



Follow-up Questions from Dec. 5th Neighborhood Meeting

On Dec. 5th, 2023, ABC Recycling hosted a neighborhood meeting to provide more details about their proposed metal shredding facility. Over 90 questions were submitted at the meeting and ABC Recycling employees were not able to speak to every single issue raised. Many of the questions revolved around the same concerns so here are the key issues raised in the questions and answers to those questions.

Why are you in business?

ABC Recycling is a fourth-generation, family-owned and operated business with headquarters located just forty miles north of Bellingham in Burnaby, BC. We are a key part of the global recycling value chain for industrial metal materials. We purchase a wide range of recycled metal material, from end-of-life consumer goods such as vehicles and appliances, off-cuts and excess metal materials from manufacturing processes to end-of-life infrastructure and equipment from utilities, demolition projects, and the resource sector.

We then utilize our specialized equipment and expertise to process the purchased metal materials (that might otherwise end up in a landfill) into globally recognized metal commodities, which get sold to industrial manufacturers worldwide to be made into new products.

By doing this, we help to save hundreds of thousands of tons of CO2 emissions annually, providing sustainability for our communities and for the planet. We exist to preserve the world's resources, building thriving communities by accelerating metal recycling. To learn more about our business values and purpose, check out www.abcrecycling.com

(paraphrased from several questions) Many residents are concerned about soil, water, and air contamination because of the proposed shredder facility. What are your plans to address those concerns?

ABC recognizes that responsible operation of a facility is an ongoing commitment and is dedicated to maintaining a **safe and environmentally responsible** facility. As part of the permitting process, all aspects of the facility will be reviewed for their potential impact on the environment.

To help control emissions, the shredder itself will be enclosed on all four sides, providing noise and debris control-



Water and foam injection into the shredder will be used during the shredding process, which will significantly reduce emissions; all downstream processing will occur inside enclosed buildings.

As part of the permitting process, ABC will complete emissions studies to confirm that the controls proposed are protective of human health and the environment prior to the Northwest Clean Air Agency (NWCAA) granting a permit for operations. ABC will also be responsible for routine sampling, inspections and reporting to ensure adherence to the established permit requirements.

For stormwater and soil concerns, the facility includes a specialized stormwater quality system. After the initial settling in the lined detention pond, stormwater will undergo treatment for turbidity, pH, oils and metals as specified by the Department of Ecology. The purpose of the detention pond is to retain water on site and to allow for the settling of suspended solids in stormwater before it undergoes further treatment. These essential steps help prevent the release of contaminants into the environment.

A key component of this process is electrocoagulation, a well-established and proven technology that effectively removes contaminants from stormwater.

ABC recognizes the importance of regulatory compliance, accountability, and agency oversight in managing stormwater. Per state requirements, ABC will secure an industrial stormwater permit that outlines stringent requirements for its operations as determined by the Department of Ecology.

Ongoing monitoring (testing) for contaminants will be scheduled on a quarterly basis to verify compliance, and results will be reported to the Department of Ecology. Through the permit, ABC will commit to an escalating corrective action schedule should future issues be identified. This approach ensures that ABC's stormwater is **protective of the environment and maintains compliance**.

For more details on environmental mitigation measures, including stormwater reports, traffic and noise studies and wetland mitigation plans, feel free to review materials submitted to the Whatcom County Planning Department here: <https://www.whatcomcounty.us/4277/ABC-Recycling>

What does “depolluting” of cars mean and how will ABC ensure that the materials brought in for shredding are clean?



The depolluting process happens at metal recycling facilities like Z Recyclers or Northwest Recycling. They inspect the vehicle, remove the tires, drain the fluids, and remove hazardous materials like mercury switches. They then compress the vehicle for transport, where it will be brought to our shredding facility.

All customers must sign a contract verifying that the material coming into the shredding facility does not contain any prohibited materials (batteries, medical waste, radioactive material, etc).

Employees at our shredding facility will then visually inspect the material prior to accepting it, rejecting all prohibited items. Inspectors will also be positioned at the materials staging area and will inspect all loads during the offloading process.

Ensuring that the material that comes into the facility are up to standard is one of the most effective ways to reduce emissions, as identified in the 2021 EPA memo on metal shredders.

Once you obtain a permit for a “small” shredder, what would prevent you from converting to a bigger one? What are your plans for growth as described by the permits you submitted to the County?

