Matthew Rodriquez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Barbara A. Lee, Director
1001 "I" Street
P.O. Box 806
Sacramento, California 95812-0806

Edmund G. Brown Jr.
Governor

May 8, 2015

Mr. Richard Josephson
Senior Vice President, General Counsel and Secretary
Schnitzer Steel Industries Inc.
299 SW Clay Street, Suite 350
Portland, Oregon 97201

RE: INFORMATION REQUEST FOR IMPLEMENTATION OF SENATE BILL (SB) 1249 (Hill, Chapter 756, Statutes of 2014)

Dear Mr. Josephson:

The purpose of this letter to request detailed information from you regarding the metal shredding activities that occur at 1101 Embarcadero W, Oakland, California 94607-2536.

As described in the Department of Toxic Substances Control's (DTSC) March 13, 2015, letter, Implementation of Senate Bill (SB) 1249 (Hill, Chapter 756, Statutes of 2014), SB 1249 requires DTSC to thoroughly evaluate metal shredding facilities and the metal shredder waste they generate to ensure these activities do not harm public health and the environment. To perform the required evaluation, DTSC needs detailed information from you about your operations. For your convenience, DTSC has developed a questionnaire (attached) to enable your facility to more easily provide DTSC with the necessary information and data required for the evaluation process. For ease of communication, this questionnaire uses terms designed to identify industry practices and may not reflect legal definitions subject to interpretation. Some terms have been defined within the questionnaire. DTSC appreciates your cooperation regarding this process and asks that your answers be as detailed as possible.

You may assert a confidentiality claim covering part or all of the information requested, pursuant to the California Health and Safety Code Sections 25173, by attaching a cover sheet to such information at the time it is submitted, with a stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary," or "company confidential." If no such claim accompanies the information when it is received by DTSC, it may be made available to the public without further notice to you.

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DTSC requests that this questionnaire be completed and the information be provided to DTSC by July 10, 2015. If you need further clarification, additional time to prepare the requested information, or have any comments or questions about the questionnaire, please feel free to contact Kevin Sanchez of my staff at (916) 322-8677 or Kevin.Sanchez@dtsc.ca.gov.

Sincerely,

Rick Brausch, Chief
Policy and Program Support Division
Hazardous Waste Management Program

cc: Mr. Christopher Cho
Staff Attorney
Office of Legal Affairs
Department of Toxic Substances Control
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Mr. Kevin Sanchez
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Ms. Margaret Rosegay
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50 Fremont Street
San Francisco, California 94105-2228

QUESTIONNAIRE
METAL SHREDDING FACILITIES
May 8, 2015

1. Describe your facility's scrap metal acceptance policy and describe all materials you bring into your facility for shredding, metals recovery, or both.

2. How much material by weight did your facility shred from January 1, 2014, through January 1, 2015? Include the percentage of total materials shredded annually for each of the following: vehicles, appliances, and other forms of scrap metal.

3. What type of shredder (e.g., the model, brand, and its horse power) is used by your facility?

4. Is your facility's shredder equipped with an Air Pollution Control Device (APCD)? How else does your facility control any particulate emissions throughout the facility?

5. Provide a copy of all permits and other forms of authorization issued to your facility by any governmental entity related to metal shredding activities.

6. Describe the ferrous metals separation process, including how shredded material is sent to the ferrous metals separation process, the type of magnet used, if any, and under what circumstances would materials exiting the ferrous metals separation process be reintroduced. Also indicate if your facility recovers ferrous metals from any material that is not shredded at your facility. If so, please describe that process. Please include representative pictures of the ferrous recovery process and a site map of where activities occur when applicable.

7. Is the shredded material ever stored onsite before ferrous metal recovery occurs? If so, on average how much and for how long is it stored, how is it stored (e.g., on a paved surface), and where in the facility is it stored?

8. If ferrous metals recovery does not occur onsite, please respond to the following questions:

   - How much shredded material is stored onsite?
   - How long is shredded material stored onsite?
   - How is the shredded material stored (e.g., on paved ground)?
   - Where in the facility is the shredded material stored?
   - Where is the shredded material sent (please include addresses)?

9. Describe the nonferrous metals separation process at your facility, if any. Describe how aggregate (i.e., the shredded material remaining after ferrous metals separation) is introduced into that process, the type of system(s) used , where in your facility it occurs, and under what circumstances would materials exiting nonferrous metals separation processes be reintroduced. Also indicate if your facility recovers nonferrous metals from any material that is not shredded at your facility. Please provide a site map of where activities occur.

QUESTIONNAIRE
METAL SHREDDING FACILITIES
May 8, 2015

10. Is aggregate ever stored onsite prior to or during the nonferrous metals separation process? If so, how much is stored and for how long? Identify where in your facility it is stored.

11. If nonferrous metals recovery does not occur onsite, please respond to the following questions:

    - How much aggregate is stored onsite?
    - How long is aggregate stored onsite?
    - How is the aggregate stored (e.g., on paved ground)?
    - Where in the facility is the aggregate stored?
    - Where is the aggregate sent (please include addresses)?
    - Describe the offsite transportation and if any Department of Transportation (DOT) requirements are followed.

12. Describe how your facility chemically treats metal shredder waste. For the purposes of this document only, "metal shredder waste" shall mean the material remaining after metal recovery is complete. Include how metal shredder waste not chemically treated is sent to the treatment process, how screening is conducted, the types of equipment used to perform the chemical treatment, chemical formulas and doses, and the sampling and analysis performed on the chemically treated metal shredder waste to ensure adequate treatment.

13. Do landfills, regional water quality control boards, or other regulating authority impose any requirements on treated metal shredder waste sent for disposal or use as Alternative Daily Cover (ADC)? If so, what are the requirements?

14. Is untreated metal shredder waste stored onsite prior to treatment? If so, how much and for how long is it stored, how is it stored and where on the facility is it stored.

15. Is treated metal shredder waste stored onsite before disposal? If so, how much and for how long is it stored, how is it stored and where on the facility is it stored?

16. How much treated metal shredder waste, if any, was transported offsite in the calendar year January 1, 2014, through January 1, 2015? List all destinations with addresses.

17. Describe the offsite transportation of metal shredder wastes. Are there any DOT requirements followed during transportation?