Buildings B, C, D and E)	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
14	Metal Management	Installed industrial cold strips over door of Building E (i.e., front-loader access point on the south side of the building)	2013	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
15	Metal Management	Enclosed autoloader used to load non-ferrous materials into shipping containers.	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
16	Metal Management	Foam Injection System	5/2013	The Foam Injection System pumps foam additive into the cooling water injection system of the shredder at a rate controlled by the shredder's programmable logic controller (PLC).	X Yes ☐ No	Initial and annual update training in tailgate sessions.
17	Metal Management	Intake inspection procedures to identify and reject loads with excessive debris (e.g. soil)	2008	Prevent introduction of materials into shredder that can become wind-blown debris	X Yes ☐ No	Initial and annual update training in tailgate sessions.
18	Metal Management	Discharge of non-ferrous commodities through enclosed chutes into collection bins at the Materials Recovery Plant.	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.

6-4-403.2 FUGITIVE EMISSIONS REDUCTIONS PREVIOUSLY REALIZED

Section #	Identify Type of Operation per Section 6-4-402	Description of Equipment, Processes or Procedures Previously Realized	Implementation Date	Purpose of Implementation	Employee Training Conducted	Description of Employee Training and Frequency of Training
19	Metal Management	Requirement for tarps or netting over all incoming and outgoing truck loads.	2011	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
20	Metal Management	Full enclosure of ship-loading conveyor.	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
21	Metal Management	Installation of a telescoping chute that extends from the ship loading conveyor directly into the hold of a ship	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
22	Metal Management	Enclosure of non-ferrous materials bays through installation of a roof, and the additive of a roof and misting system.	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
23	Metal Management	Inventory management to control height of stockpiles and minimize the stockpiled amount of unprocessed materials present at any one time.	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Increased operator training on the loading of the shredder conveyor.
24	Shredder Residue Management	Material is stored in covered building.	2013	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
25	Shredder Residue Management	Untreated Auto Shredder Residue (ASR) transferred from Building B to Building A by covered conveyor. All ASR treatment conducted inside Building A.	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.
26	All	Initial installation of green net fencing on perimeter property line.	2012	Provide an additional means to control and retain airborne debris within the facility boundary.	X Yes ☐ No	
27	All	Increased height of fencing on the Seaport Boulevard part of the east boundary to 34', on the south boundary to 20', and on the south part of the west property line to 25'. The fencing height is 8'along the north property line and the north part of the west line. The fence height is 22' high on the east side of the shredder stockpile.	2012	Minimize mobilization of particulate matter.	X Yes ☐ No	Initial and annual update training in tailgate sessions.

6-4-403.2 FUGITIVE EMISSIONS REDUCTIONS PREVIOUSLY REALIZED

Section #	Identify Type of Operation per Section 6-4-402	Description of Equipment, Processes or Procedures Previously Realized	Implementation Date	Purpose of Implementation	Employee Training Conducted	Description of Employee Training and Frequency of Training
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	
					☐ Yes ☐ No	

Schedule for the Implementation of the EMP Elements

6-4-403.4

A. Provide a list of existing or current EMP elements in place pursuant to and under a District Authority to Construct as of the initial date of EMP submittal (on or before May 1, 2014). Include a description, the purpose and schedule of the element(s).

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. 6-4-403.3.1 SCHEDULE FOR THE IMPLEMENTATION OF THE EMP ELEMENTS (on or before May 1, 2014)					
Section #	Identify Type of Operation per Section 6-4-402	List Specific Elements to be Implemented on or before May 1, 2014	Implementation Date	Description of Elements to be Implemented	Purpose of Implementation

B. 6-4-403.3.2 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 EMP	Implementation Date	Description of Elements to be Implemented	Purpose of Implementation
1	Metal Management	Shredder in covered structure	12/15	Shredder operated in covered structure	Minimize mobilization of particulate matter.
2	Metal Management	Shredder BiviTech within Shredder Downstream in covered structure	12/15	Shredder BiviTech operated in covered structure	Minimize mobilization of particulate matter.

