

## SEPA ENVIRONMENTAL CHECKLIST

### ***Purpose of checklist:***

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

### ***Instructions for applicants:***

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

### ***Instructions for Lead Agencies:***

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

### ***Use of checklist for nonproject proposals:***

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

## A. Background

1. Name of proposed project, if applicable:

Metal Shredder and Sorting System Addition

2. Name of applicant:

PNW Metal Recycling, Inc.

3. Address and phone number of applicant and contact person:

Applicant (operator)

PNW Metal Recycling, Inc.

Attn: Sean Daoud

10105 S.E. Mather Rd.

Clackamas, OR 97015

(503) 655-5433

seand@rivergatescrap.com

Property Owner

NWM Properties, LLC

Attn: Hank Doane

10105 S.E. Mather Rd.

Clackamas, OR 97015

(503) 347-0094

hank@portlandrecycling.com

Point of Contact (Agent)

Grette Associates, LLC

Attn: Syd Gebers

151 S. Worthen St., Ste 101

Wenatchee, WA 98801

(509) 640-3291

sydg@gretteassociates.com

4. Date checklist prepared:

March 28, 2022

5. Agency requesting checklist:

Cowlitz County

6. Proposed timing or schedule (including phasing, if applicable):

Shredder installation could occur as early as Spring 2023, pending receipt of all applicable permits and approvals. No phasing is proposed.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No. Installing the hammermill shredder is a stand-alone project.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Environmental information prepared for the metal shredder and sorting system addition includes:

- Air quality dispersion modeling and technical analysis is being completed in support of the Air Discharge Permit application for the Project. Preliminary results indicated that toxic air pollutant concentrations are compliant with the acceptable source impact levels.

- An updated Stormwater Pollution Prevention Plan (SWPPP) will be prepared prior to the shredder becoming operational in compliance with the facilities existing Industrial Stormwater General Permit (WAR310730).

Other available environmental information for the facility in general, but not directly related to the shredder application includes:

- An Air Discharge Permit (Permit No. 21-3500; issued January 25, 2022) and associated technical analysis for torch cutting operations at the site.
- A SEPA Determination of Nonsignificance (DNS #18-04-2576; issued April 17, 2018) for the PNW Metal Recycling Relocation Project.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

None known.

10. List any government approvals or permits that will be needed for your proposal, if known.

Air Discharge Permit from SWCAA.

State Environmental Policy Act Compliance.

Update to facility's Stormwater Pollution Prevention Plan (SWPPP) associated with the existing Industrial Stormwater General Permit (WAR310730).

Cowlitz County Building Permit.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

PNW Metal Recycling (herein the "Applicant") proposes to add metal shredding operations and equipment at their Paper Way Recycling Yard. The Recycling Yard is located on a 25-acre industrial property at 100 Paper Way, Longview, Washington (Figure 1). The metal shredding process generally uses a shredding technique to process end-of-life vehicles, appliances, and other forms of metal commodities to facilitate the separation and sorting of ferrous metals, nonferrous metals, and other recyclable materials from non-metal materials.

Operations and key equipment associated with the addition of the metal shredder and recycling system (the "Project") is as follows:

- Hammermill shredder.
- PNW Metal will receive recyclable metal commodities, such as whole car bodies, through the main gate off Paper Way. Haul vehicles proceed to the incoming scale house where they are inspected, weighed, and then routed to the appropriate location to load and unload. Haul vehicles exit the facility through the outbound scale house and proceed through the main gate.
- Tin, car bodies and other recyclable metal commodities will be sorted and/or prepared for optimal shredding in designated outdoor handling areas on the paved surfaces.

- Loading of prepared auto bodies onto the shredder's infeed conveyor will be conducted by material handlers with grapples or magnets, front-end loaders, and forklifts.
- The shredder will be enclosed inside a building capable of capturing between 95% and 100% of the emissions from the shredding process. This building is roughly 90'L x 60'W x 70.5'H.
- The emissions control system, listed in sequence, includes the following components: 1) four wet dust suppression units; 2) a particulate matter drop box to remove the heavier particulate; 3) two auto advancing media filters to remove finer particulate; 4) a regenerative thermal oxidizer (RTO) where volatile organic compounds are destroyed; and 5) an acid gas scrubber (see Section 2 for more information on air emissions).
- The material coming out of the shredder enclosure will be fed into a dual magnetic drum separator via conveyor. Here the ferrous material is separated. Non-ferrous material is rerouted and deposited to the ground via conveyor in a pile perpendicular to the magnetic drums.
- The ferrous material carries on and passes through an air knife which lifts the lighter 'fluff' material and uses a closed loop Z-box and cyclone system for capturing and transferring the material to another conveyor that separates this material and routes it to another pile.
- The ferrous material passes through two picking stations where people manually remove any nonferrous materials that made it through the process. The ferrous material is conveyed to another pile.
- Sorted and processed material from each of the three piles will then be shipped off-site as product.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

Street Address: 100 Paper Way, Longview, WA.

Tax Parcel Number: 616140106

Cross Streets: Industrial Way and Paper Way

Section, Township, and Range: NW ¼ of Section 9 and SW ¼ of Section 4, Township 7 North, Range 2 West.

