

From: [KC Ladines](#)
To: [Amy Rusko](#)
Subject: Public Comment on Seattle Galv on 67th Ave NE
Date: Monday, June 24, 2024 4:53:15 PM
Attachments: [Seattle Galv 67th Ave NE.docx](#)

This message is from an External Sender

This message came from outside the City of Arlington

Hi Amy,

Please see our comments in the attachment.

Thank you,

Kathy

To: Amy Rusko arusko@arlingtonwa.gov

Subject: Public Comment for Seattle Galvanizing Small Parts PLN #1145 Special Use Permit

Dear Amy Rusko,

We are very concerned about the threat that a chemical treatment plant will have on our neighborhood, water sources, and the environment. The project site is zoned 'General Industrial', which by definition is not obnoxious or hazardous to public safety. Does the "Special Use Permit" bypass the definition?

This is a huge safety concern to allow toxic chemicals so close to our communities. Molten zinc dip vat temperature is estimated to be 840 degrees F, which is hazardous, the chemical transportation to this sight alone poses a huge risk to all concerned. The report states that 'baghouses' will be used, but it does not state full containment, still pounds of toxic substances will be released per year... Notice the report used the units in tons, so it doesn't look so detrimental.

Notice of Constriction Appl:

'Appendix E contains the emissions calculations. Particulate matter emissions are calculated to be less than 0.028 lb/hr and 0.124 tons per year. Worst-case hydrochloric acid emissions are calculated to be less than 0.026 lb/day, less than the SQER of 0.67 lb/day.'

Here is the process from the Notice of Constriction Appl:

1. Caustic Cleaning Material is immersed in a heated **caustic solution** to remove grease, dirt, oil, and water-based paints. This process will also remove any contaminants that cannot be removed by normal chemical cleaners (ie. welding slag, splatter, lacquer, and oil-based paints).
2. **Caustic Rinse Material** is immersed in fresh water to remove any excess chemicals.
3. **Acid Pickling Material** is immersed in a diluted **Hydrochloric Acid** solution to remove all rust, mill scale, and any other surface contaminant.
4. Acid Rinse Material is immersed in fresh water to remove any excess acid and iron salts.
5. Fluxing Material is immersed in a heated aqueous **Zinc-Ammonium Chloride** solution. This process will remove any remaining impurities, moisture, and oxide film from the steel. Flux acts as a bonding agent to the molten zinc.
6. Drying Material is placed in a holding area for a certain amount of time. This will ensure the Flux is airdried and best prepared before entering the molten zinc.
7. Galvanizing Material is immersed in a molten zinc mixture. **Molten zinc is heated to 840°F.** Material will be removed from the zinc mixture when the coating thickness meets and exceeds relevant ASTM standards.
8. Inspection

On the same document Section E, it states plainly, that all the chemicals above are deadly!



GHS05



GHS07



GHS09



These will be vats of chemicals and where will the excess toxic material be stored? On site? There is a discussion of reselling it, will the company package it up on site? The opportunity for spill and toxic pollution is increasing the more this report is studied.

Not far from this location is our precious airport aquifer. A toxic spill will contaminate our groundwater and stormwater. All substances are "Very toxic to aquatic life with long lasting effects"
Our storm water system flows directly in front of the proposed location. Water is the first to become polluted, then affecting the flora and fauna of the area. I did a simple drawing you can see below (Fig 1)

