Emissions Minimization Plan

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

Sims Metal Management (SMM) - Richmond

600 South 4th Street
Richmond, CA 94804

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I, as the Responsible Manager of this facility, hereby certify that as of this date, this Emissions Minimization Plan contains all elements and information required of a complete EMP pursuant to District Regulation Section 6-4-403 and that the information contained in this EMP is accurate.

Certified by: _____ *Dated:* 12/21/2015

Vistasp Patel, Facility Manager, SMM - Richmond

Responsible Manager

Designation of Confidential Business Information

Specify the information you designate is "CONFIDENTIAL" and include specific section(s) and corresponding page number(s). Describe the basis, e.g. the information is trade secret or otherwise exempt under law from public disclosure.

Name of Section / Page Number(s)	Description of Confidential Information
None	None

Company Description

Sims Metal Management Richmond is a scrap metal recycling facility located in a portion of the City of Richmond utilized primarily for industrial and commercial uses. The Facility occupies approximately 18 acres, of which approximately 73 percent is impervious, covered by pavement or buildings. The Facility is bordered to the north by Cutting Boulevard and Hoffman Boulevard and to the west by South Fourth Street and the Levin Richmond Terminal (LRT). To the east the Facility is bordered by the LRT storage yard, the LRT rail line, and South Eighth Street. The Facility is bordered to the south by the LRT rail line easement, Wright Avenue, a Cemex storage facility, and LRT (across from Wright Avenue). Various railroad tracks are located on all sides of the Facility.

The facility accepts incoming material from both commercial and peddler accounts. All material purchased at the scale is subject to the Sims Metal Management Scrap Acceptance Policy. Raw bulk scrap is delivered to the Facility by both rail and truck. Trucks with incoming scrap enter at the 4th Street main gate where the material is weighed, inspected and sent to the appropriate location for unloading based on commodity. Rail cars are brought in through the East Gate where they are initially staged and moved to proper commodity storage for unloading. Rail inspection is done upon arrival/staging as well as unloading. All non-conforming scrap is subject to rejection.

The Facility receives both ferrous and non-ferrous materials: some is prepared, while some requires processing. Incoming material is directed to pre-processed stockpiles or processing areas depending on commodity type and processing needs. The ferrous scrap is received and initially stored on the northern portion of the Facility. Ferrous Heavy Melting Steel (HMS) and Bonus Shearing, both stationary and mobile, is conducted in the north and northeast portion of the Facility. HMS and Bonus Torching is conducted in the center of the property. The Depollution Area for Appliances is located in the northeast of the Facility and the Auto Body Depollution takes place on the eastern portion of the property. The Light Iron/Tin Storage is located in the northeast portion of the property between the Depollution Areas. Additional ferrous materials, including Cast Iron and Bushling, are stored in stockpiles in the center of the Facility. Non-ferrous materials are received and stored at the west central portion of the Facility. Bin, trailer, and equipment storage areas are primarily at the south end of the Facility.

Processing at the site include the shearing (both mobile and stationary) and torch cutting of HMS and Bonus grade products, preparation and sorting of ferrous and non-ferrous metal recycling feedstock; torch cutting of some non-ferrous commodities; baling of some non-ferrous commodities; temporary storage of finished recycled metal products, depollution of appliances and automobiles and maintenance of facility equipment.

Scrap Metal product shipment/sale is done via truck, rail and ship. HMS and Bonus are loaded into shiploading trucks that transport the material to LRT where material is then loaded into cargo ships for export. At times, Shredded Steel is trucked to the facility for shiploading due to limitations of loading at the Port of RWC. Shredded Steel is stockpiled and then loaded into shiploading trucks that transport material to LRT. Actual shiploading is handled by LRT. Light iron tin, including depolluted appliances and auto bodies, is loaded in trucks for shipment to Sims Metal Management Redwood City where it is subsequently shredded. Some Ferrous commodities are shipped by truck/rail including steel turings, baled tin cans and cast iron. Non Ferrous material is typically loaded in containers for sale.

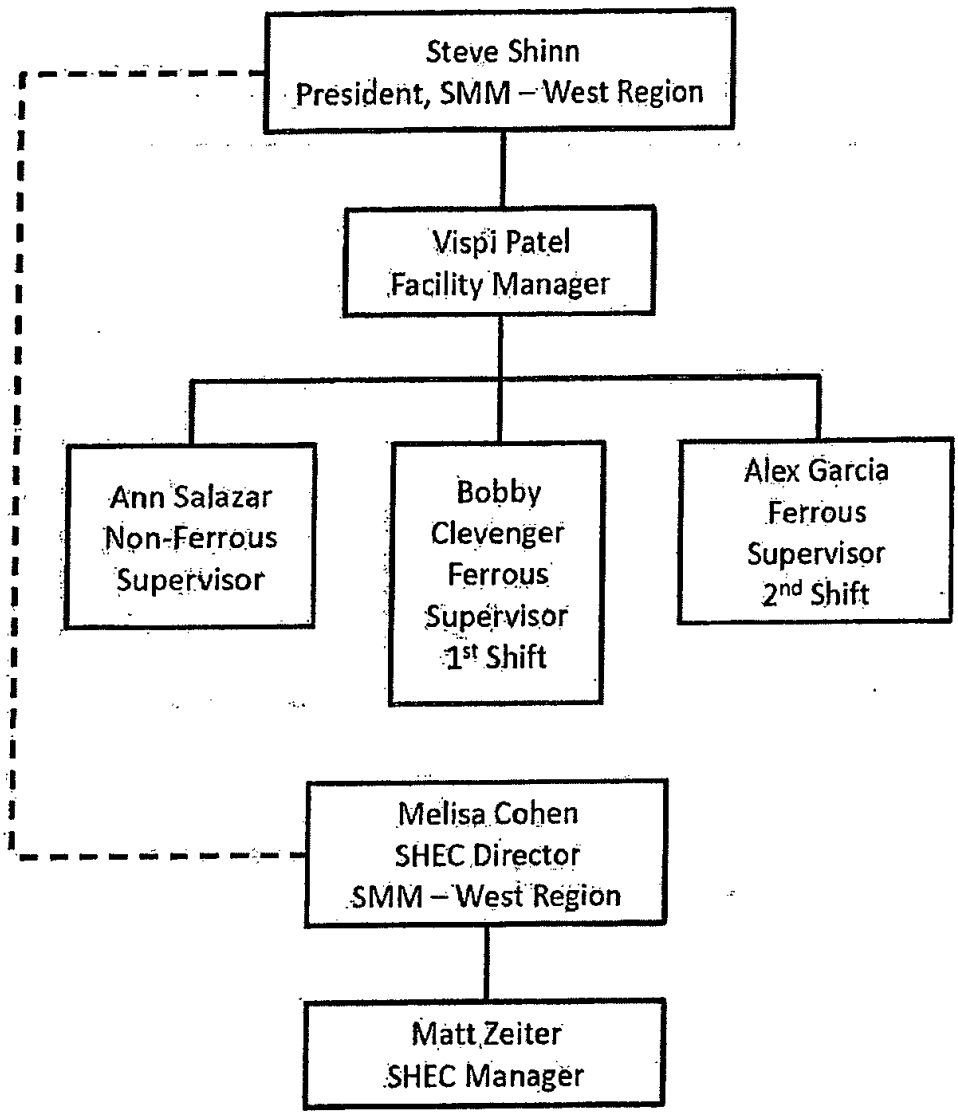
Company Organizational Chart and Schedule of Management Operators
6-4-403.1.3

A. *Company Organizational Chart-* 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.

B. *Schedule of Management Operators* - Provide the names and contact information of the Onsite Responsible Manager(s) and Onsite Alternate Contact(s) and their duty schedule.

A. Company Organizational Chart

Organizational Chart
Sims Metal Management – Richmond



B. Schedule of Management Operators

Onsite Responsible Manager(s)

Name: Vispi Patel
Title: Facility Manager
Phone: 510-412-5322
Email: Vispi.Patel@simsmm.com
Schedule/Shift: Monday through Friday/Variable

Name: Bobby Clevenger
Title: Ferrous Supervisor – 1st Shift
Phone: 510-412-5366 (w) 510-715-6462 (c)
Email: Bobby.Clevenger@simsmm.com
Schedule/Shift: Monday through Friday/Variable

Onsite Alternate Contact(s)

Name: Ann Salazar
Title: Non Ferrous Manager
Phone: 510-412-5373
Email: Ann.Salazar@simsmm.com
Schedule/Shift: Monday through Friday/Variable

Name: Alex Garcia
Title: Ferrous Supervisor – 2nd Shift
Phone: 510-837-6145 (c)
Email: None
Schedule/Shift: Monday through Friday/Variable

Name: Melisa Cohen
Title: Safety Health Environment & Community (SHEC) Director
Phone: 510-412-5307
Email: Melisa.Cohen@simsmm.com
Schedule/Shift: Monday through Friday, Variable

Operations Subject to EMP 6-4-402

The EMP shall address all of the following operations that are conducted at a metal recycling and shredding facility per 6-4-402 to reduce fugitive emissions.

Please check all facility operations that apply.

402.1 Roadways and Other Trafficked Surfaces	X Yes ☐ No
402.2 Metal Management	X Yes ☐ No
402.3 Shredder Residue (SR) Management	☐ Yes X No
402.3 Depollution Operations	X Yes ☐ No

Contents of the EMP
6-4-403

The owner or operator of the metal recycling and shredding facility subject to Section 6-4-401 shall prepare a complete and accurate EMP that details the management practices, measures, equipment and procedures that are employed or scheduled to be implemented to minimize fugitive emissions for the operations subject to the EMP.

A. Metal Recycling and Shredding Operations

I. Metal Management- List and provide a description of all process equipment, materials received, processed or stored, abatement and control equipment and monitoring parameters to reduce fugitive emissions. Include a comprehensive list of all abatement and control equipment for operations subject to 6-4-402 and specify the source(s) that it abates.

II. Shredder Residue (SR) Management- Identify the equipment or structures that are used in the management of shredder residue, including the treatment process used to reduce the leaching potential of residual soluble metals in the residue.

III. Depollution Operations- Describe policies and procedures pertaining to: 1) the safe removal of materials from major appliances and vehicles that require special handling prior to crushing or transferring to balers or shredders for recycling; and 2) special handling of these materials if discovered during the recycling process.

B. Scrap Acceptance Policy (6-4-403.3)- Provide and attach a copy of the facility's scrap acceptance policy.

C. Management Practices to Reduce Fugitive Emissions- List and provide descriptions of all management practices conducted to include preventative maintenance activities, pollution prevention, housekeeping and source reduction measures to reduce fugitive emissions of particulates. Include the frequencies or circumstances when these measures and practices are undertaken (schedule of activity).

