ZONING COMMITTEE STAFF REPORT

FILE NAME: Great Western Recycling Industries Inc. DBA: Northern Metals Recycling
 FILE # 14-095-107

2. APPLICANT: Great Western Recycling Industries, Inc.

HEARING DATE: February 27, 2014

- 3. TYPE OF APPLICATION: Conditional Use Permit
- 4. LOCATION: 521 Barge Channel Road, NW at Page
- 5. PIN & LEGAL DESCRIPTION: 092822320063, Registered Land Survey 235 Vac Sts Accruing And Blk 67 Lying Sly Of Fol Desc L Beg At Pt On Wly L Of Lot 12 Blk 67 13.08 Ft Nly Of Sely Cor Of Lot 3 Th S 44 Deg 6 Min 31 Sec E 113.29 Ft To Intersec Of Cl Of Vac Winifred St & Cl Of Arthur St & There Term And All OF Blk 64 And Part O

PLANNING DISTRICT: 3

PRESENT ZONING: 12

BY: Josh Williams

- 7. **ZONING CODE REFERENCE:** §72.32, §72.74, §61.501
- 8. **STAFF REPORT DATE:** February 18, 2014

9. DATE RECEIVED: February 11, 2014 60-DAY DEADLINE FOR ACTION: April 12, 2014

- A. **PURPOSE:** Conditional use permit for structures, material, and equipment not elevated on fill to the regulatory flood protection elevation (RFPE)
- B. PARCEL SIZE: 194713 sq. ft.
- C. **EXISTING LAND USE:** Industrial
- D. SURROUNDING LAND USE:

North: Wetlands, airport (I1)

East: Railroad tracks, residential (I1, RM1)

South: Railroad tracks, mixed-use (I2, R4, RT1, OS)

West: Industrial (I2)

- E. **ZONING CODE CITATION:** §72.74 lists standards for conditional uses in the FF flood fringe district; §72.32 lists factors to be considered in evaluating applications for conditional use permits in floodplain management overlay districts; §61.501 lists general conditions that must be met by all conditional uses
- F. **HISTORY/DISCUSSION:** The property received site plan approvals in 1993, 1994, and 1996, as well as a CUP for wet floodproofing of an existing building below the regulatory flood protection elevation (RFPE) in 1996. A CUP for replacement of a building not elevated on fill to the RFPE was issued in 2001.
- G. **DISTRICT COUNCIL RECOMMENDATION:** The West Side Citizens Organization (District 3) recommends approval.

H. FINDINGS:

- 1. The applicant is seeking to add equipment for vehicle end-of-life processing and related structures and storage at the existing metal recycling facility at 521 Barge Channel Road. The applicant has stated that addition of the equipment and related site improvements will improve the efficiency of operations and reduce the potential for environmental impact. The applicant has stated no plans to increase the volume of vehicle processing at the site.
- 2. The vehicle end-of-life processing equipment consists of a mobile unit which includes equipment for the extraction of fluids from vehicles, external storage tanks for fluid storage, and spill containment. The applicant is also seeking to add a paved area for pre- and post-processing staging of vehicles and for transportation of vehicles to and from the existing building where processing will take place, as well as a protective roof over the area where the tanks for storage of extracted fluid stage will be kept, to the rear of the existing building.
- 3. §72.74 lists standards for conditional uses in the FF flood fringe district.
 - (a) Alternative elevation methods other than the use of fill may be utilized to elevate a structure's lowest floor above the regulatory flood protection elevation. These alternative methods may

include the use of stilts, pilings, parallel walls or above grade, enclosed areas such as crawl spaces or tuck-under garages. The base or floor of an enclosed area shall be considered above grade and not a structure's basement or lowest floor if: 1) the enclosed area is above grade on at least one (1) side of the structure; 2) is designed to internally flood and is constructed with flood-resistant materials; and 3) is used solely for parking of vehicles, building access or storage. The above-noted alternative elevation methods are subject to the following additional standards:

