Emissions Minimization Plan

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

Sims Metal (Sims) - Redwood City
District Site #5152
699 Seaport Boulevard
Redwood City, CA 94063
July 2025

☐ Public Copy

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Responsible Manager Certification
6-4-404.1

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: Dillon Wasnick *Dated:* 07-24-25

Dillon Wasnick, Senior Operations Manager Sims Redwood City, CA

Responsible Manager

Designation of Confidential Business Information

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

Name of Section / Page Number(s)	Description of Confidential Information
P 10 Sec 3	Material quantities
P 26 Sec 2	Material quantities

Company Description

The Sims Metal facility (the Facility) is located at 699 Seaport Blvd. In Redwood City, CA and occupies approximately 13.5 acres of land owned by the City of Redwood City, through the Port of Redwood City (the Port), and operated by Sims Group USA Corporation, d/b/a Sims Metal (Sims). The Standard Industrial Classification (SIC) Code is 5093 (Scrap Recycling and Waste Recycling Facilities" and the North American Industry Classification System (NAICS) Code is 423930 (establishments primarily engaged in the merchant wholesale distribution off recyclable materials". The Facility is located at coordinates of 37.51514N & 122.22413W. The Facility is approximately 85% concrete, asphalt paved or covered with buildings or other structures.

Facility Operations include (a) receiving, handling, and stockpiling of end-of-life vehicles (ELV) and other light gauge steel items such as end-of-life appliances (Light Iron), collectively referred to as Feedstock Material, and thicker steel items (e.g. Beams), referred to as Heavy Melting Steel (HMS); (b) operation of the metal Shredder (Shredder) and the downstream Materials Recovery Plant (MRP) to separate and produce specification-grade ferrous and non-ferrous metal commodities (Products) from Feedstock Materials; (c)treating and separating metal from the primarily non-metallic material remaining post- MRP (Shredder Residue (SR); (d) storing/stockpiling, loading and shipping of recycled Products and Treated Auto Shredder Residue (TASR) and ancillary activities including management and storage of waste collected incident to Facility operations, as well as equipment fueling and maintenance. Shredder ferrous metal Product (Shred) is loaded in bulk as described below onto ocean-going vessels for shipment to steel mill customers. Non-ferrous metal Products (either separate Product or a mixed non-ferrous metal Product referred to as Zorba) are loaded into containers for shipment to customers via the Port of Oakland. HMS is loaded onto trucks and shipped to another Sims facility for processing shipping.

The Facility is located in an industrial area within the Por a short distance east of and across Herkner Road from the Ports's ship-loading berths located on Port wharves along Redwood Creek, a tidally influenced industrial shipping and recreational channel that flows to the San Francisco Bay. Sims engages in ship-loading operations on a periodic basis at one of those wharves, which is shared by multiple Port tenants. Ship-loading operations consist of the transfer of Shred from the Shred stockpile area at the Facility directly into the hold of bulk cargo vessels by means of a ship-loading conveyor and enclosed chute.

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 includes the name of the facility's Responsible Official. Label the attachment with the corresponding Attachment #.

Attachment # 1

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.

Onsite Responsible Manager(s)

Name: Dillon Wasnick
Title: Senior Operation Manager
Phone: (26
Email: Dillon.wasnick@simsmm.com
Schedule/Shift: Monday through Friday, Variable

Name: Jeff Shell
Title: Project Manager & Electrical
Phone: 916-769-2289 (M)
Email: Jeff.Shell@simsmm.com
Schedule/Shift: Monday through Friday, Variable

Onsite Alternate Contact(s)

Name: Jerico Tuazon
Title: Shredder Manager
Phone: 650-468-3905 (M)
Email: Jerico.Tuazon@simsmm.com
Schedule/Shift: Monday through Friday, Variable

Name: Brendan Scally
Title: MRP Manager
Phone: 650-422-1505 (M)
Email: Brendan.Scally@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 the 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	☒ Yes ☐ No
402.2 Metal Management	☒ Yes ☐ No
402.3 Shredder Residue (SR) Management	☒ Yes ☐ No
402.4 Depollution Operations	☐ Yes ☒ No

NOTE: The facility suspended the Auto Depollution Operations on site in May 2022. There is consideration to restart the program in the future which Sims will amend the EMP accordingly

Contents of the EMP
6-4-403

The owner or operator of the metal recycling and shredding facility subject to Regulation 6-4 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. Metal Shredder Residue (MSR) 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, including 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 the 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		Recyclable Material is received at the scale where it is inspected for prohibited materials. Recyclable Material consists of Feedstock Material and HMS (e.g., beams). Feedstock Material consists of ELVs, MRF Material and other Light Iron (e.g., appliances).	☒ Yes ☐ No		☐ Yes ☒ No	Visual inspection of incoming loads and rejection as needed.	☒ Yes ☐ No	Prohibited materials
2	Transport		Recyclable Material is transported by truck to the feedstock area where they self-unload or material handlers assist. Shred is loaded to Ships via covered conveyor. NF is moved by truck in containers to Port. HMS mainly shipped by truck off-site. All tracked in internal Sims systems.	☒ Yes ☐ No		☐ Yes ☒ No	Water truck sprays all facility roadways. Sweeper truck cleans roadways. Roadways are paved/concreted.Ship-loading conveyor and chute enclosed.	☒ Yes ☐ No	Visible emissions.
3	Collection		Feedstock Material is collected, sorted & stockpiled by commodity type (ELV, Light Iron, MRF Material), with the MRF Material stockpile added in order to reduce the risk of fires.HMS is stored separately for off-site shipment via truck.	☒ Yes ☐ No		☐ Yes ☒ No	Water spray on Feedstock Materials. Stockpile size limits [redacted]	☒ Yes ☐ No	Visible emissions; potential for fire.
4	Sorting / Segregation		Feedstock Material is segregated by commodity type as per #3 above.	☒ Yes ☐ No		☐ Yes ☒ No	Water spray on Feedstock Material stockpiles. Fire breaks between stockpiles and stockpile size limitations.	☒ Yes ☐ No	Visible emissions; potential for fire.
5	Separation	1	Feedstock Material is separated into shredded steel product (Shred), in-process non-ferrous metal material, non-ferrous metal Product and SR Material.	☒ Yes ☐ No		☐ Yes ☒ No	Water spray at designated locations. Conveyors are covered. Water/foam injected into operating Shredder mill.	☒ Yes ☐ No	Visible emissions.
6	Compilation		Shredded Feedstock Material separated by commodity type is placed into the shred stockpile or non-ferrous metal bins, respectively. Non-ferrous material is stored under cover.	☒ Yes ☐ No		☐ Yes ☒ No	Water spray from Dust Boss.	☒ Yes ☐ No	Visible emissions.
7	Crushing		This facility operates no crushing equipment.	☐ Yes ☐ No		☐ Yes ☐ No		☐ Yes ☐ No	
8	Shredding	1	See #5 above.	☒ Yes ☐ No	3, 4, and 5	☒ Yes ☐ No	Water/foam injected at Shredder mill and other Shredder control as per the Air District permit. All conveyors are enclosed.	☒ Yes ☐ No	Opacity and visible emissions.
9	Storage of metals		See #6 above.	☒ Yes ☐ No		☐ Yes ☒ No	Water truck, water spray from Dust Bosses.	☐ Yes ☒ No	Visible emissions.

