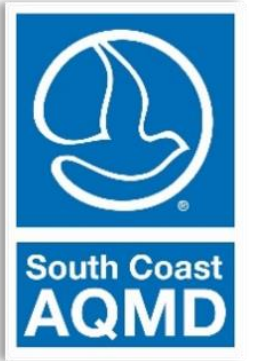


Working Group Meeting #2  
May 18, 2022, 10:00 AM



# **PROPOSED RULE 1460 – CONTROL OF PARTICULATE EMISSIONS FROM METAL RECYCLING AND SHREDDING OPERATIONS**

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**Join Zoom Meeting**

**<https://scaqmd.zoom.us/j/92076108429>**

**Zoom Webinar ID: 920 7610 8429**

**Teleconference Dial-In: (669) 900-6833**

# Agenda



# Working Group Meeting #1 Recap



- Presented background information
  - Assembly Bill 617 (AB 617) communities and Community Emissions Reduction Plans
  - South Coast AQMD rule development process
  - Initial review of facility universe
  - Facility site visits
- Provided an overview of metal recycling and shredding operations
- Discussed examples of fugitive emission sources and point source at facilities



Material  
Handling



Metal  
Processing



Storage



Metal  
Shredder

# Stakeholder Comments From Working Group Meeting #1



## Comment #1

- What is the scope and applicability of Proposed Rule 1460 (PR 1460)?

## Comment #2

- Is there a need for PR 1460 when there are other South Coast AQMD rules that address particulate matter?

## Comment #3

- Will PR 1460 overlap with requirements from industrial stormwater permits?

# Response to Comment #1: What is the scope and applicability of PR 1460?



- The purpose of PR 1460 is to reduce fugitive particulate matter emissions from metal recycling and shredding facilities
- Intent is to keep the applicability of the rule narrow
- PR 1460 will apply to facilities that are primarily engaged in the following types of activities:
  - Automotive wrecking for scrap-wholesale (*this category does not include facilities engaged in automobile dismantling for the primary purpose of selling secondhand parts*)
  - Iron and steel scrap-wholesale
  - Junk and scrap metal-wholesale
  - Metal waste and scrap-wholesale
  - Non-ferrous metals scrap-wholesale
- PR 1460 will not apply to facilities that primarily process non-metal materials

# Response to Comment #2: Is there a need for PR 1460 when there are other South Coast AQMD rules that address particulate matter?



- Existing South Coast AQMD Rules
  - Rule 402 – Public Nuisance
    - Prohibits discharge of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which cause injury or damage to business or property
  - Rule 403 – Fugitive Dust
    - Focuses on reducing particulate emissions from activities capable of generating fugitive dust, control measures are primarily oriented toward construction and earth-moving activities
- PR 1460 will act as an enhancement to existing rules as it will be more tailored to focus on emission sources at metal recycling and shredding facilities
- PR 1460 will include best management practices and housekeeping requirements

# Response to Comment #3: Will PR 1460 overlap with requirements from industrial stormwater permits?



- Under State Water Board regulations, most metal recycling facilities are required to have Stormwater Pollution Prevention Plans (SWPPP)
- SWPPPs establish best management practices to reduce stormwater pollution and off-site discharges and some may be consistent with potential PR 1460 provisions intended to reduce fugitive emissions
  - Routine sweeping
  - Ensuring there is no track out leaving the facility
  - Cleaning up spills and leaks
- PR 1460 best management practices and housekeeping provisions will compliment industrial stormwater permit requirements while focusing on strategies to minimize fugitive air emissions
- Facilities with industrial stormwater permits are not proposed to be exempt from PR 1460