- (1) Design and certification. The structure's design and as-built condition must be certified by a registered professional engineer or architect as being in compliance with the general design standards of the Minnesota State Building Code and, specifically, that all electrical, heating, ventilation, plumbing and air conditioning equipment and other service facilities must be at or above the regulatory flood protection elevation or be designed to prevent floodwater from entering or accumulating within these components during times of flooding.
- (2) Specific standards for above grade, enclosed areas. Above grade, fully enclosed areas such as crawl spaces or tuck-under garages must be designed to internally flood and the design plans must stipulate:
 - a. A minimum area of "automatic" openings in the walls where internal flooding is to be used as a floodproofing technique. There shall be a minimum of two (2) openings on at least two (2) sides of the structure and the bottom of all openings shall be no higher than one (1) foot above grade. The automatic openings shall have a minimum net area of not less than one (1) square inch for every square foot of enclosed area subject to flooding unless a registered professional engineer or architect certifies that a smaller net area would suffice. The automatic openings may be equipped with screens, louvers, valves or other coverings or devices, provided that they permit the automatic entry and exit of floodwaters without any form of intervention.
 - b. That the enclosed area will be designed of flood-resistant materials in accordance with the FP-3 or FP-4 classifications in the Minnesota State Building Code and shall be used solely for building access, parking of vehicles or storage.

This finding is met. The area where the storage tanks will be kept as a roof to protect the tanks from falling snow and is open on three (3) sides, with the fourth side consisting of the wall of the existing building where the vehicle processing will take place.

- (b) Basements, as defined in §72.14, shall be subject to the following:
 - (1) Residential basement construction shall not be allowed below the regulatory flood protection elevation except as authorized in subsection (e) of this section.
 - (2) Nonresidential basements may be allowed below the regulatory flood-protection elevation, provided the basement is protected in accordance with subsection (c) or (e) of this section.

Not applicable. Neither the existing nor the proposed structure has/will have a basement.

(c) All areas of nonresidential structures including basements to be placed below the regulatory flood protection elevation shall be structurally dry floodproofed in accordance with the FP-1 or FP-2 floodproofing classifications in the Minnesota State Building Code. This shall require making the structure watertight, with the walls substantially impermeable to the passage of water and with structural components having the capability of resisting hydrostatic and hydrodynamic loads and the effects of buoyancy. Structures floodproofed to the FP-3 or FP-4 classification shall not be permitted.

Not applicable. The proposed structure has no walls.

(d) The storage or processing of materials that are, in times of flooding, flammable, explosive or potentially injurious to human, animal or plant life is prohibited. Storage of other materials or equipment may be allowed if readily removable from the area within the time available after a

flood warning and in accordance with a plan approved by the planning commission, or if elevated above the regulatory flood protection elevation by alternative methods which meet the requirements of subsection (a) above. Storage of bulk materials may be allowed provided an erosion/sedimentation control plan is submitted which clearly specifies methods to be used to stabilize the materials on site for a regional flood event. The plan must be prepared and certified by a registered professional engineer or other qualified individual acceptable to the planning commission.

This finding can be met, provided that operations at the subject site are consistent with the flood response plan submitted by the applicant. Vehicles are currently processed on site, including the storage of oil, gasoline, and other flammable and/or hazardous materials on site. The submitted flood response plan provides for removal of the end-of-life vehicle processing unit and associated storage tanks for fluids extracted from vehicles in times of flooding. Ongoing compliance with the flood response plan should be a condition of approval.

