



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

Guidance to Prepare Regulation 6-4 Emissions Minimization Plan

Attention: Owners and Operators of Metal Recycling and Shredding

Owners and Operators of Recycling and Shredding facilities subject to the requirements of Regulation 6, Particulate Matter, Rule 4, Metal Recycling and Shredding Operations, must develop and submit an Emissions Minimization Plan (EMP) by May 1, 2014 pursuant to Regulation 6, Rule 4 Section 401. These owners and operators of facilities who conduct any of the recycling and shredding operations listed in Section 6-4-402 must detail all processes and procedures, equipment, management practices, abatement and control measures that are employed or are scheduled to be implemented to minimize fugitive emissions of particulate matter from those operations.

The purpose and scope of this document is to provide compliance assistance to facility owners and operators about the regulatory requirements of the EMP and to describe the comprehensive reporting framework and the District's pre-approved EMP template to be used in preparing the facility EMPs.

The owners and operators of these facilities must follow the EMP reporting framework below. A template of the EMP shall be available on the District's website and upon request. Please provide detailed descriptions of all sources of operations listed in Section 6-4-402; the facility process equipment, abatement and control equipment related to those operations; and the management practices, procedures and measures to reduce particulate emissions to a minimum.

1	Emissions Minimization Plan Title Page (Facility Name, Address and District Site #)
2	Table of Contents and Certification by Responsible Manager (6-4-404.1)
	<i>Provide a Table of Contents and the Certification and Signature of a Responsible Manager. A Responsible Manager is an individual who is responsible for the implementation and enforcement of the EMP.</i>
3	Designation of Confidential Business Information
	<i>Identify and describe the information you designate "CONFIDENTIAL," as trade secret or otherwise exempt under law from public disclosure. Specify the section(s) and corresponding page number(s).</i>
4	Company Description (e.g., Location, History of Company, Description of Operations)
5	Company Organizational Chart and Schedule of Management Operators (6-4-403.1.3)
	<i>a. 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.</i>
	<i>b. Provide the names and contact information of the Onsite Responsible Manager(s) and Onsite Alternate Contact(s) and their duty schedule.</i>
6	Operations Subject to EMP (6-4-302)
7	Contents of the EMP (6-4-403)
	<i>a. <u>Metal Recycling and Shredding Operations</u>. Identify all operations that are in Section 6-4-402 that are conducted at the facility. Include and describe all process equipment, materials processed in these operations, abatement and control equipment, the monitoring conducted at the facility and the monitoring parameters. Include District Permit source numbers of all equipment, abatement and control devices. Facilities</i>

	<p>must provide a comprehensive list of all abatement and control equipment for operations subject to 6-4-402 and name the source(s) of operation in which it abates.</p> <ol style="list-style-type: none"> I. Metal Management- Describe the receipt, onsite transport, collection, sorting, segregation, separation, compilation, crushing, shredding, and storage of metals, metal-containing materials and non-metallic materials. Include a list of the types of metals received or processed and detail the types of storage piles at the facility. II. Shredder Residue Management- Identify the equipment or structures that are used in the conveyance and storage of shredder residue, including the treatment process(es) used to reduce the leaching potential of residual soluble metals in the residue. III. Depollution Operations- Describe facility policies and procedures pertaining to safe removal of materials from major appliances or vehicles that require special handling prior to crushing or transferring to balers or shredders for recycling. Include special handling measures that are implemented when these materials are discovered during the recycling process.
	<p>b. <u>Scrap Acceptance Policy (6-4-403.3).</u> Attach a copy of the facility's scrap acceptance policy.</p>
	<p>c. <u>Management Practices to Reduce Fugitive Emissions.</u> List and provide a description of all preventative maintenance activities, work practice standards and other housekeeping measures at the facility to reduce fugitive emissions of particulates. Include a schedule of activity, which may be the frequencies or circumstances when these measures and practices are undertaken.</p>
	<p>d. <u>Description of Onsite Management and Schedule of Operations.</u> Provide a description of the onsite management practices to reduce fugitive emissions and an approximate schedule of operations. For example, identify whether staff are designated to observe operations for visible emissions during business hours and after the close of business; include the number of staff visible emissions evaluation (VEE) certified. Describe any duties of staff to manage storage piles after the close of business to ensure emissions are minimized and detail any employee training of management practices and work practice standards to minimize emissions from recycling and shredding operations.</p>
8	Technical Data (6-4-403.1)
	<p>a. <u>Process Flow Diagram.</u> Provide a diagram that shows each facility operation required to be listed in Section 6a of the EMP, in the order of production commencing from material receipt to completion of the final product. For each operation, specify the flow of all materials used or produced and all processes, abatement and controls to minimize emissions and identify all monitoring equipment. Identify all equipment by source numbers according to District Permit or as exempt from District Permit. Include the abatement and control devices.</p>
	<p>b. <u>Facility Layout/ Floor Plan.</u> Indicate the relative locations of all processing equipment, abatement and control devices, monitoring equipment, and 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 emissions of 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.</p>
9	Fugitive Emissions Reductions Previously Realized (6-4-403.2)
	Facilities must provide a description of the equipment, processes and procedures installed or

	<i>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.</i>
10	Schedule for the Implementation of the EMP Elements (6-4-403.4)
	a. <i>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).</i>
	b. <i>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.</i>
11	Compliance Schedule for the EMP
	a. <i><u>Determination of Completeness.</u> Provide a list of all EMP revisions submitted to the District for completeness determination. Include the, description of the revision and corresponding page number(s) and section(s) of the EMP where the revision can be located.</i>
	b. <i><u>APCO Recommendations to EMP and Determination of Approvability.</u> 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.</i>
12	Appendix
	<i>List all items to be included in the Appendix. Identify the Appendix # and provide the Page # and Section # of the EMP where the information references.</i>

The Responsible Manager shall certify in writing that the EMP is complete and accurate as of the date it is submitted to the District (Section 6-4-404.1). To be complete, the Plan must include all information required for each element of the EMP. Section 6-4-403 lists all of the required elements and information of an EMP.

The facility owner or operator must designate in the EMP all information as "CONFIDENTIAL" that it claims is trade secret or otherwise exempt under law from public disclosure. The EMP must have all information. If the EMP includes any information marked "CONFIDENTIAL," the facility owner or operator must submit simultaneously a copy of the EMP marked "PUBLIC COPY" with the designated information redacted.

The Responsible Manager shall submit all EMP reports and changes to:

Bay Area Air Quality Management District
Compliance & Enforcement Division
Attn: Tracy Lee
939 Ellis St. San Francisco, CA 94109

For any questions about this EMP guidance document and to receive an electronic copy of the EMP template, please contact Tracy Lee, Air Quality Specialist II at tracylee@baaqmd.gov or (415)749-4979.