



Public Workshop to Discuss

Potential Amendments to Rule 6-4: Metal Recycling & Shredding Operations



Photo Credit : James Simonelli

Today's Workshop

- Introductions and Opening Remarks
- Community perspective – WOEIP
- Overview of Metal Shredding and Recycling
- Background on Regulations
- Air District's Potential Rule Amendments
- AB 2851 (Fenceline Monitoring) – Assemblymember Bonta's Office
- Next Steps
- Breakout Session



Introductions & Meeting Guidelines



Community Perspective – West Oakland Environmental Indicators Project

Tonight...

Write your questions and thoughts on sticky notes and add them to the wall.

Who is WOEIP?



West Oakland
Environmental
Indicators
Project

woeip.org

@westoaklandeip

The **West Oakland Environmental Indicators Project** is a resident-led environmental justice nonprofit focused on healthy homes, jobs and lives for all who live, work, and play in West Oakland.



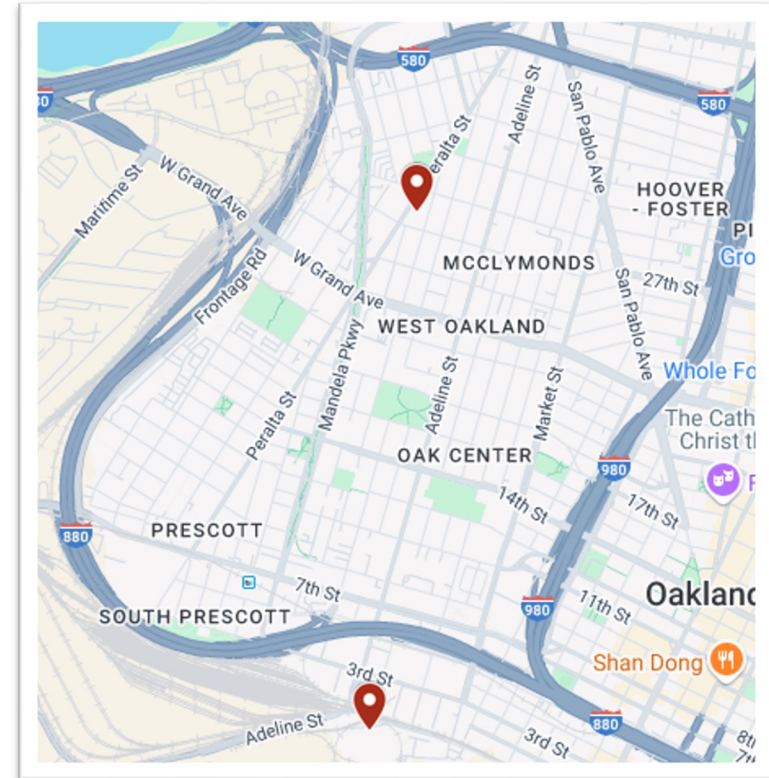
Emissions & exposure reduction projects

Policy change through collaborative problem-solving

Community education & participatory research

Radius is part of a \$3.3 billion industry in CA alone

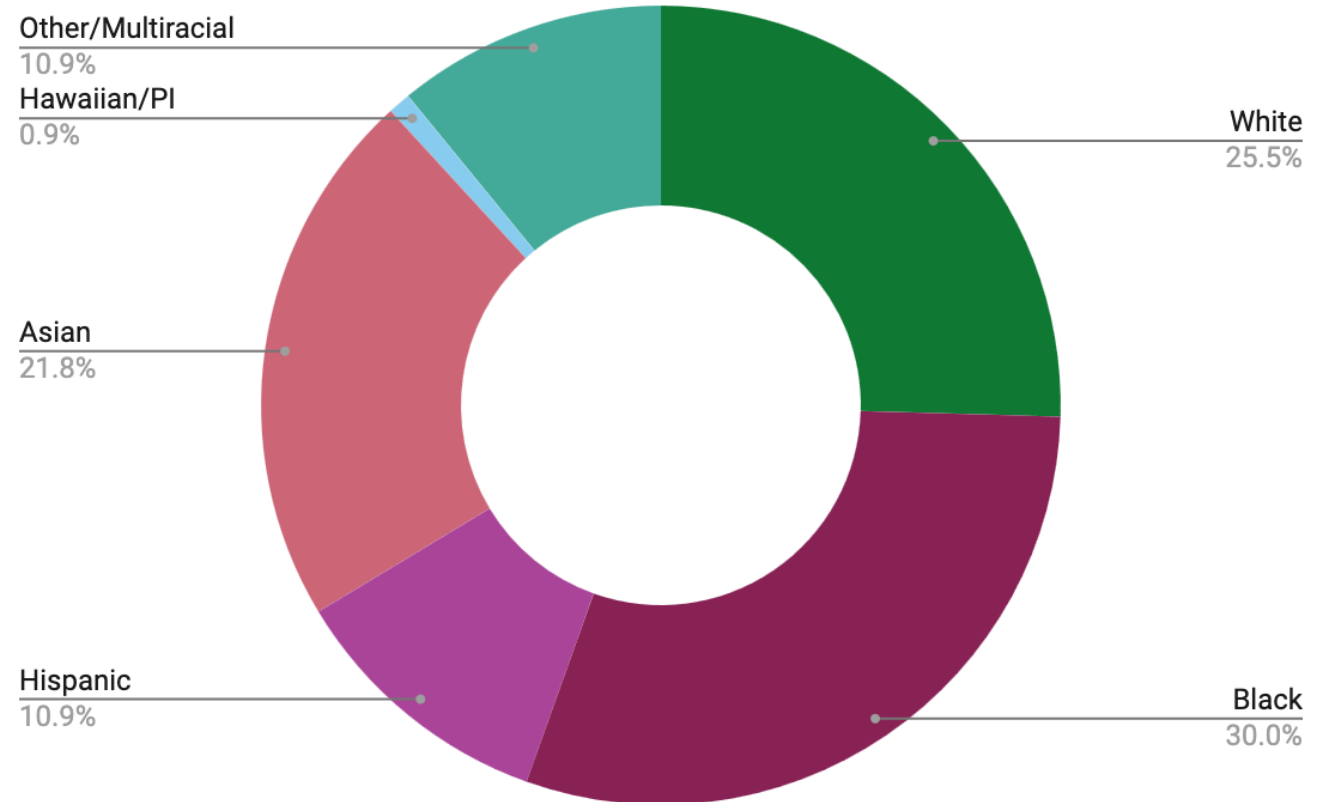
2,500 recycling facilities
9 metal shredders



Research shows that race is the primary indicator for where toxic facilities are located