D. Description of Onsite Management and Schedule of Facility Operations - Describe the onsite management practices of metal recycling and shredding operations to reduce fugitive emissions, including those during business hours and after the close of business. Provide the approximate schedule of operations.

Metal Recycling and Shredding Operations

I. Metal Management

METAL MANAGEMENT

Provide a description of metal management operations which include the receipt, on-site transport, collection, sorting, segregation, separation, compilation, crushing, shredding, and storage of metals, metal-containing materials, and non-metallic materials at a metal recycling and shredding facility. Include all abatement and monitoring parameters that are employed.

Section #	Operation	District S#	Description of Operation	Source Abated	District A#	Abatement Required by Permit	Type of Abatement	Abatement Monitored	Monitoring Parameters
1	Receipt		Scrap metal is received at the scale where it is inspected for compliance with the Scrap Acceptance Agreement	X Yes ☐ No		☐ Yes X No	Visual inspection of incoming loads and rejection as needed.	X Yes ☐ No	Prohibited materials.
2	Transport		Scrap metal is transported by truck or rail. All roadways are paved.	X Yes ☐ No		☐ Yes X No	All roadways wetted as needed with water truck and swept with Tymco sweeper. Sweeper also used on road to LRT Terminal.	X Yes ☐ No	Visible emissions.
3	Collection		Metal segregated by commodity type (HMS, Bonus, Shredded Steel, Cast iron, Auto Bodies, Appliances, Tin, Bushling, Non-Ferrous) and whether it has been prepared or unprepared. All stockpiles sprayed with water as needed to control dust.	X Yes ☐ No		☐ Yes X No	Water truck, hose station, and portable dust control units apply water for dust suppression as needed.	X Yes ☐ No	Visible emissions.
4	Segregation		Metal segregated by commodity type (HMS, Bonus, Shredded Steel, Cast iron, Auto Bodies, Appliances, Tin, Bushling, Non-Ferrous) and whether it has been prepared or unprepared. All stockpiles sprayed with water as needed to control dust.	X Yes ☐ No		☐ Yes X No	Water truck, hose station, and portable dust control units apply water for dust suppression as needed.	X Yes ☐ No	Visible emissions.
5	Separation		Appliances with materials requiring special handling (MRSH) and whole (wet) auto bodies are depolluted.	X Yes ☐ No		☐ Yes X No	Appliances and auto bodies are depolluted under cover on a paved surface. Water sprayed available as needed.	X Yes ☐ No	Visible emissions.
6	Compilation		Depolluted appliances compiled in Tin Pile . All stockpiles sprayed with water as needed to control dust.	X Yes ☐ No		☐ Yes X No	Water truck, hose station, and portable dust control units apply water for dust suppression as needed.	X Yes ☐ No	Visible emissions.
7	Crushing		Facility operates a car crusher for depolluted auto bodies, which are then transported to SMM-RWC.	X Yes ☐ No		☐ Yes X No	Car crusher is fully contained (internal receiver tank collects fluids and berm surrounds crusher)	X Yes ☐ No	Visible emissions.
8	Shredding		None	☐ Yes ☐ No		☐ Yes ☐ No	Not applicable.	☐ Yes ☐ No	Not applicable.
9	Storage of metals		Metal segregated by commodity type (HMS , Bonus, Shredded Steel, Cast iron, Auto Bodies, Appliances, Tin, Bushling, Non-Ferrous). All stockpiles sprayed with water as needed to control dust.	X Yes ☐ No		☐ Yes X No	Water truck, hose station, and portable dust control units apply water for dust suppression as needed.	X Yes ☐ No	Visible emissions.

METAL MANAGEMENT

Provide a list of the metals received and/or processed at facility.

Section #	Name of Metal or Metal Alloy
1	HMS Grade Steel
2	Bonus Grade Steel
3	Tin Grade Steel
4	Auto Bodies
5	Appliances
6	Shredded Steel
7	Bushling Grade Steel
8	Cast Iron
9	Non-Ferrous (Copper, Brass, Aluminum, Stainless, Bronze, Lead, Titanium, Tungsten)

METAL MANAGEMENT

Identify the storage piles and the types of metal and metal-containing material being stored. Include whether any monitoring is conducted and detail the monitoring parameters and equipment used to minimize fugitive emissions.

Section #	Description of Material	MONITORING			
		Monitoring Conducted	Monitoring Parameters	Monitoring Equipment	If Yes: Identify Monitoring Equipment Used
Storage of Delivered Scrap					
1	Tin pile, Appliances, Auto Bodies	X YES ☐ NO	Visible emissions	☐ YES X NO	
2	Piles HMS, Bonus, Cast Iron, Bushling	X YES ☐ NO	Visible emissions	☐ YES X NO	
3	Non-ferrous storage: indoor containers & outdoor boxes	☐ YES X NO		☐ YES X NO	
4	Shredded steel	X YES ☐ NO	Visible emissions	☐ YES X NO	
Storage of Unprocessed Material					
5	HMS/Bonus materials to be torch-cut	X YES ☐ NO	Visible emissions	☐ YES X NO	
6	Non-ferrous storage indoors in containers and outdoors in boxes	☐ YES X NO		☐ YES X NO	
7	Auto Bodies	X YES ☐ NO	Visible emissions	☐ YES X NO	
8	Appliances	X YES ☐ NO	Visible emissions	☐ YES X NO	
9	HMS/Bonus to be sheared	X YES ☐ NO	Visible emissions	☐ YES X NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of In-process Material					
10	Auto bodies to be depolluted	X YES ☐ NO	Visible emissions	☐ YES X NO	
11	Appliances to be depolluted	X YES ☐ NO	Visible emissions	☐ YES X NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Finished Product					
12	Piles HMS, Bonus, Cast Iron, Bushling	X YES ☐ NO	Visible emissions	☐ YES X NO	
13	Non-ferrous material storage and loading area	X YES ☐ NO	Visible emissions	☐ YES X NO	
14	Depolluted Appliances in Tin Pile	X YES ☐ NO	Visible emissions	☐ YES X NO	
15	Depolluted Auto Bodies	X YES ☐ NO	Visible emissions	☐ YES X NO	
Storage of Shredder Residue					
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	

ABATEMENT AND CONTROL EQUIPMENT

Provide a comprehensive list of all District-permitted abatement and control equipment to reduce emissions.

Section #	Abatement Equipment	District A#	Name of Source(s) Abated and District Source #(s)
1	None	None	None

Metal Recycling and Shredding Operations

II. Shredder Residue (SR) Management

SHREDDER RESIDUE (SR) MANAGEMENT

Describe the equipment or structures used for conveyance, storage and treatment of shredder residue (SR) during the recycling process. Include measures to minimize fugitive emissions.

Section #	Equipment or Structure for Processing SR	District S#	SR Stored in an Enclosed Area	MONITORING		SR ADDITIVE	
				Monitoring Conducted	Monitoring Parameters	Use of SR Additive	Type and Purpose of Additive
1	None		☐ Yes ☐ No	☐ Yes ☐ No		☐ Yes ☐ No	
			☐ Yes ☐ No	☐ Yes ☐ No		☐ Yes ☐ No	
			☐ Yes ☐ No	☐ Yes ☐ No		☐ Yes ☐ No	
			☐ Yes ☐ No	☐ Yes ☐ No		☐ Yes ☐ No	
			☐ Yes ☐ No	☐ Yes ☐ No		☐ Yes ☐ No	
			☐ Yes ☐ No	☐ Yes ☐ No		☐ Yes ☐ No	

Metal Recycling and Shredding Operations

III. Depollution Operations

DEPOLLUTION OPERATIONS

List all materials that require special handling and removal in depollution operations.

Section #	Materials Requiring Special Handling or Removal
1	PCB and Non-PCB Capacitors
2	Mercury Switches
3	Refrigerants (CFCs, HCFCs, etc/halogenated oil)
4	Used Oil
5	Gasoline
6	Diesel
7	Motor Oil
8	Brake Fluid
9	Transmission Fluid
10	Antifreeze
11	Radiatior Fluid
12	Oil Filters
13	Airbags
14	Batteries
15	Lead cables/weights
16	Garbage
17	Other items which may require special handling/removal/management

DEPOLLUTION OPERATIONS

Describe the policies and procedures pertaining to the safe removal of materials from major appliances and vehicles that require special handling prior to crushing or transferring to balers or shredders for recycling. Include the measures that are implemented when these materials are discovered during the recycling process.

Depollution: Appliances

Sims Metal Management Richmond is a Certified Appliance Recycler (CAR) DTSC #0387 with certified employees and proper equipment. Major Appliances received for processing must have Materials Requiring Special Handling (MRSH) removed prior to processing (i.e., crushing/baling/shredding). MRSH typically includes but is not limited to: capacitors (PCB/Non-PCB) ; CFCs, HCFCs and other non-CFC (Refrigerants); used oil; and mercury switches and temperature control devices (Switches).

All customers delivering appliances to the facilty have signed or received copies of the Scrap Acceptance/Inbound Source Control Policy. All appliances that are accepted at the facility are inspected at the scale as well as unloading area to deterimine if they contain MRSH. Appliances that are received that have had the MRSH properly removed by either another CAR or Certified Refrigerant Technician can be placed directly in the Light Tin Stockpile. Appliances which contain or potentially contain MRSH are staged in the Appliance Depollution Area.

In the Appliance Depollution Area, certified employees will inspect the appliances and remove any MRSH. If needed, an outside vendor that is also a DTSC permitted CAR can also be used if needed. MRSH is removed from appliances under cover and on a concrete surface. MRSH is collected in appropriately labelled containers and recycled or disposed of properly based on Universal Waste requirements. Once the MRSH is removed, the depolluted appliances are placed in the Light Iron Stockpile where they are loaded into trucks that transport them to SMM-RWC for shredding.

There are hose stations at both the Appliance Depollution Station and at the Light Iron Stockpile to manage any fugitive dust emissions generated from handling this material. Stockpiles and loads for shipment are wetted as necessary to control fugitive dust emissions.

Depollution: Auto Bodies

Sims Metal Management Richmond receives whole or "wet" auto bodies which must be depolluted before processing. All customers delivering auto bodies to the facilty have signed or received copies of the Scrap Acceptance/Inbound Source Control Policy as well as all documentation requirements of DMV/NMVITIS for acceptance of vehicles. The auto bodies that are accepted at the facility are inspected at the scale as well as at the unloading area. Auto bodies needing to be depolluted are staged in the Auto Body Depollution Area. Prior to being

taken to the SEDA System for fluid removal, the following items are typically removed/managed; batteries, lead cables, mercury switches, brake fluid, airbags, refrigerant and garbage.

