

Resolution on metal recycling and shredding by ABC Recycling

Whereas, Volatile Organic Compounds (VOCs) are released in large quantities from metal shredder operations. The EPA has an [Emergency Enforcement Alert](#) against metal shredders and their release of these compounds. Friction and heat release VOCs from plastics, solvents, paints, adhesives, rubber, glass, foam, fuels, oils, and heavy metals. These often toxic compounds would be carried north by predominant prevailing winds¹ into the densely populated neighborhoods of Alderwood and Birchwood; and

Whereas, many VOCs cause cancer, nervous system damage, organ damage, and respiratory problems;² and

Whereas, ABC Recycling has submitted plans that only partially enclose the shredder, with no enclosures for conveyors, truck loads, piles, etc. ABC has withdrawn all their commercial building applications so we cannot cite specific pages, but Slides 11- 20 from the December 5 meeting show schematics of the shredder system and indicate that the shredder will not be enclosed to provide openings for conveyors going in and out. It is not clear if there will be a roof. ABC's permit application has no mention of emission reductions or mitigating technologies³; and

Whereas, the California Department of Toxic Substances Control (DTSC) has concluded that the residue component of metal shredder aggregate is a hazardous waste that does not meet the definition of scrap metal;⁴ and

Whereas, metal shredder residue or "fluff" is the byproduct of the shredding process that can not be sorted into ferrous or non-ferrous material. Because California, Japan and European countries have deemed this material hazardous, there is concern over ABC's plans to transport and dispose of this material and how it will burden and pollute our already burdened solid waste system⁵; and

Whereas, metal shredding facilities contaminate communities with heavy metals, all of which present threats to human and environmental health.⁶ Lead and copper exceedance levels have been detected at the metal piles at the waterfront.⁷

¹ https://cob.org/wp-content/uploads/COB_WindAsp.pdf.

² <https://www.sciencedirect.com/science/article/abs/pii/S0195925513000358>; <https://www.lung.org/clean-air/indoor-air/indoor-air-pollutants/volatile-organic-compounds>

³ [PP - ABC Dec 5th meeting.pdf](#)

⁴ https://dtsc.ca.gov/wp-content/uploads/sites/31/2021/08/2021.08.09_Metal_Shredder_Analysis.pdf, conclusion pp. 92-94.

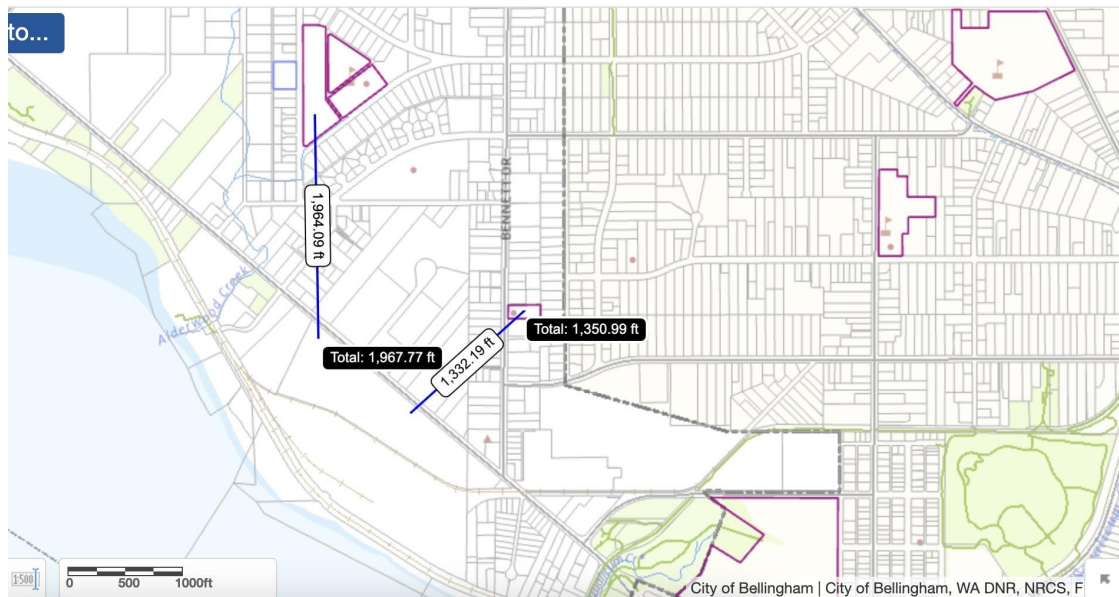
⁵ <https://www.sciencedirect.com/science/article/abs/pii/S0956053X15000744>.