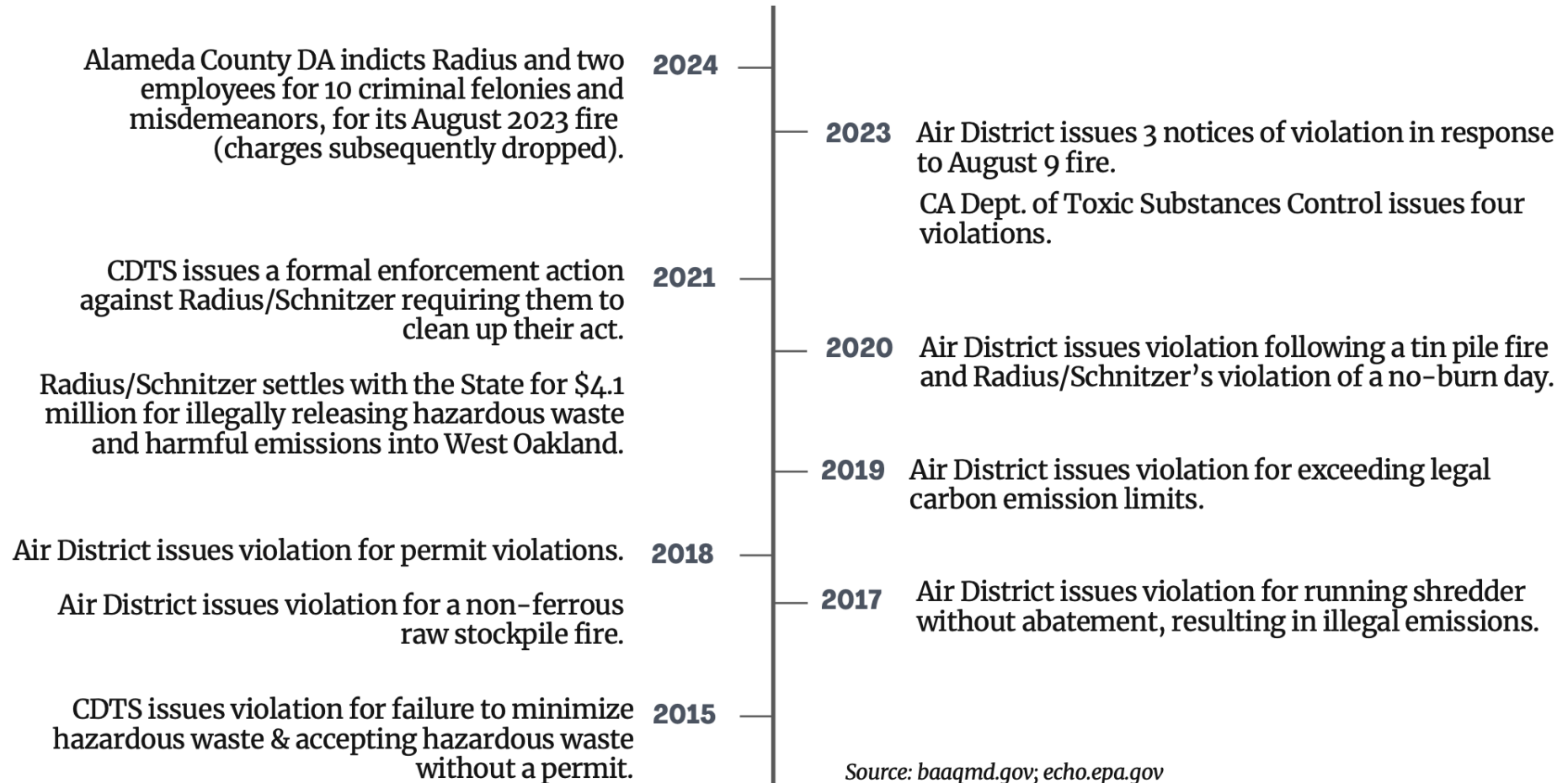
Within 1 mile of Radius:

- 75% are **people of color**
- 43% make **\$50k/year or less**
- 32% are **seniors and children**



Sources: bit.ly/race-toxic-locations, echo.epa.gov

Radius' long history of flaunting regulations



Source: baaqmd.gov; echo.epa.gov

How to curb a serial polluter?

Legislation & agency rules (& enforcement)

AB 2851

BAAD Rule 6-4

SB 404
(SB 1234)
WOEP opposes as-is

DTSC & other regulations

BAAD permit regulations

Lawsuits

2021 CA Attorney Gen. Consent Decree

A's v. Schnitzer Clean Air Act violations
Ruling pending

A's v. DTSC Haz. waste classification
In progress

A's v. BAAD Failure to regulate
In progress

Collaboration

EPA Rapid Response Task Force

EPA-WOEIP-Radius Collaborative

Pair Share: What brought you here?

What brought you here? What do you hope to leave with?

- Turn to the person next to you. That's your partner.
- First person: 2 minutes
- Switch!
- Second person: 2 minutes

Interactive Exercise- “Pair-Share”

What brought you here tonight?



