

4-22-16

# RICK MOSKWA –CITY OF RED WING DEPT OF PUBLIC WORKS.

Rick,

I wanted to take a few moments in order to address some incorrect statements as presented in the the copy of the petition regarding the city's request for a Conditional Use Permit for the yard site at Out Lot A of the Tyler Hills development. I will limit my comments to those directly involving Lab USA and its operations.

As a first point, the petitions frequently references "HEAVY METALS". It should be directly noted that Lab is not extracting "HEAVY METALS" and has no intention of doing so. Heavy Metals as defined by OSHA are- Arsenic, Beryllium, Cadmium, Hexavalent Chromium, lead and Mercury. Lab is instead focused on the traditional "Non Ferrous Metals" defined as Aluminum, copper nickel and brass. Additionally, we will extract "ferrous" metals of steel and some iron from the ash streams. This comment in the petition is inaccurate and an attempt to sensationalize this process.

Secondly, Lab USA's process is not unproven. In fact, as suggested by other letters to the Red Wing Eagle and the City Council, there are other sites operating daily in the United States, including one in Minnesota. In fact, this market is well enough established that several metals recyclers have expressed interest in the recovered metals from Red Wing already. As such this

process is not new or unproven, rather Lab's technology allows for a greater recycling rate of the materials.

As you are also aware, Lab USA has VOLUNTEERALLY chosen to undertake an Environmental Assessment Worksheet to ensure the questions regarding noise and dust are fully answered for the board and the community. We have also engaged a nationally renowned toxicologist who specializes in industrial pollutants, specifically dust, to conduct an air modeling and noise study of our operations as well as a health risk assessment. This is independent of the EAW.

As to the points of missing information, Lab has not supplied floor plans, formal noise studies, or dust analysis as Lab has not applied for a Conditional Use Permit at this time. Lab will however supply all the above as part of its application as required. Lab's facility in Roosevelt WA recently undertook a voluntary state health safety and environment audit. One of the major findings of their team was regarding noise- our loudest point in Roosevelt was non sustained peak- 87 decibels at 0 feet. The trigger for hearing protection is sustained 85. This was at 0 feet separation. When the tester was 200 feet away the level was 55. This building is far more open and has no sound reduction engineering or materials. The inspector was very happy with these levels.

SINCERELY,

BRENT DUBOIS

PRESIDENT AND CEO  
LAB USA