



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

CUSTOM ALLOY SCRAP SALES, INC. (#A0146)
2730 Peralta Street
Oakland, CA 94607

January 2, 2009

FACT SHEET

Background

- Custom Alloy Scrap Sales (CASS) was established in 1970 in Oakland. CASS is a secondary aluminum production and metal recycling facility. The facility recycles a variety of metals, such as brass, copper, stainless steel, and aluminum. The facility is located in an industrial/commercial area, and is adjacent to a residential neighborhood.
- Recycled materials are received and sorted at CASS. Once the sorting process has been completed, the material is prepared for shipment by baling or shredding, or by the smelting operation, where furnaces operate to produce secondary aluminum ingot.
- The facility operates three District-permitted sources of air pollution which are all natural gas-fired furnaces used in the recovery of scrap aluminum. A sweat furnace handles the scrap that may contain impurities (e.g., wheels, engine blocks). A reverberatory furnace handles scrap that is relatively clean (e.g., metals turnings). A holding furnace handles aluminum that has been processed in the sweat furnace prior to being poured into ingot.
- Emissions from the holding and sweat furnaces are abated by two direct afterburners in series, a cyclone, and a lime-injected baghouse, while emissions from the reverberatory furnace are abated by the baghouse. Afterburner temperatures and baghouse leaks are monitored continuously.
- CASS is subject to several different air quality rules and regulations. These include the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production, and a State Airborne Toxic Control Measure (ATCM) for Non-Ferrous Metal Melting.
- A NESHAP compliance source test was conducted at CASS in March 2007 with all three furnaces operating. This testing determined emissions of chlorinated dioxins and furans, and a variety of trace metals. Using the source test results, a Health Risk Screening Analysis (HRSA) was conducted by District staff. The results of the HRSA indicate that the maximum cancer risk is 0.3 in a million, the maximum chronic non-cancer hazard index is 0.002, and the maximum acute hazard index is 0.0002. These health risks are not considered to be significant under District requirements.

Custom Alloy Scrap Sheet, Inc. Fact Sheet

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- There has been one NOV issued to CASS in the last 10 years. This was for excessive visible emissions that resulted from a leak in the baghouse. The problem was corrected that same day.
- The District received no air pollution complaints related to CASS from 2000 through 2005. Since 2006, the District has received 43 air pollution complaints alleging CASS. Nearly all of these complaints were for odors, and the same complainant filed most of these. None of the complaints resulted in the issuance of an NOV to CASS for violations of applicable requirements.

Public Comments/Issues

- On July 10, 2008, District staff met with community members at a meeting organized by Oakland City Councilmember Nancy Nadel. Concerns were expressed over preliminary ambient air sampling for metals conducted near CASS by the non-profit organization Global Community Monitor. Requests for funding additional air monitoring were made. Concerns were also expressed about odors and visible emissions from fires and/or other events at the facility. District staff responded in detail to sixteen questions regarding CASS that were submitted as a follow-up to this meeting.
- On August 28, 2008, staff met with representatives of Global Community Monitor, the Rose Foundation, Golden Gate University Environmental Law and Justice Clinic, and resident Linda McFadden. At this meeting, the responses to community questions were discussed, and requested permit documents and other public records were provided.
- Concerns have also been expressed over the District's "automatic" renewal of CASS' annual Permit to Operate (PTO) in September 2008. Some comments indicated that a more recent source test should have been required prior to PTO renewal.
- Since the July 10 community meeting, District inspectors have responded to a number of complaints made by individuals in the vicinity of CASS, primarily for odors.

Facility Status

- The District has increased the frequency of inspections at CASS since the July 10 meeting with community members. The most recent inspections were conducted on September 19, August 13, and August 20. The facility was found to be in compliance with the applicable air quality requirements. In addition, District inspectors have responded to a number of complaints made by individuals in the vicinity of CASS, primarily for odors. In each case, a District inspector contacted the complainant, and follow-up investigations were made regarding emissions from CASS. Inspections of source operations did not discover any violations of applicable air quality rules and regulations.

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- District staff has provided a commitment to conduct ambient air quality monitoring in the vicinity of CASS as a part of a larger-scale West Oakland monitoring project that is being planned under the District's CARE program in 2009. Staff has been in communication with community members regarding the siting of these monitors, and has scheduled a community meeting to discuss this issue for January 22, 2009 .
- In a December 4, 2008, letter to Councilperson Nadel, the District explained that the renewal of a facility's PTO is required under law upon payment of permit fees, except in very limited circumstances. The District may refuse to renew a PTO for a facility only if: (1) the facility has violated applicable air quality rules or regulations in the preceding three year period resulting in excessive emissions, (2) a notice of violation was issued for these violations, and (3) the violations demonstrate a recurring pattern of noncompliance or have posed a significant risk to public health or safety, or to the environment. In the case of CASS, the facility was inspected prior to the most recent permit renewal and found to be in compliance with applicable air quality requirements, and the District has not issued the facility any notices of violation in the preceding three-year period. In addition, no changes in applicable rules and regulations have been made that would require updating of the existing permit conditions.
- Source test requirements for CASS' furnaces are established in the NESHAP, which specify that an initial compliance stack test be completed followed by continuous parametric monitoring of the control devices. In addition, requirements for more frequent source testing of toxic air contaminant emissions were not triggered under District policy based on the results of the HRSA. There was therefore no requirement for additional source testing to be completed prior to renewing CASS' annual PTO.