



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

Request for Comments

July 9, 2024

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER / APCO
SUBJECT: **Request for Comments – Metal Recycling and Shredding Operations White Paper**

The staff of the Bay Area Air Quality Management District (Air District) is requesting comments on a White Paper on Metal Recycling and Shredding Operations.

BACKGROUND

Communities near metal recycling and shredding facilities have raised concerns about air quality impacts from these operations, including particulate matter (PM) and toxic air contaminant (TAC) emissions. The California Assembly Bill (AB) 617 West Oakland Community Action Plan (WOCAP) includes Strategy #68 for the Air District to pursue amendments to the existing rules to further reduce fugitive PM emissions from metal recycling and shredding operations. The Richmond-North Richmond-San Pablo Path to Clean Air (PTCA) also includes a strategy to evaluate potential efforts to address and reduce emissions from metal recycling sources: PTCA Strategy – Commercial and Industrial (C&I) 4.5.

WHITE PAPER

Staff has developed a White Paper on metal recycling and shredding sources. The White Paper provides background information on metal recycling operations, challenges and opportunities of the existing rules, and a discussion of potential recommendations for further Air District efforts. The White Paper identifies recommendations for further potential Air District actions, including:

- Amending Rule 6-4 to replace existing Emissions Minimization Plan requirements with specific mandatory Best Management Practices;
- Amending Rule 6-4 to include monitoring requirements;
- Amending Rule 6-4 to include registration requirements for facilities not requiring permits;
- Providing better information to affect communities during air quality incidents; and
- Strengthening interagency partnerships and collaboration.

This white paper is intended to be the first step in potential Air District rule development. The rule development process will involve further evaluation of the recommended concepts, development of regulatory amendments, stakeholder engagement, and technical analysis and documentation.

INFORMATION AND COMMENTS

Staff requests comments and questions about the Metal Recycling and Shredding Operations White Paper. Following this Request for Comments and closing of the public comment period, staff will assess potential rule development.

For copies of the Metal Recycling and Shredding Operations White Paper, please visit our website at www.baaqmd.gov/ruledev or submit a request to Rule Development at (415) 749-4653 or ruledevelopment@baaqmd.gov. Interested parties are invited to submit questions or comments on the Metal Recycling and Shredding Operations White Paper to Rule Development at ruledevelopment@baaqmd.gov. The deadline to submit comments on these materials is Friday, August 23, 2024, at 5:00 p.m.