



# NOTICE OF DRAFT RULE

June 23, 2011

BAY AREA

AIR QUALITY

MANAGEMENT

DISTRICT

TO: INTERESTED PARTIES

FROM: EXECUTIVE OFFICER / APCO

SUBJECT: **DRAFT REGULATION 12, RULE 13: METAL MELTING AND PROCESSING OPERATIONS**

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The staff of the Bay Area Air Quality Management District had developed a new draft Regulation 12, Rule 13: Metal Melting and Processing Operations (Rule 12-13). The draft rule is being released now to provide ample opportunity for interested parties to review the proposal. Staff will schedule public workshops to present, discuss, and receive comments on the draft proposal.

**The dates, times, and locations of the workshops will be announced in the upcoming days.**

## BACKGROUND

The Bay Area Air Quality Management District (District or BAAQMD) has the authority to regulate emission of various air pollutants from stationary sources including criteria pollutants, toxic air contaminants and odorous compounds that can cause a nuisance to the general public. Metal melting and processing facilities (including metal recyclers) are sources of emissions of PM, VOC, and other pollutants. Because some of these facilities are located in close proximity to residences and other businesses, there exists the potential for them to impact their neighbors and tend to garner scrutiny from those community members and adjacent businesses.

## DRAFT PROPOSAL

Staff has evaluated this industrial sector and determined that while most metal melting and processing facilities operate in compliance with District rules and permit conditions, additional emission reductions could be made which in turn could result in improved air quality and fewer citizen complaints. Implementation of metal melting and casting best practices and improved mitigation and pollution prevention techniques should minimize the impacts of these facilities to nearby residences and businesses.

To address these issues, staff has developed a draft of a new rule, Rule 12, Regulation 13: Metal Melting and Processing Operations (Rule 12-13). Rule 12-13 would affect facilities that melt and cast, heat treat or recycle metals. The proposal would address emissions of PM, odorous substances, and dust from these facilities through various requirements and standards:

**Requirements:**

- Emissions Limits (MM facilities w/ > 10,000 tons annual metal throughput):
  - PM: 0.002 grains per dry standard cubic foot);
  - Opacity: ten percent for three minute maximum per hour;
  - Organic compounds: at least 95 percent control;
  - Odorous Substances:

Compound or Family of Compounds	Type A Emission Point (ppm)	Type B Emission Point (ppm)
Dimethylsulfide (CH <sub>3</sub> ) <sub>2</sub> S	0.1	0.05
Mercaptans calculated as methylmercaptan CH <sub>3</sub> SH	0.2	0.1
Phenolic compounds calculated as phenol C <sub>6</sub> H <sub>5</sub> OH	5.0	2.5
Trimethylamine (CH <sub>3</sub> ) <sub>3</sub> N	0.02	0.02

- Abated Operations: Emissions from the following operations are to be collected and controlled:
  - Tapping, pouring, and casting of molten metal;
  - Cooling and shaking out of cast metal and molds;
  - Making of molds and cores;
  - Processing of slag or dross;
  - Reclaiming of sand, and
  - Crushing and shredding of scrap metal.

**Comprehensive Compliance Plan:** Develop and submit to the District for approval a comprehensive compliance plan that includes the following sections:

- Operation, Maintenance and Monitoring: Listing of equipment used to comply with emissions limits and other standards listed above including:
  - Technical information;
  - Operating Parameters, Procedures, and Monitoring;
- Metal Management:
  - Best Management Practices for dust control, including water, dust palliatives, berms, bins, screens, tarps, and enclosures.
  - Screening process to ensure scrap metals charged to a furnace are free of contaminants.
- Odor Management:
  - List of operations and emission points of odorous substances, and
  - Best practices and measures to control emissions of odorous substances.

The proposal also requires triennial updates of the compliance plan.

**Recordkeeping:** Maintain the following records:

- Monthly throughput of metals melted, heated, scrapped, or recycled;
- Estimations of contaminants: manganese, cadmium, chromium, mercury, lead, nickel and arsenic;
- Monthly throughput and type of binder used; and
- Monthly throughput of sand used and replaced.

## **INFORMATION AND COMMENTS**

In addition to the draft Rule 12-13, District staff has prepared a workshop report to provide background and additional information on the draft rule. The workshops are the next step in the District's public engagement process. Staff is interested in comments and questions about the draft. Staff is also available to meet with interested parties regarding the proposal. Following the workshops and close of the public comment period, staff will assess the need for changes to the rule, and may consider further workshops or may proceed to a public hearing before the District's Board of Directors.

For copies of the draft Rule 12-13 and the Workshop Report, please visit our website at <http://www.baaqmd.gov/pln/ruledev/workshops.htm>. For questions or comments on the regulatory proposal, please contact Victor Douglas at (415) 749-4752 or [vdouglas@baaqmd.gov](mailto:vdouglas@baaqmd.gov). Interested parties are invited to submit comments on the draft Rule or the Workshop Report. A deadline for comments will be provided along with the upcoming notice of workshops.