Latitude and longitude coordinates: Lat. 46.1122°, Long. -122.9459°

## **B. ENVIRONMENTAL ELEMENTS**

### **1. Earth**

a. General description of the site:

(circle one):  Flat, rolling, hilly, steep slopes, mountainous, other \_\_\_\_\_

b. What is the steepest slope on the site (approximate percent slope)?

~0.1 percent.

[Note: A search of the Cowlitz County EPIC planning tool reports slopes of 30-45% on the property. Slopes in this range only occur within the two existing drainage ditches that parallel the northern and western property boundaries. The Project does not propose to modify either of these existing ditches and they will continue to function to drain stormwater from adjacent properties.]

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Approximately 80 percent of the site is mapped by NRCS<sup>1</sup> as Pilchuck loamy fine sand, 0 to 8 percent slopes. Approximately 20 percent of the site is mapped as Caples silty clay loam, 0 to 3 percent slopes. On site investigations by ELS (2018)<sup>2</sup> confirmed the NRCS findings.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No.

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

The entire 25-acre property is slated for development as a recycling facility (SEPA DNS #18-04-2576 for the PNW Metal Recycling Relocation Project). Once the relocation project is complete, over 90% of the site will be paved (Figure 2).

The shredder will be supported atop concrete foundations. Project engineers conservatively estimate the shredder foundations will be constructed of 7,000 cys of concrete. Excavation and filling volumes for the foundations will be balanced onsite.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Erosion is not anticipated due to the flat and paved nature of the site. Typical construction BMPs will also be implemented during construction.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Over 90% (~23 of 25 acres) of the site will be paved. The Project will not change the percentage of the site covered by impervious surfaces because the shredder will be located within a portion of the yard that is already paved.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Standard construction BMPs will be implemented during installation.

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<sup>1</sup> Natural Resources Conservation Service (NRCS) Web Soil Survey.

<sup>2</sup> Ecological Land Services (ELS). 2018. Wetland Feasibility Study at 100 Paper Way in Longview, Washington. Prepared for NWM Properties, LLC. January 5, 2018.

## 2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

### Construction

The materials and equipment needed during construction will be delivered to the site by truck. It is estimated that approximately 700 truck trips will be required over the construction period. Emissions during construction could include diesel exhaust from trucks and construction equipment or fugitive dust from equipment deliveries and earthwork associated with constructing the shredder footings.

### Operations

Emissions associated with metal shredding operations can include particulate matter (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>), volatile organic compounds (VOCs), toxic air pollutants (TAPS), and hazardous air pollutants (HAPs). Operational controls for these emissions are described below (see Section 2.c). Other emissions associated with operations will include transportation related emissions, such as diesel exhaust from trucks, and exhaust from employee commuter vehicles, and Project related trains and vessels (see Section 14 – *Transportation*, for more information on truck, rail and vessel transport).

A process flow diagram indicating flow of material and air emissions sources is provided in Figure 3. Farallon Consulting (2022<sup>3</sup>) developed annual Potential to Emit (PTE) estimates for the shredder operations and other emission units in support of the Air Discharge Permit application. In summary, PTE for the shredder operation, paved haul roads, material transfer activities, and torch cutting are expected to be less than 50 tons per year (tpy) of total PM, 10 tpy of VOCs, 5 tpy NO<sub>x</sub>, 5 tpy CO, 0.1 tpy SO<sub>x</sub>, and 3 tpy combined HAPs/TAPs. These results indicated that toxic air pollutant concentrations are compliant with the acceptable source impact levels.

### Maintenance

None known.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

None known.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

### Construction

The applicant proposes to reduce dust and particulates from deliveries by using a modern trucking fleet equipped with a combination of tier 3 and tier 4 emission controls. Particulate matter emissions from tier 3 and tier 4 vehicles is reduced by up to 80% and 96%, respectively.

### Operations

Dust and particulates from the shredder and stockpiles will be reduced by wetting the stockpiles, incorporating enclosed conveyors where possible and enclosing the shredder in a building equipped with an emission control system.

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<sup>3</sup> Farallon Consulting. 2022. Facility-Wide Controlled Criteria Pollutant Potential to Emit. Prepared for PNW Metal Recycling, Inc. in support of an Air Discharge Permit application.

The emissions control system has been designed to process the exhaust from the shredder to meet emission limits in compliance with applicable laws and permits. The proposal includes a shredder enclosure capable of capturing between 95% and 100% of the emissions from the shredding process. Emissions captured by the enclosure pass through a PM drop box that first captures the heavier particulate matter. The lighter materials not removed via the PM drop box pass through a set of media filters capable of 99% destruction and removal efficiency (DRE). The exhaust will then continue into a regenerative thermal oxidizer (RTO) where up to 98% of the VOC emissions are destroyed. The RTO consequently converts some chlorinated and fluorinated compounds into new compounds (acid gases) so, the exhaust continues through an acid gas scrubber capable of 99% DRE.

The applicant will submit an Air Discharge Permit application to the Southwest Clean Air Agency (SWCAA). That permit will establish emission limits, monitoring and reporting protocol.

### 3. Water

#### a. Surface Water:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

There are no surface water bodies on or immediately adjacent to the site. The Consolidated Diking Improvement District No. 1's (CDID #1) Ditch 3 is located approximately 1,000 feet north of the property. The property is also located approximately 0.3 mile west of the Log Pond and 0.4 mile north of the Columbia River (Figure 1).

