INITIAL STUDY AND ADDENDUM TO A PREVIOUSLY ADOPTED NEGATIVE DECLARATION

SCHNITZER STEEL
FACILITY UPGRADE PROJECT

Prepared For:
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1101 EMBARCADERO WEST
OAKLAND, CA 94607

Lead Agency:
PORT OF OAKLAND
530 WATER STREET
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JANUARY 14, 2016
# Table of Contents

Introduction to this Document ................................................................................................................. 1
CEQA Approach ...................................................................................................................................... 1
Project Information .................................................................................................................................. 2
Addedum to a Previous Negative Declaration ....................................................................................... 14
CEQA Findings ................................................................................................................................. 17
Evaluation of Environmental Effects ..................................................................................................... 18
Aesthetics ....................................................................................................................................... 19
Agricultural and Forest Resources ........................................................................................................ 20
Air Quality ........................................................................................................................................ 22
Biological Resources .......................................................................................................................... 24
Cultural Resources ............................................................................................................................ 26
Geology and Soils ............................................................................................................................... 28
Greenhouse Gas Emissions .................................................................................................................. 30
Hazards and Hazardous Materials ....................................................................................................... 31
Hydrology and Water Quality ............................................................................................................... 34
Land Use and Planning ........................................................................................................................ 37
Mineral Resources .............................................................................................................................. 38
Noise .............................................................................................................................................. 39
Population and Housing ..................................................................................................................... 41
Public Services ................................................................................................................................ 42
Recreation ....................................................................................................................................... 43
Transportation .................................................................................................................................... 44
Utilities and Service Systems ................................................................................................................ 46
Mandatory Findings of Significance ....................................................................................................... 48

Document Preparers ............................................................................................................................... 49
Sources ................................................................................................................................................... 49

**Figures**

- Figure 1: Project Location .................................................................................................................... 6
- Figure 2: Proposed Site Plan ................................................................................................................... 8
- Figure 3: Proposed Shredder Enclosure ............................................................................................... 10
- Figure 4: Proposed JP Plant Enclosure ............................................................................................... 12
Attachments

Attachment A: Schnitzer Stormwater Improvement Project, Initial Study/Negative Declaration, Parametrix, December 2014

Attachment B: Schnitzer Stormwater Improvement Project, Notice of Decision, Port of Oakland, January 6 2015

Attachment C: Schnitzer Stormwater Improvement Project, Port Permit Decision, Port of Oakland, January 6 2015
Introduction to This Document

This document serves as the Initial Study for the Schnitzer Steel Facility Upgrade Project (“Project”) and as an Addendum to the Schnitzer Stormwater Improvement Project Negative Declaration (prior CEQA document). Per CEQA Guidelines section 15164(b), an Addendum may be prepared if only minor technical changes or additions to a prior Negative Declaration are necessary, and none of the conditions described in Section 15162 calling for the preparation of a subsequent Negative Declaration have occurred.

This document is organized in three sections as follows:

- **Introduction, CEQA Approach and Project Description.** This section introduces the document and discusses the Project description including its location, setting, and specifics of the lead agency and contacts.

- **Addendum.** This section identifies those minor changes to the prior CEQA document necessary to adequately address the current Project, specifically including those best management practices (BMPs) identified in the prior Schnitzer Stormwater Improvement Project’s Negative Declaration that are now applicable to the Project. This section also includes draft findings that would allow adoption of this Addendum as the CEQA review document for the proposed Project.

- **Initial Study.** This section discusses the CEQA environmental topics and checklist questions, identifies the potential for environmental impacts, and identifies those BMPs from the prior CEQA document that are now applicable to the Project to avoid these impacts or reduce them to levels that are comparably less than significant as found in the prior Schnitzer Stormwater Improvement Project’s Negative Declaration.

CEQA Approach

This Initial Study constitutes an Addendum to the Schnitzer Stormwater Improvement Project Initial Study/Negative Declaration (Stormwater IS/ND) as approved by the Port of Oakland on January 6, 2015.

The Project analyzed in the December 2014 Stormwater Improvement Project IS/ND involved construction of a new stormwater system which allowed Schnitzer Steel to further treat and discharge water that was previously evaporated and reclaimed, and to provide the ability to handle larger storm events. At that time, stormwater and water used for process cooling, dust suppression and wash were all directed into an existing 1.2 million gallon holding tank, then to a clarifier, and then either evaporated or reclaimed for process use. The new stormwater system includes electrocoagulation treatment, new water conveyance pipes, an upgrade to the existing water clarifier, and new storm and sanitary sewer connections.

Pursuant to CEQA Guidelines section 15164(b), an addendum to the adopted December 2014 Negative Declaration may be prepared for the Project if only minor technical changes or additions to that prior Negative Declaration are necessary, and none of the conditions described in Section 15162 calling for the preparation of a subsequent Negative Declaration have occurred.

On January 2, 2013, the California Regional Water Quality Control Board, San Francisco Bay Region issued Cleanup and Abatement Order (CAO) No. R2-2013-1001 to Schnitzer Steel. As part of the CAO, dust was identified as a pollutant ordered to be contained. That CAO initiated the Stormwater Improvement Project and subsequent Initial Study/Negative Declaration.

The currently proposed Project is an enhancement to the dust suppression component of the stormwater system. The proposed Project will enclose the existing shredder and Joint Product Plant, and add air scrubbing equipment to remove particulate matter.
The Port of Oakland has determined that this Project represents a minor technical change or addition to the original Schnitzer Stormwater Improvement Project. Therefore, pursuant to CEQA Guidelines section 15164(b), this Addendum to the previously adopted December 2014 Negative Declaration has been prepared. None of the conditions described in Section 15162 calling for the preparation of a subsequent Negative Declaration would occur.

