

California Environmental Quality Act (CEQA)

NOTICE OF EXEMPTION

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**TO: County of Alameda**  
**Office of the Clerk-Recorder**  
**1106 Madison Street**  
**Oakland, CA 94607**

**FROM: Bay Area Air Quality Management District**  
**375 Beale Street, Suite 600**  
**San Francisco, CA 94105**

**SUBJECT: FILING OF NOTICE OF EXEMPTION PURSUANT TO CEQA § 21152(b) AND CEQA GUIDELINES § 15062**

**PROJECT TITLE: Radius Recycling dba Schnitzer Steel Products Company – Update the S-6 Shredder description to reflect correct maximum and average hourly process rate (Air District Application 30880).**

**Public Agency Approving Project (Lead Agency):** Bay Area Air Quality Management District (Air District), 375 Beale Street, Suite 600, San Francisco, CA 94105; Contact Person: Davis Zhu, Senior Air Quality Engineer; Telephone: (415) 749-4743; Email: dzhu@baaqmd.gov

**Project Applicant and Entity Carrying Out Project:** Radius Recycling dba Schnitzer Steel Products Company (Radius).

**Project Applicant Mailing Address:** 1101 Embarcadero West, Oakland, CA 94607.

**Project Applicant Contact Person:** Pamela Gray, Senior Environmental Manager, Radius Recycling dba Schnitzer Steel Products Company, 1101 Embarcadero West, Oakland, CA 94607; Telephone: (510) 912-7576; Email: pgray@rdus.com

**Project Location:** 1101 Embarcadero West, Oakland, Alameda County, CA 94607; Nearest Cross Street: Market Street.

**Project Description:**

This project is an administrative change to update the description for S-6, metal shredder, to include hourly process rates information reflective of the currently approved process rates as follows:

S-6      Shredder with water injection (electric), 350 tons per hour (tph) avg, 400 tph max

In 2019, Radius submitted Air District Application 30009 to install A-15 and A-16 Regenerative Thermal Oxidizers (RTOs), and A-17 and A-18 Packed Bed Scrubbers to abate precursor organic compound (POC) emissions. In 2020, the facility submitted Application 30880 to increase the maximum hourly process rate for S-6 and S-7, Infeed Conveyor, to 400 tph. Application 30009 was processed using the maximum hourly process rate for S-6 and S-7 proposed in Application 30880. Therefore, no additional analysis of the hourly emission increase is required as this project does not increase the maximum daily or annual throughput. The Air District processed Application 30880 as an administrative change to update the S-6 shredder description and re-issued the facility's Permit to Operate to reflect the approved process rates as noted above.

**Finding of Exemption:**

The Air District has determined that the issuance of this permit is exempt from CEQA because the Air District's approval was "ministerial" and, therefore, exempt from CEQA under CEQA, California Public Resources Code § 21080(b)(1); CEQA Guidelines Section 15268(a).

**Basis for Exemption:**

Application 30880 is an administrative permit application to update the S-6 description to reflect the correct maximum hourly process rate on the Permit to Operate. Because there is no emission increase associated with the application, this project will satisfy the "No Net Emission Increase" provisions of District Regulation 2, Rule 2. This permit application is not subject to the California Environmental Quality Act (CEQA) because the Air District's evaluation is a ministerial action (Public Resources Code Section 21080(b)(1) and CEQA Guidelines Section 15268(a)) conducted using the fixed standards and objective measurements in the Air District's rules and regulations. Also, the permit application did not trigger Best Available Control Technology (BACT) or Best Available Control Technology for Toxics (TBACT). The Air District is legally compelled to approve this application given the relevant requirements objectively met based on the information available to the Air District. Thus, the Air District's approval is ministerial and not subject to CEQA.



Pamela J. Leong

Director of Engineering

Bay Area Air Quality Management District



Date