METAL MANAGEMENT

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

Section #	Name of Metal or Metal Alloy
1	Light Iron, including appliances from Certified Appliance Recyclers, with material requiring special handling (MRSH) removed by the CAR.
2	ELVs which are depolluted (not accepting wet cars for depollution currently)
3	MRF Material which is light iron material
4	Unprepared HMS which is heavy melting steel received and transferred for processing at alternate Sims Facility
5	Feedstock Material is processed, including by separation into shredded steel and non-ferrous metal Products.
	Shred produced by Shredder and stored in Shred Stockpile
	Zorba is a non-ferrous mix created by shredder/MRP and stored in MRP Product Storage Area
	Zurik is a ferrous mix created by shredder/MRP and stored in MRP Product Storage Area
	Stainless Steel created by shredder/MRP and stored in MRP Product Storage Area

METAL MANAGEMENT

Identify the storage piles and the types of metal and metal-containing material being stored. Indicate 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	Shredder Feedstock Material (including ELVs and MRF Material and other Light Iron)	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
2	HMS	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
3	Shredder Feedstock Material (including ELVs and MRF Material and other Light Iron)	☒ YES ☐ NO	Stockpile temperature using 3 Infrared cameras tied to monitoring system 24/7. If system down, supervisor uses handheld unit	☒ YES ☐ NO	Infrared cameras 24/7
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Unprocessed Material					
4	Shredder Feedstock Material (including ELVs and MRF Material and other Light Iron)	☒ YES ☐ NO	Stockpile Temperature using 3 Infrared cameras tied to monitoring system 24/7. If system down, supervisor uses handheld unit	☐ YES ☒ NO	
5	Shredder Feedstock Material (including ELVs and MRF Material and other Light Iron)	☒ YES ☐ NO	Stockpile temperature using 3 Infrared cameras tied to monitoring system 24/7. If system down, supervisor uses handheld unit	☒ YES ☐ NO	Infrared cameras 24/7
	HMS (Unprepared)	☐ YES ☐ NO	Visible Emissions	☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of In-process Material					
6	Non-Ferrous Metal Bearing Material to be processed through MRP	☒ YES ☐ NO	Stockpile Temperature using 2 Infrared cameras tied to monitoring system 24/7. If system down, supervisor uses handheld unit	☐ YES ☒ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Finished Product					
7	Shredded Steel	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
8	Non-ferrous metal commodities (e.g. Zorba)	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
		☐ YES ☐ NO		☐ YES ☐ NO	
Storage of Shredder Residue					
9	Treated SR storage stockpile (also referred to as CTMSR - chemically treated metal shredder residue)	☒ YES ☐ NO	Visible emissions	☐ YES ☒ NO	
		☐ 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	Multiple cyclone	A3	S1 Shredder
2	Multiple cyclone	A4	S1 Shredder
3	Irrigated cyclone scrubber	A5	S1 Shredder

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	SR Additive Used	Type and Purpose of Additive
1	Treated Shredder Residue Building for Storage and Treatment		☒ Yes ☐ No	☒ Yes ☐ No	Visible emissions	☒ Yes ☐ No	In line treatment using an alkaline activator (typically cement) and a poly-silicate chemical (e.g., Metabond) to chemically fixate SR Material as per DTSC requirements for use as alternative daily cover (ADC).
2	Treated Shredder Residue Building for Truck Loading		☒ Yes ☐ No	☒ Yes ☐ No	Visible emissions	☐ Yes ☒ No	
3	Covered conveyors for Conveyance to Building		☒ Yes ☐ No	☒ Yes ☐ No	Visible emissions	☐ 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 certain non-PCB capacitors
2	Mercury switches
3	CFCs, HCFCs, and other refrigerants and halogenated oil
4	Used oil
5	Used gasoline
6	Batteries
7	Wiper solution
8	Coolant

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.

While the Facility is a Certified Appliance Recycler (#0395), at this time the Facility only receives major appliances from other CARs and does not engage in removal of MRSH from received major appliances under its own CAR certification.

At this time, the Facility also only receives previously depolluted ELVs.

In the event that this Facility engages in MRSH removal operations from major appliances or ELV depollution operations, it will amend this EMP accordingly.

Scrap Acceptance Policy

SCRAP ACCEPTANCE POLICY

Customers bringing recycled metal to Sims are required to review and sign documentation that they will abide by the site Scrap Acceptance Policy. If non-conforming items are noted when customers enter the scale, the material will not be accepted. Sims has field and machine operators at Infeed area reviewing incoming material for non-conforming items. If non-conforming items are identified, that material is segregated and managed based on material type. If it is a waste, it will be handled according to local, state and federal requirements.

Attached is a copy of the facility's Scrap Acceptance Policy labeled with the corresponding Attachment #.

Attachment # 2

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
ROADWAYS AND OTHER TRAFFICKED SURFACES	1	Facility roadways are paved/concreted	N/A
	2	Facility roadways are regularly swept	Frequently, over 8 hours per day, Monday through Saturday
	3	Speed limit of 5 mph for equipment and trucks inside the Facility	In effect at all times
	4	Employee training	Initially for new employees, annual update for current employees.
	5	Facility roadways are regularly watered	Frequently, as needed.
	6	Facility roadways are regularly inspected for fugitive emissions.	At least one inspection daily.

MANAGEMENT PRACTICES TO REDUCE FUGITIVE EMISSIONS – METAL MANAGEMENT

List and describe facility's management practices to reduce fugitive emissions. Include practices for receiving, processing and handling scrap and shredded materials to prevent fugitive emissions from these 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 hours of operation.
RECEIPT	2	Visual inspection of incoming truck loads to intercept and reject loads containing prohibited material. Annual training of inspectors.	When receiving incoming trucks.
COLLECTION	3	Watering of internal roads and recyclable metal stockpiles using water truck, portable dust control units, and sprinklers.	As per above "Roadway" table.
SORTING	4	All inspectors trained to direct incoming trucks to unload Feedstock Material at appropriate storage stockpiles.	As per above "Roadway" table.
SEGREGATION	5	Materials entering facilty are segregated into different storage piles before further processing, including Shredder Feedstock Material stockpiles (separate ELV, MRF Material and other Light Iron stockpiles), and HMS stockpiles. The Facility uses fire breaks between stockpiles. The Facility inspects Recyclable Material when placed into stockpiles per the Inbound Material Control Program to identify and remove Prohibited Materials, such as small batteries. These items are managed accordingly by off-site vendors depending on whether they can be sold as a commodity or sent out as waste.	During hours of operation when receiving incoming trucks.
SEPARATION	6	Two Dust Bosses situated on top of Shredder Infeed and a Water Fogger just inside the structure. Water/foam injected at Shredder mill. Conveyors are covered. The majority of metal separation is done inside a structure.	During hours of Shredder & MRP operation, respectively.
COMPILATION	7	Addressed by other categories above and below.	During hours of operation.
CRUSHING	8	No crushing is conducted at this facility.	N/A
SHREDDING	9	As noted above and as per the Air District permit for the Shredder.	During hours of Shredder operation.
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	Water added to the Shredder is absorbed by the SR.	During hours of Shredder operation.
	2	SR treatment occurs in covered screw conveyor in a building.	During SR treatment activity.
	3	SR is stored and loaded into trucks in treated SR building. Automated Rolling Doors are closed during loading of trucks.	Routinely.
	4	If SR incidentally stored outside building and not being loaded, will be covered with a tarp	As necessary

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	Not applicable at this time.	