# UPDATED FACILITY UNIVERSE

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# Facility Universe

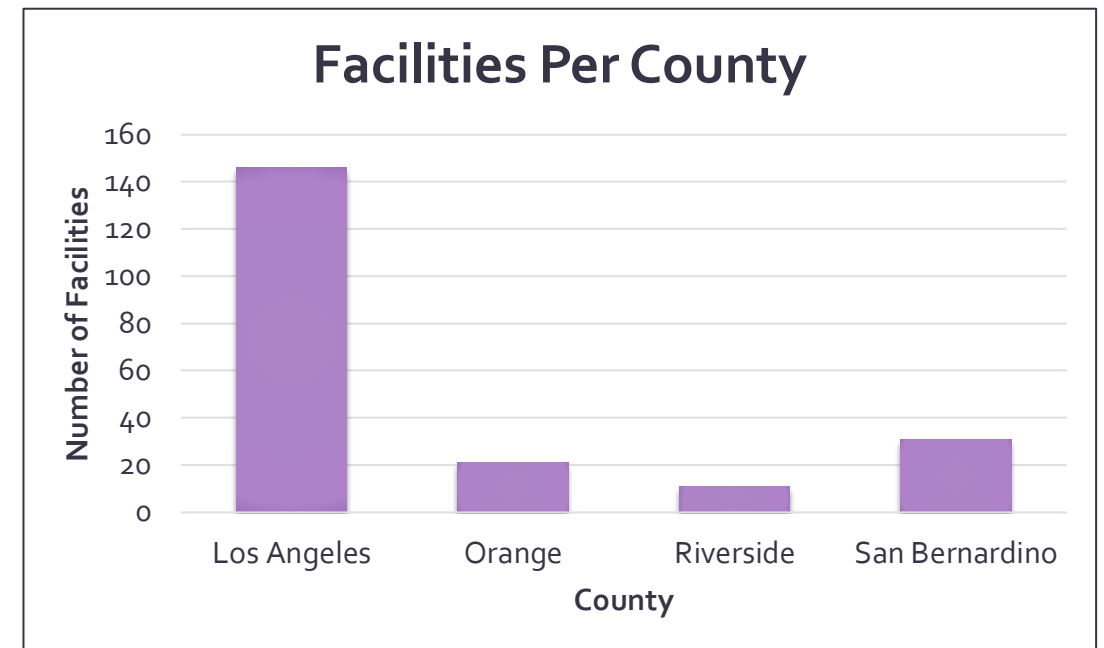


- Staff has been working to update the list of potentially impacted facilities by reviewing aerial images and documents from:
  - South Coast AQMD databases and permits
  - State Water Board
  - Department of Toxic Substances Control
- The list currently includes facilities that have a scrap metal permit under the State Water Board or have been identified through other data sources