Public Workshop to Discuss

Potential Amendments to Rule 6-4: Metal Recycling & Shredding Operations

Presenter: Poornima Dixit, PhD

Senior Air Quality Engineer

Regulatory Development



Photo Credit : James Simonelli

Presentation Outline

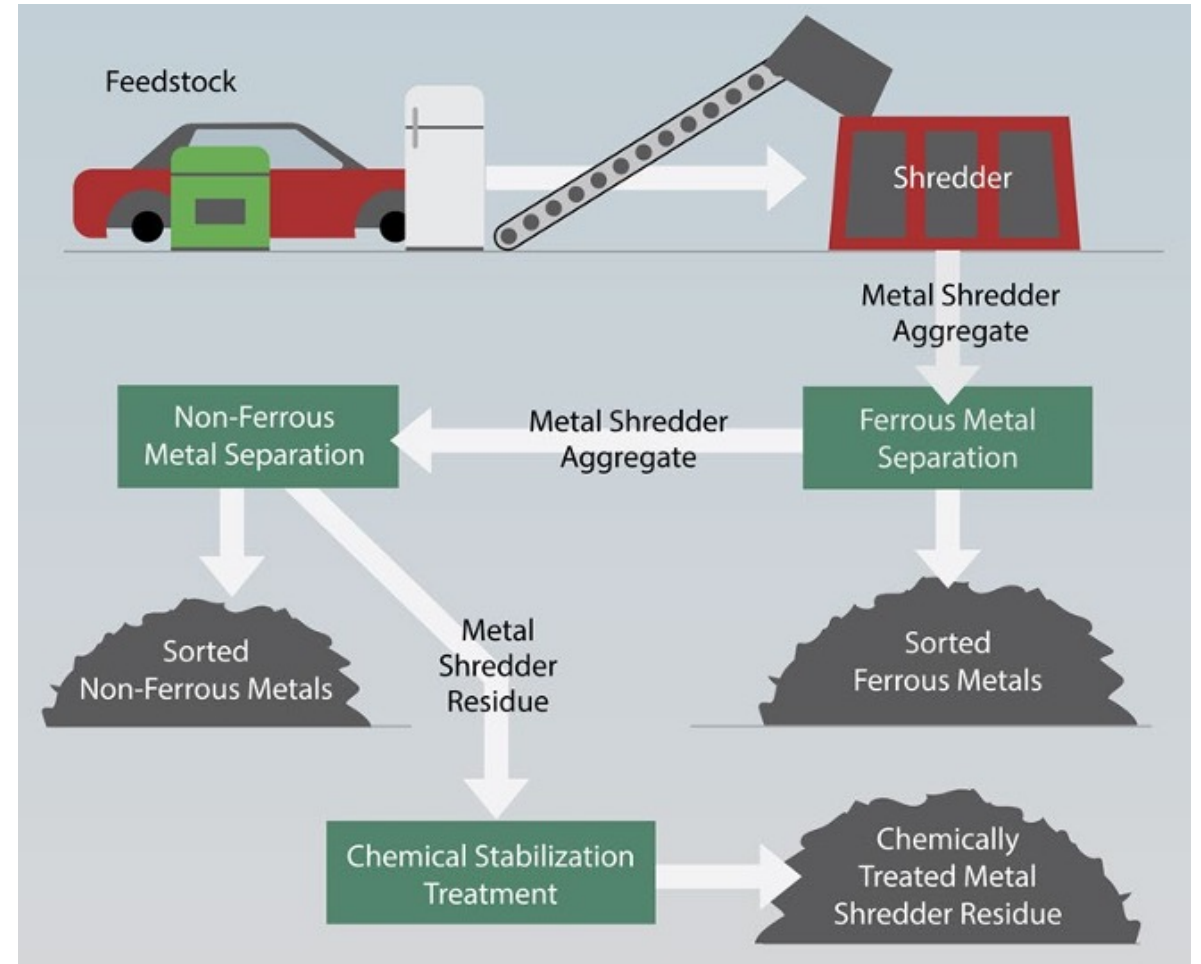
- Overview of Metal Shredding and Recycling
- Rulemaking Process
- Current Regulations on Metal Shredding and Recycling
- Air District's Potential Rule Amendments
- AB 2851 (Fenceline Monitoring) – Assembly member Bonta's Office
- Next steps

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Metal Shredding and Recycling Operations

- Depollution process
- Metal shredding and separation/sorting
- Shredder residue handling
- Chemical stabilization



Air Quality Issues and Concerns from Metal Recycling & Shredding

All Toxic Emissions resulting from Metal Recycling & Shredding Operations/Facilities

- **Particulate Matter (PM₁₀, PM_{2.5})** Shredder, Pile fires, Material-sorting & Handling, Chemical Stabilization, Trucks, rail, ships
- **Light Fibrous Material- LFM** Shredding
- **Volatile Organic Gases** Improper Depollution, Shredding, Pile fires
- **Nitrogen Oxides & GHGs** Shredding, Pile fires
- **Toxic Organics- PAHs, PCBs etc.,** Improper Depollution
- **Toxic Metals- Lead, Hex Chrome** Improper Depollution, Shredding
- **Other Chemicals - Refrigerants** Improper Depollution



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Who Develops Air Quality Regulations ?

Federal Agencies

Environmental Protection Agency (EPA) in the United States sets national standards for air quality, addressing issues in all fifty states, such as vehicle emissions and industrial pollution



State-Level Agency

California Air Resources Board (CARB), develops specific regulations for CA and implements federal standards.