Following the removal of these items, the auto bodies are lifted with a forklift onto the Depollution Rack (SEDA System), which is a fully contained fluid management station. The station is a three-sided covered structure on a concrete surface where gasoline, diesel fuel, motor oil, antifreeze, radiator fluid, and oil filters are removed. All fluids are pumped into respective aboveground storage tanks that are located behind the SEDA structure also under cover. Appropriate handling of these fluids will include storage in appropriate containers, properly marked, labeled, and stored in accordance with applicable hazardous waste requirements.

Depolluted auto bodies are then staged in the Depolluted Auto Body Area where they are subsequently flattened in the Car Crusher. The Car Crusher is a fully contained unit which has internal reservoirs for any residual fluids and is bermed on a concrete surface. Once the depolluted auto bodies are crushed, they are then staged adjacent to the Car Crusher to be loaded on trucks for shipment to SMM- RWC where they are shredded. Auto bodies are shipped either by flatbed trailer, or on top of a light iron tin end dump trailer each of which is tarped or netted to limit any fugitive dust emissions.

There are hose stations at both the Auto Body Depollution Station and the Car Crusher to manage any fugitive dust emissions generated from handling this material. Stockpiles and loads for shipment are wet down as necessary to control fugitive dust emissions.

Scrap Acceptance Policy

SCRAP ACCEPTANCE POLICY

Attach a copy of facility's Scrap Acceptance Policy.

SIMS METAL MANAGEMENT

MATERIAL ACCEPTANCE POLICY

The following materials are prohibited from acceptance at Sims Metal Management (SMM) Facilities, except by special arrangement with SMM:

1) Non-Recyclable Materials of any kind, including asphalt, concrete, debris, dirt, rags, tires, trash.

2) Non-Hazardous Free-flowing Liquids including water.

3) Hazardous Free-flowing liquids including gasoline, motor oil, hydraulic fluids, anti-freeze, oil paint or other lubricants or petroleum products, except as contained in whole vehicles SMM purchases for vehicle depollution.

4) Flammable and Combustible Materials.

5) Corrosive Materials such as soda ash or broken batteries. Whole batteries may be accepted for recycling at some facilities.

6) Radioactive Materials of any type (e.g., military scrap, medical scrap, thickness measuring devices)

7) Explosive Materials or potentially explosive materials of any type, such as munitions scrap (e.g., ammunition, shells).

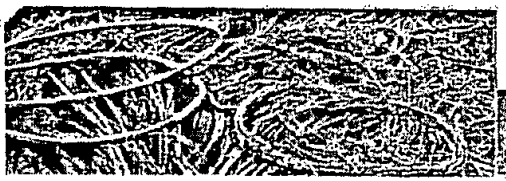
8) Chemicals or Poisons in solid, powder, liquid, or gaseous form (e.g., fertilizers).

9) Infectious Materials (e.g. in red bags or marked by the infectious symbol).

10) Pressurized Containers or Cylinders including propane tanks, compressed gas tanks, aerosol cans, or extinguishers, except if the closed cylinder has been vented or if accepted under special arrangement.

11) Closed Containers including bulk storage tanks and process vessels.

12) Containers that formerly contained hazardous materials including drums, bulk storage tanks, process vessels, paint cans and/or aerosol cans except if the containers are certified as empty per applicable law, properly cut open for inspection to verify that they are empty.



13) Any Materials Containing CFCs, HCFCs or non-exempt refrigerant substitutes that have not be evacuated, except as contained in whole appliances SMM purchased for appliance depollution.

14) Lead-containing materials, except when purchased as a lead bearing commodity.

15) PCB-containing materials (e.g., capacitors, ballasts and transformers).

16) Asbestos-containing materials (ACM), such as pipe insulation or surfacing materials.

17) Mercury-containing materials (e.g. switches, fluorescent or mercury vapor lights/fixtures/ bulbs, thermostats), except as contained in whole vehicles/appliances SMM purchases for vehicle/appliance depollution.

18) Cathode ray tubes (CRTs), liquid crystal displays (LCDs) or any device containing a CRT or LCD (e.g. computer monitor, laptop screen or television set), except at specifically designated electronics drop-off areas.

19) Any other material containing hazardous wastes or toxic substances.

REQUIREMENTS FOR CERTAIN COMMODITIES ACCEPTED BY SIMS METAL MANAGEMENT:

Processed Automobiles must have the following removed prior to delivery:

1) Fluids -
   - Oils (motor oil, transmission fluid, power steering and brake fluid from reservoirs)
   - Fuel
   - Coolant
   - Refrigerant
   - Any other fluids required by state/local law (e.g., washer fluid, axle fluid)
2) Batteries and leaded battery cable ends (Except as a seperated commodity)
3) Mercury-containing convenience light switches and any other mercury containing components as required by law
4) Air bag deployment canisters
5) No trash, dirt or wastes of any type
6) Tires (except as specifically allowed by the facility)
7) Electronic Waste

SIMS METAL MANAGEMENT

600 S 4th Street

Richmond, CA 94804

(510)412-5300

PREVENTING METAL THEFT

Sims Metal Management does not purchase stolen materials. If Company Personnel suspect materials of being stolen, they may turn away the customer, and may notify local law enforcement.

Sims Metal Management follows all federal, state and local regulations that apply to the purchase of scrap vehicles and other scrap metal to assist in the preventing the purchase of stolen metals. If you have specific questions about these local and State regulations, please contact your local SMM representative or SMM scale personnel.

1) SMM reserves the right to refuse any transaction it believes may be in violation of the law or that may contain stolen materials.
2) All sellers of metal must supply identification.
3) All transactions will be documented, and in some cases depending on the location, loads and certain materials will be photographed.
4) Please note that recyclers are often the victims of metal theft. SMM reserves the right to conduct video surveillance of our facilities and business operations.

OUR COMMITMENT TO THE SAFETY, HEALTH, ENVIRONMENT AND THE COMMUNITY (SHEC)

In January of 2012, Sims Metal Management was recognized as one the World's Top 100 Most Sustainable Corporations at the 2012 World Economic Forum in Davos, Switzerland for the third year in a row - moving up 52 spots in the rankings to number 11.

Sims Metal Management has a strong commitment to the environment, sustainability and the health of the communities in which we do business. In all aspects of the business, Sims strives to implement best practices and fulfill the ideals of our Safety, Health, Environment and Community (SHEC) Policy.

Sims Metal Management is committed to the community, supporting local educators, schools, charity, community and environmental organizations throughout the globe.
We take seriously our efforts to be a good community and environmental partner. Everyday Sims Metal Management employees make a positive impact on the environment.

In Fiscal 2011, Sims Metal Management's global carbon footprint was more than 300,000 metric tons, a reduction of 2% over Fiscal Year 2010. That compares to the 13 million metric tons of carbon emissions estimated as saved by Sims' recycling of steel alone (compared with the mining of ore and manufacture of raw material for steel production) – a ratio of 1 to 42.

May 2012

THANK YOU FOR RECYCLING WITH THE WORLD'S FULL SERVICE RECYCLER.
WE APPRECIATE YOUR BUSINESS.
www.simsmm.com/us/scrapacceptance or call (510) 412-5300 for more information.

SIMS METAL MANAGEMENT

POLÍTICA PARA LA ACEPTACIÓN DE MATERIALES

Se prohíbe aceptar los siguientes materiales en las instalaciones de SIMS Metal Management (SMM), excepto por un acuerdo especial con SMM:

1) Materiales no reciclables de cualquier tipo, incluyendo asfalto, concreto, escombros, tierra, harapos, neumáticos, basura.

2) Líquidos de flujo libre no peligrosos, incluyendo el agua.

3) Líquidos de flujo libre peligrosos, incluyendo gasolina, aceite para motores, fluidos hidráulicos, anti-congelantes, pinturas a base de aceite y otros lubricantes o productos derivados del petróleo, excepto los contenidos en vehículos completos que SMM compra para descontaminación de vehículos.

4) Materiales inflamables y combustibles.

5) Materiales corrosivos tales como carbonato de sodio o baterías dañadas. Algunos centros probablemente acepten las baterías enteras para su reciclado.

6) Materiales radioactivos de cualquier tipo (ej.: desechos militares, desechos médicos, dispositivos de medición de espesor)

7) Materiales explosivos o materiales potencialmente explosivos de cualquier tipo, tales como desechos de municiones (ej.: municiones, casquillos).

8) Químicos o venenos en estado sólido, en polvo, líquido o gaseoso (ej.: fertilizantes).

9) Materiales infecciosos (ej.: en bolsas rojas o etiquetados con el símbolo de contagioso).

10) Recipientes o cilindros presurizados, incluyendo tanques de propano, tanques de gas comprimido, latas de aerosol o extintores de incendio; excepto si el cilindro cerrado ha sido ventilado o si se acepta bajo un acuerdo especial.

11) Recipientes cerrados, incluyendo tanques de almacenamiento a granel y recipientes de procesamiento

12) Recipientes que anteriormente contenían materiales peligrosos, incluyendo tambores, tanques de almacenamiento a granel, recipientes de procesamiento y/o latas de aerosol, excepto si los recipientes están certificados como cerrados según la ley correspondiente, abiertos adecuadamente para su inspección para verificar que están vacíos.

13) Cualquier material que contenga CFC, HCFC o sustitutos de refrigerantes no exceptuados que no hayan sido depuestos, excepto los que contienen los artefactos enteros que SMM compra para la descontaminación de aparatos.

14) Materiales que contengan plomo, excepto cuando se los compre como materias primas hechas de plomo.

15) Materiales que contengan PBC (ej.: capacitores, balastos y transformadores).

16) Materiales que contengan asbestos (ACM, por sus siglas en inglés), tales como aislamientos de tuberías y materiales de superficie.

17) Materiales que contengan mercurio (ej.: interruptores, luces/estiquias/Focos fluorescentes o de vapor de mercurio, termostatos), excepto el que contienen los artefactos/vehículos que SMM compra para descontaminación de vehículos/artefactos.

18) Tubos de rayos catódicos (CRT, por sus siglas en inglés), pantallas de cristal líquido (LCD, por sus siglas en inglés) o cualquier dispositivo que contenga CRT o LCD (ej.: monitores de computadoras, pantallas de laptops o televisores), excepto en áreas específicamente designadas para dejar equipos electrónicos

19) Cualquier otro material que contenga desechos peligrosos o sustancias tóxicas.