The Project’s proposed system for removing particulate matter will substantially reduce the amount of water necessary for dust suppression, will reduce the amount of particulate matter concentrated in runoff, and will reduce both the amount and concentration of stormwater needed to be treated by the stormwater system.

**Project Information**

**Project Entitlements**
Development of the Project will require the approval of a Site Development Plan and a Development Permit from the Port of Oakland.

**Lead Agency**
Port of Oakland
Environmental Programs and Planning Division
530 Water Street
Oakland, CA  94607

**Contact Person**
Tim Leong
Port of Oakland
Environmental Programs and Planning Division
530 Water Street
Oakland, CA  94607
(510) 627-1537

**Project Sponsor**
Chris Orsolini
Regional Environmental Manager
Schnitzer Steel Industries, Inc.
1101 Embarcadero West
Oakland, CA 94607
Phone: (916) 512-0269

**Project Location**
Schnitzer Steel Products
1101 Embarcadero West
Oakland, California

Assessor’s Parcel Number
The project consists of one parcel: APN 000-0395-001

General Plan Designation
General Industrial

Zoning
City of Oakland Industrial General (IG) and Port of Oakland zoning jurisdiction

Description of Project
Schnitzer Steel Industries Inc. (Applicant) is requesting approval of a Site Development Plan and a Development Permit from the Port of Oakland for enhancement of an existing steel recycling facility located at 1101 Embarcadero West within the City of Oakland, California (see Figure 1). The Project proposes the construction of an enclosure to an existing open air structure that houses a metal shredder. The steel frame of the enclosure is preexisting as part of the shredder’s original construction. Schnitzer steel proposes to completely enclose the shredder, with the addition of a state-of-the-art ventilation system to reduce current particulate emissions generated by normal shredder operations. The Project also includes construction of a new building to enclose the existing Joint Product Plant. The Joint Product (JP) Plant is currently a system of conveyor belts that are used to process and separate metals and other materials which are encountered during normal shredding operations, and transported to different areas on the site for storage, stockpiling and to be transported off the facility. This building will be fully constructed during the duration of this project and will also contain a state of the art ventilation system (see Figure 2).

The Project does not propose to increase or decrease the overall throughput of the existing facility. The Project is an enhancement to existing structures, with the intent of decreasing current emissions released into the surrounding environment. These emissions are directly associated with current and normal operations of the facility.

Surrounding Land Uses
The Schnitzer Steel site is located at 1101 Embarcadero West, Oakland, California and within an urbanized industrial, transportation-related location. The general vicinity consists of a mix of commercial and industrial properties, including Interstate 880 and the City of Oakland to the north and east, the City of Alameda to the south, and San Francisco Bay to the west. The Project is planned on an essentially flat, 26.5 acre paved site.

Land uses contiguous to the site are as follows:

North: The Union Pacific Railroad
South: The Oakland Inner Harbor
East: SSA Terminals
West: American President Lines Limited and Port of Oakland
Proposed Project Components

**Shredder:**

The shredder is currently surrounded by a steel frame constructed of iron beams. The preliminary conceptual design intended to reduce Light Fibrous Material (LFM) emissions from the shredder includes installing additional I-beams to complete the steel frame and fully surround the shredder, and covering the upper portions of the steel frame with metal siding to create an enclosure that would fully surround the upper portion of the shredder. Installation of an LFM capture and control system is proposed as part of the Project. This system consists of metal ducting, an electric vacuum blower and a particulate emission control device (wet scrubber) to extract air from within the enclosure and remove LFM prior to discharging clean air into the surrounding environment. Very high air flow rates are required to induce necessary flows under the enclosure. The use of targeted air collection hoods positioned near the shredder within the enclosure is being evaluated to provide the necessary air flow rates. Alternatively, targeted air flow hoods could be effectively operated at lower flow rates (see Figure 3).

**Joint Products Plant:**

The existing JP Plant processing equipment is mostly located outdoors. A section of the JP processing equipment (known as the “cleaning stack”) is located within the southeastern portion of the facility’s existing large warehouse. The conceptual plan to address LFM emissions from outdoor portions of the JP plant includes construction of a new 33,000 square foot building to enclose the outdoor JP Plant equipment, and construction of a large shed to contain the JP Plant in-feed hopper and main shredder residue (SR) discharge area. This included SR storage bins, covering of the SR treatment mills, and construction of a small shed to cover the area where SR is discharged from the cleaning stack. An LFM capture and control system for the 33,000 square foot building is also proposed. This LFM capture and control system resembles a standard ventilation system, but would operate under vacuum (extraction) conditions, rather than exhausting air. Air would be collected through several vent openings strategically positioned near LFM source areas within the new building, and routed to a particulate emission control device (baghouse or wet scrubber) to remove LFM prior to discharging clean air (see Figure 4).

Additional limited measures to reduce LFM dispersal from the indoor cleaning stack may also be necessary. These measures would likely consist of installing tall curtains around the cleaning stack within the warehouse, and possibly installing one or more roll-up doors in openings at the southeastern end of the warehouse.

**Magnetic Drum Separators:**

A small floorless building is proposed to be constructed over the magnetic separators to eliminate cross winds and allow LFM to settle beneath the building where it can be managed through routine maintenance activities.

**Construction**

Structural framing for the shredder enclosure already exists. Construction of the JP enclosure will consist of both steel framing and siding. Construction of the project would begin in April of 2016 and be completed by August of 2016.

