

# Compliance Advisory

August 27, 2013

## *Metal Recycling and Shredding Operations*

*This Advisory is provided to inform you about activities of the Air District which may affect your operation. It is intended to assist you in your effort to achieve and maintain compliance with applicable air pollution regulations.*

### **ATTENTION: Metal Recycling and Shredding Owners and Operators**

### **SUBJECT: Enforcement Advisory – Recordkeeping Requirements**




On May 1, 2013, the Bay Area Air Quality Management District adopted Regulation 6, Particulate Matter, Rule 4 Metal Shredding and Recycling Operations. **As of May 1, 2013**, metal recycling and shredding operations must maintain the records required in Section 501.

**NOTE:** Facilities that process greater than 50,000 tons of metal per rolling 12 month period will also be required to submit an Emissions Minimization Plan (EMP) by May 1, 2014, unless a facility is already submitting an EMP that complies with the provisions of Regulation 12, Rule 13, Section 401 (EMP Requirements for Foundry and Forging Operations) and that EMP includes the operations listed in Regulation 6, Rule 4, Section 402.

If you own or operate a metal recycling or shredding operation that:	<b>RECORDKEEPING REQUIREMENTS</b> Sections 6-4-501 and 6-4-502 (Effective May 1, 2013)	<b>Requirement to submit an EMP</b> Section 6-4-401 (Due May 1, 2014)
<i>Processes less than 1,000 tons of metal per rolling 12 month period</i>	NONE	NO
<p><i>Processes 1,000 - 50,000 tons of metal per rolling 12 month period</i></p> <p style="text-align: center;"><i>or</i></p> <p><i>Processes 1,000 or more tons of metal but does NOT produce, receive or process shredded metal or conduct shredder operations</i></p>	<p>Maintain and make the following records available to the APCO or the APCO's designee upon request, for a minimum of 5 years:</p> <ul style="list-style-type: none"> <li>○ The annual throughput of scrap metal recycled on a 12 month rolling average; and</li> <li>○ Records for the basis of throughput determination</li> </ul>	NO

<p><b>Processes greater than 50,000 tons of metal per rolling 12 month period</b></p>	<p>Maintain and make the following records available to the APCO or the APCO's designee upon request, for a minimum of 5 years:</p> <ul style="list-style-type: none"><li>○ ALL records to determine compliance with the EMP requirements in Sections 6-4-301 and 6-4-401. Such records include, at a minimum:<ul style="list-style-type: none"><li>• The monthly throughput of each type of metal processed, including metal shredded or recycled; and</li><li>• Records for the basis of each throughput determination</li></ul></li></ul>	<p><b>YES</b></p> <p><b>District will provide an EMP guidance document with reporting format and instructions</b></p>
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**If you need further assistance, please call the District at the following numbers:**

-  For questions about this advisory contact Tracy Lee, Air Quality Specialist at [tracylee@baaqmd.gov](mailto:tracylee@baaqmd.gov) or (415) 749-4979
-  For a copy of the above listed rule, see <http://www.baaqmd.gov/Divisions/Planning-and-Research/Rules-and-Regulations.aspx>
-  For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.

Wayne Kino  
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