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 Fugitive Emissions	Schedule of Activity
Storage of Delivered Scrap	1	Delivered Feedstock Material stockpiles are watered during unloading and material handling. Two dust boss units are used to cover area and water truck with water cannon used if additional water needed.	During all hours of operation when receiving incoming trucks as needed.
	2	Feedstock Material stockpile height is limited per the Facility's Fire Prevention and Preparedness Plan (Fire Prevention SOP). Stockpile size limit [redacted]. Fire breaks of 8 ft between stockpiles.	Daily
	3	Facility attempts to shred substantially all stockpiled Feedstock Material each day of Shredder operation.	Daily
	4	Feedstock Material is inspected for items that may contain batteries. If batteries are observed, they are removed from the stockpile and stored separately. These items either sold as commodity or sent offsite as waste.	During all hours of operation when receiving incoming trucks as needed.
	5	MRF Material is segregated into a separate stockpile with a fire break between each Feedstock Material stockpile (MRF Material stockpile, ELV stockpile and Light Iron stockpile). In total, three stockpiles are now separated and located at the Shredder infeed (ELV stockpile, Light Iron stockpile, and MRF Material stockpile).	During all hours of operation when receiving incoming trucks as needed.
	7	Enforcer-500 Foam unit and 275-gallon Water Bombs (typically 16) stored in unloading area in case of fire	Everyday around the clock 24/7
Storage of Unprocessed Material	8	Unprocessed Feedstock Material storage stockpiles are watered during unloading and material handling.	As per above
	9	Feedstock Material stockpiles are inspected for items that may contain small batteries. If batteries are observed, they are removed from the stockpile and stored separately.	During all hours of operation when receiving incoming trucks as needed.
	10	Stationary infrared cameras are currently used to monitor the ELV and MRF and other Light Iron stockpiles. 3 IR cameras in use to cover infeed area	Every day, around the clock 24/7
	11	Enforcer-500 Pickup Truck Foam unit and 275-gallon Water Bombs (typically 16) stored in InFeed area in case of fire	Every day, around the clock 24/7
Storage of In-process Material	12	The in-process non-ferrous metal material in stored under cover in a building	During all hours of operation
	13	Two infrared cameras are used to monitor the in-process non-ferrous metal material	Everyday around the clock 24/7
	14	In the rare case all in-process non-ferrous metal material cannot fit in building, it will be stored outside under a tarp	As needed and monitored with handheld infrared camera
	15	Enforcer-10 Foam Fire Exquinguishers units and Enforcer-60 Foam Trailer unit in area in case of fire	Every day, around the clock 24/7
Storage of Finished Product	16	Conveyor taking shredded steel to Shred Stockpile is equipped with water spray bars and a misting ring at the top of the conveyor which run while Shredder operating.	Whenever needed during facility operation.
	17	A Dust Boss is located east of the Shred Pile for dust control.	Ship-Loading and as needed for add'l dust control
	18	The Dust Boss can also be employed if additional water needed due to noticeable dust, windy conditions etc.	As needed
Storage of Shredder Residue	SEE SHREDDER RESIDUE MANAGEMENT SECTION		

METAL MANAGEMENT – STORAGE PILE 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 maintains and implements a Fire Prevention and Preparedness Plan (Fire PPP) which is designed to reduce the risk of fires at the Facility but which also serves to minimize emissions from stored materials. The Fire PPP outlines many components that support minimization of emissions. Some key Fire PPP requirements are described below.

The Fire PPP limits Feedstock Material and Treated SR Material stockpile heights and footprints, requires fire breaks and the watering of stockpiles, and segregation of ELV, MRF Material and other Light Iron, among other requirements. The Fire PPP specifies other measures to prevent and control fires in stockpiled materials, including requirements for addressing incipient fires.

The Facility's Inbound Material Control Program requires training of operations employees in identification of Prohibited Materials (see Prohibited Materials List) among other things. Feedstock Material and HMS suppliers must sign the Recyclable Material Acceptance Agreement which includes the requirement to exclude Prohibited Materials in inbound Recyclable Material. Loads or parts of loads are subject to rejection if they do not conform to these requirements. By taking steps to keep Prohibited Materials out of stockpiles, the Facility reduces the risk of fires and fugitive emissions. This Program also includes inspection of inbound loads of Recyclable Material during and after unloading at the Feedstock Material and HMS stockpiles. Furthermore, the inspection program emphasizes the inspection for and removal of smaller batteries/items with batteries, to further reduce the risk of fire.

The Fire PPP also discusses the use of infrared cameras, which are fixed on the ELV, Light Iron, and MRF Material stockpiles and operate around-the-clock, every day to address identfied stockpile hot spots. Operators monitor the feed from the infrared cameras during each day of operation. If a camera is obeserved to be non-operational, facility management, electrician and/or the camera vendor are immediately notified. The facility electrician and/or vendor will begin trouble-shooting the situation as soon as possible. If needed, hand-held infrared cameras are available at the site.

The Facility also has purchased specialty foam product Enforcer which is extremely effective in fires. There is an Enforcer-500 which is a pickup truck which utilizes nitrogen to propel the foam in the In-Feed area. There is also a Enforcer-60 trailer unit kept between Building E (MRP) and Building E (SR) as well as multiple Enforcer-10 Fire Extinguishers throughout the MRP. 275-Gallon Water Bombs are also kept surrounding the In-Feed area which can be used by the material handlers to get water on pile immediately in any indication of smoke/fire. The water truck is also equipped with a water canon for fire fighting purposes as well as multiple fire hoses and connections in In-Feed area.

NOTE: Regular ABC Fire Extinguishers are available as well throughout the facility.

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 in the above-presented tables. Certain BMPs are noted below:

1. The Facility implements the Inbound Material Control Program and requires suppliers to sign a Recyclable Material Acceptance Agreement obligating them to keep out Prohibited Materials, some of which may result in the generation of fugitive emissions or increase fire risk.

2. Facility roadways are paved/concreted, which serve to reduce fugitive emissions from incoming and outgoing truck transport.

3. Facility roadways are routinely swept using sweepers and wetted with the water truck.

4. Fugitive emissions in Facility operating areas and stockpiles are controlled by means of applying water or mist by means of a water truck, sprinklers and portable dust control units (e.g. Dust Boss).

5. Water and foam are injected into the Shredder mill, resulting in reduced fugitive emissions during and downstream of shredding.

6. Most in-process material operations are conducted in buildings or other structures with external conveyors covered or enclosed.