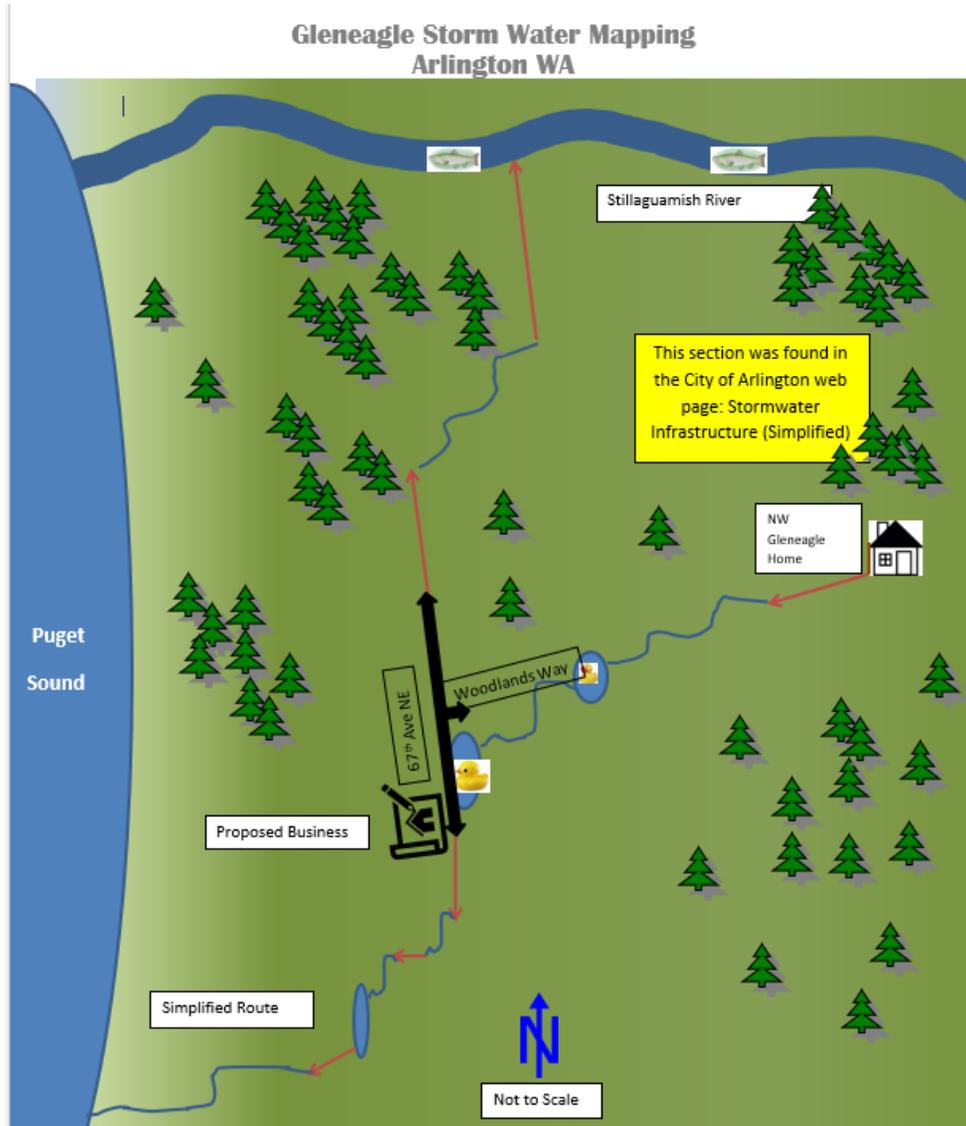


Figure 1

In closure, this type of business should not be allowed in close proximity to the neighborhoods and apartments in Arlington.

Thank you for your consideration,

Curt and Kathy Ladines

GE Residents

From: [KC Ladines](#)
To: [Amy Rusko](#)
Subject: Additional Comments for Seattle Galvanizing Small Parts PNL#1145
Date: Tuesday, June 25, 2024 10:23:16 AM

This message is from an External Sender

This message came from outside the City of Arlington

Hi Amy,
In addition to my letter to you yesterday, please include these comments:

For those of us who need a translation of the amount of pollution that will be forced out of the 41 foot stack at an outlet rate of 10,000 acfm and temps 75-135 F:

Here are my unofficial calculations, please check for accuracy, see reference numbers below.

Particulate Matter Emissions: $.028 \text{ lb/hr} \times 8760 \text{ hrs} = \mathbf{244 \text{ lbs/year or 20 lbs/mo}}$

Hydrochloric Acid Emissions: $.026 \text{ lbs/hr} \times 8760 \text{ hrs} = \mathbf{226 \text{ lbs/year or 19 lb/mo}}$

This is quite disturbing.

The question is where are these emissions going? A 'spray chart' is requested to estimate the diameter of affected area. Embers from a fire can float for miles, since these are small particulate, it may be the same. We know the plan is to force pollutants up a 41 foot stack, since the building is approximately 20 feet lower than the street level, won't that blow right into surrounding homes and ponds.