REQUISITOS PARA CIERTAS MATERIAS PRIMAS ACEPTADAS POR SIMS METAL MANAGEMENT

A los automóviles procesados primero se le deben retirar los siguientes antes de entregarlos:

1) Fluidos -
- Aceites (aceites del motor, fluido de la transmisión, líquido de dirección asistida y de freno de los depósitos)
- Combustible
- Enfriamiento
- Refrigerante
- Cualquier otro fluido requerido por la ley estatal/local (ej.: líquido de lavado, líquido del eje)

2) Baterías y terminaciones de baterías con plomo
3) Interruptores de luces que contengan mercurio y cualquier otro tipo de componentes que contengan mercurio según lo requiera la ley.
4) Cartuchos de despliegue de los air-bags.
5) Ningún tipo de basura, mugre o desechos
6) Neumáticos (excepto aquellos específicamente permitidos por la instalación).
7) Residuos Electrónicos

SIMS METAL MANAGEMENT

600 S 4th Street

Richmond, CA 94804

CÓMO EVITAR EL ROBO DE METALES

Sims Metal Management no compra materiales robados. Si alguna persona de la empresa sospecha que algún material es robado, puede evidenciar el cliente, y puede dar aviso a las autoridades locales.

Sims Metal Management respeta todas las regulaciones federales, estatales y locales que aplican a la compra de vehículos fuera de uso y el metal fuera de uso para ayudar en la prevención de la compra de metales robados. Si tiene preguntas específicas acerca de estas regulaciones locales y estatales, comuníquese con su representante local de SMM o con el personal de SMM.

1) SMM se reserva el derecho de negarse a cualquier transacción que crea que pueda suponer una violación a la ley o que pueda contener materiales robados.
2) Todos los vendedores deben proporcionar una identificación.
3) Se documentarán todas las transacciones, y en algunos casos, dependiendo de la ubicación, se tomarán fotografías de ciertas cargas y materiales.
4) Tenga en cuenta que los recicladores generalmente son víctimas de robo de metales. SMM se reserva el derecho de contar con vigilancia de video de nuestras instalaciones y operaciones comerciales.

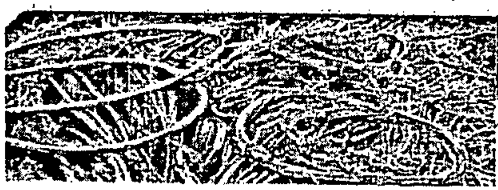
NUESTRO COMPROMISO CON LA SEGURIDAD, SALUD, MEDIO AMBIENTE Y LA COMUNIDAD (SHEC, por sus siglas en inglés)

En enero de 2012, Sims Metal Management fue reconocida por tercer año consecutivo como una de las 100 Corporaciones más aptas del Mundo en el Foro Económico Mundial 2012 que se llevó a cabo en Davos, Suiza; escalando 52 posiciones en los rankings llegando a la posición número 11.

Sims Metal Management tiene un fuerte compromiso con el medio ambiente, la sostenibilidad y con la salud de las comunidades en las cuales hacemos negocios. Sims se esfuerza en implementar las mejores prácticas y cumplir con los ideales de nuestra Política de Seguridad, Salud, Medio Ambiente y Comunidad (SHEC, por sus siglas en inglés) en todos los aspectos del negocio.

Sims Metal Management está comprometido con la comunidad mediante el apoyo de educadores, escuelas, organizaciones de caridad, comunitarias y medioambientales locales en todo el mundo.
Nos tomamos muy en serio nuestros esfuerzos de ser un buen socio comunitario y a favor del medio ambiente. Todos los días, los empleados de Sims Metal Management ejercen un impacto positivo sobre el medio ambiente.

Durante el año fiscal 2011, la huella de carbono mundial de Sims Metal Management fue de más de 300.000 toneladas métricas, una reducción del 2% respecto del año fiscal 2010. Esto se compara con los 13 millones de toneladas métricas de emisiones de carbono estimadas como ahorradas por el reciclaje únicamente de acero de Sims (comparado con la minería de minerales y la fabricación de materias primas para la producción de acero), una proporción de 1 a 42.



GRACIAS POR RECICLAR CON EL RECICLADOR DE SERVICIO COMPLETO MUNDIAL AGRADECEMOS SU PREFERENCIA

www.simsmm.com/us/scrapacceptance o llame al (510) 412-5300 para más información.

SIMS METAL MANAGEMENT	SAFETY, HEALTH, ENVIRONMENT & COMMUNITY (SHEC) INBOUND MATERIAL CONTROL		
	Exhibit A – PROHIBITED MATERIALS LIST		
West Region	Rev: August 2013	Supercedes: 2012	Page 1 of 1

The following Materials are prohibited from acceptance at all SMM Facilities *except as otherwise noted below*:

1	**Non-Recyclable Goods of any kind**, including asphalt, concrete, debris, dirt, rags, tires, trash[1].
2	**Free-flowing liquids** including hazardous (e.g., gasoline, motor oil, and other lubricants, hydraulic fluids, anti-freeze, oil paint, anti-freeze)[2] and non-hazardous materials (e.g. water)[1]
3	**Flammable and Combustible Material** or other petroleum products, including diesel fuel and gasoline[2].
4	**Corrosive Material** such as lead acid batteries[3]
5	**Radioactive Material** of any type (e.g., military scrap, medical scrap, thickness measuring devices)
6	**Explosives** or potential explosives of any type, such as munitions scrap (e.g., ammunition, shells).
7	**Poisons, Infectious Goods or Chemicals** in solid, powder, liquid, or gaseous form (e.g., fertilizers).
8	**Containers or Cylinders (Pressurized, Closed, or Formerly Containing Hazardous Material)** (e.g. propane tanks, compressed gas tanks, aerosol cans, bulk storage tanks, fire extinguishers, storage tanks, process vessels.)[4]
9	**Materials or Containers Containing Hazardous Substance Residue**, including: A Asbestos–containing materials (ACM), such as pipe insulation or surfacing materials (except as provided for in the Agreement with respect to FAPM). B Aerosol cans that contained paint, water sealer, pesticides or other hazardous or toxic substances. C Non-aerosol containers that contained paint, water sealer, pesticides or other hazardous or toxic substances. D Air conditioning and refrigeration units containing CFCs, HCFCs or non-exempt refrigerant substitutes. E PCB-containing materials, such as capacitors, ballasts and transformers. F Lead-containing materials[5] G Mercury-containing materials (e.g. switches, fluorescent or mercury vapor lights/fixtures/bulbs, thermostats). H Liquid crystal displays (LCDs)[1]
10	Any Material Containing Hazardous or Toxic Substances or Wastes[1].
11	Automobiles must have all fluids drained to the extent practicable or otherwise required by law, and their batteries, leaded battery cables, and mercury convenience light switches, and air bags, as required by law, removed[2].

[1]/ Except to the extent that the Facility is authorized and has agreed to accept such materials.

[2]/ Except to the extent that the Facility is authorized and has agreed to depollute applicable vehicles with respect to such materials.

[3]/ Except to the extent that such batteries are accepted at designated Facilities and then only if not cracked, broken, burned, or with missing caps.

[4]/ Except empty containers certified as "empty," per applicable law and approved in advance by Facility and otherwise properly prepared in accordance with Sims's empty container requirements.

[5]/ Except if accepted by the Facility as a specific commodity (e.g. lead acid batteries and leaded battery terminals, lead wheel weights, or electronic scrap materials such as cathode ray tubes (CRTs) or a commodity containing a CRT – such as a computer monitor or CRT television set.)

Management Practices

to

Reduce Fugitive Emissions

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS - ROADWAYS AND OTHER TRAFFICKED SURFACES

List and describe facility's management practices to reduce fugitive emissions from roadways and other trafficked surfaces. Detail the schedule of activities conducted.

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
ROADWAY AND OTHER TRAFFICKED SURFACES	1	All roadways are paved.	Complete
	2	Sweeping of internal paved roads.	Continuous Sweeping during business hours
	3	External paved road (South 4th Street) swept during normal business hours.	Continuous Sweeping during business hours
	4	Watering of internal roads and scrap metal stockpiles using water truck, hose station and portable dust control units	Frequently as needed.
	5	Water spraying of scrap product during loading of shiploading transport trucks going to LRT terminal for shipping.	Limited to few seconds of truck discharge into hopper to minimize water runoff.
	6	Speed limit of 5mph for equipment and trucks inside yard.	Whenever operating general plant operation
	7	Visual inspection of all onsite roads to assure sweeping is reducing road dust sufficiently	At least one complete inspection daily.
	8	Employee training: Inbound Source Control, Sweeping and Housekeeping, and Air Pollution/Dust Control Measures (Upon completion of the EMP annual training will also be included)	Initially for new employees, Daily Tool Box Talks (TBT) and annual update for current employees.

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS – METAL MANAGEMENT

List and describe facility's management practices to reduce fugitive emissions. Include the practices for receiving, processing and handling scrap and shredded materials to prevent fugitive emissions from operations. Detail the schedule of activities conducted.

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
TRANSPORT	1	Speed limit of 5 mph. Signs posted.	During all hours of operation.
RECEIPT	2	Visual inspection of incoming truck loads to intercept and refuse loads containing excessive soil. Thorough physical and visual inspections of random selected incoming loads. Annual training of scale operators and inspectors, including decision of where incoming material will be unloaded.	During all hours of operation when receiving incoming trucks.
COLLECTION	3	Covered by other categories above and below.	
SORTING	4	Scale operators and inspectors trained to direct incoming trucks to deposit loads at appropriate storage piles.	During all hours of operation when receiving incoming trucks.
SEGREGATION	5	Materials entering facility are segregated into different storage piles before further processing, including HMS, HMS Unprepared (Materials to be Sheared Storage Pile, HMS Torch Cut (Materials to be torched), Shred Pile, Auto Bodies, Appliances, Tin, Cast.and Bushling., and Non-Ferrous Storage piles. Water application is available to minimize fugative emissions at the different storage piles.	During all hours of operation when receiving incoming trucks.
SEPARATION	6	Auto Bodies and Appliances Depolluted	During all hours of depollution activities
COMPILATION	7	Depolluted appliances to Tin Pile	During all hours of compilation activities
CRUSHING	8	Water available for dust control in car crusher area.	During all hours of crusher operation.
SHREDDING	9	Not applicable to this facility.	
STORAGE OF METALS	SEE STORAGE PILE MANAGEMENT SECTION		
STORAGE OF METAL-CONTAINING MATERIAL	SEE STORAGE PILE MANAGEMENT SECTION		
STORAGE OF NON-METALLIC MATERIAL	SEE STORAGE PILE MANAGEMENT SECTION		

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS – SHREDDER RESIDUE MANAGEMENT

List and describe facility's management practices to reduce fugitive emissions from processing and handling shredder residue. Detail the schedule of activities conducted.

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
SHREDDER RESIDUE MANAGEMENT	1	Not applicable.	

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS – DEPOLLUTION ACTIVITIES

List and describe facility's management practices to reduce fugitive emissions from processing and handling materials during depollution activities. Detail the schedule of activities conducted.