**Traffic**

Typical traffic patterns for the steel recycling facility occur during standard work hours on weekdays. On average, the facility accommodates approximately 150 trucks per day. The customer remains on site for approximately 10 minutes. Unloading activities occur at various locations on site, but generally occur near the shredder.
Proposed General Plan Land Use Designations and Zoning

Currently, the site has a City of Oakland General Plan land use designation of General Industrial (GI). The Project’s proposed facility enhancements are consistent with this land use designation. The site is currently zoned Industrial General (IG). The Project’s proposed facility enhancements are consistent with the current zoning ordinance.
Figure 1: Project Location

Source: Lamphier-Gregory
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Figure 2: Proposed Site Plan

Source: Applicant
Figure 3: Proposed Shredder Enclosure
Source: Applicant
Figure 4: Proposed JP Plant Enclosure
Source: Applicant
Addendum to Negative Declaration

Project Description, Location, and Setting

This Addendum to the previously approved Schnitzer Steel Stormwater Improvement Project Negative Declaration has been prepared for the Schnitzer Steel Facility Upgrade Project. See the Introduction and Project information section of this document for details of the Project.


Best Management Practices (BMP’s) were identified in the previously approved Schnitzer Steel Stormwater Improvement Project Negative Declaration, and would now be applicable to the Facility Upgrade Project (the Project) to avoid and or substantially reduce environmental impacts. The applicable BMPs are listed below. The practices and procedures identified in these BMPs are intended to, and would protect the environment by avoiding and or minimizing potential adverse environmental impacts. Refer to the Initial Study Checklist section of this document for a more detailed discussion.

Air Quality

Air-1: Dust Control Measures: All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered as necessary to control dust. All haul trucks transporting soil, sand, or other loose material off-site will be covered. All construction vehicles will use a truck wheel wash when leaving the site. All vehicle speeds on unpaved roads will be limited to 5 mph.

Exhaust Control Measures: Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage will be provided for construction workers at all access points. All construction equipment will be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment will be checked by a certified mechanic and determined to be running in proper condition prior to operation.

Cultural Resources

Cult-1: Construction contractor will prepare an emergency plan of action for approval by Schnitzer Steel’s regional environmental manager for discoveries of unknown historic or archaeological resources, should workers encounter any unidentified resources during digging/trenching activities.

During all excavations, construction workers/crews will be especially alert for cultural resources any time they observe the following conditions: (1) soil and deposit changes such as color or type; (2) presence of charcoal particles in soil; (3) presence of any buried objects or structures; (4) a cluster, cache, or deposit (i.e., lens) of materials should be considered historically or archaeologically important by the crew until it has been assessed otherwise; and (5) isolates (a bottle or two, a tool, fragments of a plate, etc.), will be put aside until a qualified cultural resources specialist can properly examine them.

Hazards and Hazardous Materials
Haz-1: Construction contractor will prepare a health and safety plan for approval by the Schnitzer Steel’s regional environmental manager. Construction contractor will implement the Soil Management Plan (as outlined in Exhibit 5 of the previous approved Negative Declaration).

All excavated material will be properly stored on site pending chemical analysis and designation for proper offsite disposal. Construction contractor will notify Schnitzer Steel’s regional environmental manager if contamination is encountered in the field. Excess excavated soils with known or suspected contamination should be stored immediately adjacent to the excavation, placed on plastic sheeting, and covered with plastic sheeting. Stockpiled soil should be covered with plastic and secured from human contact. All equipment that comes in contact with potentially contaminated soil or water will be decontaminated before and after each use. Residual substances generated during cleaning and decontamination procedures will be containerized, labeled, and stored pending chemical analysis and designation as a clean material or hazardous waste. Storage, labeling, and inspections of potentially hazardous materials/waste will be in compliance with applicable sections of 40 Code of Federal Regulations (CFR Parts 260-270) and Chapter 15, Division 3, of Title 23, CCR. The area designated for storage of potentially hazardous waste will be secured and clearly identified in the site health and safety plan. Hazardous waste storage time limits will not be exceeded. Areas designated for storage of potentially hazardous waste will be secured and are clearly identified in the Soil Management Plan. Except where otherwise allowed by applicable regulations and policies, if the generated materials are designated as hazardous waste, it will be transported for off-site disposal at a permitted disposal facility. The generator and transporter will have a valid Environmental Protection Agency identification number for storage, disposal, and transportation of hazardous waste. The hazardous waste will be transported under a uniform hazardous waste manifest. All containers will be properly packaged, labeled, marked, and placarded on the waste transport vehicle.

Construction contractor will implement measures to prevent soil contamination as a result of project construction activities. Pollutants will not come in contact with on-site soil. Best management practices will be employed to prevent soil contamination. Well-maintained equipment will be used to perform the work. Handling and storing of chemicals will be in accordance with guidance provided by Schnitzer Steel’s regional environmental manager.

Hydrology and Water Quality

Hydro-1: All stormwater will be contained, stored, and reclaimed or evaporated with the current treatment system during construction. All outbound trucks pass through a wheel wash when leaving the site. A sweeper truck sweeps internal roads and Embarcadero West daily.

Construction contractor will keep a clean and safe workplace. Good housekeeping procedures will include locating fueling and equipment maintenance activities away from the bay, avoiding spills through employee training, and cleaning accidental spills of construction-related materials (such as concrete, equipment fuel, hydraulic fluid, etc.) immediately. Dispose of construction debris in accordance with all relevant laws and regulations.

Noise
Noise-1: Construction contractor will meet City of Oakland construction noise standards set in the Oakland Planning Code, including limits on the hours of noise-generating activities, limits on the number of consecutive days of noisy construction activities, and limits on the maximum noise at receiving properties.

