

Department of Toxic Substances
Hazardous Waste Management Program

Attn: Mr. Edward Benelli

The proposed annual flat fee on metal shredding facilities is long overdue - a quarter century late to be more precise.

It is truly unfortunate that the metal shredder operators cannot be invoiced to recoup expenditures going back to the late 1980s. The taxpayer has had to subsidize the required monitoring of this lucrative private industry for far too long.

Additionally, CalRecycle should impose waste fees for the hundreds of thousands of tons of treated auto shredder residue disguised as a recyclable waste and benignly classified as "alternative daily cover."

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