



METAL RECYCLING ENTITIES (MRE) & USED AUTO PART RECYCLERS UPDATES (CH. 16)

FACT SHEET

Council District 5 submitted a Council Consideration Request (CCR) to create a stakeholder group to assess and recommend amendments to Ch. 11 (Fire Prevention) and Ch. 16 (Licenses and Business Regulations) of the City's Code. These codes will be updated every five years.

WHAT IS AN MRE?

A Metal Recycling Entity (MRE) is defined in Ch. 16-203 as the process of acquiring and purchasing scrap, used, or obsolete ferrous or nonferrous metal and performing the manufacturing process that converts this metal into raw material products. It does not include businesses that recycle car parts.

WHAT IS A UAPR?

A Used Auto Parts Recycler (UAPR) is defined in Ch.16-186 as an entity that dismantles and reuses or resales automotive parts and does safe disposal of salvage motor vehicles or nonrepairable motor vehicles, including the resales of those vehicles.

UPDATES TO CH. 11 AND CH. 16

After several meetings with stakeholders for the proposed changes, the city council approved in May 2025 the following amendments:

Increased Options for Enforcement

Faster required timeline for violation response

- Operator given 2-day notice to correct issue when violation is noted.
- Adds the ability to use civil tickets for violations in addition to criminal tickets.
- Clarifies Certificates of Occupancy can be revoked if operating without a valid license.
- Modifies the ability to suspend or revoke a license if 3+ citations are accepted by the municipal court within a rolling 12-month period.
- The Director can require the business to cease operations pending a mandatory compliance meeting before suspension or revocation.
- Adds ability to issue a 30-day temporary license if only waiting for minor administrative items for renewals.
- Adds requirement for contaminated liquid and other hazardous waste disposal manifests be reviewed at least every 3 months by Code Enforcement to ensure legal disposal of these items.

Zoning and Nonconforming Use

- Adds zoning density rules to limit establishment of new MRE or UAPR within 1,000 feet of existing facility unless approved by City Council through zoning process.
- Adds ability for UAPRs that have legal non-conforming use to expand within their existing lot lines similar to what was granted to MREs back in 2012.

Facility Standards

- Clarifies acceptable fencing designs, materials, and maintenance requirements.
- Allows metal fencing by right for these facilities and adds requirement for fencing to limit reflectivity and heat transfer via paint or other method.
- Increased pest and vector control from every 6 months to every 3 months.
- In recycling operations areas, weeds and brushes to be maintained at 4 inches instead of 12 inches.



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Fire Prevention and Public Safety

- It adds the requirement that each yard have a fire prevention plan submitted for review by SAFD to obtain a new or renewed license.
- Plan shall identify fire department access and egress from facility; available water systems; and any fire notification systems for the property.
- Will assist SAFD with pre-planning for each facility.
- A fire prevention plan shall be reviewed and updated by an approved third party in the event of a fire at the facility, as required by the fire official.
- Adds language to ensure the required fire safety path around the facility has no obstruction within 14 feet of the ground to assist SAFD operations in an emergency event.
- It adds language that all hazardous solid waste and hazardous liquids, regardless of character or category, must be contained to prevent negative impacts on human health or the environment.
- Adds San Antonio fire code language to Ch. 16 to clarify maximum heights, size, and separation of outdoor storage piles for operational safety and to simplify inspections.
- Adds requirement for Code Enforcement to report all noted spills (based on TCEQ's reportable spill standard) to appropriate agencies: Metro Health, SAWS, TCEQ, SWMD, SAPD or SAFD

Updated or Clarified Definitions

- Hazardous Materials
- Regulated Material to align with state definition.
- Regulated Metal to align with state definition.
- Added Metal Shredder Residue (MSR) definition and a separate Fluff definition.

HOW MUCH ARE THE LICENSES?

As of Oct. 1, 2025, the licenses for MREs and UAPRs are \$1,000. The new fee ensures our code enforcement programs remain effective, safe, and sustainable for all in the community.

HOW OFTEN ARE THE INSPECTIONS?

Code Enforcement can inspect these facilities monthly to:

- Promptly address violations, especially those impacting life safety.
- Ensure illegal operating facilities are properly permitted or shut down.

CONTACT US

City staff is available and ready to assist you with any questions and information you may need. Send us an email at CodeLicensing@sanantonio.gov.