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No. There are no surface water bodies within 200 feet of the property.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No. The property is located within an area that is protected from the 100-year flood hazard by the CDID #1 levee (FEMA 2015)<sup>4</sup>.

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<sup>4</sup> Federal Emergency Management Agency (FEMA). 2015. FIRM Flood Insurance Rate Map, Cowlitz County Washington. Map Number 53015C0677G. December 16, 2015.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

The proposed shredder will not generate process waste water or otherwise involve discharge of waste materials to surface waters. The shredder and associated material piles will be equipped with a dust abatement system that sprays a fine mist to cool and mitigate dust in the shredder and material piles. The water used for these activities will be balanced with evaporation to avoid generating process water that could enter the receiving stormwater system.

b. Ground Water:

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No wells or discharge to groundwater are proposed at this time. If a well is incorporated into the Project, the applicant would be responsible for obtaining permits from the Cowlitz County Environmental Health Unit and Washington State Department of Ecology.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

The facility is connected to City utilities, including domestic sewage. No new sources of waste material are proposed as part of the current Project.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Runoff from the proposed equipment (shredder enclosure, conveyors and associated material piles) will be limited to stormwater which will be collected and treated via the facility's stormwater management system. The site is currently registered by Ecology under the Industrial Stormwater General Permit, WAR310730. The stormwater system has a treatment capacity of between 300 and 600 gallons-per-minute (gpm), with an estimated annual treatment volume of 28 million gallons per year (MGY). Treatment steps include chemical treatment, pH adjustment, gravity settling, and filtration.

Stormwater from the entirety of the property, including the proposed shredder building and material stockpiles, is routed to one of two constructed perimeter ditches located on the northwestern and southeastern property boundaries (Figure 2). The perimeter ditches empty into a detention pond before receiving chemical treatment in the centralized treatment system. Chemical treatment uses coagulation, metals co-precipitation and flocculation to remove heavy metals, solids and other pollutants from the stormwater. Feed water is then treated with sodium hydroxide to further reduce metals and to balance pH.

Chemically treated water is then directed to the settling pond for clarification. The final step is to pump water from the settling basin to the filtration system. Here, deep bed sand filtration is used to remove



unsettled flocculants and suspended sediments prior to discharge to the existing stormwater conveyance system.

Once discharged, treated runoff enters into the existing Port of Longview stormwater conveyance system. Several hundred feet north of the Property, the Port of Longview system enters into the City of Longview's municipal stormwater conveyance system that continues north where it drains to the Consolidated Diking Improvement District's (CDID) Ditch 3. Ditch 3 discharges to the Columbia River via the CDID's Oregon Way Pump Station. Stormwater discharge from the Project will be eligible for coverage under the NPDES Industrial Stormwater General Permit for the facility (ISGP WAR310730).

2) Could waste materials enter ground or surface waters? If so, generally describe.

No. All staging, storage and processing will occur on paved areas. Sources of pollution could include leaking petroleum products, antifreeze or hydraulic fluids, metal debris, dust and particulates. However, site grading will route all stormwater into the on-site stormwater treatment system prior to discharge. The facility will also have a site-specific emergency cleanup plan in the event of a spill. Waste products, such as used oil, greases and antifreeze will be stored in double-walled tanks or in drums or secondary containment areas prior to off-site disposal. Additional information on potential pollution sources at the facility is provided in response to question 7.a., below.

A query of local, state and federal databases was performed analyzing groundwater around the site. The main source of recharge for the area is the Columbia River and no critical aquifer recharge areas are located within the Project Area<sup>5</sup>. The nearest wellhead protection area is located over 3,000 ft west of the Project Area, according to the Washington Department of Health (WDOH) Source Water Assessment Program (SWAP) online mapping application<sup>6</sup>.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No. Stormwater from the site and adjacent properties is currently drained via two existing ditches located along the northern and western property boundaries. These ditches will continue to convey stormwater from adjacent properties towards the City of Longview's municipal stormwater conveyance system.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

To minimize the potential for contaminants coming into contact with groundwater, the shredder equipment in its totality and the associated stockpiles will be located within the paved portion of the site. The shredder will be enclosed within the building detailed above. There is no material storage or operations proposed on gravel or exposed dirt. Further, the existing detention and sedimentation ponds are lined with impervious material and have no groundwater connection.

Flow patterns on the site route stormwater from the entirety of the property to a stormwater treatment system (described above). The proposed shredder system will be operated in compliance with the Washington Department of Ecology's National Pollutant Discharge Elimination System (NPDES)

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<sup>5</sup> Cowlitz County. 2018. Cowlitz County online EPIC interactive mapper. Retrieved March 26, 2018. Available online at: [www.cowlitzinfo.net/netmaps25v10/index.html?App=EPIC&](http://www.cowlitzinfo.net/netmaps25v10/index.html?App=EPIC&).

<sup>6</sup> Washington Department of Health. 2018. Source Water Assessment Program online interactive mapper. Retrieved March 26, 2018. Available online at: <https://fortress.wa.gov/doh/eh/maps/SWAP/index.html>.

Industrial Stormwater General Permit (ISGP, WAR310730) and the updated Stormwater Pollution Prevention Plan (SWPPP) for the facility.