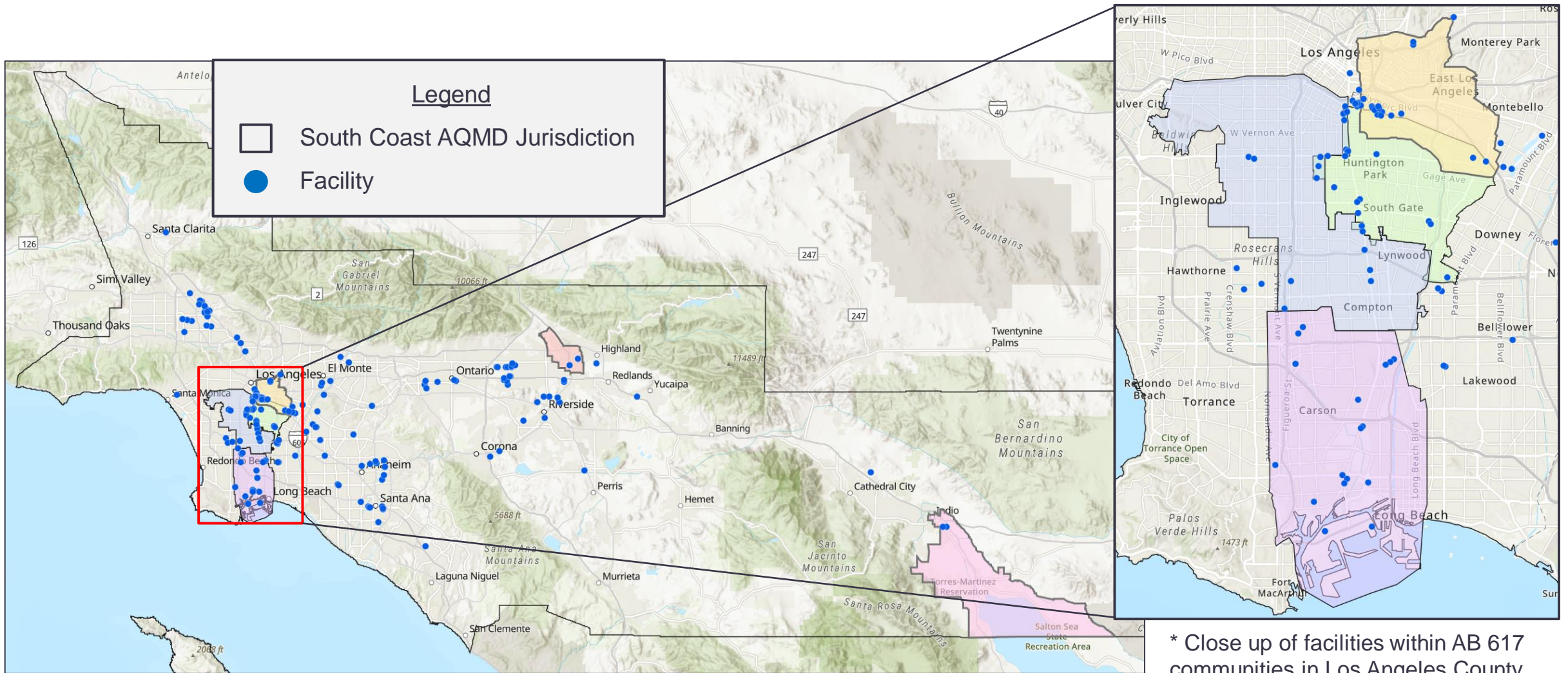
# Facility Data



- Staff has identified approximately 200 metal recycling and shredding facilities
  - Majority of facilities are in Los Angeles County
- Approximately 40 facilities have South Coast AQMD facility IDs
- Approximately 160 facilities are not identified in South Coast AQMD databases
- This list includes a wide range of facility sizes



# Potential Facilities Throughout the District



\* Close up of facilities within AB 617 communities in Los Angeles County

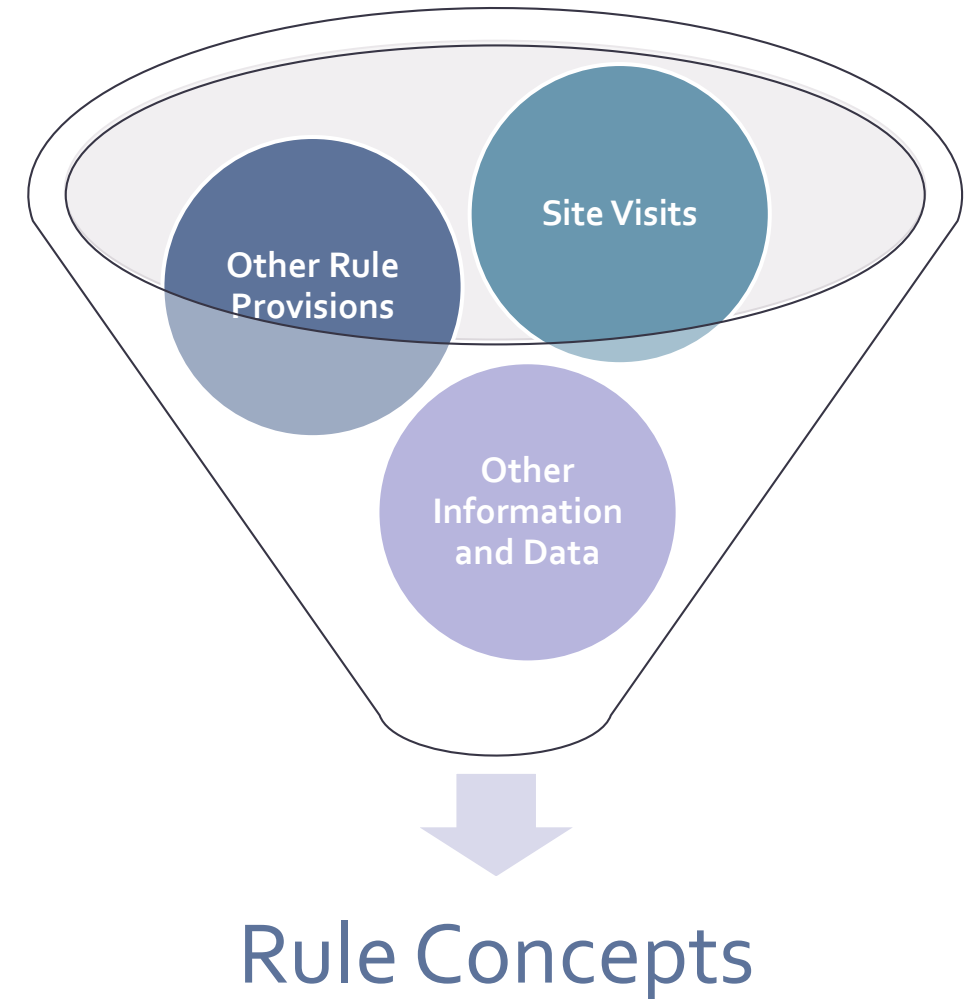
# RULE CONCEPTS

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# Overview



- Rule concepts are initial thoughts for proposed provisions and consider:
  - Provisions in other particulate rules
  - Information gathered from facilities during site visits
  - Other information and data
- Stakeholder input on rule concepts helps shape proposed rule language
- This section will focus on housekeeping provisions, best management practices, and administrative requirements
- Proposed rule requirements will be based on specific facility characteristics (e.g., throughput)



