

From: [Matthew Galibert](#)
To: [Sylvia Miller](#)
Subject: FW: Robertson Recycling/American Pulverizer
Date: Wednesday, January 17, 2024 5:41:04 AM

FYI – Feedback from IEC Environmental Engineering on behalf of Robertson’s Metal Recycling

MATTHEW GALIBERT
CITY PLANNER

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From: Lydia Crabtree <lydia@iecnashville.com>
Sent: Tuesday, January 16, 2024 5:39 PM
To: Matthew Galibert <Matthew.Galibert@dickinsongov.com>
Cc: Claiborne Thornton <claiborne@iecnashville.com>; daniel@robertsonmetal.com; reggie@robertsonmetal.com
Subject: Robertson Recycling/American Pulverizer

Hi Matthew,

Thanks for taking time to speak with me today. This email will provide three focused areas of information: 1) Conditions in place that will promote safe environmental operations of the Robertson Metal Recycling, LLC shredder, 2) Address the need for the operational zoning permit to extended beyond annual renewal, and 3) provide information from the Institute of Scrap Recycling Industries, Inc (ISRI) which is an organization promoting the safe, economically sustainable and environmentally responsible recycling through networking, advocacy, and education.

Conditions currently in place at Robertson Metal Recycling:

- Complying with applicable permits - The facility will obtain and comply with applicable permits including as necessary air, stormwater, and waste. This includes complying with state, county, and city rules and ordinances.
- Accepting safe recyclable materials - Signs will be posted identifying materials/scrap not accepted at the recycling facility. Operators will inspect incoming scrap to ensure it has been drained of liquids, and that batteries have been removed. Scrap with fluids or batteries will not be put in the shredder. Signage identifying acceptable scrap material and inspecting to identify improper scrap are standard best management controls in the metals recycling industry to mitigate receiving hazardous waste, and to protect the facility and equipment from fires.
- Fugitive air emissions - The shredder has an automated water injection system to reduce dust emissions. The facility is installing a 40-foot-high barrier around the shredder and a 20-foot-high barrier around the property that will help reduce dust migration as well as dampening noise. The facility has applied and will comply with an air pollution control permit through the North Dakota Department of Environmental Quality. The facility will monitor wind direction both using a wind sock at the site as well as monitoring wind direction on a weather app, and will not operate when the wind direction would directly blow from the facility onto the adjacent residential property.
- Noise - The facility will erect a 40-foot-high noise barrier around the shredder using

Acoustifense. The facility will also erect a 20-foot-high steel barrier, and if necessary will line the steel barrier with additional noise dampening/absorbing material. This will allow the facility to comply with local noise ordinances of 80 dBa from 7:00am to 11:00pm, and 75 dBa from 11:00pm to 7:00am.

- Vibration - The facility ordered a shredder with vibration dampening springs that reduce vibration by 90%. The shredder is on a concrete foundation that was engineered to absorb the other 10%. The foundation slab is 340 yards of concrete reinforced with 125,000 pounds of rebar for a total weight of 1,500,000 pounds.
- Truck traffic - The facility currently has approximately 50 customer vehicles coming through the yard on an average day. The facility anticipates an additional 5 semi-trucks per day (total of 55 vehicles) as it increases to receiving 2,500 tons of scrap per month.

Request the permit not be an annual renewal:

Robertson Recycling has spent \$2.5 million on this shredder installation and by the time the shredder is complete with non-ferrous downstream the facility estimates they will have over \$10 million invested. Therefore, annual renewal will not provide the assurance that is needed to have a return on a \$10 million investment. Financial institutions will not invest with the uncertainty that the shredder could not be allowed to operate in a year. Robertson Recycling is committed to addressing credible nuisance complaints in a timely manner, and requests to be promptly notified of credible complaints.

Institute of Scrap Recycling Industries, Inc (ISRI):

ISRI is a 3rd party organization promoting safe, economically sustainable and environmentally responsible recycling through networking, advocacy, and education. ISRI provided recommendations and guidance to companies operating in the scrap recycling industry. ISRI's environmental guidance can be referenced at: [ISRI Environmental Guidance](#).

Robertson Recycling will also provide this information in a letter format that can be given to committee members at tomorrow morning's meeting. You can reach me at Lydia@iecnashville.com or 615-202-1311.

Sincerely,
Lydia Crabtree, CSP



Lydia Crabtree, CSP
Environmental, Health, and Safety
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