The SWPPP is required to reflect site operations and processes and will be updated prior to the shredder being brought online. The updated plan will specify site specific effluent sampling requirements and standards, and set general conditions for reporting and compliance. Best Management Practices (BMPs) for the areas of potential pollutant sources will be implemented at the facility to reduce or eliminate the potential to contaminate stormwater and prevent violation of stormwater standards. Operational source control BMPs are identified in the ISGP and SWPPP and typically include good housekeeping, preventive maintenance, preparation of a site-specific emergency cleanup plan, and conditions related to employee training, inspections, and recordkeeping.

#### 4. Plants

a. Check the types of vegetation found on the site:

deciduous tree: alder, maple, aspen, other

evergreen tree: fir, cedar, pine, other

shrubs

grass

pasture

crop or grain

Orchards, vineyards or other permanent crops.

wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

water plants: water lily, eelgrass, milfoil, other

other types of vegetation

The Project Area was developed as a recycling facility in 2021 and very little vegetation remains on the site. Existing vegetation is limited to grasses and weedy herbaceous plants growing in gravel areas along the margins of the site.

b. What kind and amount of vegetation will be removed or altered?

None. The shredder will be located within a paved portion of the site.

c. List threatened and endangered species known to be on or near the site.

None known.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None proposed.

e. List all noxious weeds and invasive species known to be on or near the site.

None. The entirety of the Project area was cleared and developed into a recycling facility in 2021.

## 5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Over 90 percent of the property will be paved and wildlife presence on the property is expected to be extremely limited. Wildlife species that may occur in the vicinity of the property include common species of birds, rodents, amphibians, reptiles, and invertebrates. Larger and highly mobile species or mammals that are habituated to developed areas may also be present, including coyote (*Canis latrans*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*) and deer (*Odocoileus* sp.). The security fencing and highly developed nature of the site will limit the habitat value and availability of the property to wildlife.

b. List any threatened and endangered species known to be on or near the site.

None known.

c. Is the site part of a migration route? If so, explain.

The site is within the Pacific Flyway for migrating waterfowl.

d. Proposed measures to preserve or enhance wildlife, if any:

None.

e. List any invasive animal species known to be on or near the site.

None known.

## 6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The shredder will be powered by a 6,000 HP AC Motor. Electricity will be used to power the shredder and its components. Cowlitz PUD provides electricity to the site. Other energy needs for the completed project include gasoline, oil, and diesel fuel associated with transportation.

b. Would your project affect the potential use of solar energy by adjacent properties?

If so, generally describe.

No.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None proposed.

## 7. Environmental Health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

Potential discharges during construction could include rupture of hydraulic lines or accidental spills or leakage of petroleum products from construction equipment.

During operations, outdoor storage of automotive vehicles could include pollution sources such as leaking petroleum products, antifreeze, and hydraulic fluids. Ferrous and non-ferrous metal sorting and processing could also include pollutant sources such as petroleum products, metals and debris. Vehicle and equipment movement will be limited to paved areas but could generate dust and particulates associated with brake dust or tire-wear. (See response 7.a.5 below for BMPs intended to minimize these sources).

Waste products generated during shredder operations and maintenance will be handled in a manner consistent with industry standards. Specifically, used oil grease and antifreeze generated during maintenance of equipment or draining of automotive fluids are stored in double-walled tanks or in drums on secondary containment in covered storage. Waste is disposed of or recycled on a periodic basis. Solid non-hazardous waste will be stored in covered bins and disposed of or recycled off the PNW Metal facility on a periodic basis.

Emissions associated with metal shredding operations can include dust, particulate matter, volatile organic compounds (VOCs), and HAPs/TAPs. Potential air emissions are addressed in greater detail in Section 2.

- 1) Describe any known or possible contamination at the site from present or past uses.

None known.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None known.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

See response to question 7.a, above.

- 4) Describe special emergency services that might be required.

None.

5) Proposed measures to reduce or control environmental health hazards, if any:

See Section 2.c for a description of proposed measures to control shredder emission (i.e., dust, particulate, VOC, and acid gas controls).

The shredder will be operated in compliance with the NPDES Industrial Stormwater General Permit and Stormwater Pollution Prevention Plan (SWPPP) for the facility. The SWPPP identifies the operational Best Management Practices to protect water quality. The plan also details protocols for inspections, spill reporting, employee training, discharge monitoring, and water sample collections. See section 3.c above for additional details on stormwater controls.

BMPs for reducing the possibility for release of hazardous materials from facility operations include good housekeeping practices, conducting equipment maintenance in enclosed or bermed area and limiting material handling to paved areas.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

None.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

The shredder equipment will be manufactured offsite and delivered to the facility by rail and truck for assembly. Constructing the shredder will result in a temporary increase in noise primarily during daylight hours. Vehicles travelling to and from the site would also generate noise during construction.

The Project will generate noise during outdoor processing and vehicle shredding operations, primarily between the hours of 7am and 4pm. Noise levels at the facility are not expected to exceed local ordinances or the applicable Washington State Noise Level Standards. Specifically, noise limits are established at the property line of neighboring properties, with limits in receiving residential areas being the most stringent. The nearest residential property is located approximately 0.3-mile northwest of the facility. Applicable sound limits for residential properties are 60dBA during the day and 50dBA between the hours of 10pm and 7am.

Additional noise sources during operations will include vehicles traveling to and from the site and sound associated with rail traffic.

