



Radius Recycling previously known as Schnitzer Steel Industries, Inc. Update on Environmental Compliance

August 2026



Background

Radius Recycling previously known as Schnitzer Steel Industries, Inc. owns and operates a scrap metal recovery and recycling facility located at 1101 Embarcadero West, Oakland, California 94607 ("Radius"). Radius occupies approximately 33.2 acres adjacent to the Oakland Inner Harbor waterfront and the Port of Oakland. The Facility is bounded to the south by the Oakland Inner Harbor, to the east and west by the Port of Oakland (Howard Terminal and Roundhouse Terminal respectively), and to the north by Embarcadero West and Union Pacific Railroad tracks. Community members are concerned about fires and potential exposure to pollution that may impact public health from Radius's operations.

Is the facility subject to environmental requirements?

Radius is subject to federal, state, and local requirements related to air emissions, water quality, and hazardous materials and waste.

Who is involved in this matter?

Multiple agencies at the local, state, and federal level are responsible for regulating Radius and have been engaged in inspection and enforcement activities. These agencies include:

- Alameda County Department of Environmental Health, Certified Unified Program Agency (CUPA)
- Bay Area Air Quality Management District (Bay Area AQMD)
- City of Oakland/Oakland City Attorney
- San Francisco Bay Regional Water Quality Control Board
- Alameda County District Attorney
- California Attorney General
- State Water Resources Control Board
- California Air Resources Board (CARB)
- California Department of Toxic Substances Control (DTSC)
- California Environmental Protection Agency (CalEPA)
- United States Environmental Protection Agency, Region 9 (US EPA)

Alameda County CUPA Actions

The Alameda County Department of Environmental Health (ACDEH) became the CUPA for the City of Oakland in 2015. As the CUPA, ACDEH implements administrative requirements, permits, inspections and enforcement of hazardous materials laws and regulations. The CUPA programs under the authority of ACDEH as a regulatory agency include:

- Hazardous Materials Business Plan (HMBP)
- Hazardous Waste Generator (HWG)
- Underground Storage Tank
- Aboveground Petroleum Storage Act (APSA)
- California Accidental Release Prevention

Radius is subject to HMBP, HWG and APSA program requirements. Since becoming the CUPA for Schnitzer Steel/Radius Recycling in 2015, ACDEH has conducted inspections and found the following violations:

- September 14, 2015, one HMBP program violation that was corrected on October 13, 2015.
- September 14, 2015, five HWG program violations that were corrected on February 16, 2016.
- September 15, 2015, four APSA program violations that were corrected on December 3, 2015.
- December 11, 2017, one HMBP program violation that was corrected on December 21, 2017.
- November 8, 2018, one HWG program violation that was corrected on December 7, 2018.
- November 5, 2019, one HMBP Notice of Violation was issued and corrected on November 11, 2019.
- April 11, 2023, four HWG program violations that have not been corrected.
- April 11, 2023, one APSA program violation that has not been corrected.
- August 10, 2023, one HMBP program violation that has not been corrected.
- August 10, 2023, three HWG program violations that have not been corrected.
- November 27, 2023, an NOV was issued for HMBP, HWG and APSA program violations. All violations were corrected on January 16, 2024. Enforcement of the violations was referred to the Alameda County District Attorney's Office on January 26, 2024.
- May 14, 2025, Alameda County opposed Senate Bill (SB) 404 which proposed to remove metal

shredding facilities from regulation under the Hazardous Waste Control Law (HWCL) and exclude the hazardous waste they generate from the definition of hazardous waste, effectively codifying an existing loophole. Consequently, this hazardous waste could be managed, transported, and disposed of without complying with hazardous waste regulations, endangering the health and safety of communities and the environment. Furthermore, local governments would be unable to conduct enforcement on such violations because metal shredding facilities would no longer be subject to HWCL regulation, local CUPAs would lose critical enforcement authority to ensure compliance with HWCL requirements by owners and operators of these facilities within Alameda County.

