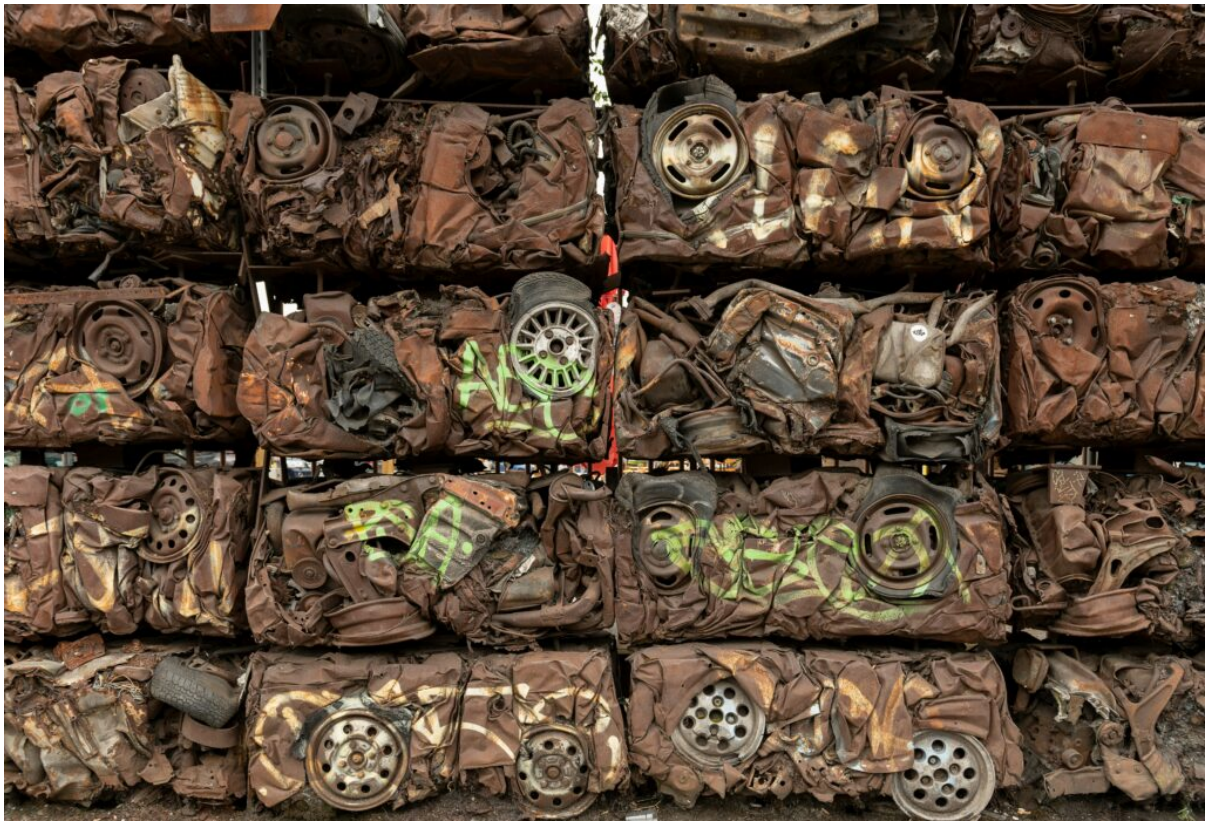


Photo: v2osk via Unsplash

This post was co-written by UCLA Law student Kate Inman (J.D., 2026).

Throughout California's Senate District 20, roughly thirty scrap metal recycling facilities sit in the industrial corridors running alongside residential housing. For the working-class, majority-Latino communities living blocks away, the legal system has been slow to respond.

Drive through Sun Valley or Pacoima on a weekday morning and you will smell it before you see it: the metallic tang of shredded steel, the faint chemical bite of residual fluids baking in the San Fernando Valley sun. More than half of the thirty scrap metal dismantling and recycling facilities in District 20 sit within a few blocks of homes, schools, and parks.

The juxtaposition is not accidental. It is the product of decades of permissive land use policy, inconsistent enforcement of environmental and zoning laws, and a regulatory architecture built for a different era.

For nearly a century, the City of Los Angeles maintained zoning practices, including

concentrating industrial activity in corridors adjacent to schools and homes, that fueled urban sprawl, deepened socioeconomic inequality, and worsened environmental outcomes. Those decisions did not fall randomly across the city. They tracked race and income as a product of policy, not coincidence. Today, the affordable housing crisis has only tightened the bind: as rents climb across Los Angeles, low-income residents are pushed toward neighborhoods in the San Fernando Valley where housing is cheaper precisely because it sits in the shadow of industrial and commercial activity. The communities bearing the greatest pollution burden are, increasingly, the communities with the fewest options to leave.

Many constituents have raised these issues with their elected officials, including Senator Caroline Menjivar. For the last several months, the UCLA Law Environmental Legislation Clinic has been in ongoing communication with Senator Menjivar's office to evaluate potential regulatory pathways for addressing the environmental justice issues stemming from scrap metal recycling and auto-dismantling activity in District 20.