3) Proposed measures to reduce or control noise impacts, if any:

Noise control will be provided by the shredder enclosure building. A similar enclosure building was shown to effectively achieve local noise ordinances where the shredder was located within approximately 500 feet of the nearest noise-sensitive residential property<sup>7</sup>.

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<sup>7</sup> Saxelby, Luke A. 2012. Noise Control for a Metal Shredder and Recycling System. J.C. Brennan & Associates, Inc., Auburn, California. Sound and Vibrations; August 2012 (pp. 15-18).

## 8. Land and Shoreline Use

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

Beginning in approximately 1939 and continuing until approximately 1990, the Project Area was used as a mill site and lumberyard<sup>8</sup>. All of the mill infrastructure was removed and the property remained unused, apart from road maintenance, since the mid-1990's. In 2021, the 25-acre property became home to PNW Metal Recycling's metal recycling facility.

Adjacent properties are currently used for a variety of industrial uses, including warehouses, a lumber yard, intermodal shipping yards, metal fabrication and the Port of Longview's shipping terminals. The Project is located within an industrial area and is not expected to affect adjacent land uses.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No.

- c. Describe any structures on the site.

The entire 25-acre property is slated for development as a recycling facility (SEPA DNS #18-04-2576 for the PNW Metal Recycling Relocation Project). Once the relocation project is complete, there will be an office and two truck scales near the entrance to the site (Figure 2). The facility will also be equipped with security fencing and water treatment infrastructure.

- d. Will any structures be demolished? If so, what?

No.

- e. What is the current zoning classification of the site?

Heavy Manufacturing (MH)

- f. What is the current comprehensive plan designation of the site?

The property is designated as Economic Resource Land - Industrial Use (ERL-IND) in the 2017 Updated Cowlitz County Comprehensive Plan<sup>9</sup>. Among other things, this designation serves to encourage

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<sup>8</sup> Ecological Land Services. 2018. Wetland Feasibility Study at 100 Paper Way in Longview, Washington. Prepared for NWM Properties, LLC. January 5, 2018.

<sup>9</sup> Cowlitz County. 2017. Cowlitz County Comprehensive Plan 2017 Update. July 19, 2017.

industrial development in areas with fewer environmental constraints and where industrial land can be protected from incompatible uses that could potentially prevent or substantially restrict industrial activity.

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

No.

i. Approximately how many people would reside or work in the completed project?

Approximately 20 employees work at the site. The completed Project is expected to add approximately 30 full-time positions, for a total of approximately 50 employees.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

None needed.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

None needed. The Project is compatible with existing and projected land uses.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

None needed. The site is not located on or near agricultural or forest lands.

## 9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None.

c. Proposed measures to reduce or control housing impacts, if any:

None needed.

## 10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The proposed shredder enclosure building will be 70.5-feet at its highest point. The enclosure building will be a prefabricated steel frame building with aluminum siding.

b. What views in the immediate vicinity would be altered or obstructed?

None.

b. Proposed measures to reduce or control aesthetic impacts, if any:

The facility will be fully enclosed with slated chain link security fencing that will screen the property from neighboring roads and properties.

## 11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

The site would have appropriate operational and security lighting. Light would be directed to the work area to minimize light spill.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No.

c. What existing off-site sources of light or glare may affect your proposal?

None.

d. Proposed measures to reduce or control light and glare impacts, if any:

None needed.

## 12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

None.

b. Would the proposed project displace any existing recreational uses? If so, describe.

No.



- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None needed.

### 13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.

No. Prior to opening as a metal recycling yard in 2021, the property was vacant.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

None known. Over 90 percent of the property is paved.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

None.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None.

### 14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

Vehicle access from Interstate 5 is primarily via WA-432 W and Industrial Way (see maps and driving directions to the facility, included as Attachment A). The entrance to the facility is located on Paper Way and the Project will not change access to the existing street system.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Yes. The two nearest public transit stops are: 1) 20<sup>th</sup> and Beech located approximately 1.1 miles from the site (Route 32), or, 2) Beech and 15<sup>th</sup> located approximately 0.8 mile from the site (Route 31). Public transit services are run by RiverCities Transit.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

No changes to parking are proposed.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

Yes. Rail access to the property is via the BNSF/UNION PACIFIC Spur and Port of Longview's Industrial Rail Corridor. There are two spur tracks that extend from the Industrial Rail Corridor onto the property. Normal operations generate approximately 30 trains per month, or approximately 1 to 2 rail cars per day, 5 days per week. The Project will likely add approximately 45 trains per month.

PNW Metals currently ships products internationally via the Port of Longview's Berth 7. The facility typically ships products via Berth 7 between 6 and 7 times per year. Vessels are either Handy or Handymax class vessels, each capable of moving approximately 40K tons per ship. The shredder addition is anticipated to at least double the current shipping volume of the facility, with up to one shipload per month leaving via Berth 7. Driving directions from the facility to Berth 7 are included in Attachment A.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

Standard operations typically necessitate approximately 40 commercial truck trips per day. The Project is expected to add approximately 80 additional truck trips per day. Operating hours will be primarily between the hours of 7am and 4pm, Monday through Friday.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No.

- h. Proposed measures to reduce or control transportation impacts, if any:

None needed.

## 15. Public Services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No.

b. Proposed measures to reduce or control direct impacts on public services, if any.

None needed.