⁶ [Spatial Analysis of Heavy Metal Emissions in Residential, Commercial and Industrial Areas Adjacent to a Scrap Metal Shredder in Winnipeg, Canada](#)

⁷ https://drive.google.com/file/d/1G1EF_QhCQxBrXghAU5Rmm7UwxTLUuvnV/view?usp=sharing
https://drive.google.com/file/d/1SmM09iENF_o_rXYauoo5_WadW7ldLsnS/view?usp=sharing

These chemicals are well documented by the World Health Organization to produce a spectrum of injury across multiple body systems and are most often irreversible⁸;

Whereas, one of the most common causes of illness for metal shredder employees is toxic metal poisoning.⁹ This is significant given the difficulty in positively identifying a cause and effect for that condition. It is especially troubling when considering the residents living in such close proximity, most notably the 400 young children who attend elementary and preschools less than 2000 feet away (see map); and



Whereas, there are currently 12 active cleanup sites along Bellingham Bay¹⁰ at great financial and environmental costs to our region; damaging the ecosystem by which we depend for the health and sustainability of our waterways and treaty-protected and economically significant fisheries. Well documented polluting industries such as metal shredders are therefore of concern on our already overburdened Bay.

Whereas, the detention pond to store stormwater that has been submitted as part of the shredder permit application is proposed to be built to withstand a “100 year” rainfall event. Due to climate change and experiences from recent years, this could be significantly undersized¹¹, risking uncontrolled overflow of toxic stormwater and sludge into Little Squaticum Creek and estuary, Alderwood Creek, and Bellingham Bay; and

⁸ <https://www.who.int/publications/i/item/9789289071796>;
[Toxic Metals - Overview | Occupational Safety and Health Administration](https://www.cdc.gov/nceh/toxicology/occupational_safety_and_health_administration/)

⁹ [Green Job - Recycling: Scrap Metal Recycling | Occupational Safety and Health Administration](https://www.osha.gov/sites/default/files/publications/OSHA3348-metal-scrap-recycling.pdf);
<https://www.osha.gov/sites/default/files/publications/OSHA3348-metal-scrap-recycling.pdf>;

¹⁰ <https://apps.ecology.wa.gov/publications/UIPages/documents/2009168.pdf>

¹¹ <https://apps.ecology.wa.gov/publications/documents/1201004i.pdf>, pp 107-109.

Whereas, the proposed shredder will not have sewer connectivity, so all human waste must be “treated” in place by an onsite septic system and leach field.¹² ABC has stated that the whole facility will be paved, but that is inconsistent with the needs of a stormwater pond and leach field for septic. Detention pond flooding, combined with leach field issues are a combination that could harm groundwater; and

Whereas, the increase in diesel semi-trailer truck traffic from the proposed shredder site to Bellingham’s downtown waterfront would add 45-75 trucks daily, working their way through downtown and neighborhoods. These semi-trucks are filled to capacity with shredded metal, weighing 80,000 pounds or more (Mark Hallenbeck, retired WA State Director of Transportation) which causes excessive wear and tear on truck routes¹³; and

Whereas, toxic metal particulates which accumulate on the ground at the shredding yard attach to tires leaving the yard and would be dispersed throughout Bellingham and the region. In addition, dust and particulate matter would be released from open and unsecured loads; and