7. SR Material is transferred to a building in an enclosed conveyor where it is treated per DTSC requirements and loaded into trucks in a building and tarped for off-site shipment.

8. Shredded steel Product is transferred from stockpile to vessel by means of a covered ship-loading conveyor with a telescoping chute to minimize fugitive emissions during ship-loading.

9. Employee training includes initial and annual refresher training and toolbox talks including training on dust control measures and fire prevention.

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 to observe visible emissions 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**	☒ Yes ☐ No	Number of Staff All staff trained to observe visible emissions and request additional dust control as needed Visible Emissions Certified ☐ Yes, # ☒ No	☒ Yes ☐ No	Number of Staff 1 (third-party security personnel Visible Emissions Certified ☐ Yes, # ☒ No	No on-site Facility staff to observe after hours. A third-party security company (contracted by the Port of Redwood City) provides one person responsible for observing visible emissions after hours (i.e., M-F 9 pm – 5 am, and 24 hours during weekend). Facility supervisory staff when present during operations from 9 pm onward also observe for visible emissions. An integrated camera system is monitored 24/7 which included 3 Infrared Cameras at the In-Feed and 2 Infrared cameras for the In-Process Non-Ferrous Metal Material for fire protection If Infrared camera system down, guard/supervisor will conduct fire watch with handheld infrared camera. Hourly rounds will be conducted for materials that would normally be monitored with Infrared Camera System. Number of points to monitor will depend on pile size with minimum of 3 points. These handheld reviews will be logged and records maintained on-site
2	**Metal Management**	☒ Yes ☐ No		☒ Yes ☐ No		
3	Transport	☒ Yes ☐ No		☒ Yes ☐ No		
4	Receipt	☒ Yes ☐ No		☒ Yes ☐ No		
5	Collection	☒ Yes ☐ No		☐ Yes ☐ No		
6	Sorting	☒ Yes ☐ No		☒ Yes ☐ No		
7	Segregation	☒ Yes ☐ No		☒ Yes ☐ No		
8	Separation	☒ Yes ☐ No		☒ Yes ☐ No		
9	Compilation	☒ Yes ☐ No		☒ Yes ☐ No		
10	Crushing	☐ Yes ☒ No		☐ Yes ☒ No		
11	Shredding	☒ Yes ☐ No		☒ Yes ☐ No		
12	Storage of Metals	☒ Yes ☐ No		☒ Yes ☐ No		
13	Storage of Metal-Containing Material	☒ Yes ☐ No		☒ Yes ☐ No		
14	Storage of Non-Metallic Material	☒ Yes ☐ No		☒ Yes ☐ No		
15	**Shredder Residue Management**	☒ Yes ☐ No		☒ Yes ☐ No		
16	**Depollution Activities**	☐ Yes ☐ No		☐ Yes ☐ 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 initial training and current operating employees receive an annual update training on operations, including BMPs for fugitive dust control.
2	New employees receive initial training and current operating employees receive an annual training on Fire Prevention and Preparedness

SCHEDULE OF FACILITY OPERATIONS

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

Feedstock Material Receiving: Monday through Friday 3:00 am to 7:00 pm

Feedstock Material Shredding:

Summer Schedule (Jun – Sept): Monday through Friday 8:00 am 3:00 pm and 9:00 pm – 2:00 am

Winter Shredding (Oct – May): Monday through Friday 12:00 am to 9:00 pm (no power demand issues during this time of year)

In Process Material Processing (MRP): 9:00 pm t0 11:00 am

Ship- Loading: When Ship in which is typically a few days each month and operation 24/7
Shift 1: 5:00 am to 5:00 pm and Shift 2: 5:00 pm to 5:00 am

NOTE: Hours can vary depending on material intake.

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. Label the attachment with the corresponding Attachment #.

Attachment # 3

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. Label the attachment with the corresponding Attachment #.

Attachment # 4

Five-Year Review of the EMP: Schedule for Implementation of the EMP Elements and Fugitive Emissions Reductions 6-4-408

A. 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 of equipment, processes and procedures installed or implemented to reduce fugitive emissions and indicate the permit status if applicable. Specify the purpose for implementation and detail any employee training that was conducted. Any associated training materials shall be made available for Air District review upon request.

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. 6-4-408 SCHEDULE FOR IMPLEMENTATION OF THE EMP ELEMENTS AND FUGITIVE EMISSIONS REDUCTIONS REALIZED WITHIN THE LAST 5 YEARS (MARCH 1, 2016 – FEBRUARY 28, 2021)							
Section #	**Identify Type of Operation per Section 6-4-402**	**Description of Equipment, Processes or Procedures Implemented Between March 1, 2016 and February 28, 2021**	**Permit Status**		**Implementation Date**	**Purpose of Implementation**	**Description of Employee Training**
1	Metal Management	Extended telestacker conveyor over shredded steel product stockpile to reduce need for movement of product by dozer.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	2016	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions.
	Roadways and other Trafficked Surfaces	Hard surfacing of operating area of Facility (paving/concrete).	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	2018	Minimize mobilization of particulate matter by reduced exposure of soil to wind and tracking during operations.	N/A
1	Metal Management	Dust Bosses installed at Feedstock Material stockpile, replacing Rain Bird sprinklers.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	2020	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions.
1	Metal Management	Enclosed non-ferrous metal separation operations (Buildings B, C, D, E, F) and in 2021 extended building enclosures to the ground.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	01/2021	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions.
1	Metal Management	Replaced autoloader installed in 2012 with Sleeve Loader to load non-ferrous metal product into shipping containers.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	01/2021	Minimize mobilization of particulate matter.	N/A
1	Metal Management	Upgraded Foam Injection System installed in 2013 to provide for upgraded foam delivery.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	01/2021	Minimize mobilization of particulate matter.	Initial and annual update training in tailgate sessions.
1	Metal Management	Reconfigured double-decker conveyor system which moves in-process material to MRP.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	02/2021	Minimize mobilization of particulate matter.	N/A
1	Metal Management	Relocated covered non-ferrous metal product bunkers/bays and product loader & replaced product loader with enclosed loader.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	03/2021 (relocated)	Minimize mobilization of particulate matter by placing bays and product loading in more wind-protected area and by replacing loader with one with enclosed loading operation.	Initial and annual update training in tailgate sessions.
1	Metal Management	Relocated other non-ferrous metal bunkers from southeast to southwest corner.	☐ A/C ☐ P/O ☐ N/A	Application # (if applicable):	03/2021	Minimize mobilization of particulate matter in a more wind-protected area.	N/A

B. 6-4-408 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 Updated EMP**	**Projected Implementation Date**	**Description of Elements to be Implemented**	**Purpose of Implementation**
1	Metal Management	Installed upgraded conveyors to transfer in-process Recyclable Material (completed)	2023-24	Three enclosed conveyors	Minimize mobilization of particulate matter.
1	Metal Management	Upgrade Shredder emissions capture system and particulate matter (PM) controls for Shredder	2025-26 (subject to permitting, etc.)	Upgrade emissions capture system pick-up points and cyclone/wet scrubber system with alternative emissions capture/PM controls.	Minimize mobilization of particulate matter.
1	Metal Management	Installation of a misting system above the infeed conveyor at the shredder structure.	2024	Installation of a misting system above the infeed conveyor at the shredder structure.	To reduce
1	Metal Management	Installed upgraded conveyors transferring in-process Recyclable Material from Shredder and between MRP operations	2023-24	Enclosed conveyors	Minimize mobilization of particulate matter.
2	SR Management	Upgraded rollup doors for Treated SR in Treated SR storage building	2023	Added high-speed rollup doors	Minimize mobilization of particulate matter.
1	Metal Management	Separation of MRF Material from ELV & Light Iron Feedstoc Material Stockpiles	05/2024	Additional stockpile breakout in the Infeed storage area	Minimize the potential of a fire

Appendix

Insert any attachments and supplemental information within the corresponding sections of the EMP or at the end of this document. Label each attachment with the corresponding Attachment #.