	Section #	Management Practices to Reduce Fugitive Emissions	Schedule of Activity
DEPOLLUTION ACTIVITIES	1	Certified Appliance Recycler (CAR # 0387) using certified equipment to remove Materials Requiring Special Handling (MRSH).	Daily
	2	Subcontracted depollution conducted by certified subcontractors holding DTSC and EPA permits.(i.e. "Certified Appliance Recyclers") when additional support necessary.	Occasional activity.
	3	Applicance area is paved and covered.	On-going fixed feature
	4	Appliance area is swept and cleaned.	Daily
	5	Appliance area employees trained: Inbound Source Control, Sweeping and Housekeeping, Air Pollution/Dust Control Measures (Upon completion of the EMP annual training will also be included)	Initially for new employees, Daily Tool Box Talks (TBT) and annual update for current employees.
	6	Appliance scrap acceptance and inspection.	Daily for each delivered load
	7	Auto bodies depollution unit is located on concrete and covered.	On-going fixed feature
	8	Auto bodies crusher is self-contained and area is bermed	On-going fixed feature
	9	Depollution unit cleaned.	Daily/weekly/monthly activities
	10	Auto bodies area swept and cleaned	Daily
	11	Auto bodies area employees trained: Inbound Source Control, Sweeping and Housekeeping, Air Pollution/Dust Contol Measures (Upon completion of the EMP annual training will also be included)	Initially for new employees, Daily Tool Box Talks (TBT) and annual update for current employees.
	12	Auto bodies scrap acceptance and inspection	Daily for each delivered load

METAL MANAGEMENT – STORAGE PILE MANAGEMENT

List and describe the facility's storage pile management practices to reduce fugitive emissions from stored materials. Detail the schedule of activities conducted.

Types of Storage	Section #	Management Practices to Reduce Emissions	Schedule of Activity
Storage of Delivered Scrap	1	Delivered scrap stockpiles are sprayed manuallywith water by a stationary hose as needed during unloading and material handling. Storage pile size is determined by commodity type.	During all hours of operation when receiving incoming trucks as needed.
Storage of Unprocessed Material	2	Unprocessed material storage piles are sprayed manually with water by a stationary hose as needed during unloading and material handling. Storage pile size is determined by commodity type	During all hours of operation as needed.
Storage of In-process Material	3	In-process material storage piles are sprayed with water both manually and by continuous spray as needed during unloading and material handling by use of stationary hoses and portable dust control units. Storage pile size is determined by commodity type	During all hours of operation as needed.
Storage of Finished Product	4	Finished product stockpiles (not to exceed 36 ft. in height) are sprayed with water both manually and by continuous spray as needed during unloading and material handling by use of stationary hoses and portable dust control units. Storage pile size is determined by commodity type.	During all hours of operation as needed.
Storage of Shredder Residue	SEE SHREDDER RESIDUE MANAGEMENT SECTION		

METAL MANAGEMENT

Describe facility's storage pile management practices to minimize and prevent emissions from stored materials (i.e. limiting size of piles, creating fire breaks, segregation of materials, etc.). Specifically include policies and measures to prevent and control combustion of storage pile materials.

The facility has an Inbound Source Control SOP which requires training of all employees as well as customers on prohibited items. Prohibited items include: Non-Recyclable materials of any kind, free flowing liquids, flammable and combustible material, corrosive material, radioactive material, explosives, poisons, infectious materials or chemicals, containers or cyclindars (pressurized, closed, or previously containg hazardous materials), materials or containers containing hazardous substance residue, and any material containing hazardous or toxic substances or wastes. Customers must have signed the Scrap Acceptance Policy to conduct business or, if a peddler, must sign the certification on their transaction ticket that their materials conform to our policy. All loads or parts of loads are subject to rejection if they do not conform to the policy. By minimizing non-conforming items such as dirt/debris/trash, fugitive dust emissions are also reduced. In addition, by ensuring prohibited items that may create a fire hazard such as batteries/closed cylinders, are precluded from entering the yard, fire danger is greatly reduced.

All loads are inspected at the gate as well as during unloading. Incoming scrap is segregated by commodity type and whether the scrap requires processing. Pile sizes depend on the commodity being stored and piles of different commodities are stored separate with sufficient fire breaks in between. HMS and Bonus piles are typically allowed larger pile sizes (up to 36 ft) as they contain very limited non-metallics. Scrap destined for the Shredder (Auto Bodies and Tin) are moved offsite as quickly as possible, particularly before weekend closure. Water is used on piles as necessary to control visible emissions.

The site maintains a Fire Prevention and Preparedness SOP which is intended to minimize the risk of of fires which may result from activities engaged in at the facility including the stockpiling of scrap metal. The plan covers stockpiling (i.e. pile heights/sizes, depending on commodity type) as well as procedures regarding security, hot work, housekeeping, safety inspections, storage and use of combustible and flammable materials, vehicle depollution, equipment fueling, maintenance of electrical systems, smoking policy and training. The plan includes requirements for Plant and Fire Protection Equipment and specifies locations, inspection and maintenance schedule, and training. All Employees are trained on preventing preparing for and responding to fires. The Facility also maintains an Emergency Action Plan which references the SOP as well as a Fire Response Plan. Last, the facility installed a perimeter security system with thermal cameras directed at the "light iron" scrap metal material stockpile as well as the area where unprepared scrap auto bodies are stored. This system continuously monitors the stockpile/auto body area temperature and sends alarm notifications if any unusual temperature changes occur in those areas. When the facility is closed, the thermal cameras are monitored at the vendor offsite location. .

Description of Onsite Management

And

Schedule of Facility Operations

Onsite Management Practices

Provide a description of the facility's onsite management practices to reduce fugitive emissions.

BMPs for reduction of fugitive emissions are listed throughout the previous charts of this document. The facility utilizes the Inbound Source Control Policy to minimize materials which may create fugitive emissions. The facility roadways are fully paved to reduce fugitive emissions from incoming and outgoing transport. Roadways are swept using sweepers and wet down with water with water truck as needed. The water truck and hose stations throughout the facility as well as portable dust control units are utilized to control fugitive emissions while conducting material handling processing and stockpiling. Employee training includes initial training, annual refresher and various toolbox talk topics on Air Pollution and Dust Control Measures.

Description of Onsite Management

Identify if staff are designated to observe visible emissions from metal shredding and recycling operations during business hours and after the close of business. Specify if staffing is Visible Emissions Evaluation (VEE) Certified. If onsite staffing is designated after the close of business, include a description of the duties to ensure visible emissions are minimized from storage piles of material.

Section #	Operations	Onsite Personnel DURING Business Hours to Observe Visible Emissions	Staffing to Observe Visible Emissions	Onsite Personnel AFTER Business Hours to Observe Visible Emissions	Staffing to Observe Visible Emissions	If onsite staffing is designated after the close of business to observe visible emissions, describe the specific duties to manage storage piles to prevent and minimize visible emissions.
1	**Roadways and Other Trafficked Surfaces**	X Yes ☐ No	Number of Staff 0 Visible Emissions Certified X Yes, 1 No	☐ Yes X No	Number of Staff 0 Visible Emissions Certified ☐ Yes, 0 X No	The facility installed a perimeter security system with thermal cameras directed at the "light iron" scrap metal material stockpile as well as the area where unprepared scrap auto bodies are stored. This system continuously monitors the stockpile/auto body area temperature and sends alarm notifications if any unusual temperature changes occur in those areas. When the facility is closed, the thermal cameras are monitored at the vendor offsite location. Since the monitoring is continual, the facility does not intend to maintain a record of such monitoring activities location.
2	**Metal Management**	X Yes ☐ No		☐ Yes X No		
3	Transport	X Yes ☐ No		☐ Yes X No		
4	Receipt	X Yes ☐ No		☐ Yes X No		
5	Collection	X Yes ☐ No		☐ Yes X No		
6	Sorting	X Yes ☐ No		☐ Yes X No		
7	Segregation	X Yes ☐ No		☐ Yes X No		
8	Separation	X Yes ☐ No		☐ Yes X No		
9	Compilation	X Yes ☐ No		☐ Yes X No		
10	Crushing	X Yes ☐ No		☐ Yes X No		
11	Shredding	☐ Yes ☐ No		☐ Yes ☐ No		
12	Storage of Metals	X Yes ☐ No		☐ Yes X No		
13	Storage of Metal-Containing Material	X Yes ☐ No		☐ Yes X No		
14	Storage of Non-Metallic Material	X Yes ☐ No		☐ Yes X No		
	Shredder Residue Management	☐ Yes ☐ No		☐ Yes ☐ No		
15	**Depollution Activities**	X Yes ☐ No		☐ Yes X No		

Description of Onsite Management

Identify any employee training provided pertaining to management practices and work practice standards to minimize fugitive emissions from recycling and shredding operations.

Section #	Employee Training
1	New employees receive an initial training session
2	All operators, supervisors, and managers receive the same training.
3	Inbound Source Control
4	Sweeping and Housekeeping
5	Air Pollution/Dust Control Measures. (Upon completion of the EMP, annual training will also be included.)
6	Annual Training
7	Tool Box Talks (TBT)

Schedule of Facility Operations

Provide the facility's schedule and hours of operation. Schedule of operations should include all shifts with specific operations identified.

Material Receiving: Monday through Friday 6am to 3:30pm, Saturday 8am - 12:30pm

Shiploading: As needed, usually a couple of days per month, Shift 1: 6:00am to 4:30pm, Shift 2: 4:30pm to2:00am.

Metal Processing: Shearing: 6:00am to 10:00pm, Monday through Friday

Metal Processing: Torch Cutting: 6:00am to 3:30pm, Monday through Friday, extemded tp 10:00pm as needed.

Note: Operation shift times and days of week can vary.