Our permit application reflects the facility operating at full capacity. There may be future adjustments such as adding new technology as it becomes available to recover more metal as part of the post-shredding process, but any significant change to our operations, such as increasing the size of our shredder, would require a new permitting process with opportunities for public input.

The small shredder indicated in all our permitting documents reflects the full build out of the facility.

How much noise will the shredder make?

The shredder will be contained inside a sound-attenuating enclosure with replaceable wall panels designed to mitigate sound. The shredder will be positioned in the central part of the facility to increase distances from Marine Drive and optimize intervening buildings, landscaping, and terrain to enhance noise reduction.

ABC has worked with qualified consultants to measure the potential impact of sound from the shredder outside the facility perimeter. It is one of the many things that is studied as part of the permitting process. The nearest residential location (houses directly southeast from the facility) is predicted to receive sounds at approximately 36 decibels, which is slightly louder than a whispered conversation. Commercial businesses across the street from the proposed location



(Signs Plus) are anticipated to receive sounds at approximately 60 decibels, which is equal to a normal talking conversation.

You can also review details of the sound study we conducted on slide 24 of our presentation or review the sound study materials submitted to the County planning department at <https://www.whatcomcounty.us/4277/ABC-Recycling>.

Will you be operating 24/7 days a week?

In consultation with our electrical utility (PSE), we intend to operate during normal business hours (7am to 5pm, Monday through Friday), however if there is an equipment breakdown or maintenance is required, we may need to operate outside of those hours, which is why we applied to the County to be able to operate 7am to 10pm, however a vast majority of our operations will be within the normal business hours.

What is the overall square footage?

The facilities will be just shy of 40,000 square feet on a 20-acre parcel, of which approximately 9 acres will be utilized for development. The remainder will remain in its natural vegetative state as it is today.

What is the diameter of the shredded material?

The shredder reduces post-consumer products down to pieces ranging between the size of a baseball to the size of a football.

What is going to happen to the waste – the stuff you don't want?

The post-shredding process will separate out the ferrous metals, non-ferrous metals, and non-metallic materials. The non-metallic materials will then be sent to local landfills, which will use it as alternative daily cover. State and federal regulations require that landfills regularly cover the garbage to keep animals from accessing the waste. Use of this material is called alternative daily cover.

Which sorting techniques will the facility be using

The post-shredding processes utilize state of the art technology to generate several metallic products. You can learn more about them from our presentation, starting at 15:01. There are also more details in our PowerPoint presentation, starting at slide 15.



How many jobs will be created and how much will they pay?

At ribbon cutting, we anticipate that 12-15 family wage jobs will be created at this facility, with 30 full-time jobs created at full buildout. ABC is committed to hiring local and investing in the Bellingham community. Bringing the shredder online will also increase employment at our shipping operation at the Port of Bellingham.

You keep mentioning rail cars, can you tell us how that is going to work? There are no tracks to the facility.

There are rail facilities adjacent to the property and as part of the full buildout, ABC will be constructing a rail spur. Once activated, we plan to utilize the rail siding to move materials in and out of the facility; the BNSF railway will provide daily service and we expect to average one to three railcars per day. Each rail car can replace four truck trips so we look forward to activating that rail access soon after the facility is up and running.

Why did ABC Recycling choose this site in particular rather than somewhere in Canada or out at the Cherry Point industrial area?

We wanted to locate in Whatcom County because there is a market opportunity. It is close to the other ABC locations, just forty miles north of Bellingham, which keeps our business focused and local. While there is a metal shredder operating in Richmond, BC, there are no metal shredders in Whatcom, Skagit or Snohomish County. Finally, there is a deep-water port that is underutilized at the Bellingham Shipping Terminal, which provides us the flexibility we need for our shipping operations.

For the metal shredder site specifically, we required a parcel of land with high voltage electrical service (for operation of the shredder) and situated on both rail lines and a federally designated truck route. To reduce the climate impact and transportation costs, we wanted to locate close to our shipping operations. Finally, to operate our facility, it would need to be located in a Heavy Impact Industrial zone.

With those requirements, the current location under consideration meets our needs.

How many trucks per day? What route will the trucks take? How will this impact the roads and traffic in Bellingham? Will the trucks be uncovered?