Whereas, diesel truck emissions pollute neighborhoods and warm the climate¹⁴;

Whereas, while ABC claims that the noise level of their shredder will be 67 decibels (dB) “at the highest”, a 60”x60” shredder with a 1,000-hp electric motor creates noise of up to 123 dB.¹⁵ Exposure to sounds higher than 110 dB can cause instantaneous hearing loss¹⁶; and

Whereas, studies have shown direct links between noise, diminishing health, and lower quality of life. Noise-related health issues include sleep disruption, lost productivity, anxiety and depression, speech interference, and heart disease.¹⁷ Our county does not have a rigorous enough noise ordinance to protect residents from these health issues; and

Whereas, neighborhoods in close proximity to shredders have become undesirable places to live.¹⁸ There is much growth potential for middle-class housing in these neighborhoods with a myriad of zoning options to create more affordable housing; and

¹²<https://www.whatcomcounty.us/DocumentCenter/View/82606/mpp2023-00001-addendum-to-major-project-permit-20231228>

¹³ [Truck Weight and Its Effect on Highways | U.S. GAO](https://trucksafety.org/washington-state-cannot-afford-bigger-trucks-on-our-stressed-highways/)
<https://trucksafety.org/washington-state-cannot-afford-bigger-trucks-on-our-stressed-highways/>.

¹⁴ <https://envhealthcenters.usc.edu/wp-content/uploads/2016/11/Driving-Harm.pdf>.

¹⁵ [Seeking some quiet time - Recycling Today](#).

¹⁶ <https://hearing.health.mil/Prevention/Causes-of-Injury/High-Decibel-Levels>.

¹⁷<https://www.epa.gov/clean-air-act-overview/clean-air-act-title-iv-noise-pollution>

¹⁸ [St. Boniface residents say metal shredder is polluting air, harming health | CBC News; Crushing Cars Is a Loud, Smelly Business That’s Terrible for Air Quality](#).

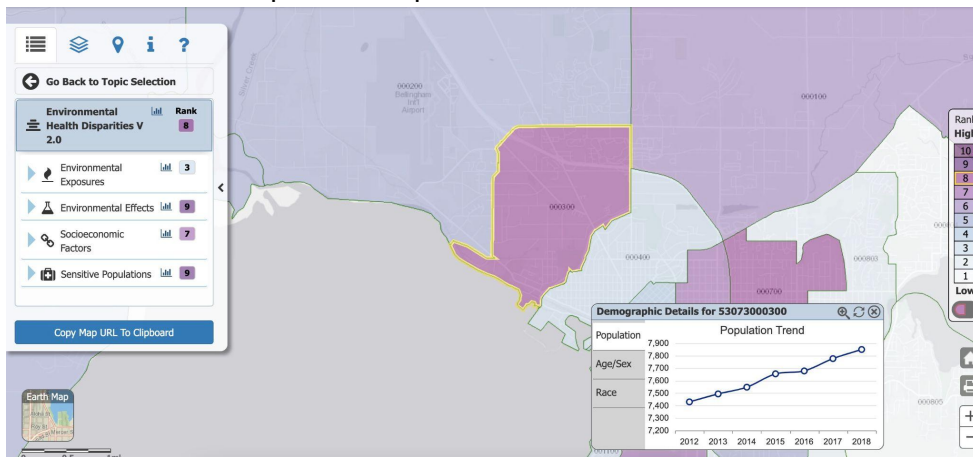
Whereas, metal shredders require a great deal of electricity which would strain Bellingham and the UGA's grid infrastructure;¹⁹ and

Whereas, small explosions and fires occur frequently and catastrophic events are “inevitable.”²⁰ A large amount of highly toxic compounds are released during such incidents. Catastrophic fires happen as well, releasing giant plumes of black smoke that force people to stay indoors for days and which can require 83 million liters of water.²¹ There are no special response teams and our local firefighters are not trained or equipped for such inevitabilities; and

