



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

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

## FACT SHEET

June 24, 2009

### 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, but 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.

- The District received no air pollution complaints related to CASS from 2000 to 2005. Since January 1, 2006, the District has received 72 air pollution complaints alleging CASS. Nearly all of these complaints are for odors. Each complaint was investigated and did not result in the issuance of any 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 were made for funding additional air monitoring near CASS. 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 a resident who lives adjacent to CASS. 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. Requests have been made for the District to hold a public comment period prior to the next PTO renewal. A comment has also been made that a more recent source test should be required prior to PTO renewal.

### Facility Status

- The District has increased the frequency of inspections at CASS since the July 10 2008, meeting with community members, and continues to monitor CASS activities outside of normal District working hours. The most recent facility inspection on June 3, 2009, indicated that the facility was in compliance with applicable air quality requirements. In addition, District inspectors have continued to respond to air pollution complaints made by individuals in the vicinity of CASS, primarily for odors. In each case, a District inspector contacted the complainant and conducted follow-up investigations at CASS. These inspections did not result in the issuance of any Notices of Violation.

- In a December 4, 2008, letter to Councilperson Nadel, the District explained that the renewal of a facility's PTO is required under State 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. Due to the limited scope of review for PTO renewals under State law, District regulations do not include provisions for a public comment period prior to permit renewal. Nonetheless, the District has made CASS' permit available to those members of the public that have requested it, and staff would consider any relevant comments submitted prior to PTO renewal.
- 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. 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.
- During the summer months of 2008, District staff provided trucking firms at CASS with diesel truck grants information to retrofit older, high emitting diesel trucks with air pollution control equipment.
- District staff has provided a commitment to conduct ambient air quality monitoring in the vicinity of CASS as a part of the larger-scale West Oakland Measurement Study (WOMS), which is being completed under the District's CARE Program. In 2009, the District held three community meetings (on January 22, March 16, and May 11) to present an overview and background on the CARE Program, and to discuss and receive input on the supplemental air monitoring near CASS. The air monitoring study will address the issue of the contribution of CASS to local metals and particulate matter air concentrations (other facilities, such as a nearby concrete batch plant and an art studio that operates ceramic kilns, could also be a source of metals, along with mobile source activity).
- The air sampling is scheduled to begin this summer, and three sites will be established and operated for one year (including an initial assessment of sites and methods during the first three months) to evaluate conditions near the CASS facility. One site will be located west (predominantly upwind) of the facility, likely at Cypress Auto Salvage on Peralta Street. A second site will be east (predominantly downwind)

of the CASS facility, likely at the ASA Academy School on Adeline Street. A third site will be located further east, likely at Excel High School on Myrtle Street. District staff has reviewed each of these locations and are currently negotiating terms of access with site owners. CASS may fund a fourth site upwind of the CASS facility but downwind of the nearby concrete batch plant. District staff is working with CASS to ensure that methods and analysis for this monitoring site are consistent with those of the other three sites.

- MiniVol samplers will be deployed and used to collect particles on filters, which will then be analyzed for more than 50 metals using X-Ray Fluorescence. PM<sub>2.5</sub> will also be derived from the MiniVol filters. Wind and temperature measurements will be collected at the nearby EBMUD Sewage Treatment Plant. All metals analysis will be conducted by the District's contractor, Desert Research Institute (DRI). The estimated project cost is approximately \$40,000, which includes the cost of samplers and metals analysis by DRI, but does not include costs of District staff time for project management, community meetings, data collection, and data analysis.
- District staff will review the analyzed data and perform quality assurance/quality control. The District will make data summaries and raw data available to the public at least on a quarterly basis. The data analysis phase of this project will use the data collected near CASS to compare with other data in West Oakland (and other Bay Area locations), compare with the results of a prior modeling study, estimate potential contributions from CASS, and assess health risks.
- The WOMS will be carried out during a four-week period in 2009 that will overlap with the CASS measurement project. To the extent possible, the metals and PM sampling efforts near CASS will be coordinated with WOMS to maximize co-benefits of the two sampling programs.