- (e) When the Federal Emergency Management Agency has issued a letter of map revision-fill (LOMR-F) for vacant parcels of land elevated by fill to the one (1) percent chance flood elevation, the area elevated by fill remains subject to the provisions of this chapter. A structure may be placed on the area elevated by fill with the lowest floor below the regulatory flood protection elevation provided the structure meets the following provisions:
 - (1) No floor level or portion of a structure that is below the regulatory flood protection elevation shall be used as habitable space or for storage of any property, materials, or equipment that might constitute a safety hazard when contacted by floodwaters. Habitable space shall be defined as any space in a structure used for living, sleeping, eating or cooking. Bathrooms, toilet compartments, closets, halls, storage rooms, laundry or utility space, and similar areas are not considered habitable space.
 - (2) For residential and nonresidential structures, the basement floor may be placed below the regulatory flood protection elevation subject to the following standards:
 - a. The top of the immediate floor above any basement area shall be placed at or above the regulatory flood protection elevation.
 - b. Any area of the structure placed below the regulatory flood protection elevation shall meet the "reasonably safe from flooding" standards in the Federal Emergency Management Agency (FEMA) publication entitled "Ensuring that Structures Built on Fill In or Near Special Flood Hazard Areas Are Reasonably Safe From Flooding," Technical Bulletin 10-01, a copy of which is hereby adopted by reference and made part of this chapter. In accordance with the provisions of this chapter, and specifically section 72.33(g), the applicant shall submit documentation that the structure is designed and built in accordance with either the "Simplified Approach" or "Engineered Basement Option" found in FEMA Technical Bulletin 10-01.
 - c. If the ground surrounding the lowest adjacent grade to the structure is not at or above the regulatory flood protection elevation, then any portion of the structure that is below the regulatory flood protection elevation must be floodproofed consistent with any of the FP-1 through FP-4 floodproofing classifications found in the Minnesota State Building Code.
- Not applicable. No Letter of Map Revision has been issued for the subject parcel.
- 4. §72.32 lists thirteen (13) factors to be considered in evaluating applications for conditional use permits in the FF flood fringe district:
 - (a) The relationship of the proposed use to the comprehensive plan and floodplain management program for the city. The proposed use is in compliance with the Saint Paul Comprehensive Plan and the city's floodplain management program. Policy 5.1.3 of the river corridor chapter of the comprehensive plan supports continuation of and additions to industrial uses in this area. The proposed site modifications and operational changes are for purposes of efficiency and protection against potential environmental contamination and, per the applicant, are not

intended to increase operational capacity.

- (b) The importance of the services provided by the proposed facility to the community. The proposed changes are to an existing facility. The primary importance to the community is economic activity and tax base.
- (c) The ability of the existing topography, soils, and geology to support and accommodate the proposed use. The topography, soils, and geology in the area already support and accommodate the existing facility and can accommodate the proposed use.
- (d) The compatibility of the proposed use with existing characteristics of biologic and other natural communities. The area of the proposed use is industrial in character, and does not contain significant biological communities. The site currently drains to an adjacent City-controlled ditch, which flows into a nearby wetland. Migration of fluids and other contaminants from vehicles processed or waiting to be processed on the site could negatively impact surrounding natural communities. However, subject to regular cleaning of the mobile vehicle processing unit and of proposed paved areas designated for storage and transportation of salvage vehicles, the proposed changes to the site and operations can result in minimal negative impact to adjacent natural communities due to storm water runoff from the site.
- (e) The proposed water supply and sanitation systems and the ability of those to prevent disease, contamination, and unsanitary conditions. The site is already served by adequate water supply and sanitation systems. The proposed addition will not create additional demand for water supply or sanitation capability.
- (f) The requirements of the facility for a river-dependent location, if applicable. Not applicable.
- (g) The safety of access to the property for ordinary vehicles. Safe access to the site is available for all vehicles via Barge Channel Road.
- (h) The susceptibility of the proposed facility and its contents to flood damage and the effect of such damage on the individual owner. The new construction proposed by the applicant is of open construction, composed of flood resistant materials, and resistant to flood damage. The applicant has also submitted a flood response plan for removal in times of flooding of equipment subject to flood damage.
- (i) The dangers to life and property due to increased flood heights or velocities caused by encroachments. The proposed site improvements do not include fill or other significant reductions of flood storage capacity or of flood flows.
- (j) The expected heights, velocity, duration, rate of rise, and sediment transport of the floodwaters expected at the site. The existing facility is located in the flood fringe, where the velocity of flood flow is generally reduced, and the proposed addition is of limited footprint and volume.
- (k) The danger that materials may be swept onto other lands or downstream to the injury of others. The applicant has submitted a flood response plan that in times of flooding provides for removal of processing and storage equipment proposed by the applicant.
- (I) The availability of alternative locations or configurations for the proposed use. Not applicable. This is an existing use of the site.
- (m) Such other factors as are relevant to the purposes of this chapter. The factors and findings enumerated and described herein adequately evaluate the proposed use for the purposes of this chapter.
- 5. §61.501 lists five standards that all conditional uses must satisfy:
 - 1. The extent, location and intensity of the use will be in substantial compliance with the Saint Paul Comprehensive Plan and any applicable subarea plans which were approved by the city council. This finding is met. The proposed use is in compliance with the Saint Paul Comprehensive Plan and the city's floodplain management program. Policy 5.1.3 of