- September 15, 2025, Alameda County wrote to the Governor's Office urging the Governor to veto SB 404.
- October 13, 2025, the Governor vetoed SB 404 noting "this bill lacks clear definitions regarding the materials processed at these facilities, including what "hazardous waste" requirements are applicable. Without this clarity, this bill is not as protective, places a significant burden on DTSC, and cannot be successfully implemented."
- January 7, 2026, Alameda County opposed SB 811 – a copy of SB 404 and the third time the same bill was resurrected ("zombie bill") – to continue protecting public health and the environment including environmental justice communities such as West Oakland.
- March 13, 2026, responded to California Governor's Office Emergency Services Hazardous Materials Spill Report Control #: 26-1199.
- June 9, 2026, seven (7) HWG program violations that have not been corrected.
- June 15, 2026, an NOV was issued for HWG program violations. Proof of correction of violations was required by July 15, 2026. All violations remain uncorrected.
- June 22, 2026, responded to California Governor's Office Emergency Services Hazardous Materials Spill Report Control #: 26-3136.

Details of these violations can be found in *Appendix A - Alameda County CUPA Inspections, Violations, and Return to Compliance*.

Bay Area AQMD Actions

The Bay Area AQMD regulates air emissions from Radius.

- 2013-2015: Investigated two (2) air pollution complaints alleged against Radius (April 2013 and Sept 2015). No odors or visible emissions from the facility were observed; no violations of permit conditions or Air District regulations were found.
- 2015-2023: Conducted facility inspections May 2015, July 2016, Oct 2017, Aug 2018, Jan 2019, March 2020, Sept 2021, and June 2023 to determine compliance with Air District regulations and permit conditions. No violations were found.
- January 2017: The Air District and Radius enter into a compliance and settlement agreement to allow the facility to operate for up to 4 months without abatement in violation with Air District requirements while necessary upgrades to the facility were made including upgrading abatement equipment and enclosing the shredder.
- July 2017: Conducted a facility inspection to determine compliance with the above compliance and settlement agreement. One (1) notice of violation was issued for not operating the shredder with abatement during the agreement period.
- June 2018: Investigated a non-ferrous raw stockpile fire at Radius and an associated air pollution complaint. The investigation resulted in the issuance of a Notice of Violation for the following violations: 1) prohibited open burning, 2) non-compliance with its approved Emission Minimization Plan, and 3) failure to keep records.
- Nov 2018: A compliance and settlement agreement was executed between the Air District and Radius to acknowledge the pending exceedance of the number of ship calls allowed in Air District permit conditions. The agreement allowed additional ship calls above its permitted limit, imposed excess emission fees and monetary penalties.
- Dec 2018: Radius reported an exceedance in the number of ship calls allowed in Air District permit conditions resulting in a notice of violation for violation (issued Jan 2019) of Air District permit conditions.
- Jan 2019: A source test conducted at the Radius shredder indicated a violation of Air District Regulation 8, Rule 2 Miscellaneous Operations for excess VOCs and resulted in the issuance of a notice of violation in July 2019.

- June 2020: Investigated a fire that occurred at the tin (pre-shred) stockpile at Radius, which resulted in the issuance of a notice of violation for prohibited open burning on a no burn day.
- Aug 2020: Investigated an air pollution complaint alleged against Radius. Odors from the facility were not detected and no violations of permit conditions or Air District regulations were found.
- Sept 2020: A compliance and settlement agreement was executed between the Air District and Radius to allow the facility to continue operating while two (2) regenerative thermal oxidizer (RTO) abatement devices were installed at the shredder to abate volatile organic compound (VOC) emissions discovered during Jan 2019. The agreement imposed enforceable timelines for the installation of the abatement devices, imposed monetary penalties for the excess VOC emissions, and required Radius to provide over 46 tons of emission reduction credits.
- 2022: Investigated two (2) air pollution complaints alleged against Radius in January and March. Odors or dust/particulates from the facility were not detected and no violations of permit conditions or Air District regulations were found.
- Feb 2022: An addendum to the Sept 2020 compliance and settlement agreement was executed between the Air District and Radius to allow the facility to continue operating during the change out of the existing particulate abatement device at the shredder with the two (2) RTO abatement devices. The agreement imposed enforceable timelines for the changeover of the abatement devices, monetary penalties for the excess particulate matter emissions, and limits on operating hours at Radius, and required additional control of particulate matter through the use of a portable mister and implementation of best management practices.
- 2022: Source tests conducted Apr 2022, July 2022, Aug 2022, and Oct 2022 at the shredder indicated violations of Air District permit conditions and resulted in the issuance of four (4) notices of violation.
- 2023: Source tests conducted Feb 2023 and April 2023 at the shredder indicated violations of Air District permit conditions and resulted in the issuance of two (2) notices of violation.
- Aug 2023: Investigated a pre-shred light tin/iron scrap stockpile fire and associated fifty-one (51) air pollution complaints. The investigation