Transportation

Trans-1: **Construction Management Plan.** Prior to the issuance of the first construction-related permit, the project applicant and his/her general contractor shall prepare a Construction Management Plan (CMP). The CMP shall contain measures to minimize potential construction impacts including measures to comply with all construction-related Conditions of Approval such as dust control, construction emissions, hazardous materials, construction days/hours, construction traffic control, waste reduction and recycling, stormwater pollution prevention, noise control, complaint management, and cultural resource management. The CMP shall provide project-specific information including descriptive procedures, approval documentation, and drawings (such as a site logistics plan, fire safety plan, construction phasing plan, proposed truck routes, traffic control plan, complaint management plan, construction worker parking plan, and litter/debris clean-up plan) that specify how potential construction impacts will be minimized and how each construction-related requirement will be satisfied throughout construction of the project.
CEQA Findings
The Port of Oakland has determined that with the implementation of all applicable BMPs as identified in this Addendum to the previously approved Schnitzer Steel Stormwater Improvement Project Negative Declaration, the proposed Project will not have a significant effect on the environment. If this Addendum is adopted by the Port of Oakland, the requirements of CEQA will be met by preparation of this Addendum, and the Project will not require the preparation of an Environmental Impact Report. This decision is supported by the following findings:

a. The Project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels or threaten to eliminate a plant or animal community. It does not reduce the number or restrict the range of a rare or endangered plant or animal. It does not eliminate important examples of the major periods of California history or pre-history, since there is no identified area at the Project site which is habitat for rare or endangered species, or which represents unique examples of California history or prehistory. The Project does not have any significant, unavoidable adverse impacts. Implementation of specified BMPs as identified in the prior Schnitzer Steel Stormwater Improvement Project Negative Declaration, and now applicable to the proposed Project, will avoid or reduce the effects of the Project on the environment and thereby avoid any significant impacts.

b. The Project does not involve impacts which are individually limited but cumulatively considerable, because the Project will incorporate Best Management Practices to avoid significant impacts of the Project in the context of continued growth and development in the City of Oakland.

c. The Project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly, because all adverse effects of the Project are less than significant.
Evaluation of Environmental Effects/Initial Study Checklist

This CEQA Checklist provides a summary of the potential for new or more severe environmental impacts that may result from implementation of the Project, as compared to impacts identified in the prior Stormwater Improvement Project Initial Study/Negative Declaration (Stormwater IS/ND).

This CEQA Checklist hereby incorporates by reference the Stormwater IS/ND discussion and analysis of all potential environmental impact topics. Only those environmental topics that could have a potential for project-level environmental impact are included. The Stormwater Improvement Project IS/ND’s significance criteria have been consolidated and abbreviated in certain portions of this CEQA Checklist for administrative purposes; a complete list of the significance criteria can be found in the Stormwater Improvement Project IS/ND. This CEQA Checklist provides a determination of whether the proposed Project would result in:

- Equal or less severe impact as previously identified in the Stormwater IS/ND;
- a substantial increase in severity of previously identified significant impact in the Stormwater IS/ND; or
- a new significant impact.

Where the severity of the impacts of the proposed project would be the same as or less than the severity of the impacts described in the Stormwater IS/ND, the checkbox for Equal or Less Severity of Impact Previously Identified in the Stormwater IS/ND is checked. If the checkbox were to indicate a Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND, or a New Significant Impact, it would indicate that the Project would have impacts that are:

- Peculiar to the Project or project site (per CEQA Guidelines Sections 15183 or 15183.3);
- Not identified in the previous Stormwater IS/ND (per CEQA Guidelines Sections 15183 or 15183.3), including off-site or cumulative impacts (per CEQA Guidelines Section 15183);
- Due to substantial changes in the Project (per CEQA Guidelines Section 15162);
- Due to substantial changes in circumstances under which the Project will be undertaken (per CEQA Guidelines Sections 15162); or
- Due to substantial new information not known at the time the Stormwater IS/ND was certified (per CEQA Guidelines Sections 15162, 15183, or 15183.3).

As indicated in the following Checklist, none of these conditions have been identified. The Project sponsor (Schnitzer Steel) has agreed to incorporate and/or implement all required and applicable BMPs as part of the proposed Project.
1. AESTHETICS
Would the project:

<table>
<thead>
<tr>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Have a substantial adverse effect on a scenic vista?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>c) Substantially degrade the existing visual character or quality of the site and its surroundings?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</td>
<td>☒</td>
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</table>

Stormwater Improvement Project IS/ND

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had No Impact on aesthetics relative to the above criteria.

Project Analysis and Conclusions

There is nothing about the Project that would result in unique or peculiar impacts related to aesthetics. Visual changes from the addition of new siding to the existing shredder enclosure structure will be minimal. Construction of the new JP Plant enclosure will be shielded from roadways by the existing warehouse and not visible to the public. The proposed Project is aesthetically consistent with existing conditions at the site, and would not substantially alter or degrade the visual character of the site or its surroundings. After construction of the Project, the visual character of the site would remain consistent with the industrial character of the area.

Conclusion: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to aesthetics, nor would it result in any new significant impacts to aesthetics.
### 2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</td>
<td>☒</td>
<td></td>
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</tr>
<tr>
<td>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</td>
<td>☒</td>
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<tr>
<td>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production(as defined by Government Code section 51104(g))?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Result in the loss of forest land or conversion of forest land to non-forest use?</td>
<td>☒</td>
<td></td>
<td></td>
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<tr>
<td>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</td>
<td>☒</td>
<td></td>
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</tr>
</tbody>
</table>

### Stormwater Improvement Project IS/ND

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had No Impact on agriculture and forestry resources related to the above criteria.

### Project Analysis and Conclusions

There is nothing about the Project that would result in unique or peculiar impacts related to agriculture and forestry resources. There are no agricultural areas or farms located within the Project area. The Project site is fully developed.

Conclusion: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to
agriculture and forestry resources, nor would it result in any new significant impacts to agriculture and forestry resources.
3. AIR QUALITY
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

<table>
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<tr>
<th>Would the project:</th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
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</thead>
<tbody>
<tr>
<td>a) Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td>☒</td>
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</tr>
<tr>
<td>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Expose sensitive receptors to substantial pollutant concentrations?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) Create objectionable odors affecting a substantial number of people?</td>
<td>☒</td>
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Stormwater Improvement Project IS/ND
The purpose of the previous Schnitzer Stormwater Improvement Project was to improve water quality of the discharge of commingled process and stormwater discharge from the metal shredding operations. The Stormwater IS/ND found that there would be no impacts to air quality based on the above criteria.