- the river corridor chapter of the comprehensive plan supports continuation of and additions to industrial uses in this area. The proposed site modifications and operational changes are for purposes of efficiency and protection against potential environmental contamination and, per the applicant, are not intended to increase operational capacity.
- 2. The use will provide adequate ingress and egress to minimize traffic congestion in the public streets. This condition is met. The existing facility is adequately served by Barge Channel Road, and the applicant has indicated that the proposed site improvements will n not result in increased vehicular traffic.
- 3. The use will not be detrimental to the existing character of the development in the immediate neighborhood or endanger the public health, safety and general welfare. This condition is met. Proposed site alterations do not significantly alter the existing industrial character of the immediate neighborhood nor, based on information provided by the applicant, increase the impact of the site on the surrounding properties.
- 4. The use will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district. This condition is met. The use is industrial in nature, and will not impede improvement of surrounding properties for allowed uses.
- 5. The use shall, in all other respects, conform to the applicable regulations of the district in which it is located. This condition is met. The proposed use conforms to all applicable regulations of the I2 general industrial district.
- I. **STAFF RECOMMENDATION:** Based on the above findings, staff recommends approval of the conditional use permit for structures, material, and equipment not elevated on fill to the regulatory flood protection elevation subject to the following additional condition(s):
 - 1. Accumulations of fluid in the containment pan of the mobile processing unit shall be removed by application and proper disposal of adsorbent substances once per week at minimum and more frequently as needed, and prior to removal of unit in response to projected flooding.
 - 2. The proposed paved area shall be cleaned by application and proper disposal of adsorbent substances once per week at minimum and prior to predicted rain events or flooding.
 - 3. In times of flooding, the applicant shall follow procedures outlined in the flood response plan on file with the Department of Safety and Inspections.
 - 4. Site plan approval.

SAINT PAUL AAAA

CONDITIONAL USE PERMIT APPLICATION

Department of Planning and Economic Development Zoning Section 1400 City Hall Annex 25 West Fourth Street Saint Paul, MN 55102-1634 (651) 266-6589



APPLICANT	Name Great Western Recycling Ind. Inc DBA Northern Metals Recycling Address Sal Barge Channel Road City St. Paul st. My zip SS107 Daytime Phone 651-224-4877 Name of Owner (if different) Steven Ettinger Contact Person (if different) Thomas Swafford Phone 651-328-8825	
PROPERTY LOCATION	Address / Location S2/ BARGE Channel Road, St. Paul, Mn, SS107 Legal Description Scratachment TAX+ Property Current Zoning I.2 (attach additional sheet if necessary)	
TYPE OF PERMIT: Application is hereby made for a Conditional Use Permit under provisions of		
	Chapter 6, Section 72.73, Paragraph 1 of the Zoning Code.	
SUPPORTING INFORMATION: Explain how the use will meet all of the applicable standards and conditions. If you are requesting modification of any special conditions or standards for a conditional use, explain why the modification is needed and how it meets the requirements for modification of special conditions in Section 61.502 of the Zoning Code. Attach additional sheets if necessary.		
	ttachment B	
Required site plan is attached		