Whereas, the water usage required in the shredding process to control toxic air and particulates, cool the equipment, suppress dust and sparks, prevent explosions and extinguish fires is significant²² and the source of that water has not been made clear for an already overburdened watershed; and

Whereas, While there is support for a vital and sustainable working waterfront, ABC has indicated the shredder project will only create 15-30 jobs, none of them union jobs; and

Whereas, The metal shredder would be located within a third of a mile of Alderwood Elementary School with 53% minority student enrollment and 57% economically disadvantaged students.²³ The proposed project is located within a pollution overburdened community as defined by the WA State Health Disparities Map.



Whereas, in a separate but related Whatcom County operation, “Port of Bellingham officials notified ABC Recycling Thursday, Feb. 22 that the company was in default of its lease for failing to meet environmental requirements at its waterfront ship-loading operation. The Canadian recycling company, which stores scrap metal near the shipping terminal and loads it onto

¹⁹ [Optimizing Shredder Operations.](#)

²⁰ [September 2020 Fire Report: Scrap Metal Fires Surge!](#)

²¹ ['Catastrophic' fire at AIM could happen again, task force says in harrowing account | CBC News.](#)

²² [Shredder Explosion Prevention and Recovery.](#)

²³ [Alderwood Elementary School in Washington - U.S. News Education.](#)

vessels for export, has 30 days to come into compliance with the environmental requirements of its lease or vacate the waterfront ... Ship-loading has resulted in excess levels of lead, zinc and copper in Whatcom Waterway”.²⁴

Whereas, on December 18, 2023, Lummi Nation submitted a letter to Whatcom County Planning and Development Services, stating, “This letter conveys our formal objection to the construction, permitting and operation of the metal shredding and recycling operation currently under evaluation in your SEPA process document, SEPA2023-00088. We ask that you and all other responsible officials take immediate action to stop this project from being built. Our objection and request are based on the ongoing infringement of our treaty-reserved right of taking [fin and shell] fish at our ‘Usual and Accustomed (U&A) Grounds and Stations’. There are 600 tribal fishers that already cannot harvest in the vicinity of the Port of Bellingham due to pollution. In the case of this project, we are deeply concerned about the potential ground and surface water contamination from both point source and nonpoint source pollution – expanding the area where we will not be able to fish. While we understand that efforts will be made to avoid contamination, we also see that such facilities nevertheless do have releases of solid, liquid, and gaseous contamination into our environment. ... We ... strongly encourage the County to address the concerns we’ve raised here by denying the permitting, construction, and operation of the project, protecting our rights, and our shared environment.”²⁵

NOW THEREFORE BE IT RESOLVED by the Whatcom County Democrats that:

- Permit applications for construction and operation of an industrial metal shredder on Marine Drive must be subject to the highest level of scrutiny and environmental review.
- The permit process must specifically explore and address utmost safety for the environment and residents, require mitigation relating to the following issues: toxicity from VOCs, heavy metals; shredder residue and solid waste disposal; stormwater runoff; noise; fire and emergency preparedness; emission reduction or mitigating technologies; water and energy usage; damage to roads.
- In line with the Washington State HEAL Act, environmental justice must be included as a consideration in the permitting process.
- Unless ABC Recycling can satisfy Lummi Nation that its treaty-based fishing rights – which enjoy Constitutional protection as “the highest law of the land” – will be unimpaired, the permit should be denied.

Adopted by a vote of 38 to 17 at the 24 February 2024 General Membership Meeting of Whatcom County Democrats.

²⁴ Ralph Schwartz, “[Port: ABC Recycling has 30 days to meet environmental requirements — or leave,](#)” *Cascadia Daily News*, Feb. 23, 2024.

²⁵ <https://www.whatcomcounty.us/DocumentCenter/View/82599/Lummi-Nation-Objection-to-ABC-Recycling-Realty-Corp-Project-SEPA2023-00088>.