Please request an estimated particulate landing area, including environmental factors, such as wind, rain, snow and ice.

The hope is that this information will be very informative to the city and its citizens, and deter this from being approved.

Kathy Ladines

Reference: Quote from Notice of Construction Application:

The facility expects to operate 24 hours per day, 5 days per week, along with some occasional weekends. Production capacity is approximately 1 ton per hour maximum.

Emissions Primary emissions of concern are particulate matter from the fluxing agents used in dip galvanizing kettle. Other emissions include small quantities of hydrochloric acid from the pickling tanks. Another potential

*toxic air pollutant (TAP) used in the process is sodium hydroxide (caustic) that is used in the degreasing/cleaning tank. However, as caustic does not have a vapor pressure value, emissions from the tank are expected be near zero and well below the Small Quantity Emission Rate (SQER) for sodium hydroxide. Particulate matter emissions from the galvanizing kettle are proposed to be controlled with A 10,000 CFM baghouse with a minimum of 99% control efficiency. Hydrochloric acid emissions are based on worst-case assumptions of the tank being open and emitting **8,760 hours per year.***

*Appendix E contains the emissions calculations. **Particulate matter emissions are calculated to be less than 0.028 lb/hr and 0.124 tons per year. Worst-case hydrochloric acid emissions are calculated to be less than 0.026 lb/day, less than the SQER of 0.67 lb/day***

From: [KC Ladines](#)
To: [Amy Rusko](#)
Cc: [City Council](#)
Subject: Updated Comments: Seattle Galvanizing Small Parts PLN #1145 Special Permit.
Date: Tuesday, June 25, 2024 4:35:50 PM
Attachments: [Comments Seattle Galv 67th Ave NE Updated.docx](#)

This message is from an External Sender

This message came from outside the City of Arlington

Hi Amy,
I found a calculation error in the submitted documents. I have updated my comments, please disregard my previous email.
Please see the attached.
Thank you,
Kathy Ladines

6/25/24

To: Amy Rusko arusko@arlingtonwa.gov

Subject: Public Comment for Seattle Galvanizing Small Parts PLN #1145 Special Use Permit

Dear Amy Rusko,

Please accept this revision to my previous letter submitted on 6/24/24

We are very concerned about the threat that a chemical treatment plant will have on our neighborhood, water sources, and the environment. The project site is zoned 'General Industrial', which is by definition, is **not obnoxious or hazardous to public safety**. Does the "Special Use Permit" bypass the definition?

This is a huge safety concern to allow toxic chemicals so close to our communities, schools, and natural resources. Molten zinc dip vat temperature is estimated to be 840 degrees F, which is hazardous, the chemical transportation to this sight alone poses a huge risk to all concerned. The report states that 'baghouses' will be used, but it does not state full containment, still pounds of toxic substances will be released per year...

Notice of Construction Application for Order of Approval page 14:

'Appendix E contains the emissions calculations. Particulate matter emissions are calculated to be less than 0.028 lb/hr and 0.124 tons per year. **Worst-case hydrochloric acid emissions are calculated to be less than 0.026 lb/day**, less than the SQER of 0.67 lb/day.'

It appears that the emissions of Hydrochloric Acid emissions were mistakenly written in the summary above as 0.026, a decimal place off. Notice of Construction Application for Order of Approval, Appendix E, Emissions Calculations Summary and Safety Data Sheets, page 21.

HCL (lbs/day)	0.26
HCL SQER (24-hr) (CAS 7647-01-0)	0.67

Below are unofficial calculation conversions to units we commonly use. The amount of pollution that will be forced out of the 41 foot stack at an outlet rate of 10,000 acfm and temps 75-135 F:

Particulate Matter Emissions: 0.028 lb/hr x 8760 hrs = **244 lbs/year or 20 lbs/mo**
Hydrochloric Acid Emissions: 0.26 lbs/day x 365 days = **95 lbs/year or 8 lbs/mo**
(note reference calculation notes below)

This is quite alarming, if my calculations are correct, 28 pounds of toxic matter will be released in the local air every month!