- resulted in the issuance of three (3) notice of violations representing four (4) following violations: 1) public nuisance, 2) prohibited open burning, 3) excessive visible emissions, and 4) non-compliance with its approved Emission Minimization Plan.
- November 2023: A letter was sent to Radius notifying the facility that the violations issued as a result of the August 2023 fire was a triggering event requiring a revision of the Emission Minimization Plan to be submitted within 30 days per Air District Regulation 6, Rule 4.
- December 2023: Air District received the revised Emissions Minimization Plan from Radius. Air District staff are currently reviewing the plan for completeness.
- August 2024: Air District approved the revised Emissions Minimization Plan (EMP) from Radius. Plan addressed deficiencies noted from August 2023 fire.
- January 2025-Current: Compliance & Enforcement staff conducted routine patrols one (1) to three (3) times a week along streets around the facility for off-site odors. Occasional faint odors observed; however, none could be attributed to activities or sources at Radius. No violations of permit conditions or Air District regulations were documented because of patrols.
- July 21, 2025: Compliance Inspection conducted at the facility to determine compliance with Air District regulations, permit conditions, and EMP. No violations documented.
- March 3, 2026: Conducted site walkthrough with Air District Regulatory Development staff to observe and assess best management practices for potential rule implementation. Compliance & Enforcement staff inspected a flow measurement device at both Regenerative Thermal Oxidizers (shredder abatement devices) to confirm installation of equipment and ensure compliance with Radius' permit. No violations documented.
- March 2026: Investigated a conveyor belt fire and an associated air pollution complaint. No Air District violations have been documented because of the fire.

City of Oakland/Oakland City Attorney

City of Oakland Enforcement History

The City of Oakland civilly and administratively enforces the Oakland Municipal Code, including but not limited to the Fire Code (the combined state and local provisions),

Building and Maintenance Code (OMC 15.08), laws about blight (OMC Chapter 8.24), the Planning Code (OMC Title 17), and laws about storm water management and creek protection (OMC Chapter 13.16), where applicable.

Oakland Fire Department (OFD)

The Oakland Fire Department (OFD) conducts an annual inspection of Radius to determine whether the facility is compliant with the Fire Code. If there are aspects of the facility that require correction, OFD will request that Radius make those corrections, usually within 30 days. Once the corrections are made, OFD will issue Radius an “operational hazardous materials: use, store, handle, dispense permit.”

- December 6, 2022: OFD's annual inspection documented Fire Code violations relating to servicing, adding, and mounting certain fire extinguishers, labeling certain gasoline tanks, adding NFPA diamond labels where applicable, and moving certain stored cylinders. All violations were corrected. The inspection document can be found in *Appendix B - OFD Inspection Schnitzer Steel 12-6-22*.
- March 14, 2023: OFD issued the annual operational fire permit.
- July 8, 2024: OFD's annual inspection documented violations relating to servicing fire extinguishers and replacing extension cords with permanent wire and recommended that all fire hydrant locations have signs to indicate their location.
- July 25, 2024: OFD issued the annual operational fire permit.
- June 18, 2025: OFD conducted a fire alarm annual inspection and issued a certificate for passing the inspection.
- July 9, 2025: OFD conducted a Fire/Life Safety inspection and granted a Fire Clearance/Certificate of Compliance.
- July 21, 2026: OFD conducted a Fire/Life Safety inspection and granted a Certificate of Compliance.
- July 21, 2026: OFD issued the operational fire permit after conducting inspections related to hot works operations, compressed gas, hazmat, and high pile storage. As of the date of issuance, Radius was in compliance with the City of Oakland Fire Code.

