Department of Toxic Substances Control

Fence-line Monitoring at Metal Shredding Sites Pre-Regulatory Workshop

AUGUST 18, 2026

Introductions

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Welcome

- Purpose: present and receive feedback from interested parties on the proposed regulation package required by statute adopted in Assembly Bill 2851 (Ch. 743, St. 2024)
- Materials for this event are available online at https://dtsc.ca.gov/metal-shredders/

How to Participate

- **During the presentation:**
  - Question & Answer (Q&A) function
  - Feedback form at https://dtsc.ca.gov/metal-shredders/
- **After the presentation:**
  - Hand raise function
    - For those calling in, dial *9 to raise your hand and dial *6 to unmute

AB 2851 (Ch. 743, St. 2024) requires:

- DTSC to collect an annual fee from metal shredders to fund DTSC and Office of Environmental Health Hazard Assessment (OEHHA)'s costs to implement metal shredder oversight
- Air districts to develop requirements for facility-wide fence-line air quality monitoring at metal shredders
- Metal shredders to monitor for hazardous waste constituents and report results
- DTSC to collect and analyze light fibrous material at fence-lines
- Develop a procedure for community notification if monitoring indicates a release

Discussion Items

- Metal Shredding Site
- Regulatory Definitions
- Hazardous Waste Constituent Monitoring Requirements
- Hazardous Waste Constituent Reporting Requirements
- DTSC's Off-site Fence-line Monitoring
- Enforcement

Metal Shredding Site

- Metal Shredding Site is defined in section 69600.2 of the California Code of Regulations as either of the following:
  1. A metal shredding facility, as defined in section 25150.82 of the Health and Safety Code, or
  2. A location at which metal shredding machinery processes vehicles or major appliances, or other metallic or partially metallic feedstock materials to facilitate the separation, sorting, or removal of recoverable ferrous or nonferrous or both ferrous and nonferrous metals from recyclable or nonrecyclable materials

Added Regulatory Definitions

- The following definitions were added, including:
- Light Fibrous Material – a fibrous mixture of nonmetallic materials, including, but not limited to, synthetic fabric and carpet fibers, and entrained metallic particles, often representing the lightest fraction of metal shredder aggregate produced from the shredding of end-of-life vehicles and other metallic items, that is susceptible to dispersal into the environment.
- Fence-line – means the property boundary for a metal shredding site.

Photograph of LFM

Hazardous Waste Constituent Monitoring Requirements

- Every week, metal shredding sites shall:
  - Inspect the fence-line of the metal shredding site.
  - Collect any LFM and/or dirt and debris if observed at the fence-line or within five feet inside the fence-line
  - Make a hazardous waste determination on any LFM or dirt and debris observed within the set parameters
  - Manage and dispose of any hazardous LFM or hazardous dirt and debris accordingly

Hazardous Waste Constituent Reporting Requirements

Metal shredding sites shall write a report summarizing the observations and any results of the inspection and collection of LFM and/or dirt and debris

General Information

- Business name and address
- Contact information
- Site Identification Number
- The date of the inspection

LFM and/or dirt and debris collection

- The approximate amount of LFM and/or dirt and debris observed and collected during the inspection
- The equipment used if LFM and/or dirt and debris is collected

Hazardous Waste Constituent Reporting Requirements

Metal shredding sites shall write a report summarizing the observations and any results of the inspection and collection of LFM and/or dirt and debris

Documentation

- Photographs of the fence-line including areas where any LFM and/or dirt and debris is observed
- Photographs of the areas after LFM and/or dirt and debris is collected
- An aerial view site map that outlines the fence-line and the location marked on a map where any LFM and/or dirt and debris was observed
- Documentation on how a hazardous waste determination is made on the LFM and/or dirt and debris if observed

Hazardous Waste Constituent Reporting Requirements Cont'd.

If the LFM and/or dirt and debris is deemed hazardous, the report shall be uploaded within 45 days of the inspection by the metal shredding site on a web-based platform that is available to the public and DTSC

The metal shredding site shall develop a web-based notification program where the public can opt-in to receive notifications that would notify the public when a new report has been uploaded

The reports shall be kept on the web-based platform for 3 years from the date the hazardous LFM and/or hazardous dirt and debris was collected

Any reports not posted on the web-based platform shall be retained for 3 years from the date of the inspection and made available to DTSC within 72 hours upon request

Department's Off-site Fence-line Monitoring

- DTSC will routinely conduct inspections off-site of the metal shredding sites to inspect for LFM and dirt and debris.
- DTSC will send any inspection reports from off-site inspections to the metal shredding site to post on their web-based platform.

Enforcement

- DTSC's proposed regulations include the assessment of penalties for the following violations:
  - When LFM or any dirt and debris deemed hazardous is observed off-site at the fence-line or at any location beyond the fence-line of the metal shredding site
  - If the metal shredding site collected hazardous LFM and/or hazardous dirt and debris and does not notify DTSC or the public

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Feedback Request

- What would be the easiest way to report the amount of LFM and/or dirt and debris observed and collected during the inspections?
  - grams, ounces, cups, etc.
- Are the monitoring and reporting requirements clear?
- Issues regarding the web-based platform and notification system

DTSC will consider feedback received on or before **August 28, 2026.**

How to Participate

- Questions or Feedback can be submitted through:
  - Question & Answer (Q&A) function
  - Hand raise function
    - For those calling in, dial *9 to raise your hand and dial *6 to unmute.
  - Feedback form at https://dtsc.ca.gov/metal-shredders/

Thank you for joining!

- Presentation materials of today's workshop will be posted at https://dtsc.ca.gov/metal-shredders/
- For questions about this proposal, please contact us via DTSC_MSfencelinemonitoring@dtsc.ca.gov