SAINT PAUL AAAA

APPLICATION FOR SITE PLAN REVIEW

Department of Safety and Inspections (DSI)
375 Jackson Street RECEIVED IN D.S.I.
Suite 220

Saint Paul MN 55101-1806 651-266-9086

JAN 23 2014

STAFF USE ONLY

SPR # 14.089613

Fee \$ (previously pd)

Staff meeting date: 2/11/14

City agent Tom Beach

PPLICANT	Name Thomas J. SWAFFORD Company DRA Northern Metal Redicting Address 521 BARGE Channel ROAD
	City St. Paul State Mn Zip SS107.
	Phone 651-328-8825
•	Email Tom. Swafford (emrgroup & com
OWNER	Name Steven ETTINGER Company North ERN Metals. LLC
(If different than applicant)	Address 2800 Pacific St, N. Mpls, MN, SS411 Phone 612-529-9221
PROJECT	Project name / description
7	End of hife Vehicle (ELV) Operation
}	See Attachment A FOR Full project
)	Project address / Location 521 BARGE CHANNEL ROAD
	St. Paul, Minnesota, 55107
}	Legal description of the property: See attachment - Survey
{	
}	nature Thimus J. Date Jan 23,2014
\pplicant's sig	nature // Milvas VA Allo Allo
STAFF	Sub DEL Work Train S.F. 15,000
Folder	Name Novth Metal FLV
1 1 1 1 1 1 1 1 1 1	ed by
Commo	Banker Control of the
	 End of Life Vehicle equipment is proposed to drain fluids from cars and prepare them so they can be recycled.
	 End of Life Vehicle equipment will go in the west half of the existing maintenance building. No
//	new buildings are proposed. They are not proposing to shred or crush vehicles.

Protection Elevation.

See "Attachment A" for more information.

A new concrete pad will be built in front of the maintenance building as shown on "Site Layout"

Stormwater drainage and water quality measures are shown on "Grading and Drainage" plan.

Conditional Use Permit is required because improvements are below the Regulatory Flood

Attachment A: Project Description

Project Overview

Great Western Recycling Industries, Inc. / DBA Northern Metal Recycling's facility at 521 Barge Channel Road in Saint Paul is proposing to utilize new End of Life Vehicle (ELV) Operation equipment at the site, which would update our historical activities at this site. The new ELV equipment includes a Seda "Mobile" Unit (fluid extractor), four "mobile" storage tanks, and the storage area for both wet and dry vehicles.

Great Western Recycling Industries, Inc. / DBA Northern Metal Recycling's facility at 521 Barge Channel Road in Saint Paul is proposing to put down a 12 inch concrete pad around three sides of the cold storage building and south to existing concreted pads at the site. This pad will be used for loading, unloading and storage of the wet and dry vehicles. Wet vehicles will be stacked, no more than 3 high or roughly 15' in height until they get processed. The dry vehicles will be stacked, no more than four high or roughly 20' in height. The pad will be cleaned as needed. The current vehicle traffic count is roughly 90 trucks per day.

A copy of the grading and drainage plan for this new pad was done by a licensed Engineer for Lake and Land Surveying Inc.is attached for review.

A copy of a certified Survey is attached to show the legal description of the site and that all roads inside of the site have been vacated for review.

A copy of information as to land ownership will be given to Thomas Beach at the meeting.

Right of Way Inspector Clint Mrozinski (651) 485-4263 will be contacted one week prior to the beginning of work if any such work might affect the Right of Way. As of now, we do NOT anticipate that any of this work will affect the Right of Way.

City of St. Paul Requirements, obstruction and excavation permits for working in Right of Way, does not apply to the work being done at the site.