## 16. Utilities

a. Circle utilities currently available at the site:

electricity,  natural gas,  water,  refuse service,  telephone,  sanitary sewer, septic system,  
other: \_\_\_\_\_

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Electric power provided by Cowlitz Public Utility District.

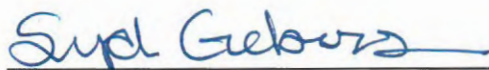
On-site water, sewer and refuse services provided by Cowlitz County

Construction will necessitate excavation and grading associated with extending underground utilities to the proposed vehicle shredder. No utilities, in addition to what is existing at the property, will be needed.

## C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: \_\_\_\_\_



Name of signee: Sydney Gebers

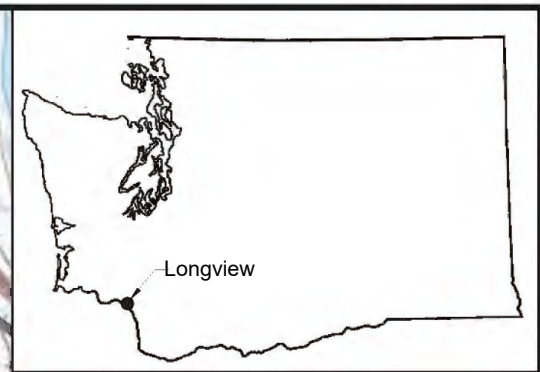
Position and Agency/Organization: Grette Associates; Biologist

Date Submitted: March 28, 2022

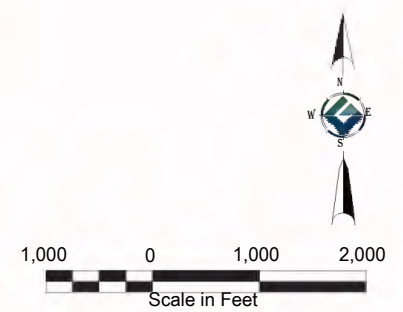
# **PNW Metal Recycling Vehicle Shredder Project Longview, Washington**

## **SEPA Environmental Checklist**

### **Figures**



- Project Site
- Longview City Limits



Source: Cowlitz County Net Map  
USGS The National Map

**FIGURE 1**  
**OF 3**

**PURPOSE:** Add metal shredding operations and equipment to an existing recycling facility

COUNTY OF: COWLITZ      LATITUDE: 46.1122N  
STATE: WA                      LONGITUDE: -122.9459W  
IN: LONGVIEW                S.T.R: T7N, R2W, S4 AND S9