Technical Data

6-4-403.1

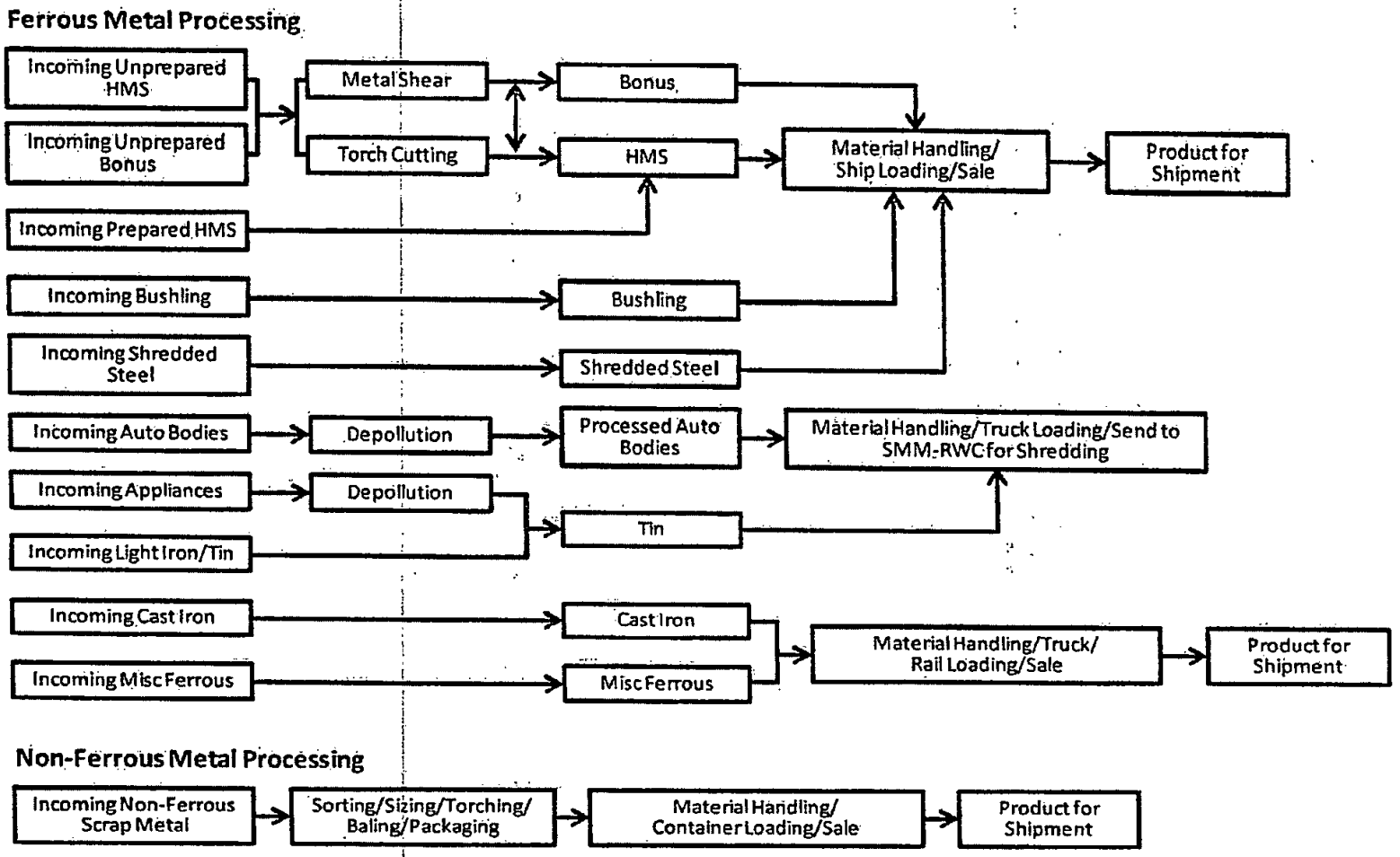
A. *Process Flow Diagram* - Facilities must indicate all operations in Section 6-4-402, the flow of materials used and identify all monitoring and the processes, abatement and controls to minimize emissions beginning from material receipt to achievement of final product. Identify all equipment by source numbers according to District Permit or as exempt from District Permit. Include the abatement and control devices.

B. *Facility Layout / Floor Plan* - Facilities must indicate all relative locations of processing equipment and monitoring and controls, 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 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.

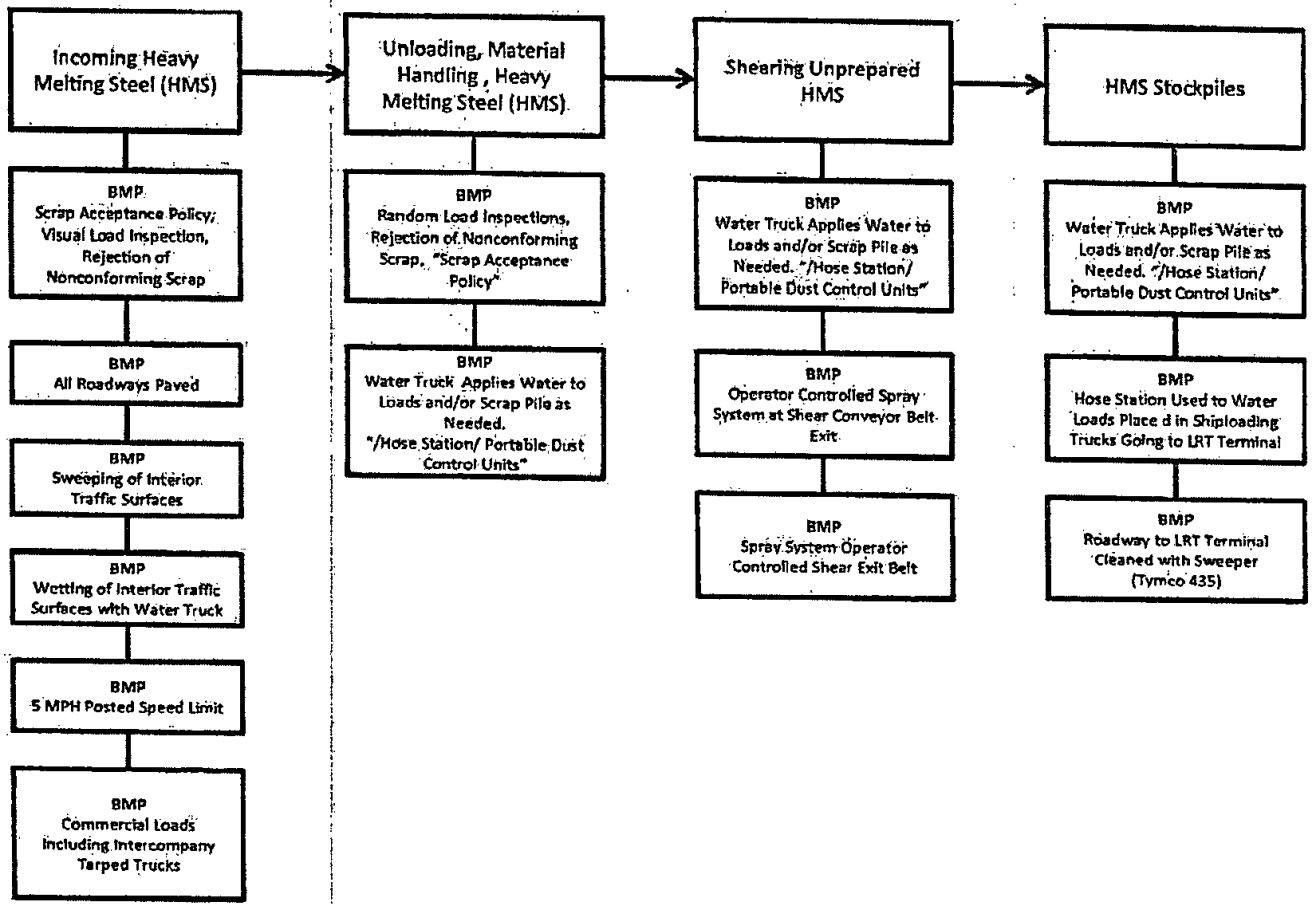
A. Process Flow Diagram

Attach Process Flow Diagram

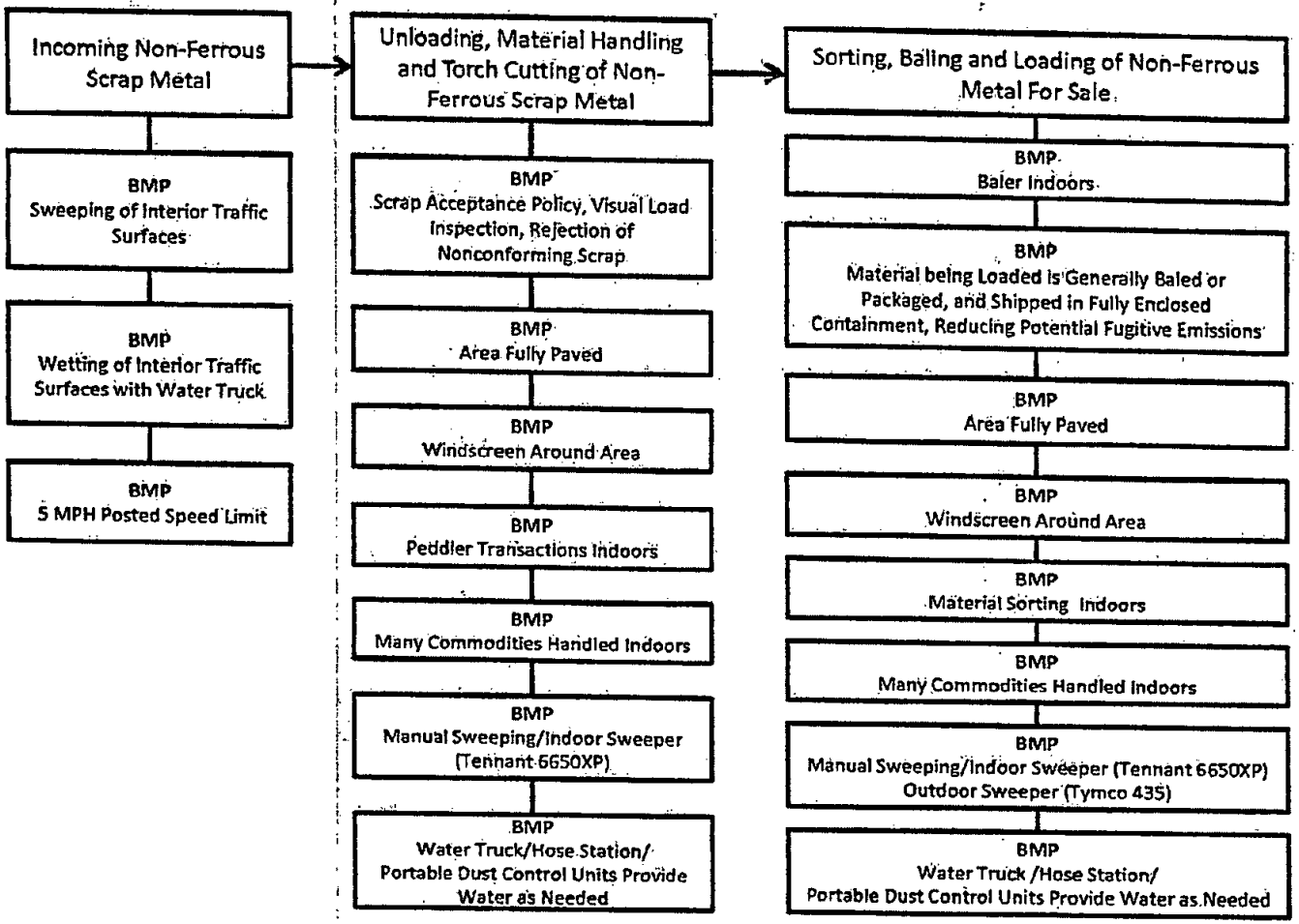
Overall Process Diagram
Sims Metal Management – Richmond