Beyond these annual inspections, OFD also conducts inspections of the facility when Radius is doing construction work at the facility related to fire suppression systems, to ensure the work is done in compliance with the Fire Code.

Building Code and Department of Public Works

Oakland's Building Code Enforcement team and Department of Public Works have overseen construction and related permits at Radius's facility over the years, and at times have had jurisdiction over storm drain inspections. We are investigating ongoing compliance. We are not aware of past Notices of Violation that have been issued against Radius for non-compliance with the Building Code.

On September 11, 2020, Oakland's Department of Public Works referred Radius to the San Francisco Bay Regional Water Quality Control Board and DTSC after finding evidence of PCB contamination in the storm drains near Radius. Enforcement authority now lies with the Water Board. This referral form can be found in *Appendix C - Schnitzer Steel Source Property Referral (09-11-20)*.

Alameda County District Attorney

The Alameda County District Attorney's Office (ACDAO) investigates alleged criminal and civil violations of environmental laws. On or about July 17, 2025, the ACDAO and the Bay Area Air Quality Management District (Air District) filed a joint civil action in Alameda County Superior Court (Case No. 25CV132114) alleging violations of the Unfair Competition Law and Air District regulations relating to operations at Radius Recycling's Oakland, CA facility including violations relating to the fire that occurred on August 9-10, 2023. The case is currently pending with no trial date set.

California Attorney General

- On February 3, 2021, the Attorney General's Office, DTSC, and the District Attorney of Alameda County (the “prosecution team”) filed a lawsuit against Radius for violations of several environmental laws, including the Hazardous Waste Control Law, Proposition 65, the Health & Safety Code, and the Fish & Game Code, in connection with Radius's operation of its metal shredding and recycling facility in West Oakland.
- On February 3, 2021, the Alameda County Superior Court entered a Consent Judgment against Radius that required, among other things, the company to: 1) pay over \$2 million to fund supplemental environmental projects to install and maintain mechanical air filtration and install and implement an air quality monitoring program in West Oakland and pay over \$2 million in penalties and costs; 2) enclose its shredder and joint products plant to prevent the release of Light Fibrous Material; 3)

install two Regenerative Thermal Oxidizers to reduce Radius's emissions of toxic air pollutants; and 4) provide Proposition 65 warnings to businesses and residences in the vicinity of the facility.

- The prosecution team continues to jointly monitor and enforce Radius's compliance with the judgment.

State and Regional Water Board Actions

Radius (Waste Discharger Identification 2 01S0067) is regulated pursuant to National Pollutant Discharge Elimination System (NPDES) Permit CA0030228, Order No. R2-2022-0016 (2016 Order). The Facility intermittently discharges treated stormwater and process wastewater to the City of Oakland's municipal separate storm sewer system, which discharges to Oakland Inner Harbor, a water of the United States within San Francisco Bay's South Bay Basin watershed. Past compliance information:

- November 9, 2016: 2016 Order issued to cover discharges to Oakland Inner Harbor when discharges to East Bay Municipal Utilities District are not permitted (during and within 24 hours after a rain event).
- December 8, 2016: Inspection of facility under new permit. Found that Radius needed to improve housekeeping to reduce tire track out of mud at the facility.
- February 17, 2017: Inspection of the wastewater treatment system, no wastewater violations were documented.
- March 16, 2018: Inspection of the facility. Staff noted ineffective containment of industrial stormwater at the wooden pier and ponding near stockpiled materials.
- April 26, 2018: Inspection as a follow up to the previous month's inspection found Radius needed to update its maintenance and monitoring strategies for its treatment plant.
- July 6, 2018: Mandatory minimum penalties of \$12,000 issued for violations of pH and copper effluent limits.
- February 15, 2019: Inspection to evaluate compliance with the 2016 Order. Improvements to truck cleaning (wheel washing), stockpile management, and updates to plans for other structural improvements required.
- March 12, 2020: Final report submitted for completed 980,000-gallon storage tank to limit discharges to Oakland Inner Harbor.
- December 18, 2020: Wooden pier

decommissioned to stop industrial stormwater discharges.