**PNW Metals Vehicle Shredder  
Vicinity Map**

**SITE ADDRESS:** NWM Properties  
10105 S.E. Mather Rd  
Clackamas, OR 97015

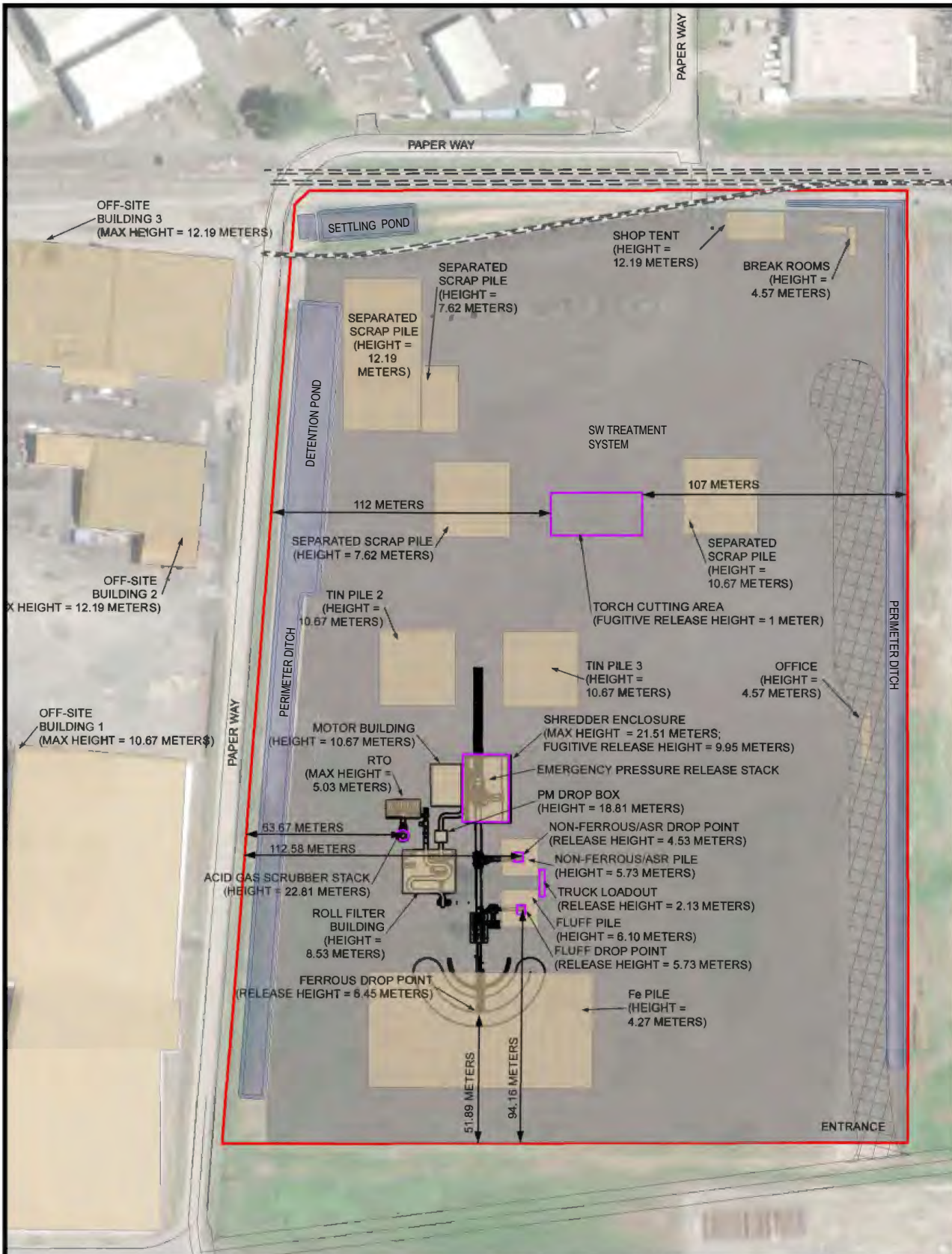
**DRAWING SCALE:** AS NOTED



**Grette Associates LLC**  
ENVIRONMENTAL CONSULTANTS

2102 North 30th Street, Suite A  
TACOMA, WA 98403  
(253) 573-9300  
gretteassociates.com

<b>CLIENT:</b> NWM PROPERTIES, LLC	<b>PROJECT #:</b> 455.002	<b>DESIGNED BY:</b> SG	<b>DATE:</b> 3.28.22
<b>CHECKED BY:</b>	<b>DATE:</b>		



**Grette Associates LLC**  
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 gretteassociates.com

**CLIENT:** NWM PROPERTIES, LLC  
**PROJECT #:** 455.002  
**DESIGNED BY:** SG  
**DATE:** 3.28.22  
**CHECKED BY:** [ ]  
**DATE:** [ ]

**PNW Metals Vehicle Shredder**  
 Site Plan

**SITE ADDRESS:** NWM Properties  
 10105 S.E. Mather Rd.  
 Clackamas, OR 97015

**DRAWING SCALE:**  
 1 inch = 60 meters

**PURPOSE:** Add metal shredding operations and equipment to an existing recycling facility

**COUNTY OF:** COWLITZ  
**STATE:** WA  
**IN:** LONGVIEW

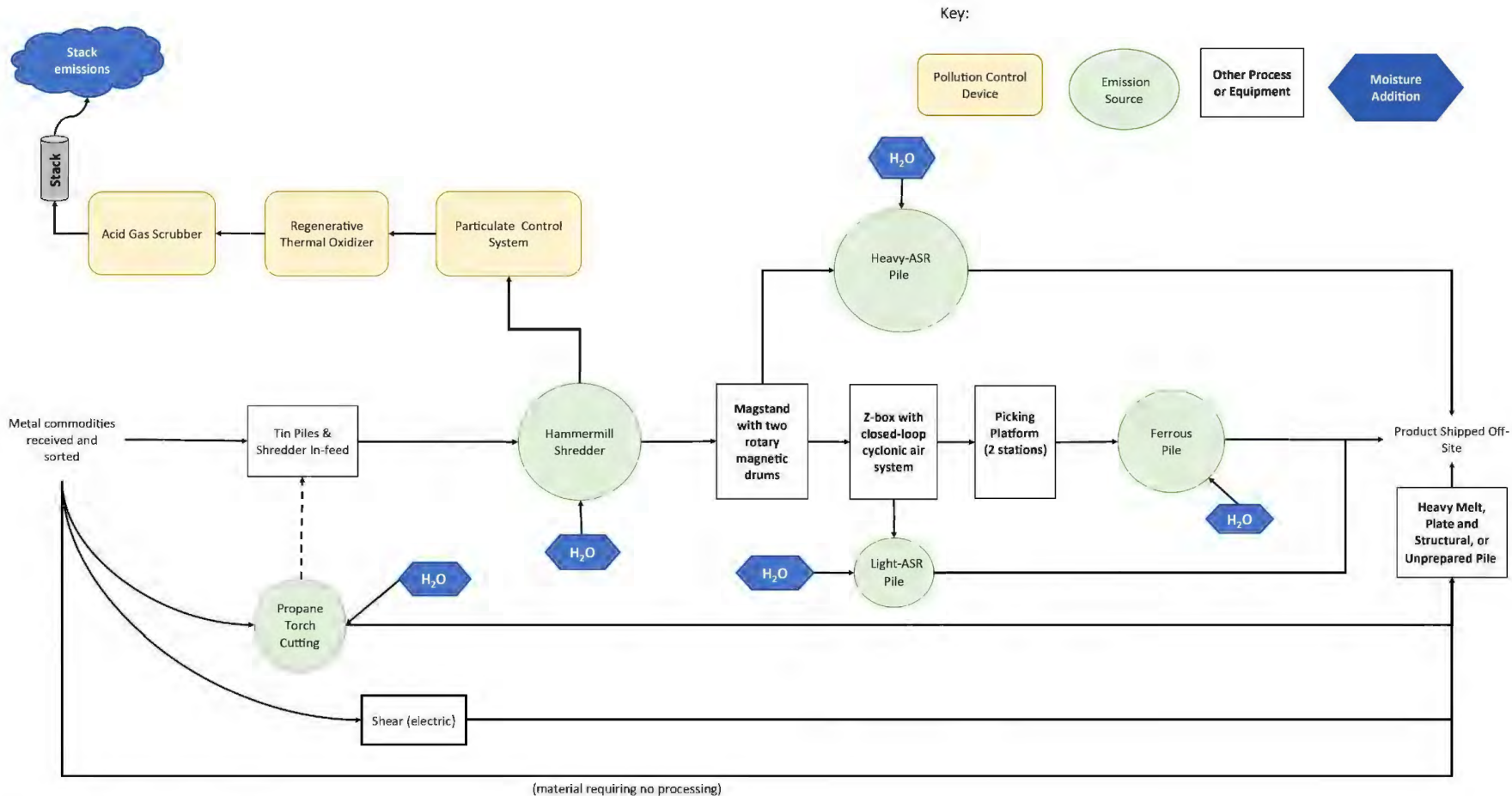
**LATITUDE:** 46.1122N  
**LONGITUDE:** -122.9459W  
**S.T.R:** T7N, R2W, S4 AND S9