In the table below, list each Attachment # and provide the Page # and Section # (if applicable) of the EMP where the material is referenced.

Attachment #	Reference to Page # and Section # of EMP
1	Page #6, Section #A Company Organization Chart
2	Page #20, Section # Scrap Acceptance Policy
3	Page #33, Section # A Process Flow Diagram
4	Page #33, Section # B Facility Layout/Floor Plan
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #
	Page # , Section #

ATTACHMENT 1
COMPANY ORGANIZATIONAL CHART

Updated March 2025

INCIDENT COMMUNICATION PLAN

Redwood City, CA

Shift Lead to Assess Emergency Situation

Immediate action required to control situation

Primary Emergency Coordinator (EC)
Dillon Wasnick
Cell: (267) 454-4762

If Contact is made

Manage Emergency as per instructions. Primary Emergency Coordinator will alert all necessary management for situation

If contact is not made

High Risk, Government, or third party associated?

Yes

West Region Operations Director
Kyle Heidebrink
Cell: (918) 500-0479

EHS Partner
Manny Ruiz
Cell: (408)250-6206

EHS Director NAM
Kyle Mills
Cell: (916) 865-8115

No

Identify type of situation

Operations Emergency (Fire, Equip Failure, Etc.

Alternate EC
Brendan Scally
Cell: (650) 422-1505

Alternate EC
Jerico Tuazon
Cell: (650) 369-4161

Safety, inspector, or injury/medical emergency

Alternate EC
Brendan Scally
Cell: (650) 422-1505

Alternate EC
Jerico Tuazon
Cell: (650) 369-4161

Security Emergency

Alternate EC
Brendan Scally
Cell: (650) 422-1505

Alternate EC
Jerico Tuazon
Cell: (650) 369-4161

Environmental, Inspector, or emergency

Alternate EC
Brendan Scally
Cell: (650) 422-1505

EHS Partner
Manny Ruiz
Cell: (408)250-6206

Barge/ Ship Emergency

Alternate EC
Brendan Scally
Cell: (650) 422-1505

Alternate EC
Jerico Tuazon
Cell: (650) 369-4161

Transportation Emergency

Transportation Manager
David Bentley
Cell: (510) 734-6639

ATTACHMENT 2
SCRAP ACCEPTANCE POLICY

I) PURPOSE & APPLICABILITY:

A) This standard (Standard) establishes minimum requirements for the acceptance of recyclable materials (Materials) at any Sims Metal (Sims) recycling facility in the West Region (Facility).

B) The Facility Manager is responsible for implementing the elements of this Standard that pertain to operational practices and activities at the Facility.

C) The Commercial Manager within the Sims Region is responsible for implementing the elements of this Standard that pertain to commercial practices and activities in that Region.

D) This Standard may be amended from time-to-time.

II) DEFINITIONS:

A) **Material:** Depolluted end-of-life vehicles (ELVs), and other depolluted end-of-life thin gauge metal-bearing material, such as appliances (Light Iron, together with ELVs, Infeed Material), along with other depolluted metal-bearing material purchased by Sims at a Sims Facility.

B) **Prohibited Material:** Those Materials described in the Sims Prohibited Materials List.

III) MINIMUM REQUIREMENTS FOR INBOUND QUALITY CONTROL PROGRAM

A) **Prohibited Materials**: Prohibited Material are not accepted at the Facility. There are limited exceptions, as agreed upon between Sims and a Supplier, including whole ELV which Sims agrees to depollute or lead-acid batteries which Sims would handle and sell as a commodity, without processing, to a battery recycler.

B) **Signage:** Each Facility entrance used by Supplier trucks/vehicles shall have a sign listing a range of Prohibited Materials.

C) **Supplier Agreements:** All Suppliers of Materials that could potentially contain refrigerants (i.e., CFCs, HCFCs, etc.) or other Prohibited Materials are required to have a Scrap Acceptance Agreement (Supplier Agreement, as may be amended).

1) **Commercial or Regular Suppliers:** The Commercial Manager shall check that each applicable Supplier of Material has a Supplier Agreement on file, which shall be periodically updated.
2) **New Suppliers & Other Suppliers without Supplier Agreements**: The Facility shall subject any load of Material from an applicable Supplier without a Supplier Agreement on file to an inspection for Prohibited Materials. In addition, the Facility shall provide that Supplier with a Supplier Agreement prior to completing the transaction for use with subsequent transactions.

D) **Supplier Information Program** – Suppliers with Materials potentially containing Prohibited Materials are provided written notice of the Sims Prohibited Materials Program, either by the Commercial Department or Facility management, upon establishing a business relationship with that Supplier and at least annually, thereafter. The written notice may be made by means such as a letter, flyer or hand-out and shall include the Prohibited Materials List.

E) **Material Load Check Program** –The load check program consists of the following:

1) **Pre-Pickup Inspections by Truck Drivers**: Where Sims arranges to pick up Material from a Supplier's location, the Driver (whether Sims or contractor) is to visually inspect the portion of the load of Material being picked up which is observable by the driver for Prohibited Material concerns (subject to safety considerations). If Prohibited Material concerns are identified, the Driver is to contact the Sims Dispatcher for instructions.
2) **Visual Inspections**: Each Facility shall have one or more inspectors inspect the visible portion of loads of Material for the presence of Prohibited Material (subject to safety considerations) during Material unloading. Other operations personnel handling Inbound Material also shall also inspect the visible portion of that handled Material for Prohibited Materials.
3) **Detailed Inspections** shall be conducted periodically for loads of ELV and/or Light Iron Material received at a Facility.
4) **Notifications of Identified Prohibited Material:** The Facility Manager, and the Commercial Manager assigned to a Supplier account (if any), shall be notified of Prohibited Material non-conformances by a Supplier identified during an inspection. The Facility Manager shall apply the Corrective Measures Program (see Section IV, below) applicable to the Facility.

IV) Corrective Measures Program – Each Facility, in cooperation with the applicable Commercial Manager, shall develop and implement a Corrective Measures program to address Suppliers which provide Material that does not conform to the Company's Inbound Material Control Program.