Compliance Schedule for the EMP

6-4-404

A. *APCO Recommendations to EMP and Determination of Approvability–* Acknowledge acceptance or rejection of each of the APCO's recommendations. For each of the accepted recommendations, describe the measures to be implemented and include the date of proposed implementation. If the facility rejects a recommendation, provide a detailed basis for that rejection.

A. APCO Recommendations to EMP and Determination of Approvability (6-4-405)

Date of EMP: **5/19/15**

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

Section #	(FOR APCO USE ONLY) APCO Recommendation	Acceptance of APCO Recommendation	If NO: Basis for Rejecting APCO Recommendation	If YES: Measures to Implement Recommendation	Proposed Date of Implementation	(APCO USE ONLY) APCO Approval of Response
1	Shred all scrap to the ground each day to minimize fugitive emissions.	☒ Yes ☒ No	PARTIAL As a fire prevention measure, the facility is committed to shredding received "light iron" scrap metal materials to the ground by the end of each operating day but in the event that shredder maintenance, restricted operating hours due to peak energy demand constraints, after-hours scrap metal material deliveries, or other such operational conditions preclude full implementation of that commitment, the facility will have on-site appropriate operations personnel to monitor and respond to residual fire risk. The facility however does not observe that a stockpile of unprepared scrap metal materials remaining after operating hours in itself is a significant potential source of fugitive emissions. ***District Response:*** *Confirm that as a daily standard operating practice, facility shreds "light iron" scrap metal materials to the ground each day, with the understanding that the listed circumstances may prevent doing so on certain occasions.*		Alternate proposed measures are already in place	☐ Yes ☒ No
		☒ Yes ☐ No		As a fire prevention measure, the facility is committed to shredding received "light iron" scrap metal materials to the ground by the end of each operating day but in the event that shredder maintenance, restricted operating hours due to peak energy demand constraints, after-hours scrap metal material deliveries, or other such operational conditions preclude full implementation of that commitment, the facility will have on-site appropriate operations personnel to monitor and respond to residual fire risk. The facility however does not observe that a stockpile of unprepared scrap metal materials remaining after operating hours in itself is a significant potential source of fugitive emissions.	Alternate proposed measures are already in place	☒ Yes ☐ No

2	Equip all conveyance equipment with water sprays or misters.	☒ Yes ☒ No	PARTIAL The facility has visually evaluated the potential for fugitive emissions from the various conveyance systems at the facility and has developed a program to minimize fugitive emissions from such conveyance systems, which in part consists of the use of water sprays or misters at some of those conveyance systems. For example the facility has equipped the shredder infeed conveyor with a misting system and has equipped the shredder mill with a water/foam spray system so that material exiting the mill has a substantially reduced potential to emit fugitive emissions. Other measures the facility has installed to minimize the potential to emit fugitive emissions include covering or shielding conveyance systems or related drop-points and having such conveyance systems operate within a building or enclosed structure. For example, the facility has located several conveyance systems in buildings including two buildings currently under construction. As for any remaining conveyance systems not otherwise under cover or in a building, the facility has scheduled an visit this month by a water spray vendor to assess whether additional water/mist application or covering would be needed to minimize the potential for fugitive emissions from such conveyance systems. ***District Recommendation:*** *Include the date that the facility will identify the addition or increase of misters and water sprays at all locations.*		Depending on outcome of vendor visit, will determine schedule for any additional misting/water cannons or other covering	☐ Yes ☒ No
		☒ Yes ☐ No		The facility has visually evaluated the potential for fugitive emissions from the various conveyance systems at the facility and has developed a program to minimize fugitive emissions from such conveyance systems, which in part consists of the use of water sprays or misters at some of those conveyance systems. For example the facility has equipped the shredder infeed conveyor with a misting system and has equipped the shredder mill with a water/foam spray system so that material exiting the mill has a substantially reduced potential to emit fugitive emissions. Other measures the facility has installed to minimize the potential to emit fugitive emissions include covering or shielding conveyance systems or related drop-points and having such conveyance systems operate within a building or enclosed structure.	Containment Strategies implementation started 9/2015; and ongoing. Cost Expendeture Report (CER) to be completed for 2 additional Dust Bosses on 12-17-15	☒ Yes ☐ No