Project Analysis and Conclusions
There is nothing about the Project that would result in unique or peculiar impacts related air quality (No impact). Light Fibrous Material (LFM) is a byproduct of the metal shredding operation which currently discharges into the surrounding environment. The purpose of the current Project is to reduce airborne pollutants discharged during these metal shredding operations.

Current metal recycling operations are powered by a dedicated PG&E substation that is located on site near the JP Plant. No new diesel generators are proposed with the construction of the Project.

Construction Emissions
BAAQMD recommends implementation of basic construction management practices to reduce construction-related criteria pollutant and fugitive dust emissions during construction for all projects. These basic measures are described below, will be implemented by the Project as BMPs during construction. Implementation of these BMPs would reduce construction-period criteria pollutant impacts to a level of less than significant.
Air-1: **Dust Control Measures:** All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered as necessary to control dust. All haul trucks transporting soil, sand, or other loose material off-site will be covered. All construction vehicles will use a truck wheel wash when leaving the site. All vehicle speeds on unpaved roads will be limited to 5 mph.

Air-2: **Exhaust Control Measures:** Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage will be provided for construction workers at all access points. All construction equipment will be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment will be checked by a certified mechanic and determined to be running in proper condition prior to operation.

**Conclusion:** Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to air quality, nor would it result in any new significant air quality impacts. The project is designed to reduce airborne pollutants which is beneficial to the environment and enhances air quality.
### 4. BIOLOGICAL RESOURCES

Would the project:

<table>
<thead>
<tr>
<th>Would it have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
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</tr>
<tr>
<td>d)</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e)</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>f)</td>
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<td></td>
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</tr>
</tbody>
</table>

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had no impact on biological resources related to the above criteria.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts to biological resources. The Project site is located in a disturbed, partially paved, urban and industrial location which does not contain wetlands or other sensitive natural communities. Construction of the Project would occur within a highly developed industrial area that is lacking any vegetation and/or habitat areas. Therefore, the Project would not result in a substantially adverse effect, either directly or through habitat modifications, on any candidate, sensitive or special status species.
Conclusion: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to biological resources, nor would it result in any new significant impacts to biological resources.
5. CULTURAL RESOURCES

Would the project:

<table>
<thead>
<tr>
<th></th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Cause a substantial adverse change in the significance of a historical resource as defined in Public Resources Section 15064.5?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Public Resources Section 15064.5?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Disturb any human remains, including those interred outside of formal cemeteries?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had No Impact on cultural resources related to the above criteria.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to cultural resources. There is a very low potential for encountering significant archaeological resources during Project construction, as the site has previously been developed and disturbed by existing operations. There are no known archaeological or paleontological resources existing in the subsurface of the Project site, but there is a very low potential for encountering significant archaeological resources during project construction. No human remains are likely to be found in this area.

The City of Oakland’s Historic Preservation Planner visited the site on November 23, 2015 and opined that the JP Plant enclosure would not affect any historic aspects of the site (the City of Oakland does not have jurisdiction over the shredder enclosure).

Specific procedures should be put in place in the event that pre-historic cultural resources or human remains are encountered during construction activities. Therefore, to ensure that no unknown cultural resources are adversely impacted as a result of this Project, the following BMP’s are hereby incorporated into the project.
Cult-1: Construction contractor will prepare an emergency plan of action for approval by Schnitzer Steel’s regional environmental manager for discoveries of unknown historic or archaeological resources, should workers encounter any unidentified resources during digging/trenching activities.

During all excavations, construction workers/crews will be especially alert for cultural resources any time they observe the following conditions: (1) soil and deposit changes such as color or type; (2) presence of charcoal particles in soil; (3) presence of any buried objects or structures; (4) a cluster, cache, or deposit (i.e., lens) of materials should be considered historically or archaeologically important by the crew until it has been assessed otherwise; and (5) isolates (a bottle or two, a tool, fragments of a plate, etc.), will be put aside until a qualified cultural resources specialist can properly examine them.

Conclusion: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to cultural resources, nor would it result in any new significant impacts to cultural resources.
### 6. GEOLOGY AND SOILS

Would the project:

<table>
<thead>
<tr>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ii) Strong seismic ground shaking?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>iii) Seismic-related ground failure, including liquefaction?</td>
<td></td>
<td></td>
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<tr>
<td>iv) Landslides?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Result in substantial soil erosion or the loss of topsoil?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?</td>
<td></td>
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</tr>
</tbody>
</table>

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had No Impact on geology and soils based on the above criteria.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to geology and soils. All proposed infrastructure and Project design would be required to meet or exceed Uniform Building Code (UBC) seismic zone design standards to withstand expected earthquake-related ground shaking, liquefaction or other ground failures. Appropriate standards would be implemented during
construction to ensure the safety of workers and/or equipment during strong seismic shaking. Loose to medium soils do exist within the subsurface at the Project site and during a liquefaction event, lateral spreading and seismically induced settlement could take place at the Project site. These potential impacts would be reduced by designing and constructing all Project improvements in compliance with those recommendations contained in the final geotechnical evaluation for the previous Stormwater Enhancement project, and current UBC seismic design standards.

**Conclusion:** Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to geology and soils, nor would it result in any new significant impacts to geology and soils.
7. GREENHOUSE GAS EMISSIONS

Would the project:

<table>
<thead>
<tr>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

Stormwater Improvement Project IS/ND

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had no impact on greenhouse gas emissions related to the above criteria.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to greenhouse gas emissions. Based on the Project activities, limited quantities of GHG emissions would occur during the construction period. The construction impacts would be temporary in nature.