V) Training: Employees shall receive the following training in Inbound Material Control**.**

A) **Initial Training**

1) All new Commercial Managers (i.e., Buyers), Inspectors, Supervisors and Managers, and other applicable Employees shall receive training in this Standard. This training shall be completed upon hire or transfer into one of the positions listed above;
2) Other new applicable employees shall receive orientation awareness training.

B) **Refresher Training -** All applicable Employees shall receive a refresher training at least annually. The training shall emphasize any changes to the Company's Inbound Material Control Program.

The following Materials are prohibited from acceptance at all Sims Metal facilities *except by special arrangement with Sims Metal*:

1	Non-Metallic Materials, including but not limited to dirt, asphalt, concrete, debris, tires, trash, etc.
2	Non-Hazardous Free-flowing Liquids, including but not limited to, water.
3	Hazardous Free-flowing Liquids and sludges including but not limited to gasoline, diesel fuel, motor oil, hydraulic fluids, anti-freeze, oil, paint, lubricants, petroleum products and chemicals, except as contained in whole end-of-life vehicles (ELV) purchased by Sims Metal that Sims Metal agrees to depollute (Whole ELV).
4	Flammable and Combustible Materials, including compressed gas and compressed gas cylinders of any kind.
5	Corrosive Materials such as soda ash, acids, and lead-acid batteries, unless purchased separately by Sims Metal.
6	Radioactive Materials of any type, e.g., military scrap, medical scrap, measuring devices, etc.
7	Explosive Materials or potentially explosive materials of any type, such as sealed tanks, munitions scrap, etc.
8	Chemicals or Poisons in solid, powder, liquid, sludge or gaseous form including fertilizers.
9	Infectious Materials (generally placed in red bags or marked by the "infectious" symbol) and Medical Waste.
10	Pressurized Containers or Cylinders including propane tanks, compressed gas tanks, aerosol cans, and fire extinguishers, except when such tanks have been properly cut, uncapped, derimmed or in such a state where easy visual inspection inside the vessel is possible or are independently certified as having been properly vented.
11	Closed Containers Formerly Containing Non-Hazardous Materials, including bulk storage tanks and vessels.
12	Containers Formerly Containing Hazardous Materials including drums, bulk storage tanks, process vessels, paint cans and aerosol cans, except if the containers are certified as empty and cleaned per applicable law, and properly cut open so that they can be thoroughly inspected to verify they are empty and clean in accordance with Sims' empty container requirements.
13	Any Materials Containing CFCs, HCFCs and Refrigerant Substitutes, unless contained in Whole ELV.
14	PCB-containing materials such as capacitors, ballasts, certain underground cables and transformers, etc.
15	Asbestos-Containing Materials (ACM), such as pipe insulation, surfacing materials, etc.
16	Mercury-containing materials such as switches, fluorescent and mercury vapor lights, fixtures, bulbs and thermostats, except as contained in Whole ELV.
17	Cathode ray tubes (CRTs), liquid crystal displays (LCDs) or any device containing a CRT or LCD such as computer monitors, laptop screens and televisions, except at a designated Electronic Materials receiving area.
18	Rechargeable batteries of all sizes and shapes, including but not limited to lithium-ion, lithium iron phosphate, lithium-ion polymer, nickel-cadmium, nickel-metal hydride, and zinc-air batteries.
19	Hazardous Waste – Any Materials containing hazardous or toxic substances and wastes of any kind.
20	ELVs manufactured by Volvo model year 1991 or older (where this restriction is applicable).
21	End-of-life materials or other recyclable metal materials comingled with fly ash.

OTHER REQUIREMENTS FOR ACCEPTANCE OF MATERIALS BY SIMS METAL

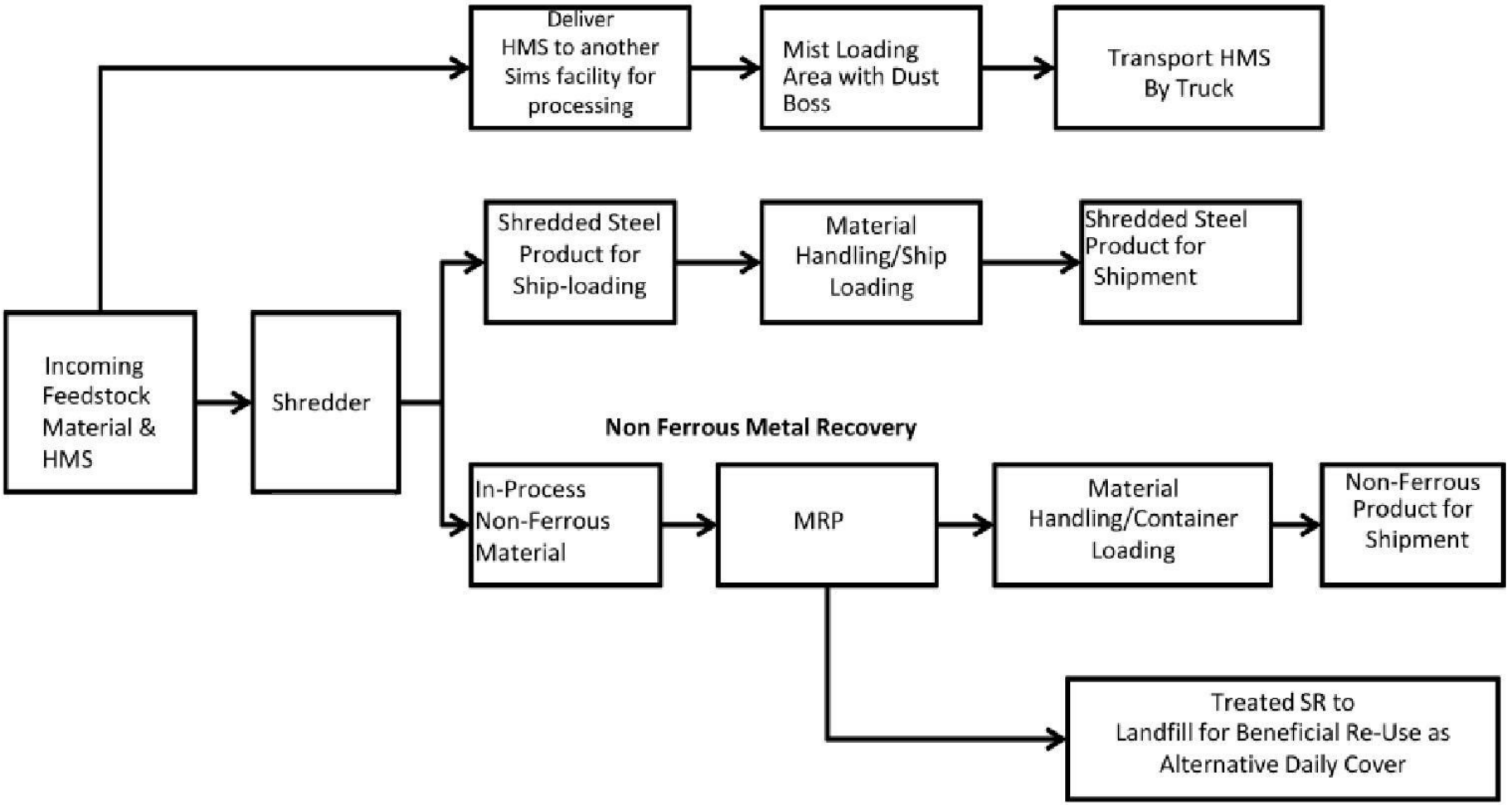
Automobiles (except Whole ELV) must have the following items removed prior to delivery (as required by law or Sims Metal policy): petroleum products and other fluids (e.g. vehicle fuel (including gasoline, compressed natural gas or other fuels), motor oil, and hydraulic fluids, coolants, and antifreeze, and washer fluid (in certain states)), refrigerants, batteries, leaded battery cable ends, mercury convenience light switches (including mercury headlamps, back lit displays and other mercury containing devices in certain states), unspent air bag canisters, other Hazardous Materials and any other materials required by federal or state law to be removed.