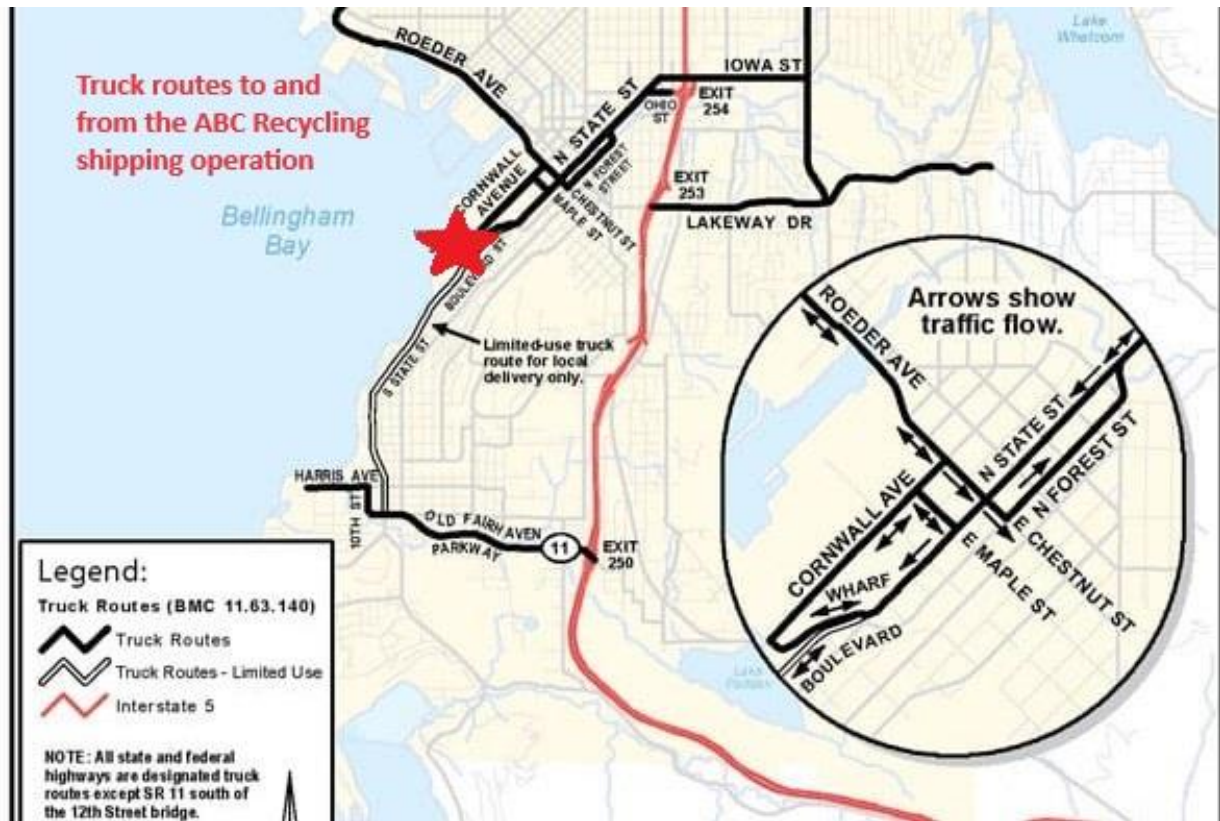
We project a maximum of four trucks per hour while we are operating (8am to 5pm), for a total of no more than 36 trucks per day.

The vehicles are legally required to travel on federally designated truck routes – which are roads that are built wider and sturdier than other streets to accommodate trucks.

Here are the routes the trucks are anticipated to take:



Trucks traveling to the Marine Drive shredding facility from I-5 can use either Airport Drive over to Marine Drive, or Bennett Drive to Marine Drive. They would then use the same route to return to I-5.



To reach our shipping operation at the Bellingham Shipping Terminal, they would then utilize Ext. 254 on Iowa Street, take North State Street into Bellingham before arriving at Cornwall Avenue to reach the shipping operation. They would then take East Chestnut to North Forest Street to return to I-5.



Trucks carry potentially hazardous materials **safely** through our community every single day. Shipments to and from our facility will be subject to the same regulations.



Drivers are required to **secure their load**, per Dept. of Transportation (DOT) regulation, this includes covering the material as pictured here.

Best management practices will be in place to ensure trucks do not track out dirt and debris when entering and exiting the facility.

For more information about ABC Recycling's proposed metal shredding facility, including fact sheets about the environmental benefits of metal recycling, check out our website at <https://www.abcrecycling.com/locations-contact/bellingham>.

Whatcom County also has created a website to host all of ABC Recycling's permit documents and submissions. You can find that here: <https://www.whatcomcounty.us/4277/ABC-Recycling>