- October 1, 2021: Joint inspection with State Board, no major findings.
- December 20, 2021: Structural improvements such as paving the facility to limit dirt and debris track out completed and final report submitted.
- September 30, 2022: Toxicity reduction evaluation plan submitted in response to toxicity issues in wastewater.
- May 11, 2022: NPDES permit reissued with updated pollutant regulations and requirements.
- August 10, 2023: Inspection of the facility in response to fire incident. No direct observation of offsite discharge of fire suppression water or wastewater in the vicinity of the affected stockpiles.
- October 17, 2023: Notice of Violation issued requiring Radius to submit additional information related to offsite discharges and corrective actions to prevent future occurrences.
- November 17, 2023: Radius responds to the NOV, providing requested information, corrective measures available to prevent site runoff, and a commitment to update their pollution prevention plan.
- August 8, 2025: Inspection to observe facility upgrades and verify groundwater monitoring locations.
- March 11 and 13, 2026: Inspections responding to the March 11, 2026, found that fire suppression water did not discharge into the community or to the estuary.
- June 29, 2026: Radius provided information about a fire on June 22, 2026; suppression water did not discharge into the community or to the estuary.

Radius is also regulated pursuant to Cleanup and Abatement Order No. R2-2013-1001 (2013 Order), which rescinded Site Cleanup Requirements issued in 1988 (Order No. 88-023). GeoTracker ID: [SL0600116612](#). Actions taken to clean up the site include the following:

- January 2, 2013: The 2013 Order required cleanup of process sediment, industrial process wastewater, and metal shredding byproducts discharged into Oakland Inner Harbor. The 2013 Order also required the Discharger to implement best management practices (BMPs) to prevent future discharges.
- June 20, 2013: Radius encountered petroleum-contaminated soil and groundwater in nine foundation pits during construction of a wind barrier.
- June 25, 2013: Inspection of nine foundation pits.
- August 20, 2013: Required investigation of

petroleum in soil and groundwater around nine foundation pits after petroleum was observed during their excavation in June 2013.

- April 14, 2014: Notice of Violation of the 2013 Order for failure to provide adequate reports.
- March 23, 2015: Conditional approval of workplan for sampling near the nine pits for petroleum, metals, and PCBs and requirement to submit a completion report. Radius complied with the requirement and submitted a report on July 31, 2015.
- February 24, 2017: Required additional groundwater sampling for petroleum and metals. Radius complied with the requirements and submitted reports on July 14 and August 18, 2017. The Regional Water Board concurred with the reports on September 5 and December 5, 2017.
- April 16, 2019: Regional Water Board issued a letter documenting violations of the 2013 Order and requiring two additional technical reports to determine the extent of contaminants discharged to Oakland Inner Harbor.
- October 1, 2020: Groundwater investigation required to determine presence of PFAS chemicals.
- March 8, 2022: Approved work plan to conduct groundwater and sediment pore-water sampling for chemicals of potential concern, including PFAS. Completion report submitted September 7, 2022.

CARB Actions

CARB is responsible for protecting the public from the harmful effects of air pollution and reducing emissions that cause climate change. CARB enforces emission standards and requirements to ensure mobile sources are as clean as possible. Additionally, CARB supports and oversees air district stationary source programs. To this end, CARB staff participated in a facility inspection at Radius on June 23, 2019, with US EPA and Bay Area AQMD staff. In 2020, CARB staff provided technical assistance to DTSC, the California Attorney General, and the Alameda County District Attorney to identify additional actions Radius could take to reduce air pollution emissions. In 2022, CARB entered into a settlement agreement with Radius that resolved alleged violations related to mobile source record keeping and reporting requirements.

DTSC Actions

DTSC regulates the generation, handling, transportation, storage, treatment, and disposal of hazardous wastes.

