



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

# PUBLIC NOTICE

October 15, 2007

TO: Neighbors of the proposed new source of air pollution listed below.

FROM: Bay Area Air Quality Management District

RE: Permit Application #16042 for the following source of air pollution:

**Controlled Pyrolysis Cleaning Furnace  
Alco Iron & Metal Company  
2366 Davis Street/1091 Doolittle Drive  
San Leandro, CA 94577**

**ALAMEDA COUNTY**  
Tom Bates  
Scott Haggerty  
Janet Lockhart  
Nate Miley

**CONTRA COSTA COUNTY**  
John Gioia  
Mark Ross  
(Chair)  
Michael Shimansky  
Gayle B. Uilkema

**MARIN COUNTY**  
Harold C. Brown, Jr.

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
Chris Daly  
Jake McGoldrick  
Gavin Newsom

**SAN MATEO COUNTY**  
Jerry Hill  
(Vice-Chair)  
Carol Klatt

**SANTA CLARA COUNTY**  
Erin Garner  
Yoriko Kishimoto  
Liz Kniss  
Patrick Kwok

**SOLANO COUNTY**  
John F. Silva

**SONOMA COUNTY**  
Tim Smith  
Pamela Torliatt  
(Secretary)

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

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The Bay Area Air Quality Management District (the "District") is a local agency that regulates stationary sources of air pollution such as factories, industrial sites, and gasoline stations.

You are receiving this Public Notice because a permit application has been filed with the District for the above referenced source of air pollution. A description of the proposed project follows:

**Alco Iron & Metal Company  
Permit Application for a Small Pyrolysis Furnace**

- **FACILITY DESCRIPTION:** Alco Iron & Metal Company ("Alco") purchases, processes and sells scrap metal (steel, stainless steel, aluminum, brass and copper), performs metal fabrication and operates a state certified redemption center for aluminum cans and glass and plastic containers at its San Leandro Facility. Alco is also licensed to demolish large industrial structures such as water tanks and power and water plants.
- **PERMIT APPLICATION:** Alco submitted an accelerated permit application per section 106 of BAAQMD Rule 2-1 to the District for a small propane-fired controlled pyrolysis furnace with afterburner on April 23, 2007.
- **PYROLYSIS FURNACE SOURCE DESCRIPTION:** Pyrolysis cleaning furnaces are commonly used in the recycling industry; hundreds of

similar sources are located in California. The furnaces thermally decompose varnish, epoxy and other organic materials at 750 to 800 degrees Fahrenheit in the absence of oxygen. Organic residues are vaporized off the metal parts leaving them free of organic material.

- **AFTERBURNER CONTROL DESCRIPTION:** The furnace afterburner chamber is integral to the operation of the pyrolysis furnace. It operates in excess of 1400 degrees Fahrenheit and a residence time of ½ second or greater. The abated emissions consist primarily of water vapor and carbon dioxide, and the discharge is odorless and colorless.
- **EMISSIONS:** The annual average and maximum daily emissions of criteria pollutants (NO<sub>x</sub>, SO<sub>x</sub>, POC, PM , CO and lead) from the pyrolysis furnace and afterburner are below the trigger levels for Best Available Control Technology, Prevention of Significant Deterioration, and New Source Review Offsets per BAAQMD Rule 2-2. The annual average and maximum daily emissions of toxic air contaminants from the pyrolysis furnace and afterburner are also below the trigger levels for Health Risk Assessment per Table 2-5-1 of BAAQMD Rule 2-5.
- **OPERATION:** The low levels of criteria and toxic pollutant emissions, as well as the location of the Alco facility, qualified this application for an accelerated permit. Pursuant to the District's accelerated permit requirements in section 106 of Rule 2-1, Alco has installed and begun operations of the Pyrolysis furnace.
- **HEALTH RISK ASSESSMENT (HRA):** Neither the U.S. Environmental Protection Agency nor the California Air Resources Board has identified emission factors for any toxic air contaminants from pyrolysis furnaces in similar service. However, because of community concern, the District found EPA emission factors for a scrap electric wire incinerator operation and used them to perform an HRA of this source. Note that the materials treated by these other incinerators include scrap wire with PVC coating and cable casings with chlorinated organics, neither of which will be permitted at the Alco pyrolysis furnace.
- **RISK SCREEN RESULTS:** The Health Risk Assessment showed a cancer risk for workers at 0.1 in a million, and for residents 0.003 in a million based on the emission factors for propane combustion and the emission factors for the scrap wire furnace.
- **SOURCE TESTING:** The District has agreed to fund a contract to test pyrolysis furnace emissions to verify that dioxins are below detectable levels, as expected.

If you are interested in getting more information on the District's evaluation of this proposed project, you may request copies of the applicable staff report(s) by calling the District at the telephone number listed at the end of this notice. This information also can be viewed or downloaded from the District website at:

[http://www.baaqmd.gov/pmt/public\\_notices/index.htm](http://www.baaqmd.gov/pmt/public_notices/index.htm)

***PUBLIC COMMENT PERIOD***

**There is a 30-day period for public response to this proposal. If you wish to comment on the proposed project, you may do so in writing or by e-mail. Alternatively, you may call and leave a telephone message up to one minute in length. Please leave your name and telephone number so that a District staff member may respond to your message.**

Please use the following contact information if you would like to comment on the proposed project:

Mailing address:      Application No. 16042 Public Notice Response  
                                 BAAQMD  
                                 Engineering Division  
                                 939 Ellis Street  
                                 San Francisco, CA 94109  
                                 Attn: Craig Ullery

E-mail address:      [cullery@baaqmd.gov](mailto:cullery@baaqmd.gov)

Telephone Number:   (415) 749-4718

The public comment period for this project ends on November 16, 2007.