

# BAYSHORE

Your recycling solution.



**New Jersey Clean Air Council**  
**“Dust In The Wind” Public Hearing**  
**Fugitive Emission Control in the Recycling Industry**  
**April 21, 2021**  
**Gary Sondermeyer**  
**Vice President of Operations**  
**Bayshore Family of Companies**

# Conclusion

- Class B recycling facilities in New Jersey are heavily regulated
- C&D materials are the most effectively recycled materials in the entire disposal stream in the United States (74% recycling rate nationally)
- Sustainable materials management of C&D provides substantial environmental, GHG emissions reduction, economic and jobs creation benefits
- Continuous Dust control is a clear requirement – fugitive source emissions must be controlled whenever we operate – period
- Controls are in place from the Division of Solid & Hazardous Waste, Air Permitting, Stormwater Management and Federal OSHA
- Additional on-site and off-site Best Management Practices are substantial and effective
- Strict monitoring and reporting requirements are already in place and regular compliance inspections conducted
- We do not feel that additional fugitive dust emissions controls are needed at Class B Recycling Centers

# New Jersey Recycling Facilities

- **Four “Classes” of Recycling Facilities in New Jersey:**
- **"Class A material"** includes source separated metal, glass, paper, plastic containers, and corrugated and other cardboard.
- **"Class B material"** concrete, asphalt, brick, block, asphalt roofing scrap, wood waste, whole trees, tree trunks, parts & stumps, brush, scrap tires and petroleum contaminated soil.
- **"Class C material"** includes compostable food waste, biodegradable plastic, yard trimmings, biomass and lakeweeds.
- **"Class D material"** includes used oils, antifreeze, latex paints, lamps (light bulbs), batteries and consumer electronics.

# Operational Class B Recycling Facilities

- Total Class B Facilities Operating in New Jersey = 97
- Class B's Accepting Concrete and Asphalt = 82
- Class B Facilities with on-site crushers = TBD
- **Source:** NJDEP Class B Facilities List (last updated November 2020)

# Class B Regulation

- General “Recycling Center Approvals” from DEP DSHW  
– Very rigorous – 40 “General Provisions” and 45 additional “Conditions” for all Class B Operations
- Air Quality Regulation: Title V or Preconstruction Permits May Pertain to Each Piece of Equipment (sources)
- Stormwater Management Facility-wide Pollution Prevention Plans which deal with mud and dust as a Surrogate for Fugitive Emissions
- OSHA Requirements for Worker Safety

# Big Picture National Summary

- Total C&D generation in 2018 was **600 Million Tons**
- Composition Analysis:
  - 67.5% Concrete
  - 17.8% Asphalt/Concrete
  - 6.8% Wood
  - 8% Other
- Sustainable Material Management: **74% Recycling Rate**
  - Aggregate Products = 52%
  - Other Manufactured Products = 22%
  - Landfill = 24%
  - Other = 2% (Compost, Soil Amendment, Fuel)
- Significant GHG Reduction, Economic and Jobs Benefits From Industry

**Source:** USEPA Advancing Sustainable Materials Management 2018 Fact Sheet: December 2020

# BAYSHORE

Your recycling solution.

♻️ **One of New Jersey's Largest Approved Recycler!**

♻️ **We Recycle:**

- **Buildings, Roads, Parking Lots, Bridges;**
- **Non-Hazardous Petroleum Impacted Soil;**
- **Curbside Commodities: Bottles, Cans, Plastic;**
- **Houses and Construction/Demolition Debris;**
- **Traditional Metals (copper, steel, brass);**
- **Dredge Material;**
- **Consumer Electronics;**
- **Approved for Food Waste.**



♻️ **Corporate Goal: Operate 100% Green Businesses  
Powered 100% By Renewable Energy**









KNAACK

KNAACK

NO SMOKING  
NO FUMAR  
AUTHORIZED PERSONNEL ONLY  
PLEASE WEAR SAFETY GEAR

CAUTION

NATURAL GAS

# **Bayshore Fugitive Dust Controls**

- Hours of Operation for Processing/Crushing
- Baghouse on Thermal Desorption Facility
- Dust Management Plan Required for LTDD
- Water Spray Misters on Crusher Conveyor Belts
- 100% Paved Roads v. Dirt Roads
- On-site “Mud Management” – Company Street Sweepers
- Continuous Water Truck Misting During Operations
- Contract Services for Street Sweeping Public Roads

# Bayshore Fugitive Dust Controls

- On-Site “Bounce House” or Rumble Strip BMP
- Entry and Exit “Tracking Pads” or “Fods”
- Stormwater Controls: Inlet and outfall fabric filters, structural best management practices and operational BMP’s in place
- Stormwater Monitoring: Quarterly monitoring for TSS Which is a Surrogate for Dust Generation
- Annual Reporting and DEP Compliance Inspections (DSWM, Air, Stormwater, Middlesex CEHA)
- OSHA Requirements for Worker Safety and OSHA Inspection

# OSHA Respirable Crystalline Silica Rule

- Nationally, OSHA Proposed Rules in September 2013
- Looked at Fugitive Emissions from Worker Safety Perspective
- National C&D Recycling Association (CDRA) Participated in Review and Comment as part of a 22 Association “Construction Industry Safety Coalition”
- OSHA Proposed Lowering the Permissible Exposure Limit (PEL) for Respirable Crystalline Silica from 250 ug/m<sup>3</sup> to 50 ug/m<sup>3</sup> with an Action Level of 25 ug/m<sup>3</sup>
- After Extensive Public Comment, OSHA did adopt their more stringent PEL Standard applicable to C&D recyclers in 2016

# Sources

- USEPA Sustainable Materials Management: 2018 Fact Sheet, December 2020: [https://www.epa.gov/sites/production/files/2021-01/documents/2018\\_ff\\_fact\\_sheet\\_dec\\_2020\\_fnl\\_508.pdf](https://www.epa.gov/sites/production/files/2021-01/documents/2018_ff_fact_sheet_dec_2020_fnl_508.pdf)
- The Benefits of Construction and Demolition Material Recycling in the United States: A CDRA White Paper, December 2014: [https://cdrecycling.org/site/assets/files/1050/cd\\_recycling\\_impact\\_executive\\_summary.pdf](https://cdrecycling.org/site/assets/files/1050/cd_recycling_impact_executive_summary.pdf)
- NJDEP Class B Facilities List (last updated November 2020) <https://www.state.nj.us/dep/dshw/lrm/classb.htm>
- OSHA Adopted Rules at 29 CFR 1910.1053, 3/25/16 <https://www.federalregister.gov/documents/2016/03/25/2016-04800/occupational-exposure-to-respirable-crystalline-silica>