DTSC has conducted the following inspections at Radius since 2015:

- March 17 – 19, 2015: Inspected facility for Hazardous Waste Control Law (HWCL) compliance and violations. DTSC cited several violations of the HWCL regarding onsite management of hazardous waste. Sample analysis results indicated various soil samples and Light Fibrous Material (LFM) exceeded soluble Threshold Limit Concentrations and Total Threshold Limit Concentrations for Lead, Zinc, Chromium, and Copper.
- June 5, 2018: Inspected facility for HWCL compliance and violations related to a fire that occurred onsite on June 2, 2018. Cited for failure to minimize the possibility of a fire.
- June 18, 2020: Inspected facility for HWCL compliance and violations related to a fire that occurred onsite on June 17, 2020. Cited for failure to minimize the possibility of a fire and failure to remove materials that require special handling from appliances.
- December 2020 to July 2022: Beginning in December 2020, DTSC's Office of Criminal Investigations set up two total suspended particulate monitors, one southwest of Radius (Southwest Monitor) and one east of Radius (East Monitor), that collected particles in the air onto filters that were then weighed and analyzed for metals in a laboratory. Between December 2020 and July 2022, a total of 98 samples were collected from these monitors.
- February 3, 2021: Alameda County Superior Court entered Consent Judgement (see description under California Attorney General, above). The Consent Judgement resolved the violations cited during DTSC's March 2015 inspection and violations for offsite releases of LFM through February 3, 2021.
- June 2021 to May 2023: Inspected areas outside of the facility's perimeter for LFM on the ground resulting in 23 sampling events and 67 LFM samples collected.
- December 16, 2021: Radius submitted a Fixed Treatment Unit Permit By Rule notification to Alameda County CUPA to chemically treat metal shredder residue. On May 25, 2022, DTSC sent Alameda County CUPA a notice of intent to administer and assume ownership of the Permit By Rule regulations.

- March 30, 2022: A joint letter from DTSC, the Attorney General's Office, and the Alameda County District Attorney's Office (the "People") was sent to Radius notifying them of continued off-site releases and deposition of LFM from their facility and identifying how they were not complying with the February 3, 2021, Consent Judgment.
 - May 15-16, 2022: Inspected facility for HWCL compliance and violations. DTSC cited several violations, including but not limited to, illegal treatment, transportation, and disposal of hazardous waste.
 - September 8, 2022: Joint letter from the People sent to Radius demanding that Radius immediately implement additional measures to prevent the off-site release and deposition of LFM.
 - January 18, 2023: Conducted a sampling follow up inspection to collect samples of the Chemically Treated Metal Shredder Residue and wastewater runoff from various treatment units.
 - July 31, 2023: Final cease and desist letter was sent to Radius by the People. The letter summarized the results of the total suspended particulate sampling.
 - August 9 – 11, 2023: A fire occurred at the facility. Inspected facility for HWCL compliance and violations. DTSC cited failure to minimize the possibility of a fire and failure to notify the California Office of Emergency Services immediately upon discovery of the fire.
 - August 30, 2023: Radius responded to the People's July 31, 2023, letter that included a workplan to make changes to the facility to eliminate the release of LFM. This included upgrades to the facility and monitoring around the facility as well as a health risk assessment.
 - November 6 and 7, 2023: Inspected facility for HWCL compliance and violations. DTSC cited one Class I violation for failure to maintain and operate the facility in a manner to minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents.
 - November 8, 2023: Conducted sampling of fire-impacted solid material collected as a follow-up to the inspection conducted on August 10, 2023, related to the fire.
 - November 13, 2023: Meeting with the People and Radius to discuss LFM workplan submitted as part of August 30th response from Radius.
- DTSC followed up meeting with a letter sent to Radius requesting additional information/documents and providing the People's initial comments on LFM workplan.
- January 15, 2024: The people received additional documents from Radius regarding proposed HRA and air monitoring plan.
 - December 11, 2024: DTSC conducted a site visit at the facility to verify Radius Recycling's Emissions Minimization Plan being properly implemented and to observe what changes have been made to prevent future fires.
 - April 15-16, 2025: Inspected facility for HWCL compliance and violations. DTSC cited two violations: 1) failure to use registered hazardous waste transporter, and 2) accumulation of hazardous waste antifreeze for longer than the permissible 90 days.
 - December 15, 2025: DTSC, OCI staff conducted a walkthrough of the facility, discussed the recent upgrades made to mitigate LFM dispersal offsite with Radius personnel, and collected samples from varying points throughout the metal shredding process. These samples were analyzed by CA Dept of Public Health to determine which parts of the process are contributing to the LFM dispersal.
 - March 11, 2026: A fire occurred at the facility. Inspected facility for HWCL compliance and violations. DTSC cited one violation for failure to submit a written report to DTSC within 15 days after the fire incident.
 - April 21, 2026: Inspected facility for HWCL compliance and violations. DTSC cited one Minor violation for failure to properly label hazardous waste accumulation containers.
 - From April 2021 to present, DTSC, OCI staff have inspected the fenceline and surrounding areas of the Radius facility for LFM approximately 61 times. This resulted in 29 sampling events when enough LFM was found for laboratory analysis, and 32 times when samples were not collected, but photographs of LFM were taken.
 - June 17, 2026: DTSC enforcement action resulted in securing a court approved settlement with Radius Recycling, Inc. for violations identified during multiple inspections and fire related investigations at Radius's West Oakland metal shredding facility. Radius agreed to pay \$1.5 million in penalties and costs, including \$510,000 directed to community programs that protect the environment and public health. The settlement addresses 21 violations of the Hazardous Waste Control Law, including violations stemming from fires in June 2018, June 2020, and August 2023, plus violations discovered during DTSC