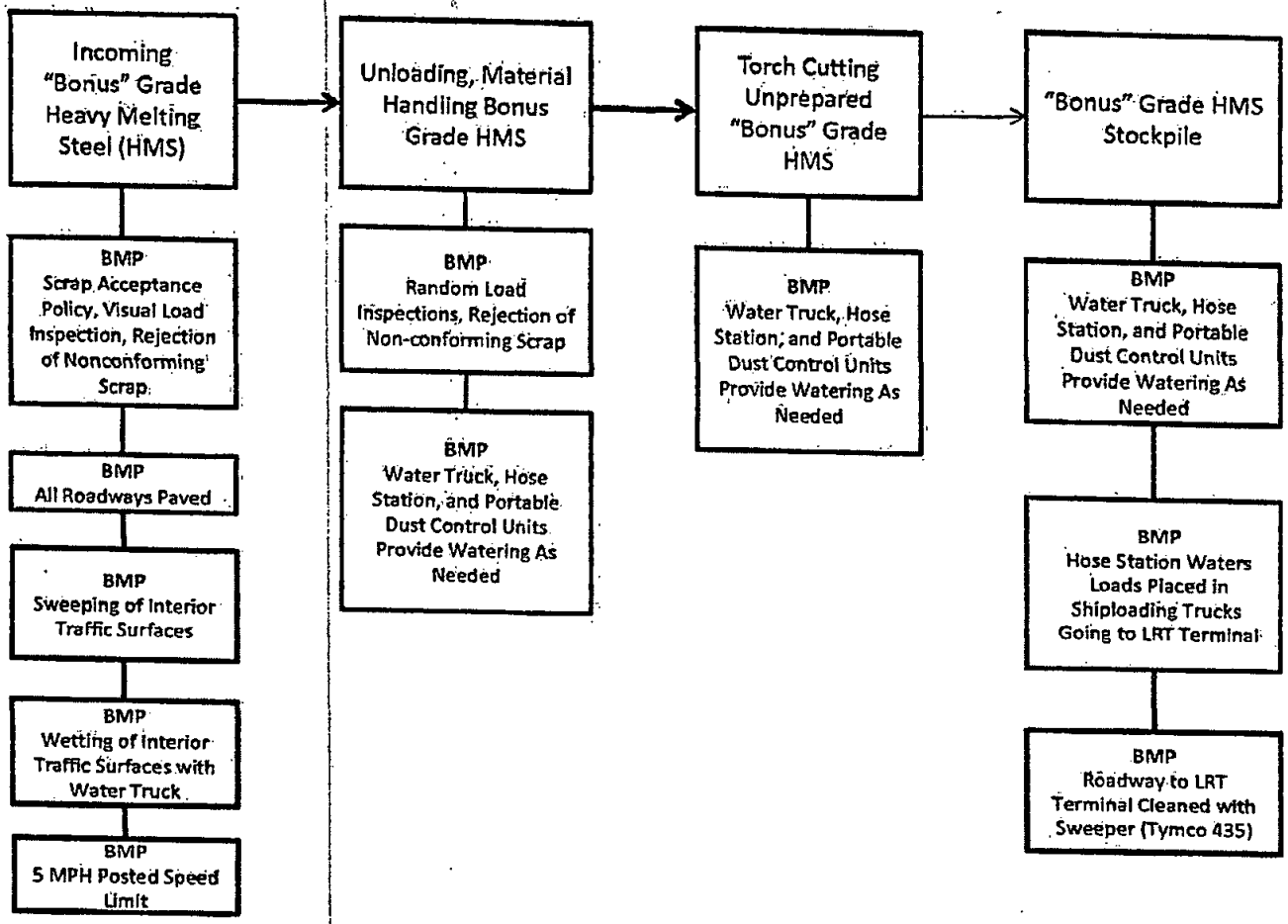
Shearing Process Diagram with BMPs
Sims Metal Management – Richmond



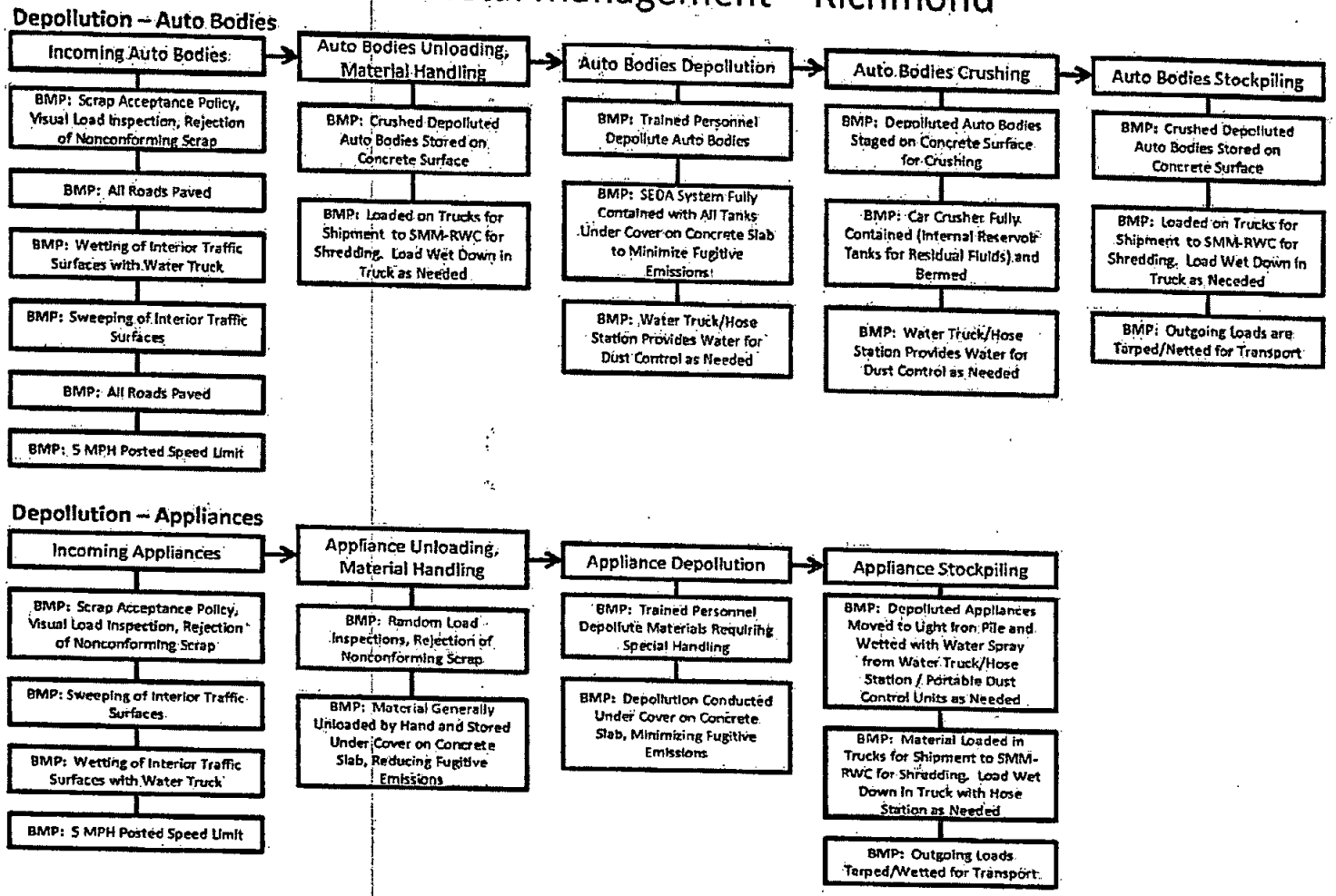
Non-Ferrous Metal Receiving and Processing Diagram with BMPs
Sims Metal Management – Richmond



Ferrous Metal Torch Cutting Process Diagram with BMPs
Sims Metal Management – Richmond



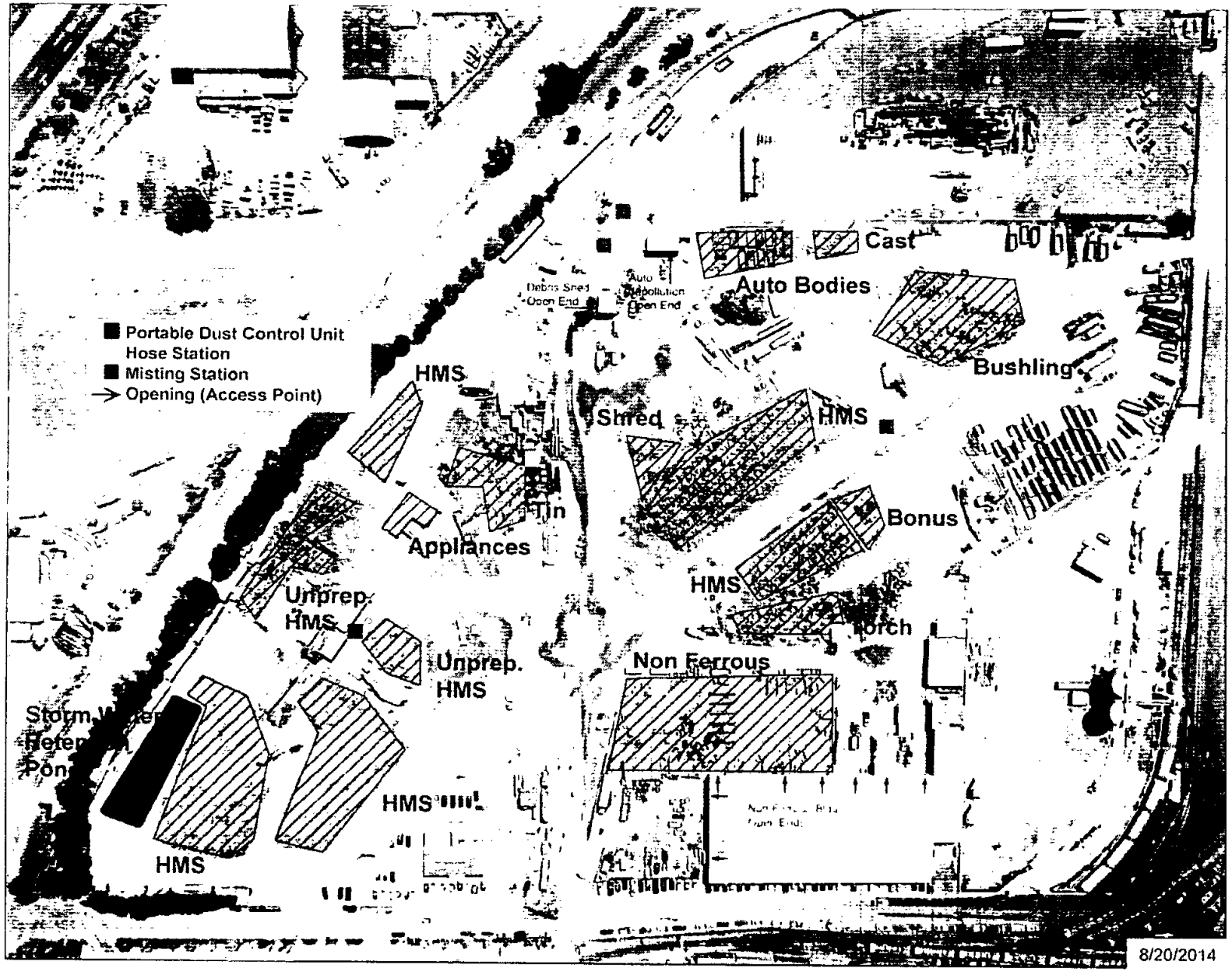
Depollution Diagram with BMPs
Sims Metal Management – Richmond



B. Facility Layout / Floor Plan

Attach Facility Layout/ Floor Plan

Sims Metal Management - 600 South 4th Street - Richmond, CA 94804
Emission Minimization Plan



Fugitive Emissions Reductions Previously Realized

6-4-403.2

Facilities must provide a description of the equipment, processes and procedures installed or 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.