Local Air District

like the **Bay Area Air District**, adopt and enforce rules specific to Bay Area Region.



What other regulations are relevant besides air quality?

California Department of Toxic Substances Control (DTSC)
enforces hazardous waste laws and safe disposal of contaminated resources

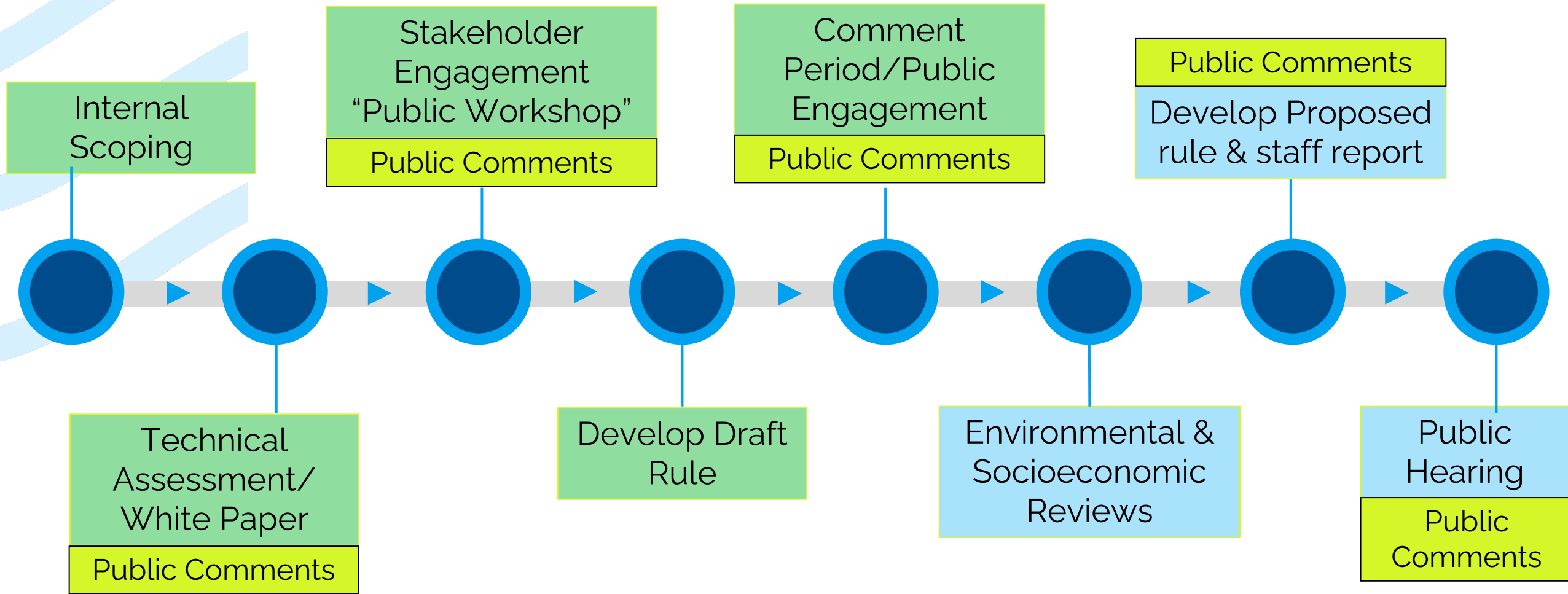


San Francisco Bay Regional Water Quality
Control Board

Develop and enforce water quality objectives,
regulating surface and groundwater quality

San Francisco Bay Conservation and
Development Commission
protect and ensure the responsible, productive, and
equitable use of the San Francisco Bay and shoreline

Rule Amendment Process



What Metal Recycling & Shredding Facilities Must Follow Today?

Existing Rule

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

What Does it Do ?

Require facilities to develop an Emissions Minimization Plan to minimize the fugitive emissions from metal recycling facilities operating within the District

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Why are we amending the rule?