inspections in May 2022, November 2023, and April 2025.

- June 26, 2026: DTSC conducted a site visit responding to an incident that occurred within the shredder on June 22, 2026. DTSC sampled the ash and debris and, as of the date of this action report, is waiting for sampling analysis results before finalizing the investigation.

DTSC, OCI staff and Radius are in constant communication regarding: upgrades being made to the facility to limit LFM migration, a pilot air monitoring study conducted at the fenceline of the facility, and LFM collection by Radius at Howard and Roundhouse terminals. DTSC has created a website for Radius's Site Project Documents to help the public understand DTSC's cleanup, permitting, enforcement, and investigation efforts. Please refer to the following website for additional information:

<https://dtsc.ca.gov/hw-projects/schnitzer-steel-industries-inc/>

CalEPA Actions

CalEPA is the parent agency to six boards, departments, and offices charged with protecting public health and the environment, including DTSC, CARB, and the Water Boards. CalEPA has not exercised independent enforcement authority over activities at Radius but helps to ensure enforcement and compliance activities are consistent, effective, and coordinated, including through the creation of a Rapid Response Task Force in the immediate aftermath of the August 2023 fire at Radius and the continued Metal Shredder Collaborative regarding Radius with WOEIP, US EPA, DTSC, Waterboards, BAAQMD, and Radius Recycling.

US EPA Actions

US EPA Region 9 (Pacific Southwest Region) provides regulatory oversight over states, tribes, and territories. US EPA coordinates with state and local environmental regulatory agencies to ensure compliance with all federal environmental requirements. Direct enforcement is listed below:

- July 23, 2019: Clean Air Act inspection.
- January 27, 2020: Notice of Violation issued to Radius for failure to apply for a major source permit and excess emissions of volatile organic compounds at the shredder.
- February 2021: US EPA provided technical

support in the California Attorney General-led settlement with Radius, ultimately requiring Radius to pay a \$2.05 million penalty and \$2.05 million to fund supplemental environmental projects for the surrounding community. It also required installation of additional air pollution control equipment.

- April 22, 2022: The US Department of Justice and US EPA settled with Schnitzer Steel Industries nationally, requiring implementation of an EPA-approved Refrigerant Recovery Management Plan at all 40 facilities, including the west Oakland facility. This settlement also included civil penalties of \$1.55 million and implementation of an environmental mitigation project to destroy additional refrigerants.
- March 1, 2024: Clean Water Act Inspection.
- June 10, 2025: US EPA settled with Radius Recycling, Inc. DOCKET NO. CWA-309(a)-25-002, requiring Radius to install a polishing filtration system following the existing granular activated carbon (GAC) unit in the Wastewater Treatment System, inspect the treatment system, and modify SOPs for system maintenance.
- November 13, 2025: Clean Water Act Inspection. Confirmed the installation of GAC per the AOC occurred before the start of the wet weather season (Oct – April).
- July/August 2026 (anticipated): Radius to submit final report for AOC (CWA-309(a)-25-002). EPA to evaluate annual report and relevant DMRs from the 2025-2026 reporting year to confirm the facility upgrades to their treatment system and associated inspection and maintenance program ensured compliance with NPDES discharge limitations.

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