The electricity needed to operate the new air filtration system for both structures will be a minimal increase as compared to the existing power usage for current recycling operations. Schnitzer Steel is provided power from a dedicated PG&E power substation located on site, near the JP Plant location. It is unlikely that the increase in power consumption will exceed BAAQMD stationary source permit thresholds. However, BAAQMD will analyze and confirm the stationary source emissions during their stationary source equipment permit process, which is required for this Project.

**Conclusion:** Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to greenhouse gas emissions, nor would it result in any new significant impacts to greenhouse gas emissions.
8. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

<table>
<thead>
<tr>
<th></th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>b)</td>
<td>Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>c)</td>
<td>Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>d)</td>
<td>Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>e)</td>
<td>For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>f)</td>
<td>For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>g)</td>
<td>Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>h)</td>
<td>Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system could result in impacts related to hazards and hazardous materials, but that
The implementation of BMPs identified for that project would reduce such impacts to a less than significant level.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to hazards and hazardous materials.

On January 2, 2013, the California Regional Water Quality Control Board, San Francisco Bay Region, issued Cleanup and Abatement Order (CAO) NO. R2-2013-1001 to Schnitzer Steel. As part of the CAO, dust was identified as a pollutant ordered to be contained. That CAO initiated the Stormwater Improvement Project and subsequent Initial Study/Negative Declaration. The Project site is under an active Cleanup and Abatement Order (CAO) from the Water Board.

As was also indicated in the prior Stormwater IS/ND, the site has been identified as meeting the “Cortese List” requirements of Section 65962.5(a) as a known location of documented contaminants. Potential impacts of the Project related to these known contaminants are specific to construction activities, as hazardous materials known to be present in the site subsurface may be encountered during soil removal activities. Handling, packaging, transport, and disposal of hazardous materials and/or wastes may pose significant hazards to the public and/or the environment if appropriate procedures are not implemented to prevent the release of the hazardous materials to the environment and/or prevent the exposure of the public to such materials. Specific procedures must be implemented to prevent exposure to hazards and hazardous materials during construction activities.

The prior Stormwater IS/ND identified a number of BMPs that were required of that project, and that are now applicable to the current Facility Upgrade Project. These BMPs, as identified below, require implementation of a Soil Management Plan and development and implementation of a Site Health and Safety Plan that outline hazardous waste storage, transport, and disposal procedures. These BMPs ensure proper storage, treatment, and disposal of any hazardous materials and/or waste generated by the Project and will reduce the hazards associated with the transport and disposal of hazardous materials and/or wastes generated during construction of the Project. Additionally, any hazardous material meeting the definition of a hazardous waste by the California Department of Toxic Substances Control (DTSC) would be transported off-site for hazardous waste disposal.

The following previously identified BMP’s shall also be applicable to, and incorporated into the Project:

**Haz-1:** Construction contractor will prepare a Health and Safety Plan for approval by the Schnitzer Steel’s regional environmental manager. Construction contractor will implement the Soil Management Plan (as outlined in Exhibit 5 of the previous approved Negative Declaration).

All excavated material will be properly stored on site pending chemical analysis and designation for proper offsite disposal. Construction contractor will notify Schnitzer Steel’s regional environmental manager if contamination is encountered in the field. Excess excavated soils with known or suspected contamination should be stored immediately adjacent to the excavation, placed on plastic sheeting, and covered with plastic sheeting. Stockpiled soil should be covered with plastic and secured from human contact. All equipment that comes in contact with potentially contaminated soil or water will be decontaminated before and after each use. Residual substances generated during cleaning and decontamination procedures will be containerized, labeled, and stored pending chemical analysis and designation as a clean material or hazardous waste. Storage, labeling, and inspections of potentially hazardous materials/waste will be in compliance with applicable sections of 40 Code of Federal Regulations (CFR Parts 260-270) and Chapter 15, Division 3, of Title 23, CCR. The area designated for storage of potentially hazardous waste will be secured and clearly identified in the site Health and Safety Plan. Hazardous waste storage time limits will
not be exceeded. Areas designated for storage of potentially hazardous waste will be secured and are clearly identified in the Soil Management Plan. Except where otherwise allowed by applicable regulations and policies, if the generated materials are designated as hazardous waste, it will be transported for off-site disposal at a permitted disposal facility. The generator and transporter will have a valid Environmental Protection Agency identification number for storage, disposal, and transportation of hazardous waste. The hazardous waste will be transported under a uniform hazardous waste manifest. All containers will be properly packaged, labeled, marked, and placarded on the waste transport vehicle.

Construction contractor will implement measures to prevent soil contamination as a result of project construction activities. Pollutants will not come in contact with on-site soil. Best management practices will be employed to prevent soil contamination. Well-maintained equipment will be used to perform the work. Handling and storing of chemicals will be in accordance with guidance provided by Schnitzer Steel’s regional environmental manager.

Conclusion: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to hazards and hazardous materials, nor would it result in any new significant impacts related to hazards and hazardous materials.
9. HYDROLOGY AND WATER QUALITY

Would the project:

<table>
<thead>
<tr>
<th>a) Violate any water quality standards or waste discharge requirements?</th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>f) Otherwise substantially degrade water quality?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</td>
<td>☒</td>
<td></td>
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</tr>
<tr>
<td>h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>j) Inundation by seiche, tsunami, or mudflow?</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
On January 2, 2013, the California Regional Water Quality Control Board, San Francisco Bay Region, issued Cleanup and Abatement Order (CAO) NO. R2-2013-1001 to Schnitzer Steel. As part of the CAO, dust was identified as a pollutant ordered to be contained. That CAO initiated the Stormwater Improvement Project and subsequent Initial Study/Negative Declaration.

The purpose of the previous Schnitzer Stormwater Improvement Project was to improve water quality related to the discharge of commingled process and stormwater discharges from metal shredding operations. The prior Stormwater IS/ND found that there would be no impacts to hydrology and water quality, and that the Stormwater Improvement Project would be beneficial to water quality.