- Concerns about LFM, PM, and recent fires/incidents
- Recommended Actions in Community emissions reductions plans
 - West Oakland Community Action Plan (WOCAP)
 - Richmond-North Richmond-San Pablo Path to Clean Air (PTCA)
- Evaluating challenges and opportunities of the existing Rule

Identifying the main challenges and opportunities

- White Paper (released in July 2024)
 - Thorough review and gap analysis
- Current rules that are comprehensive at other Air Districts
- Comments received from Whitepaper

Potential Changes/Solutions

Existing Rule

Facilities develop a flexible plan-
“Emissions Minimization Plan”, which
consists strategies that shall potentially
reduce emissions from their operations

Challenges

- “EMP” review process is staff time intensive
- EMP is challenging to enforce
- EMP lacks consistency between facilities

Amended Rule

The Air District establishes a consistent set of
required “best management practices” that all
facilities must follow

Benefits

- Introduce consistency and clarity
- Improve enforceability and accountability
- Increase stringency

Potential Changes/Solutions

- Best Management Practices to reduce fugitive emissions from point sources
- Best Management Practices for fire prevention
- Best Management Practices to reduce trackout emissions
- Registration Program
- Fenceline Monitoring

Potential Changes/Solutions



Best Management Practices to reduce fugitive emissions from point sources

- Require enclosures and/or windscreens for processing operations and stockpiles
- Cease activities during high wind events
- Use of water to minimize particulate emissions

Potential Changes/Solutions



Best Management Practices for fire prevention

- Shred-to-ground requirements
- Improve depollution and inspection requirements
- Require continuous monitoring of all fire prone storage piles with stationary FLIR
- Use of water during operational and non-operational hours (feedstock and metal shredder residue containing flammables or materials with potential to catch fire)

Potential Changes/Solutions

Best Management Practices to reduce trackout emissions

“Track out” refers to dirt, dust, or debris that sticks to the tires of trucks and equipment and gets carried from a construction site or material facility onto nearby roads.



Potential Changes/Solutions

Best Management Practices to reduce trackout emissions

- Prohibition of Trackout
 - Onto paved roadways
 - From any un-paved roadways on-site
 - During cleanup activities
- Require paving of all permanent onsite roadways
- Facility vehicle traffic speed and signage



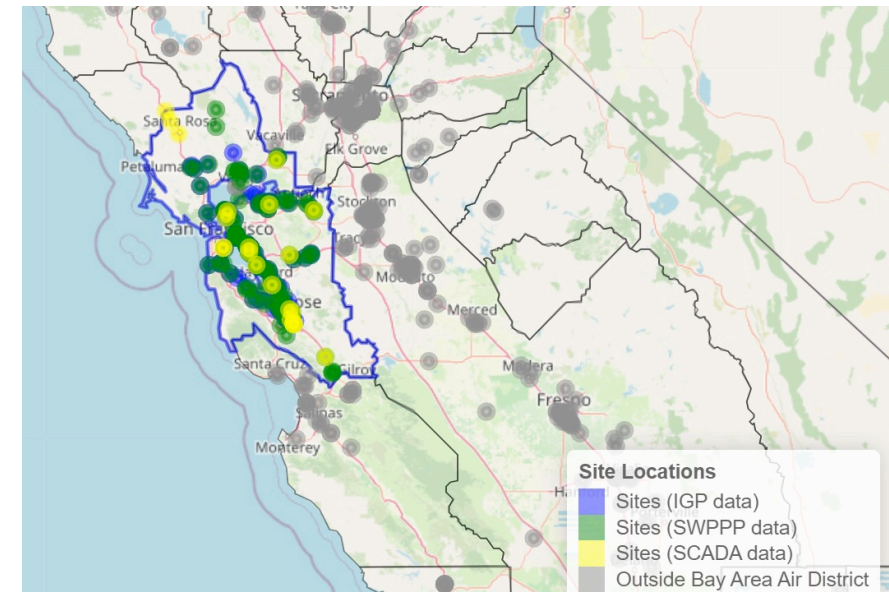
Potential Changes/Solutions



Registration Program

Require all scrap metal facilities that do not have an Air District Permit and do not operate a shredder to register with the Air District

- Promotes accountability
- Regulatory visibility
- Currently over 100 sites in the Bay Area



Air District's Potential Changes- Summary

- The current rule will be restructured
 - The EMP requirement will be removed
 - The rule will now have a list of Best Management Practices
- The changes will bring
 - Better enforceability & Accountability
 - Improved stringency
 - Greater clarity and consistency

