



June 10, 2026

Assembly Member Damon Connolly, Chair
 Assembly Environmental Safety and Toxic Materials Committee
 1021 O Street, Room 444C
 Sacramento, CA 95814

Re: SB 811 (Caballero) Metal Shredding Facilities – OPPOSE

Dear Assembly Member Connolly and Committee Members:

The undersigned organizations respectfully oppose Senate Bill 811 by Senator Caballero. The bill’s effort to exclude metal shredders from California’s hazardous waste laws while providing an inadequate replacement puts communities and the environment at risk. Our organizations raised our concerns in opposition to SB 404, which was vetoed last session but has been revived as SB 811. Despite the minor amendments from SB 404, this bill still fails to address significant concerns and should be rejected.

The materials managed at metal shredding facilities are hazardous waste and must be regulated as such under California’s hazardous waste laws.¹ Instead of SB 811’s overly complicated approach, California should regulate metal shredding facilities under the existing hazardous waste framework, including by promptly requiring the facilities to obtain hazardous waste permits with conditions necessary to protect human health and the environment. The Department of Toxic Substances Control (DTSC) should then be directed to develop additional requirements, within the existing hazardous waste legal framework, tailored to address the ongoing problems we’ve seen at metal shredding facilities—including fires and dispersal of heavy metals into surrounding communities.

DTSC already struggles to manage its existing regulatory responsibilities. Carving metal shredding facilities out of the hazardous waste framework to create a separate permitting regime for the metal shredding industry will stretch DTSC even thinner and needlessly tax its capacity to implement the hazardous waste program. The focus instead should be on ensuring DTSC is providing regulatory oversight and ensuring protection of human health and the environment. SB 811 is also part of a problematic trend of erasing protections for communities already burdened by the dangers of hazardous waste mismanagement. For example, DTSC’s hazardous waste management plan contemplates adopting regulations to exclude certain types of hazardous wastes from the definition of solid waste, thus excluding them from crucial hazardous waste requirements.² DTSC has also proposed an exemption from the requirements for generators to manifest their hazardous waste and use registered hazardous waste transporters.³ Instead of adopting exclusions and undertaking a time and resource intensive regulatory process to cobble together a less-protective oversight scheme, California should prioritize moving forward with available authority, under the existing framework, to safeguard its communities and environment from toxic pollution.

We agree with the need to address the threats posed by metal shredding facilities to communities, but this bill as written moves in the wrong direction. For this reason, we ask for your “NO” vote, and a structural reappraisal of this approach to metal and waste regulations, with impacted communities leading this conversation.

¹ Additionally, SB 811 lacks adequate feedstock control measures. For example, metal shredders are the last chance to ensure the removal and reclamation of refrigerants from autos, HVAC equipment, chillers, air conditioners and refrigerators. SB 811 does not provide for the proper capture and disposal of refrigerants that deplete the ozone layer and warm the atmosphere thousands of times more than CO₂.

² Department of Toxic Substances Control, 2025 Hazardous Waste Management Plan at 19 (2025), https://dtsc.ca.gov/wp-content/uploads/sites/31/2025/10/2025-Hazardous-Waste-Management-Plan_accessible.pdf.

³ Department of Toxic Substances Control, Manifest Exemption, <https://dtsc.ca.gov/manifest-exemption/> (last visited June 8, 2026).

Sincerely, the undersigned organizations,

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