



February 28, 2018

California Department of Toxic Substances Control  
1001 I Street  
Sacramento, CA 95814-2828  
[mstwstakeholders@dtsc.ca.gov](mailto:mstwstakeholders@dtsc.ca.gov)

Re: DTSC Report on Scrap Metal Recyclers and Metal Shredding Facilities

Dear DTSC:

Familias Unidas de California provides awareness and seeks to improve wellness in our Latino community by focusing on issues of poverty, immigration reform, health care, and quality education.

Scrap metal collection, transportation and recycling provides many jobs and opportunities to develop and own small businesses throughout our community. Many in our community have fed their families, sent their children to school and built ownership in the value of scrap metal from discarded appliances, cars, demolition materials and other goods when their useful life is over. For decades, these very useful businesses have ensured financial independence for many lower income families and the widespread creation of jobs.

We are very concerned that DTSC's report, entitled the "Evaluation and Analysis of Metal Shredding Facilities and Metal Shredder Wastes" (January 31, 2018) will result in great harm, if not the entire demise, to small businesses and jobs in the scrap metal recycling industry.

The Report appears to study only the largest facilities that operate shredders on an industrial scale, and then make blanket conclusions that would cover all scrap metal recycling businesses regardless of size.

We urge you to clarify in the report that the conclusions reached apply only to the six facilities studied in the report, and that scrap metal recyclers will continue to operate as they always have in California. This is correct result that DTSC should reach since the people involved in these jobs are engaged in the environmentally and economically

beneficial activity of extracting value from society's garbage, reducing the need to mine for virgin materials, saving landfill space, providing jobs, creating financial independence for many at the lower income level.

Yours truly,

Luis Alvarado  
President  
Familias Unidas de California