# HOUSEKEEPING

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# Housekeeping



- Housekeeping measures are effective at reducing fugitive emissions when conducted routinely and using appropriate methods
- PR 1460 housekeeping provisions are intended to be consistent with housekeeping requirements in other South Coast AQMD particulate rules such as
  - Rule 1430 – Control of Emissions from Metal Grinding Operations at Metal Forging Facilities
  - Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants
- Initial housekeeping concepts are based on the following categories from recent particulate rules, adjusted for metal recycling facilities:

Potential  
Cleaning Methods

Routine  
Cleaning

Waste Collection  
and Storage



# Initial Concepts - Housekeeping



## Potential Cleaning Methods

- Techniques used to clean that do not generate fugitive emissions (e.g., wet cleaning and vacuuming)
- Wet cleaning uses water to prevent emissions and examples include wet washing, wet mopping, and cleaning with a damp cloth
- Wet vacuum, floor sweeper, or ride on vacuum with dust suppression

## Routine Cleaning

- Areas that should be cleaned at regular intervals/frequencies
- For PR 1460, daily routine cleaning of the following:
  - Vehicular traffic areas
  - Material unloading areas
  - Material processing areas

## Waste Collection and Storage

- Waste materials are generated from various processes
  - Collected material from control devices or sweeping activities
  - Debris left over after sorting and cleaning scrap metal
- Waste material can be covered or stored in closed containers to minimize fugitive emissions



# **BEST MANAGEMENT PRACTICES RULE CONCEPTS**

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# Best Management Practices



- Best management practices are a suite of actions that when implemented can help to reduce fugitive particulate emissions
- For metal recycling and shredding facilities actions can be taken when receiving, handling, processing, and storing material



# Initial Concepts - Best Management Practices



- Use of dust suppressants such as spraying water when:
  - Unloading transport trucks
  - Handling material
  - Processing material
- Watering of materials prior to unloading each transport truck
- Watering of materials before handling and processing
- Watering of material storage piles daily



# Initial Concepts - Best Management Practices



- Limit activities during high winds
- Storing materials
  - Within a barrier equal to the height of the pile
  - Under coverings
- Site improvements
  - Concrete pavement throughout facility
  - Rumble grates or wheel washing systems at egress points
- Considerations for new facilities
  - Conduct activities within an enclosure vented to air pollution control equipment



# ADMINISTRATIVE PROCEDURES

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# Administrative Procedures



- South Coast AQMD permitted facilities or those subject to source specific rules are subject to requirements that facilitate inspections
- Most metal recycling facilities are not subject to permitting and are unaccounted for in South Coast AQMD databases
- PR 1460 administrative procedures are intended to establish a consistent approach to demonstrate compliance
- Initial concepts are to include requirements for:

**Registration**

**Recordkeeping**

**Signage**

# Registration and Recordkeeping



- Facilities regulated under South Coast AQMD permits are required to provide facility information
- Permitted facilities or those subject to source specific regulations are required to maintain records
- Initial PR 1460 concepts include:

## Registration

- Register with South Coast AQMD to provide facility information
- Can include information such as:
  - Contact information
  - Hours of operation
  - Types of materials received and processed
  - Metal throughput

## Recordkeeping

- Establish recordkeeping requirements to be able to monitor
  - Housekeeping
  - Best management practices
  - Monthly and annual metal throughput

# Signage



- Signage is a requirement found in many South Coast AQMD regulations and particulate rules such as:
  - Rule 403
  - Rule 1466
- Initial PR 1460 concept is to require installation and maintenance of signage
  - Information could include a facility contact and a South Coast AQMD contact such as 1-800-CUT-SMOG



# Initial Rule Concepts Recap



Category	Recommendation Summary
Housekeeping	Use approved cleaning methods for routine cleaning, coverings for waste material
Best Management Practices	Apply suppressants and implement procedures to minimize dust emissions, enclosures, site improvements
Administrative Procedures	Registration, recordkeeping, signage

# Next Steps



Staff to continue discussions with stakeholders and regulatory agencies



Working Group Meeting #3 to present potential rule language



Next Working Group Meeting tentatively scheduled for June

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<input type="checkbox"/> Rule 1426	Emissions from Metal Finishing Operations
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<input checked="" type="checkbox"/> Rule 1460	Control of Particulate Emissions from Metal Recycling and Shredding Operations
<input type="checkbox"/> Rule 1466	Toxic Air Contaminant Emissions from Decontamination of Soil
<input type="checkbox"/> Rule 1469	Hexavalent Chromium Emission from Chrome Plating and Chromic Acid Anodizing Operations

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