**FIGURE 2**  
**OF 3**

**LEGEND**

- Rail lines
- Roads
- Buildings/Piles
- Stormwater Treatment
- Paved Road
- Emission Sources
- Paved Area
- Property Fence Line

**FARALLON CONSULTING**



**FIGURE 3**  
OF 3

PURPOSE: Add metal shredding operations and equipment to an existing recycling facility

COUNTY OF: COWLITZ      LATITUDE: 46.1122N  
STATE: WA                      LONGITUDE: -122.9459W  
IN: LONGVIEW                S.T.R: T7N, R2W, S4 AND S9

PNW Metals Vehicle Shredder  
Process Flow Diagram

SITE ADDRESS: NWM Properties  
10105 S.E. Mather Rd.  
Clackamas, OR 97015

DRAWING SCALE: Not to Scale



2102 North 30th Street, Suite A  
TACOMA, WA 98403  
(253) 573-9300  
gretteassociates.com

CLIENT: NWM PROPERTIES, LLC

PROJECT #: 455.002

DESIGNED BY: SG      DATE: 3.28.22

CHECKED BY:      DATE:

**PNW Metal Recycling Vehicle Shredder Project  
Longview, Washington**

**SEPA Environmental Checklist**

**Attachment A:  
Driving Directions and Maps to the Project Site  
(100 Paper Way, Longview, WA)**





Portland to 100 Paper Way, Longview, WA 98632 Drive 48.7 miles, 51 min



Map data ©2018 Google 1000 ft

### Portland


Oregon


#### Get on I-405 N from W Burnside St


- ↑ 1. Head west on W Burnside St toward W Burnside St 3 min (0.7 mi)
- ↪ 2. Turn right onto SW 14th Ave (signs for US-30 W/Interstate 405 N) 0.4 mi
- ↶ 3. Keep left to stay on SW 14th Ave 36 ft
- ⤴ 4. Use any lane to take the Interstate 405 N ramp to US-30 W/Interstate 5 N 266 ft
- ⤴ 5. Use any lane to take the Interstate 405 N ramp to US-30 W/Interstate 5 N 0.2 mi


#### Take I-5 N to WA-411 S/3rd Ave in Longview. Take the 3rd Ave/WA-411 exit from WA-432 W

- ⤴ 6. Merge onto I-405 N 44 min (46.4 mi)
- ↪ 7. Use the middle 2 lanes to take the Interstate 5 N exit toward Seattle 1.2 mi
- ↪ 8. Use the middle 2 lanes to take the Interstate 5 N exit toward Seattle 0.6 mi

- 


**7. Merge onto I-5 N**  
i Entering Washington
 
41.5 mi
- 


**8. Use the 2nd from the right lane to take exit 36 for WA-432 W toward Longview/Long Beach/WA-4 W**
0.5 mi
- 


**9. Continue onto WA-432 W**
2.4 mi
- 


**10. Take the 3rd Ave/WA-411 exit toward Indust. Area/Port Longview**
0.3 mi


#### Follow 3rd Ave to Industrial Way

- 

**11. Turn left onto WA-411 S/3rd Ave**  
i Continue to follow 3rd Ave
 
5 min (1.7 mi)
- 

**12. Continue onto Industrial Way**
0.5 mi
- 

**13. Turn left to stay on Industrial Way**
0.9 mi
- 

**14. Sharp right to stay on Industrial Way**
0.2 mi
- 

**14. Sharp right to stay on Industrial Way**
0.1 mi

## 100 Paper Way

Longview, WA 98632

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.



100 Paper Way, Longview, WA to Terminal Way, Longview, WA 98632

Drive 1.1 miles, 4 min

Driving Directions to Port of Longview's Berth 7



Map data ©2018 Google 1000 ft

### 100 Paper Way

Longview, WA 98632

- ↑ 1. Head southwest on Industrial Way toward Panel Way 0.2 mi
  - ↶ 2. Turn left onto Paper Way 0.3 mi
  - ↶ 3. Turn left onto Terminal Way 0.7 mi
- i Destination will be on the left

### Terminal Way

Longview, WA 98632

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.