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Potential Changes/Solutions



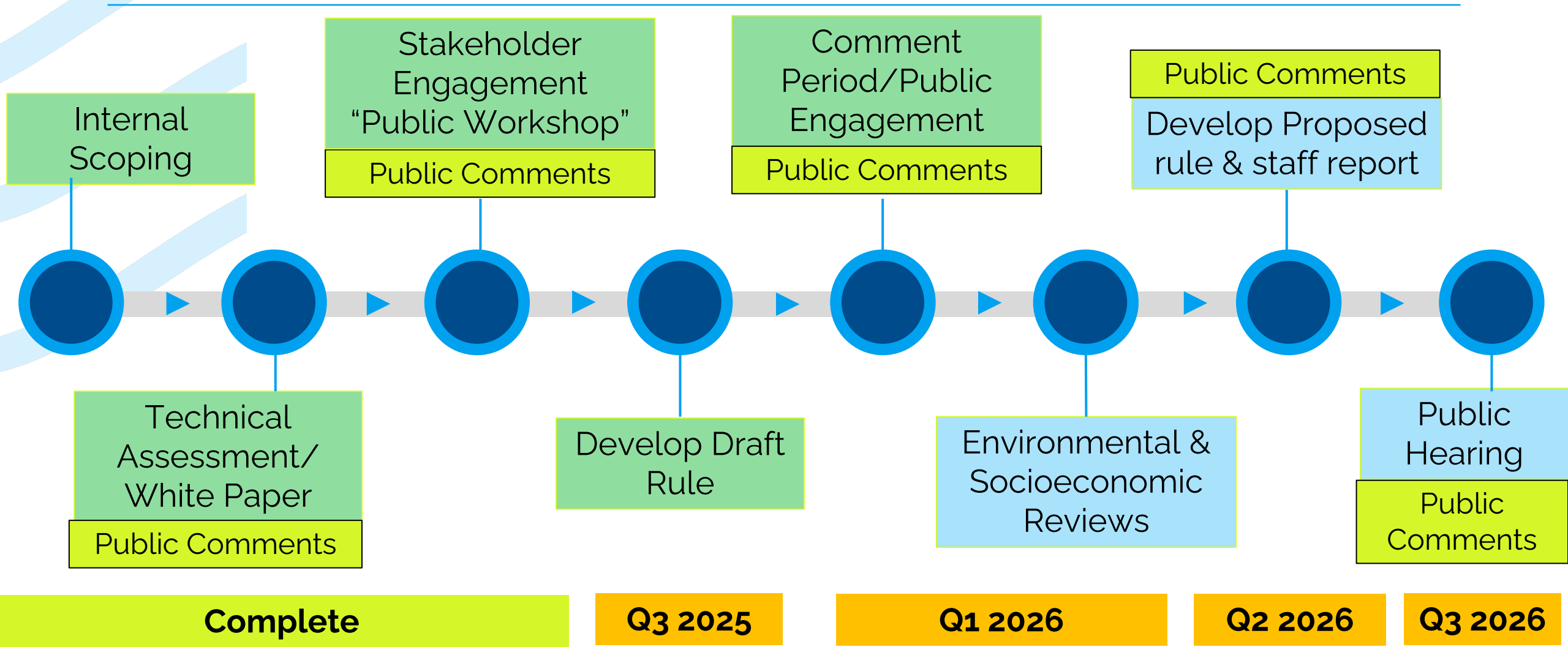
Fenceline Monitoring- AB2851

Next Steps

Be Involved

- Public comment process
- Engage with staff
- Stay updated on all regulatory activity (sign up)

Next Steps- Timeline



Interactive Exercise - Breakout

- What resonates most with you? Why?
- Is there anything you've heard that concerns you? Why?
- Is there anything missing?
 - From this rule?
 - Beyond this rule?
- Are there other metal shredding/recycling issues that matter to you? Why?

Acknowledgements

- Our community members and stakeholders for dedicating your time and sharing your perspectives. Your involvement is essential to the success of this rule amendment process.
- The West Oakland Environmental Indicators Project (WOEIP) for your unwavering support in community engagement and for providing invaluable insights on this important topic.
- Randolph Beale for your seamless facilitation, outreach efforts and for making sure everyone is well taken care of with food and hospitality.
- All Air District staff who are contributing to this rule amendment effort.

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Metal Recycling and Shredding Website