Project Analysis and Conclusions

There is nothing about the Project that would result in unique or peculiar impacts related to hydrology and water quality (No impact).

The Project analyzed in the December 2014 Stormwater IS/ND involved construction of a new stormwater system which allowed Schnitzer Steel to further treat and discharge water that was previously evaporated and reclaimed, and to provide the ability to handle larger storm events. Prior to the Stormwater Improvement Project, all stormwater, and water used for process cooling, dust suppression and wash were directed into an existing 1.2-million gallon holding tank, then to a clarifier, and then either evaporated or reclaimed for process use. The new system now includes electrocoagulation treatment, new water conveyance pipes, an upgrade to the existing water clarifier, and new storm and sanitary sewer connections.

The currently proposed Project is an enhancement to the dust suppression component of the stormwater system. Currently, Light Fibrous Material (LFM), which is a byproduct of the metal shredding operation, is emitted into the air, and these emissions are reduced by spraying water into the air as a dust suppression activity. These LFM emissions are suppressed on site by the dust suppression, and then eventually discharged into the stormwater system. The Project proposes to enclose the existing shredder and Joint Product Plant and add air scrubbing equipment to remove particulate matter. With the removal of particulate matter, use of water for dust suppression would become obsolete, and the amount of water needed to be treated by the new stormwater system would be reduced.

During construction of the Project, procedures must be put in place to prevent adverse impacts to hydrology and water quality. To ensure that construction-related impacts to hydrology and water quality are minimized, the following BMP’s from the prior Stormwater IS/ND are now applicable and shall be incorporated into the Project.

**Hydro-1:**

All stormwater will be contained, stored, and reclaimed or evaporated with the current treatment system during construction. All outbound trucks pass through a wheel wash when leaving the site. A sweeper truck sweeps internal roads and Embarcadero West daily.

Construction contractor will keep a clean and safe workplace. Good housekeeping procedures will include locating fueling and equipment maintenance activities away from the bay, avoiding spills through employee training, and cleaning accidental spills of construction-related materials (such as concrete, equipment fuel, hydraulic fluid, etc.) immediately. Dispose of construction debris in accordance with all relevant laws and regulations.

Conclusion: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to hydrology and water quality, nor would it result in any new significant hydrology and water quality impacts. Schnitzer currently holds an NPDES General Permit for its current operation which allows discharge of stormwater from the site. Schnitzer also holds an EBMUD Wastewater Discharge Permit. As
Schnitzer already holds these approvals, there is no need to acquire new permits related to construction of the enclosure for the shredder and the JP Plant.
### 10. LAND USE AND PLANNING

Would the project:

<table>
<thead>
<tr>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Physically divide an established community?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>c) Conflict with any applicable habitat conservation plan or natural community conservation plan?</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had **No Impact** on land use and planning based on the above criteria.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to land use and planning. The Project is located within an industrial area where no established community exists that can be physically divided. The Project is consistent with the allowable uses for the site, and implementation of the Project would not conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the Project. The Project is located within a heavy industrialized area and not associated with any habitat conservation plans or natural community conservation plan areas.

**Conclusion**: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to land use and planning, nor would it result in any new significant impacts to land use and planning.
11. MINERAL RESOURCES
Would the project:

<table>
<thead>
<tr>
<th>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
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</thead>
<tbody>
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</table>

| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☒ | | |

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had no impact to mineral resources based on the above criteria since the site contains no known mineral resources.¹

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to mineral resources.

**Conclusion:** Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related mineral resources, nor would it result in any new significant impacts to mineral resources.

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12. NOISE

Would the project result in:

<table>
<thead>
<tr>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels?</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>f) For a project in the vicinity of a private airstrip, exposure of people residing or working in the project area to excessive noise levels?</td>
<td>❌</td>
<td></td>
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</tbody>
</table>

Stormwater Improvement Project IS/ND
The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had no impact related to increased noise levels based on the above criteria.

Project Analysis and Conclusions
There is nothing about the Project that would result in unique or peculiar impacts related to increased noise levels. Operation and construction noise associated with the Project is anticipated to be equal to, or less than the current metal shredding and shearing operations which currently occur on site. With eventual enclosure of the operations as a result of the Project, operational noise is expected to be reduced compared to existing conditions.

However, specific procedures should be put in place to prevent exposure to construction noise. To ensure that exposure to noise is minimized during construction of the Project, the following BMP’s from the prior Stormwater IS/ND are now applicable and shall be incorporated into the project.

Noise-1: Construction contractor will meet City of Oakland construction noise standards set in the Oakland Planning Code, including limits on the hours of noise-generating activities,
limits on the number of consecutive days of noisy construction activities, and limits on the maximum noise at receiving properties.

**Conclusion:** Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to increased noise levels, nor would it result in any new significant impacts to the environment related to noise.
13. POPULATION AND HOUSING
Would the project:

<table>
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<tr>
<th></th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</td>
<td></td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</td>
<td></td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</td>
<td></td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had no impact related to population and housing based on the above criteria.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to population and housing. The Project is located within an urban industrial/developed area. Its designated land use is for Heavy Industrial uses. There are no residences located within the Project site nor does the Project propose construction of new housing or infrastructure.

**Conclusion:** Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related population and housing, nor would it result in any new significant impacts to population and housing.
14. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services?

<table>
<thead>
<tr>
<th>Service</th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Fire protection.</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Police protection.</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Schools.</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Parks.</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) Other public facilities.</td>
<td>☒</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had no impact related to public services based on the above criteria.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to public services. The City of Oakland provides police and fire protection services for the Port area, with additional security provided by the U.S. Department of Homeland Security, U.S. Customs, and the U.S. Coast Guard. The police response time to the site for life-threatening emergencies is usually less than 5 minutes and for the fire department it is approximately 3 to 5 minutes. There are no schools or parks located within the Project site.