Information regarding the routes construction vehicles will take to access the site are listed below;

<u>From the North</u>-take Hwy 52, Lafayette Bridge South bound to the Concord St. Exit- Hwy 56. Take a left on Concord Street- Hwy 56, go about two blocks to Barge Channel Road. Take a left on Barge Channel Road to site entrance, take a left into site.

<u>From the South</u>-take Hwy 52 ,North bound to the Concord Street Exit- Hwy 56, turn right onto Concord Street- Hwy 56, go about one block to Barge Channel Road, turn left on Barge Channel Road to site entrance, turn left into site.

<u>From the West</u>-take Concord Street- Hwy 56 East bound to Barge Channel Road, turn left on Barge Channel Road to site entrance, turn left into site.

<u>From the East</u>-take Concord Street- Hwy 56 West bound to Barge Channel Road, turn right on Barge Channel Road to site entrance, turn left into the site.

A copy of routes is attached.

The Seda Mobile Unit would be indoors, on a concrete floor, where the process of extracting all fluids from the vehicle would take place in a much safer environment versus similar activities being historically performed outdoors at this site. The Seda Mobile Unit has its own secondary containment built into the unit. Performing these activities indoors, in one of our existing buildings, would result in a much more controlled environmental, both environmentally and from a safety standpoint for our employee's, given our rather harsh environment.

Details on the Seda- Mobile Unit are as follows;

- 1. The Seda unit is built with a 17' x 18' secondary containment system to catch any spills or leaks from the unit or vehicles, should any occur.
- 2. The Seda Unit has fork lift pockets, located both in the front and back, to move the unit at will, if / when necessary.
- 3. The Seda Unit has quick disconnect fittings to the piping and storage tanks.
- 4. The Seda Unit operates with compressed air-filtered and dehumidified.
- 5. The Seda Unit is designed specifically as a "closed loop system".
- 6. The Seda Unit drainage equipment consists of:
 - A. A vacuum chamber for brake fluid.
 - B. One double diaphragm pump in a soundproof housing for gasoline, diesel, used oil, coolant and windscreen fluid.
 - C. An operator panel.
 - D. A device for precise drilling into tanks.
 - E. A precise gearbox drilling device.
 - F. Rotating arms for the tank drilling device and the used oil funnels.
- 7. The Seda Unit has adjustable arms that vehicles are placed on, to access the lowest point of a fuel tank.
- 8. Information on the Seda Unit is attached.

The four mobile storage tanks would be stored outside of the building - on the back/north side of the existing cold storage building on site. No physical building dimension changes are necessary or planned. A 15 x 30' concrete pad would be poured, upon which the new tanks would be placed.

Details on the "mobile" tanks are as follows;

- 1. All four of the tanks are constructed of certified double walled steel.
- 2. All four of the tanks have a 490 gallon capacity.
- 3. All four of the tanks were manufactured using UL 142 guidelines.
- 4. All four of the tanks are mobile.
- 5. All four of the tanks will be above ground, on a new cement pad.
- 6. All four of the tanks have a quick disconnect feature.
- 7. Two tanks will hold fuel, one tank will hold used oil and one tank will hold used coolant. We will not be dispensing any fuel on site. All liquids will be removed from the site and recycled by certified recyclers of same.

The new ELV Operation, which is only one of many our company currently operates in Minnesota, Wisconsin and North Dakota, would add roughly 15 more vehicles each day, which is a very slight increase for this site. Considering this very minimal daily vehicle increase, the traffic generated is similar to other types of heavy industrial uses permitted in the I2 zone.

Our Great Western site is an outdoor recycling processing center. The proposed ELV operation will not change the current use. Leg. Code & 65.844 permits acceptance, processing and storage of recyclable materials. Processing is defined therein to include crushing, compacting and sorting of recyclable materials. Although we intend to reserve the right to "crush", we do not intend to crush these vehicles after processing. The ELV Operation proposed is similar to the Leg Code & 65.844.