Lead Acid Batteries are accepted at most Sims Metal facilities unless cracked, broken, burned or have missing caps.

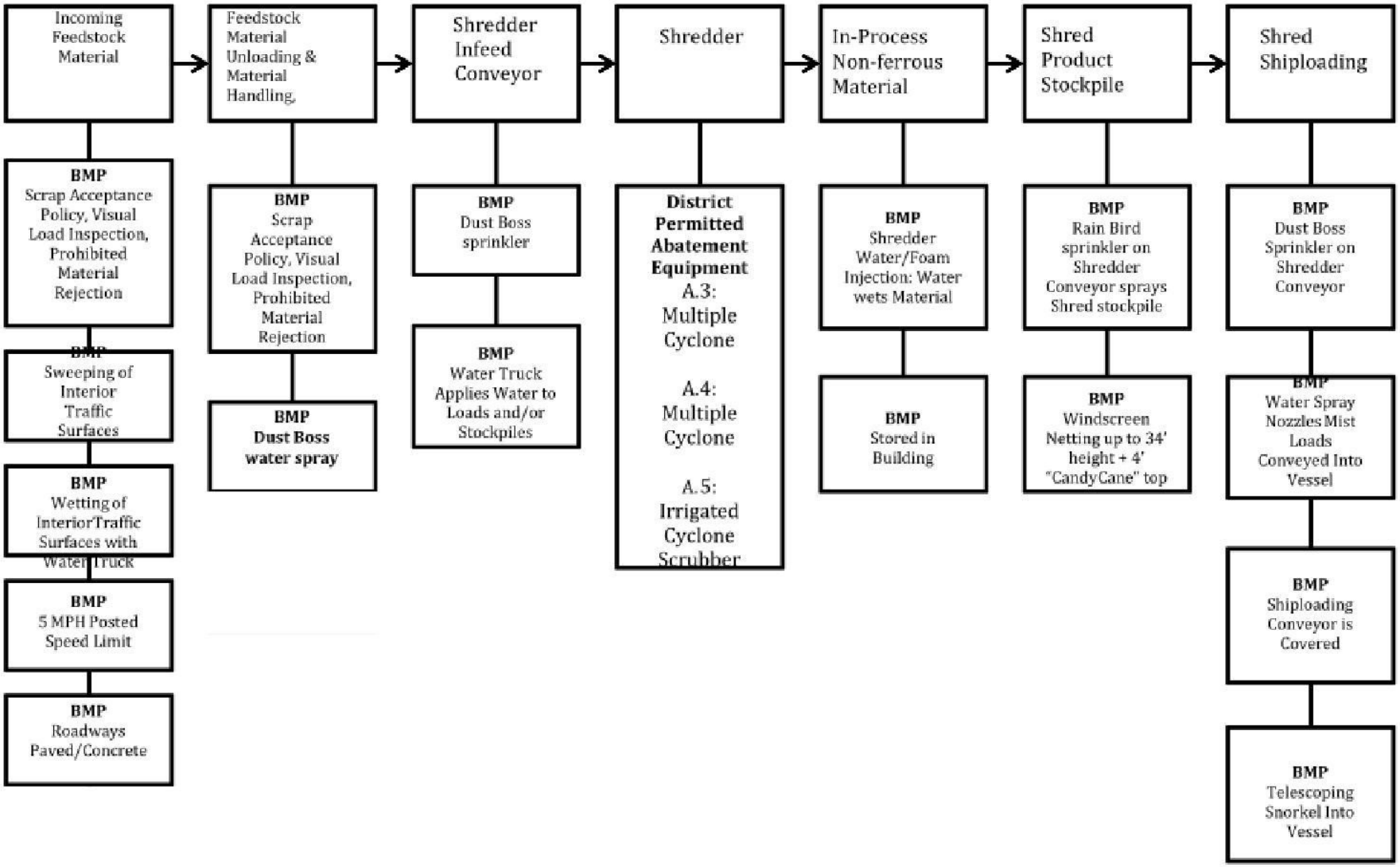
Electronic Materials – Each state has its own requirements regarding which of these materials may be accepted and under what requirements (e.g. a California facility may accept certain "electronic devices" as "Universal Waste").