California is home to an estimated 2,500 metal recycling facilities—operations that together collected and processed roughly 6.4 million tons of metal worth $3.3 billion in 2019, as noted by DTSC and CalEPA's 2021 study. These facilities range from small feeder yards that collect scrap from the public, to automobile dismantlers, to large-scale metal shredding operations that run cars and appliances through industrial hammer mills. In District 20, these facilities skew toward the smaller end, and thus their legal violations are often unnoticed or ignored by the relevant law enforcement agencies that are tasked with regulating them. There are twelve facilities in Sun Valley alone, with clusters of facilities in North Hollywood, Van Nuys, Pacoima, and Panorama City.

Most of these metal recycling facilities are bare-bones "mom-and-pop" operations—small businesses typically without published contact information or websites. Collectively, they offer a comprehensive range of services: salvage and demolition, appliance and automobile recycling, aluminum, copper, and brass processing. What they share, beyond their industrial function, is proximity to the people who can least afford to bear the consequences of their operations. Of the seventeen out of thirty scrapyards identified in District 20 that are in close proximity to residential communities, several are extremely close—as in within just 500 feet.

Understanding the Risks Posed by Metal Recycling Facilities

The health risks posed by these metal recycling facilities are dire and well-documented. Metal shredder waste—a complex byproduct known as “metal shredder aggregate”—contains dangerous heavy metals including lead, copper, zinc, and, in some cases, cadmium. The California Department of Toxic Substances Control (DTSC) has documented through sampling studies that this metal shredder aggregate frequently exceeds regulatory limits for these heavy metals. Even after chemical treatment, soluble concentrations of certain heavy metals often remain above permissible standards. Exposure to the toxic substances in metal shredder aggregate has been linked to lead poisoning, kidney and liver damage, and a range of adverse neurological symptoms.

The L.A. Zoning Code Governs Metal Recycling Facilities, But the City Needs to Enforce it

The proximity of scrap facilities to sensitive receptors in District 20 is not a recent phenomenon. It is an artifact of historically permissive land use practices. This is a legacy in which industrial zoning designations were drawn without meaningful consideration of cumulative community health impacts.

Under the City of Los Angeles’s zoning framework, scrap yards and recycling operations fall under M1 Limited Industrial, M2 Light Industrial, and M3 Heavy Industrial designations. M2 permits automobile dismantling yards and junkyards subject to noise, dust, and enclosure requirements; M3 directly authorizes scrap metal processing but with stricter conditions on enclosure and landscaping, particularly near residential zones. Recycling materials processing facilities operating in M2 and M3 zones without a conditional use permit are only lawful if they meet specific distance and operational requirements—including a 1,000-foot buffer from residential or other sensitive zones.

Yet, many facilities in District 20 do not meet that standard. Of the twenty facilities operating in M2-zoned lots within District 20, all twenty sit within 1,000 feet of a residentially zoned parcel, and six are located within 500 feet. Yet only two of these twenty facilities hold conditional use permits. The remaining 18 facilities appear to be operating industrial activity in close proximity to residential lots without the permits the zoning code requires—rendering their operations potentially unlawful under the plain terms of the ordinance.

This discrepancy has gone largely unaddressed, with city officials seemingly treating these facilities as grandfathered in nonconforming uses. That position is legally questionable. Where a facility has meaningfully changed its use—expanding operations, adding equipment, or shifting the nature of its activity—the nonconforming use doctrine may no longer apply, and the facility may be required to come into compliance with current permitting requirements. The city has not systematically investigated whether such changes in use have occurred, and the lack of enforcement has allowed the apparent violations to persist.

Part of this problem is attempted to be remedied by the City's Clean Up Green Up (CUGU) ordinance, which imposes additional environmental performance standards on industrial facilities near homes and schools in three designated neighborhoods—Boyle Heights, Wilmington, and Pacoima/Sun Valley. CUGU acknowledges what community advocates have documented for decades: that clusters of industrial operations create cumulative health burdens that individual permit reviews routinely miss. Yet, CUGU only applies in the cases of new construction, additions, major improvements, or changes in use.

CUGU is, by design, only prospective. It applies to new permits and significant modifications—not to facilities operating business-as-usual. With regard to most existing scrap yards, the CUGU ordinance offers surrounding communities potential protections in the future, but not immediate relief.

Legacy facilities, therefore, continue to operate under outdated zoning and permit conditions. While the ordinance prevents future facilities from exacerbating the health and environmental issues associated with these facilities, the exclusion of existing facilities limits the effectiveness of the zoning ordinance in reducing ongoing exposure risks.

The substantive requirements associated with M2 zoning, the zoning designation of a majority of the facilities in District 20, add a further layer of concern. Within the M2 zone, activities such as crushing, baling, and metal reduction must be conducted in ways that do not generate excessive noise or dust, and operations must be fully enclosed within a solid fence or masonry wall at least eight feet high. Noise is defined as excessive if it exceeds "the noise emanating from ordinary street traffic and from other commercial or industrial uses measured at the same point on said adjacent property."