This site is <u>not</u> a motor vehicle salvage yard, nor does it have any intention of operating as such, nor change its primary business function in any way.

The ELV process will operate in the following manner;

- 1. Customers enter the property from Barge Channel Road, as they always have, and proceed to the existing scale(s) for weighing.
- 2. Customers with vehicles will be directed to the dedicated vehicle unloading area.
- 3. Vehicles will be inspected for acceptance. If vehicles are unacceptable, they will be rejected.
- 4. After delivery, customers will return to the scale, to weigh out and get paid.

- 5. The inspector will cut the battery cables, if present. The vehicles will either be stored on the containment pad or brought directly into the ELV building for immediate processing. We will not be storing vehicles at locations other than our dedicated storage area.
- 6. Inside of the ELV building, on the concrete floor, the battery, mercury switches, lead cables, and lead wheel weights will be removed, and CFC's will be extracted, if present.
- 7. Vehicles will be placed on the Seda de-polluting rack, where all fluids will be extracted from the vehicle and properly stored in the associated tanks. Open holes will be plugged. The gas tank will be removed from the vehicle.
- 8. De-polluted vehicles will be marked as "completed" and stored on the containment pad for outbound shipment to Northern Metals' shredding operation in Minneapolis.

Note: Over the past year, roughly 80% of the vehicles received at this site are "dry vehicles", which have been purchased from certified suppliers to Northern Metals, from vehicle salvage yards that Northern Metals certifies annually, as documented in our published permits with the Minnesota Pollution Control Agency. The remaining vehicles received, or roughly 20%, originate from the general public, which would be properly processed by the Seda system.

Flood plain compliance;

The project site is located in the floodplain of the Mississippi River. The floor grade of the building and storage area is below 707 feet above sea level, as required by the City's flood plain regulations. We have been advised that a Conditional Use Permit is required. Since the ELV Operational Equipment is "mobile", the following flood plan will be used;

- 1. Stop accepting vehicles.
- 2. Process all vehicles on site.
- 3. Ship out all vehicles.
- 4. Clean up storage area.
- 5. Disconnect Mobile Seda ELV Unit and relocate it to higher ground
- 6. Disconnect all four mobile storage tanks, have them properly drained and relocate them to higher ground.
- 7. Clean area around the de-polluting station.
- 8. Berm the outside of the ELV building.
- 9. A revised flood plan for site is attached.

Environmental Impacts;

The ELV Operation will not impact the environment in any significant way, as per below;

- 1. Air emissions: The ELV Operation will not generate air emissions, thus does not require an air permit.
- 2. Fugitive dust: The ELV Operation is inside of an existing building. All processing will be protected from the weather by the existing roof and walls.

- 3. *Industrial effluent and sewage discharges*: The ELV Operation will not generate any industrial effluent / sewage discharge, thus does not require a permit for that purpose.
- 4. Storm Water Quality: The ELV Operation is located in an exiting building and will not impact storm water run-off.

Note: The ELV Operation does not expand the foot print of the existing building or the overall site. The existing building, structure height and property / land area will not be enlarged or expanded in any way. Thank you for your consideration.

Flood Plan for Northern Metal Recycling @ 521 Barge Channel Road St. Paul

- A. Move as much scrap as possible out of yard
- B. Move scrap piles to higher ground
- C. Pile scrap as high as possible
- D. Clean up around piles, any thing that can float away
- E. Move all skids, barrels, buckets, plastic, etc. to higher ground
- F. Move all gas cylinders to upper warehouse or higher ground
- G. Move all equipment that's not being use to higher ground
- H. All transformer disconnected and put berm around them
- I. Move all lugger, and roll-off boxes to higher ground
- J. All turnings put into boxes and move to higher ground

701.86 / 18.24 Maintenance bld.