				For example, the facility has located several conveyance systems in buildings including two buildings recently constructed. The Facility met with Dust Boss, and Martin Engineering, both water spray vendors, to evaluate the remaining conveyance systems not otherwise under cover or in a building to assess whether additional water/mist application or covering would be needed to minimize the potential for fugitive emissions from such conveyance systems.It was determined that no additional misters were needed, but instead the Facility has implemented containment startegies such as skirting, belt scrappers, and netting under conveyors. The Facility also replaced the screw conveyor with a belt conveyor.		
3	Provide onsite staff with training through the California Air Resource Board (CARB) to obtain and maintain a visible emissions evaluation (VEE) certification in accordance with US EPA Method 9	☒ Yes ☒ No	PARTIAL The Environmental Manager (EM) for the West Region is certified as a VEE and covers all the facilities in CA including Redwood City as referenced in current EMP. If EM not available, if VEE testing required, SMM has outside consultants available certified to conduct such tests. ***District Response:*** *Specify the schedule and procedures to ensure that the EM and offsite VEE certified consultants are able to conduct timely VEE testing when necessary.*		Alternate proposed measure is already in place	☐ Yes ☒ No
		☒ Yes ☐ No		The Environmental Manager (EM) for the West Region is certified as a VEE and covers all the facilities in CA including Richmond as referenced in current EMP. The EM will maintain certification every 6 months. If EM not available, if VEE testing required, SMM has outside consultants available certified to conduct such tests that can be available immediately.	Scheduled for Recertification on 2/10/16	☒ Yes ☐ No
4	Develop a schedule for sweeping along roadways and trafficked areas to prevent track out of fugitive emissions.	☒ Yes ☐ No		The Facility will document a sweeping schedule to memorialize the program already in place	7/31/15	☒ Yes ☐ No

5	Develop and implement a program for scheduled monitoring of all stockpiles with a temperature probe/gun and maintain a record of all monitoring activities.	☒ Yes ☒ No	PARTIAL The Facility has installed a Perimeter Security System which has thermal cameras pointed at the shredder scrap metal stockpile infeed area as this material is potentially suspectible to fire incidents. This system is much more effective than a probe/gun as this system will continuously monitor the shredder infeed scrap metal stockpile temperature and send alarm notifications if any unusual temperature changes occur in those areas. When the facility is closed, the thermal cameras will be monitored at the vendor offsite location. Since the monitoring is continual, the facility does not intend to maintain a record of such monitoring activities location.When the facility is closed, the cameras are monitored at the vendor offsite location. ***District Response:*** *Please confirm that perimeter infrared monitoring is adequate to determine hot spots in stockpiles.*		Alternate proposed measure is already in place	☐ Yes ☒ No
		☒ Yes ☐ No		The Facility has installed a Perimeter Security System which has thermal cameras pointed at the shredder scrap metal stockpile infeed area as this material is potentially suspectible to fire incidents. This system is much more effective than a probe/gun as this system will continuously monitor the shredder infeed scrap metal stockpile temperature and send alarm notifications if any unusual temperature changes occur in those areas. When the facility is closed, the thermal cameras will be monitored at the vendor offsite location. Since the monitoring is continual, the facility does not intend to maintain a record of such monitoring activities location.When the facility is closed, the cameras are monitored at the vendor offsite location. Two additional thermal cameras were added in Building E (Aggregate Bldg).The facility does have a temperature/probe gun that can be used at the facility as an as needed basis.	Alternate proposed measure completed 9/01/2014. Additional Thermal Cameras installed 12/02/2015	☒ Yes ☐ No
6	Pave all roadways and trafficked surfaces where metal management, shredder residue management and depollution operations are conducted.	☒ Yes ☐ No		All roadways and trafficked surfaces are already paved as stated in the current version of the EMP	Recommended measures have previously been implemented	☒ Yes ☐ No

Appendix

If additional information are to be included in the EMP, identify the associated Appendix # as "*#*" in the text box of the specific table.

In the table below, note the Appendix # and provide the Page # and Section # of the EMP where the material references.

Appendix #	Reference to Page # and Section # of EMP
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #

Appendix #	Reference to Page # and Section # of EMP
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #

Appendix #

Reference to Page # , Section #