ATTACHMENT 3
PROCESS FLOW DIAGRAMS

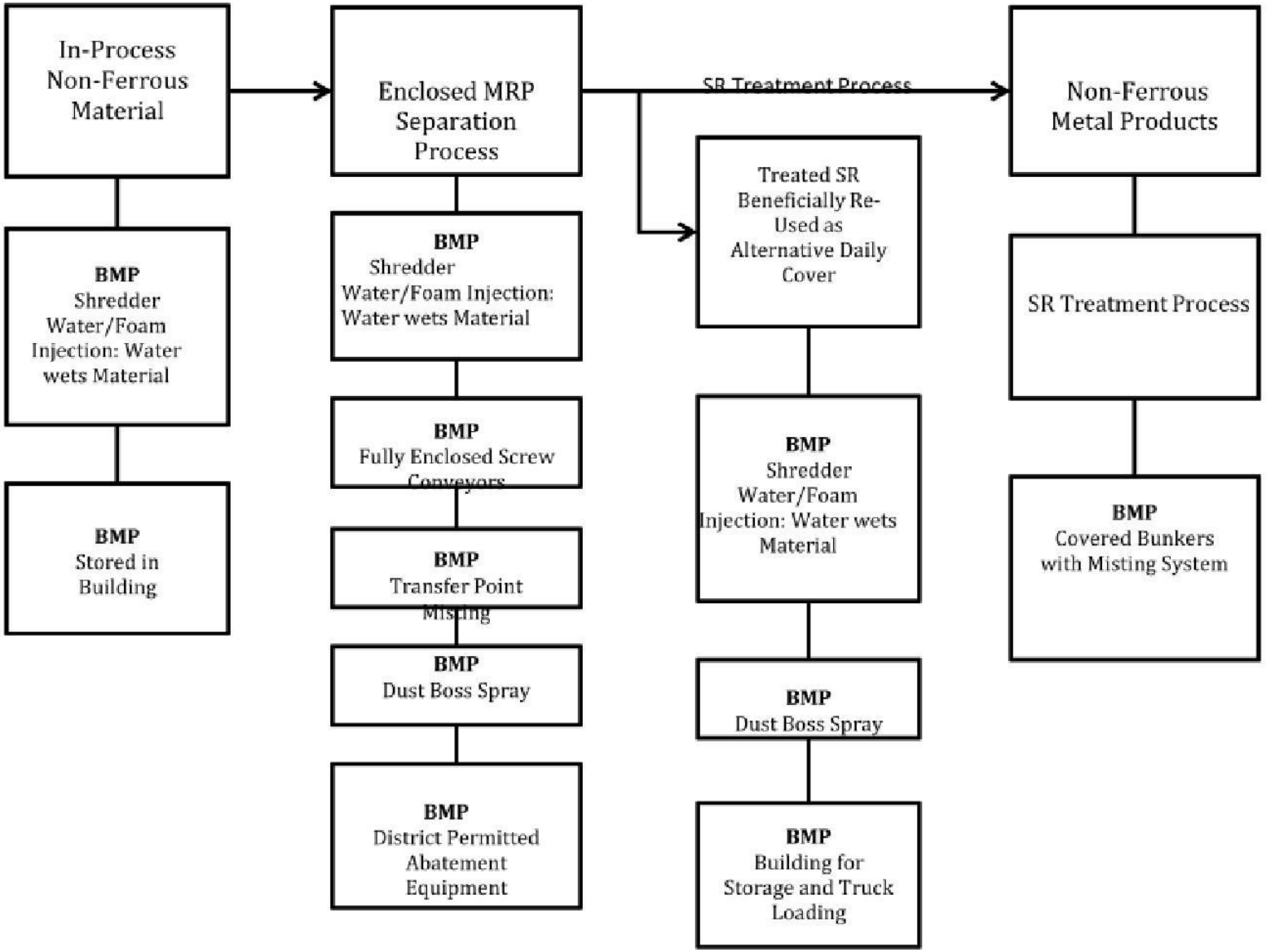
Overall Process Diagram
Sims Metal Management, Redwood City



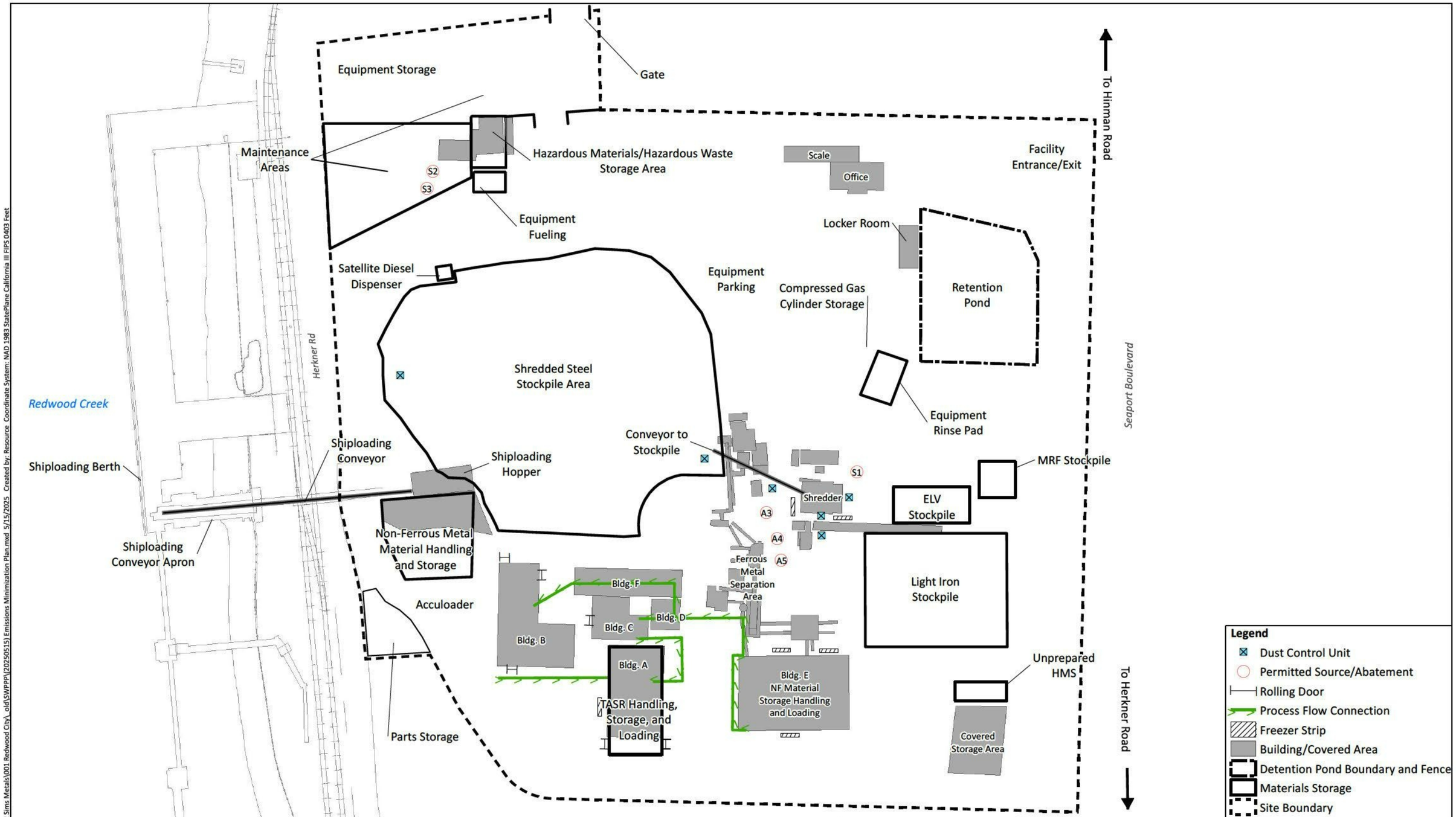
Shredding Process Diagram (with BMPs)
Sims Metal Management, Redwood City



Materials Recovery Plant Separation Process Diagram (with BMPs)
Sims Metal Management, Redwood City



ATTACHMENT 4
FACILITY LAYOUT / FLOOR PLAN



Notes:
S1 = Hammer Mill Shredder
*S2 = Waste Gasoline Tank
*S3 = Drained Gasoline Tank
A3 = Cyclone
A4 = Cyclone
A5 = Scrubber/Irrigated Cyclone
* = Out of Service. ELV Depollution not active

0 50 100 150 200 Feet

1 inch = 100 feet

N

SAFETY FIRST

terraphase engineering

CLIENT:	Sims Metal May 14, 2025
PROJECT:	699 Seaport Blvd Redwood City, CA 94063
PROJECT NUMBER:	0012.007.001

Emissions Minimization Plan

Facility Layout/Floor Plan

File: N:\GIS\Prj\0026 Ahtna\0012 Sims Metals\001 Redwood City_old\SWPPP\(20250515) Emissions Minimization Plan.mxd 5/15/2025 Created by: Resource Coordinate System: NAD 1983 StatePlane California III FIPS 0403 Feet