- 1. Disconnect all power
- 2. Move all misc items on floor to higher ground
- 3. Move all tanks that can be move to higher ground
- 4. Move used oil tank to higher ground
- 5. Move diesel tank to higher ground
- 6. Move all gas cylinders to higher ground

Cold Storage & ELV Equipment Building

- 1.Stop accepting vehicles
- 2. Process all vehicles at site
- 3. Ship out all dry vehicles
- 4.Clean-up storage area
- 5.Disconnect Mobile Sdea ELV Unit Lines and move to higher ground
- 6.Disconnect all four mobile storage tanks, have them properly drained and move to higher ground..
- 7.Clean out area of the de-polluting station
- 8.Berm the outside of cold storage & maintenance building

702.51/18.89 Harris Bailer bld.

- 1. Disconnect all power
- 2. Move all misc items on floor to higher ground
- 3. Berm around bailer bldg

702.97 / 19.35 Yard office

- 1. Disconnect all power
- 2. Move all misc items on floor to higher ground
- 3. Berm around yard office bld.

704.62 / 21. 1100 Shear bld.& Metso Shear

- 1. Disconnect all power
- 2. Move all misc items on floor to higher ground
- 3. Berm around 1100 shear bldg & Metso Shear

706.27 / 22.65 Alum bld.

1. Berm on east side of bldg if needed

706.73 / 23.11 Upper warehouse bay doors

1. Berm around the north side of bld.

Front scale

- 1. Disconnect all power
- 2 Fill scale with water if needed
- 3. Berm around scale area

Emergency Numbers

Lube Tech: 651-633-7051 Lakes Gas: 612-529-9276

Police/Fire: 911

Collins Electric: 651-224-2833

Xcel Electric: 1-800-895-1999

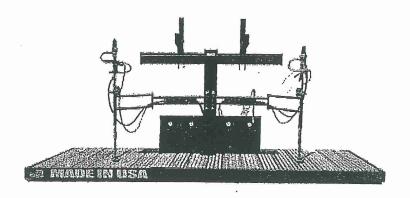
Xcel Gas: 1-800-895-2999





Mobile Drainage Station

SEDA Environmental LLC 135 Walter Way Fayetteville, Georgia 30214 Toll Free: 800-991-7332 info@seda-usa.com





Use in accordance with the terms

2.1 Description of the drainage equipment

The SEDA drainage equipment consists of:

- a vacuum chamber for brake fluid,
- one double diaphragm pump in a soundproof housing each for petrol, diesel, used oil, coolant and windscreen wash,
- an operator panel and
- a device for drilling into tanks,

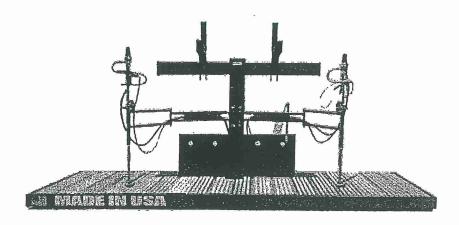
Additional accessories:

- a transparent fuel container.
- a-gearbox drilling device,
- a rotating arm for the tank drilling device and one for the used oil funnels.
- OPTIONAL: a separator for coloured/dirty and clean diesel
- and various devices for the extraction of the fluids.

All devices operate only with compressed air which is filtered, dehumidified and, if required, is displaced by compressed air oil.

Each component of the machine is designed in such a way that it forms a closed system. This applies both to the relevant fluids and to the vapours that may be created in certain circumstances.

Each device for the extraction of the fluids is clearly described in the operation manual, designed specifically for the purpose and also clearly marked with labels on the assembly points. By this means and with use in accordance with the instructions and regulations, mixing of the fluids is theoretically prevented.







FIRE HYDRANTS

UTILITY POLES RAILROAD LINES

UNDER GROUND CULVERTS

STORM WATER FLOW

PAY HOUSE 15 X 10 X 12 ELEVATION 704.30 ALUMINUM BLDG. 80 X 375 X 40 ELEVATION 705.38

VEGETATION