6-4-403.2 FUGITIVE EMISSIONS REDUCTIONS PREVIOUSLY REALIZED

Section #	Identify Type of Operation per Section 6-4-402	Description of Equipment, Processes or Procedures Previously Realized	Implementation Date	Purpose of Implementation	Employee Training Conducted	Description of Employee Training and Frequency of Training
1	Roadways and other Trafficked Surfaces	All roadways fully paved.	Completed 2007	Minimize dust generation onsite as well as trackout of dust on to city streets	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.
2	Roadways and other Trafficked Surfaces	Multiple sweepers have been procured, including two Tympco 435s, one Tennant 6650, and one Rosco Lee Boy Co.	2006-2013	Each sweeper used for specific areas: Tympco – paved roadways onsite and offsite; Tennant – non-ferrous area and general maintenance; Rosco – broom sweeper for onsite roads.	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.
3	Roadways and other Trafficked Surfaces	Facility Speed Limit, 5 mph.	2006	Reduce generation of fugitive dust through controlling vehicle and equipment speed.	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.
4	Metal Management	Portable dust control units purchased: Buffalo Turbine Monsoon and Dust Fighter 7500.	2010-2012	Wet piles during material handling and minimize particulates already mobilized in the air.	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.
5	Metal Management	Water Truck used to wet piles during material handling.	2005	Minimizes particulate generation during material handling.	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.
6	Metal Management	Sprinkler system on shear box and spray system on shear exit conveyor installed	2012	Operator controlled so water can be sprayed as needed. A hose station is located in shearing area.	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.
7	Metal Management	Eucalyptus trees planted along Cutting Boulevard fenceline.	Pre-2005	Reduce fugitive particulate transported offsite.	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.
8	Metal Management	Containers lined along Cutting Boulevard fenceline.	2013	Reduce fugitive particulate transported offsite.	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.
9	Metal Management	Multiple hose stations installed throughout facility to improve access to water for dust control as follows (unprepared HMS, applicance depollution area, torch cutting area, non-ferrous area, ship loading pad, light iron storage, car crusher, and auto depollution area)	2005-2013	Reduce particulate generation during material handling	☐ Yes ☐ No	Covered in initial orientation training and annual training on air pollution and dust control measures.

Schedule for the Implementation of the EMP Elements

6-4-403.4

A. 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).

B. 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.

A. 6-4-403.3.1 SCHEDULE FOR THE IMPLEMENTATION OF THE EMP ELEMENTS (on or before May 1, 2014)

Section #	Identify Type of Operation per Section 6-4-402	List Specific Elements to be Implemented on or before May 1, 2014	Implementation Date	Description of Elements to be Implemented	Purpose of Implementation
1	Metals Management	Additional elevated Buffalo Turbine Monsoon watering system procured	2/2014	Tower-mounted water mist turbine	General suppression of incidental fugitive dust where needed,
2	Metals Management	Added windscreen fabric to Non-Ferrous area fencing	3/2014	Windscreen fabric material added to fencing	Reduce potential fugitive emissions from Non-Ferrous area.

B. 6-4-403.3.2 NEW OR FUTURE EMP ELEMENTS TO BE IMPLEMENTED

Section #	Identify Type of Operation per Section 6-4-402	List Specific Elements to be Implemented Following APCO Approval of the EMP	Implementation Date	Description of Elements to be Implemented	Purpose of Implementation
1	Metal Management	Water cannon	12/14	Install and operate water cannon at light iron pile	Dust abatement and fire protection
2	Metal Management	Virtual Guard	7/15	Iinstalled a perimeter security system with thermal cameras directed at the "light iron" scrap metal material stockpile as well as the area where unprepared scrap auto bodies are stored	Fire protection and facility security

Compliance Schedule for the EMP

6-4-404

A. *APCO Recommendations to EMP and Determination of Approvability*– 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.

A. APCO Recommendations to EMP and Determination of Approvability (6-4-405)

Date of EMP: **5/19/15**

Provide determination of acceptance to APCO recommendations. Include the determination of acceptance by the facility's Responsible Manager and the basis for rejecting any APCO recommendations. If recommendation is accepted, include measures to implement APCO recommendation and the proposed date of implementation.

Section #	(FOR APCO USE ONLY) APCO Recommendation	Acceptance of APCO Recommendation	If NO: Basis for Rejecting APCO Recommendation	If YES: Measures to Implement Recommendation	Proposed Date of Implementation	(APCO USE ONLY) APCO Approval of Response
1	Install additional rain birds or water cannons to prevent fugitive emissions from occurring in areas where scrap or processed metals are stored.	☒ Yes ☒ No	PARTIAL Even though the facility has implemented a number of measures to minimize fugitive emissions from areas where scrap metal materials are stored, the facility has scheduled a visit this month by a water spray vendor to assess whether rain birds/ water cannons or other water/mist systems would be needed to minimize the potential for fugitive emissions from such areas. ***District Recommendation:*** *Specify the recommendation by water spray vendor and provide the schedule of implementation.*		Depending on outcome of vendor visit, will determine schedule for any additional misting/water cannons or other water/mist systems	☐ Yes ☒ No
		☒ Yes ☐ No		Even though the facility has implemented a number of measures to minimize fugitive emissions from areas where scrap metal materials are stored, the facility scheduled a visit with Dust Boss, a water spray vendor, to assess whether rain birds/ water cannons or other water/mist systems would be needed to minimize the potential for fugitive emissions from such areas. Following the assessment, no additional water cannons or other water/mist systems are required.	Recommended measures have previously been implemented	☒ Yes ☐ No
2	Pave all roadways and trafficked surfaces where metal management, shredder residue management and depollution operations are conducted.	☒ Yes ☐ No		All roadways and trafficked surfaces are paved as stated in the current version of the EMP	Recommended measures have previously been implemented	☒ Yes ☐ No

3	Equip all conveyance systems with water sprays or misters.	☒ Yes ☐ No		All conveyance systems at the facility are equipped with misting systems as noted in the EMP. The only conveyance system at the facility, which has a misting system, is located at the stationary shear. ***District Response:*** *Please clarify if conveyance systems connected to and from marine vessels are equipped with a misting system.*	Recommended measures have previously been implemented	☐ Yes ☒ No
		☒ Yes ☐ No		All conveyance systems at the facility are equipped with misting systems as noted in the EMP. The only conveyance system at the facility, which has a misting system, is located at the stationary shear.Note: The conveyance systems connected to and from marine vessels are owned and operated by Richmond Levin Terminal (LRT) and not Sims Metal Management Richmond.	Recommended measures have previously been implemented	☒ Yes ☐ No
4	Develop and implement a program for scheduled monitoring of all stockpiles with a temperature probe/gun and maintain a record of all monitoring activities.	☒ Yes ☒ No	PARTIAL. A temperature/probe gun is only useful in monitoring a stockpile of scrap metal material when such stockpile contains material with the potential to ignite. Most scrap metal stockpiles at this facility consist of ferrous metals with insufficient non-metallic material to ignite and sustain a fire. There is one stockpile of "light iron" scrap metal material which has the potential to result in a fire if ignited. There also are unprepared scrap auto bodies with the potential to result in a fire if ignited. The facility is preparing to install a perimeter security system with thermal cameras directed at the "light iron" scrap metal material stockpile as well as the area where unprepared scrap auto bodies are stored. Once installed this system will continuously monitor the stockpile/auto body area temperature and send alarm notifications if any unusual temperature changes occur in those areas. When the facility is closed, the thermal cameras will be monitored at the vendor offsite location. Since the monitoring is continual, the facility does not intend to maintain a record of such monitoring activities location. ***District Recommendation:*** *Confirm that the alternative proposed measure, perimeter security system, adequately identifies hot spots in stockpiles.*		Alternate proposed measure scheduled to be completed 7/1/15	☐ Yes ☒ No

		☒ Yes ☐ No		The facility installed a perimeter security system with thermal cameras directed at the "light iron" scrap metal material stockpile as well as the area where unprepared scrap auto bodies are stored. This system continuously monitors the stockpile/auto body area temperature and sends alarm notifications if any unusual temperature changes occur in those areas. When the facility is closed, the thermal cameras are monitored at the vendor offsite location. Since the monitoring is continual, the facility does not intend to maintain a record of such monitoring activities location. The facility does have a temperature/probe gun that can be used at the facility as an as needed basis.	Proposed measure was completed 7/1/15	☒ Yes ☐ No
5	Provide onsite staff with training through the California Air Resource Board (CARB) to obtain and maintain a visible emissions evaluation (VEE) certification in accordance with US EPA Method 9.	☒ Yes ☒ No	PARTIAL The Environmental Manager (EM) for the West Region is certified as a VEE and covers all the facilities in CA including Richmond as referenced in current EMP. If EM not available, if VEE testing required, SMM has outside consultants available certified to conduct such tests. ***District Recommendation:*** *Specify the schedule and the procedures to ensure that the EM and offsite consultants are able to conduct VEE testing when necessary.*		Alternate proposed measure is already in place	☐ Yes ☒ No
		☒ Yes ☐ No		The Environmental Manager (EM) for the West Region is certified as a VEE and covers all the facilities in CA including Richmond as referenced in current EMP. The EM will maintain certification every 6 months. If EM not available, if VEE testing required, SMM has outside consultants available certified to conduct such tests that can be available immediately.	Scheduled for Recertification on 2/10/16	☒ Yes ☐ No

Appendix

If additional information are to be included in the EMP, identify the associated Appendix # as "*#*" in the text box of the specific table.

In the table below, note the Appendix # and provide the Page # and Section # of the EMP where the material references.

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