



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

2021 Guidance to Update Emissions Minimization Plan

Attention: Owners and Operators of Metal Recycling and Shredding Operations

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 update the APCO-approved Emissions Minimization Plan (EMP) and submit the updated EMP for review within 90 days of the five-year anniversary date of the approval of the original EMP, pursuant to Regulation 6, Rule 4, Section 408.

The purpose and scope of this document is to inform facility owners and operators about the changes made to the Air District’s pre-approved EMP template and to provide guidance on updating the EMP for the five-year review. Please note the following changes were made to the EMP template:

- Addition of *Five-Year Review of the EMP: Schedule for Implementation of the EMP Elements and Fugitive Emissions Reductions* section (EMP pages 34-36) per Regulation 6, Rule 4, Section 408. Section 408 replaces the 403.2 (Fugitive Emissions Reductions Previously Realized) and 403.4 (Schedule for Implementation of the EMP Elements) sections in the 2016 approved EMP template.

Owners and operators of these facilities must update the EMP according to the framework below:

1	Operations Subject to EMP (6-4-402), Company Organizational Chart and Schedule of Management Operators (6-4-403.1.3), Contents of the EMP (6-4-403), Technical Data (6-4-403.1)
<i>Facilities must update Sections 402 & 403 of the EMP to accurately reflect changes in management personnel and processes and procedures, equipment, management practices, and abatement and control measures that have occurred during the five-year review period (March 1, 2016 – February 28, 2021). Facilities must ensure the Plan is accurate, complete, and up-to-date based on current facility operations.</i>	
2	Five-Year Review of the EMP: Schedule for Implementation of the EMP Elements and Fugitive Emissions Reductions (6-4-408)
<u>A. Schedule for Implementation of the EMP Elements and Fugitive Emissions Reductions Realized</u>	
<ul style="list-style-type: none"> • Provide a list of existing or current EMP elements in place during the 5-year review period (March 1, 2016 – February 28, 2021). Include a list and description of equipment, processes and procedures installed or implemented to reduce fugitive emissions. • Indicate the permit status (whether the EMP element is currently under an Authority to Construct (A/C), Permit to Operate (P/O), or neither). • Specify the implementation date and purpose for implementation. • Specify the employee training that was conducted for that equipment, process, or procedure and make associated training materials available for Air District review upon request. 	
<u>B. New or Future EMP Elements to be Implemented</u>	
<ul style="list-style-type: none"> • 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. 	

The Responsible Manager shall certify in writing that the EMP is complete and accurate as of the date it is submitted to the Air District. To be complete, the Plan must include all information required for each element of the EMP. Sections 6-4-402 and 6-4-403 list all 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.

A copy of the updated EMP template will be made available to the designated Responsible Manager of the facility. Please submit all EMPs to elara@baagmd.gov. For questions about this EMP guidance document or to receive an electronic copy of the EMP template, please contact Eric Lara, Air Quality Specialist II, at (415) 749-8707.