**Conclusion:** Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to public services, nor would it result in any new significant impacts to public services.
15. RECREATION
Would the project:

<table>
<thead>
<tr>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

Stormwater Improvement Project IS/ND

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had no impact related to recreation based on the above criteria.

Project Analysis and Conclusions

There is nothing about the Project that would result in unique or peculiar impacts related to recreation. The Project would not cause an increase in use of existing neighborhood and regional parks or other nearby recreational facilities. It does not include construction of new or an expansion of existing facilities. The Project is not expected to affect population growth and would not significantly alter the number of employees working at the project site. Therefore, it would not result in an increased demand on recreational facilities.

Conclusion: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to recreation, nor would it result in any new significant impacts to recreation.
16. TRANSPORTATION
Would the project:

<table>
<thead>
<tr>
<th></th>
<th>Equal or Less Severity of Impact as Previously Identified in the Stormwater IS/ND</th>
<th>Substantial Increase in Severity of Previously Identified Significant Impact in the Stormwater IS/ND</th>
<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>b)</td>
<td>Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>c)</td>
<td>Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>d)</td>
<td>Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>e)</td>
<td>Result in inadequate emergency access?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>f)</td>
<td>Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

**Stormwater Improvement Project IS/ND**

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had No Impact related to transportation based on the above criteria.

**Project Analysis and Conclusions**

There is nothing about the Project that would result in unique or peculiar impacts related to transportation.

The Project will not result in an increase to additional truck trips as the Project does not propose an expansion of current metal recycling operations. The purpose of the Project is to control airborne particulate matter, and will not result in an increase to the level-of-service standards on nearby roadways or highways.
Construction-related truck traffic is not expected to increase enough to result in impacts on traffic flows during peak periods. Any increase would be considered temporary. To further address construction-period traffic, the Project will include a Construction Management Plan that will preclude construction equipment from parking on the street, and access to the surrounding properties would not be blocked as a result of the construction. Temporary parking for vehicles and equipment associated with construction would be accommodated on site.

Specific procedures to be put in place to prevent construction activities from impacting transportation facilities to the surrounding businesses are indicated in the following BMP’s hereby incorporated into the Project.

**Trans-1: Construction Management Plan.** Prior to the issuance of the first construction-related permit, the project applicant and his/her general contractor shall prepare a Construction Management Plan (CMP). The CMP shall contain measures to minimize potential construction impacts such as dust control, construction emissions, hazardous materials, construction days/hours, construction traffic control, waste reduction and recycling, stormwater pollution prevention, noise control, complaint management, and cultural resource management. The CMP shall provide project-specific information including descriptive procedures, approval documentation, and drawings (such as a site logistics plan, fire safety plan, construction phasing plan, proposed truck routes, traffic control plan, complaint management plan, construction worker parking plan, and litter/debris clean-up plan) that specify how potential construction impacts will be minimized and how each construction-related requirement will be satisfied throughout construction of the project.

**Conclusion:** Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to transportation, nor would it result in any new significant impacts to transportation.
17. UTILITIES AND SERVICE SYSTEMS

Would the project

<table>
<thead>
<tr>
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<th>New Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</td>
<td>☒</td>
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</tr>
<tr>
<td>e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>g) Comply with federal, state, and local statutes and regulations related to solid waste?</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

Stormwater Improvement Project IS/ND

The previous Schnitzer Stormwater Improvement Project IS/ND found that construction of the stormwater system had No Impact related to utilities and service systems based on the above criteria.

Project Analysis and Conclusions

There is nothing about the Project that would result in unique or peculiar impacts related to utilities and service systems. The Project will reduce the use of water for dust suppression, and will correspondingly decrease the amount of wastewater discharged into the existing sewer system.
Conclusion: Based on an examination of the analysis, findings, and conclusions of the Stormwater IS/ND, implementation of the Project would not substantially increase the severity of impacts related to utilities and service systems, nor would it result in any new significant impacts to utilities and service systems.
18. MANDATORY FINDINGS OF SIGNIFICANCE

| Environmental Quality. With implementation of BMPs as identified in this checklist, the Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community. The Project would not impact rare or endangered wildlife species, or eliminate important examples of the major periods of California history or prehistory. |
|---|---|
| b, c) Cumulative Impacts and Adverse Effects on Human Beings. The Project would not result in adverse impacts that are individually limited but cumulatively considerable and would not involve substantial adverse effects on human beings, either directly or indirectly, including effects for which project-level mitigation were identified to reduce impacts to less than significant levels. All of these potential effects would be less than significant with implementation of BMPs identified in this document, and would not contribute in considerable levels to cumulative impacts. |
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Port of Oakland

This document was prepared in consultation with Tim Leong, Environmental Programs and Planning Division, Port of Oakland.

SOURCES

1. Paramatrix, December 2014, Schnitzer Stormwater Improvement Project Initial Study/Negative Declaration
ATTACHMENT A:

SCHNITZER STORMWATER IMPROVEMENT PROJECT INITIAL STUDY/NEGATIVE DECLARATION

(Note that appendices to this document have been omitted from the printed copy. A digital copy including appendices is available at the Port of Oakland, Environmental Programs and Planning Division)
ATTACHMENT B:
SCHNITZER STORMWATER IMPROVEMENT PROJECT
NOTICE OF DECISION

(NOTE THAT APPENDICES TO THIS DOCUMENT HAVE BEEN OMITTED FROM THE PRINTED COPY.
A DIGITAL COPY INCLUDING APPENDICES IS AVAILABLE AT
THE PORT OF OAKLAND, ENVIRONMENTAL PROGRAMS AND PLANNING DIVISION)
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ATTACHMENT C:

SCHNITZER STORMWATER IMPROVEMENT PROJECT

PORT PERMIT DECISION

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