This standard presents a significant enforcement problem in practice. The ordinance

measures excessive noise by comparison to surrounding commercial or industrial activity, rather than establishing an objective decibel threshold or other quantifiable metric. In practice, this creates a compounding effect in areas like Sun Valley and Pacoima, where dismantling facilities cluster alongside one another. If all nearby facilities produce elevated noise levels, each can remain technically compliant. In this case, the comparative standard normalizes the elevated baseline that the cluster itself has created. The language effectively undermines the intent of the noise restriction, allowing industrial clusters to collectively raise what counts as "ordinary," and making it nearly impossible to identify violations or meaningfully protect surrounding communities from cumulative noise impact.

Air Pollution Regulations Apply to Metal Recycling Facilities, But Implementation of Those Regulations Remains Inconsistent

On the air quality side, the story is similarly complicated. The metal shredding process itself generates heat, causing residual fluids and fuels to volatilize and become airborne particulates. These emissions, regulated as "point sources" under South Coast Air Quality Management District rules, necessitate permits for metal shredding equipment and the use of mandated air pollution control devices. But the vast majority of the "mom-and-pop" metal recycling facilities in District 20 do not operate heavy-duty metal shredding equipment that would trigger a permit requirement, so they are not regulated by those South Coast rules.

The South Coast AQMD's Rule 403 addresses fugitive dust from industrial operations, and Proposed Rule 1460—developed specifically in response to community concerns—would require metal recycling facilities to register with the district and implement dust suppression measures. But even requiring these best-management practices, without mandatory emissions reduction targets, will not produce meaningful improvements for communities already experiencing disproportionate exposure.

There Is a Lack of Widespread Enforcement of Existing Laws and Regulations Against Metal Recycling Facilities

California's regulatory structure provides significant enforcement tools—on paper. DTSC holds broad authority to inspect facilities, issue corrective action orders, suspend permits, and pursue civil and criminal penalties under the Hazardous Waste Control Law. Penalties for knowing violations can reach $100,000 per day; facilities that generate great bodily injury or risk of death face even steeper

consequences.

The record of enforcement at facilities in District 20 illustrates both what the law can accomplish when deployed—and how rarely it is actually put into practice.

At C&S Metal in North Hollywood, DTSC investigators found hazardous waste stored in open, uncontained piles on unpaved ground. Testing confirmed that lead and cadmium exceeded regulatory thresholds. The facility had falsified records, conducted unauthorized hazardous waste treatment, and failed to maintain required compliance documentation. The case resulted in over $150,000 in penalties—a significant figure, but one that community advocates note is modest relative to the environmental and public health costs imposed on the surrounding neighborhood.

Express Metals Recycling in Sun Valley remains under DTSC corrective action for contamination of soil, groundwater, and soil vapor with lead, mercury, PCBs, and zinc. PDQ Auto Salvage has been flagged for potential asbestos-containing materials and PCB contamination. These are not isolated incidents; they represent a pattern of legacy contamination that requires years of state oversight, costly remediation, and ongoing monitoring long after violations occur.

At the local level, the Los Angeles Department of Building and Safety (LADBS) is the primary enforcement body for zoning code violations, empowered to issue Orders to Comply, levy escalating fees, and refer persistent violators to the City Attorney for potential criminal prosecution.

A review of the Los Angeles County Recorder's property records reveals a further dimension of the enforcement problem. Several facilities in District 20 have had liens brought against them—evidence that LADBS has, at least in some instances, initiated the code enforcement process. But what that record actually shows is something more troubling than simple neglect: enforcement has been sporadic, non-uniform, and disconnected from any systematic strategy. Some facilities have accumulated liens, often unresolved for several years, while nearby operations with identical or worse conditions appear to have faced no action at all.

The lien process itself is cumbersome and error-prone: the City Council has previously flagged instances where LADBS erroneously placed liens for duplicate violations, after cases were already resolved, or when property owners were never properly notified in the first place. The only opportunity a property owner has to

challenge LADBS's findings is at the City Council confirmation stage. This is the final step in the lien process, though, which allows procedural errors to go uncorrected for months, and legitimate violations can lose their legal footing before any remediation occurs.

The result is an enforcement landscape that is reactive rather than systematic, episodic rather than sustained. Facilities that have drawn complaints may face action; those that have not largely operate without scrutiny. In a corridor as densely concentrated with industrial activity as Sun Valley and Pacoima, this approach is not just inefficient. It is a structural failure that allows the cumulative burden on surrounding communities to compound year after year.

The enforcement tools exist. The question advocates and lawmakers are pressing is why they are not being used more aggressively—and systematically—before the pollutants currently being emitted by metal recycling facilities become legacy contamination.

The residents of Sun Valley and Pacoima deserve to have their health prioritized by these government officials, whose success is measured in the air they breathe, the groundwater beneath their homes, and the distance between their children's schools and the nearest open pile of dangerous scrap metal waste.

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