The question is where are these emissions going? A 'spray chart' is requested to estimate the diameter of affected area. Embers from a fire can float for miles, since these are small particulate, this emission may be the same distance or farther..

We know the plan is to force pollutants up a 41 foot stack, since the building is approximately 20 feet lower than the street level, it's expected that it will disperse into surrounding homes and ponds?

Please request an estimated particulate landing area, including environmental factors, such as wind, rain, snow and ice.

Below is the process from the Notice of Construction Application for Order of Approval. Here you will find a list of the toxins expected to be released:

1. Caustic Cleaning Material is immersed in a heated **caustic solution** to remove grease, dirt, oil, and water-based paints. This process will also remove any contaminants that cannot be removed by normal chemical cleaners (ie. welding slag, splatter, lacquer, and oil-based paints).
2. **Caustic Rinse Material** is immersed in fresh water to remove any excess chemicals.
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On the same document Section E, it states plainly, that all the chemicals above are deadly!



These will be vats of chemicals. Where will the excess toxic material be stored? On site? There is a discussion of reselling it, will the company package it up on site? The opportunity for accidental spill and toxic pollution is increasing the more this report is studied.

Not far from this location is our precious airport aquifer. A toxic spill will contaminate our groundwater and stormwater. All substances are "Very toxic to aquatic life with long lasting effects"

Our storm water system flows in front of the proposed location, with no filtration or safety nets. Water is the first to become polluted, then affecting the flora, fauna, and people! I did a simple drawing you can see below (Fig 1)

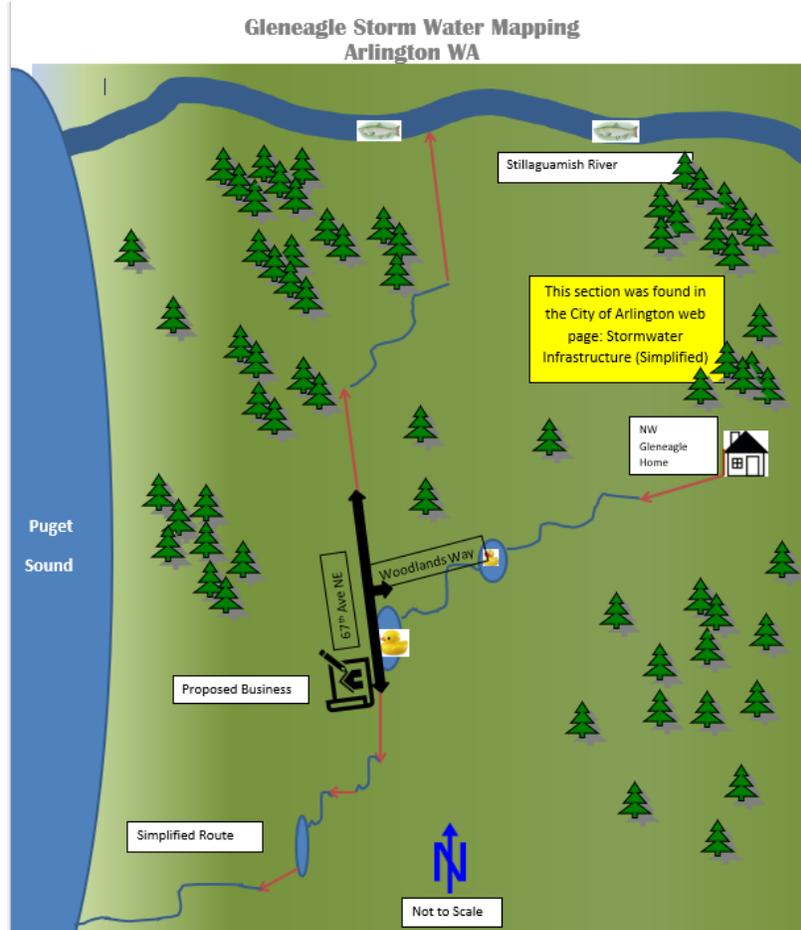


Figure 1

In closure, this type of business should not be allowed in proximity to neighborhoods/apartments, water sources, wild life. The hope is that this information will be very informative to the city and its citizens, and deter this from being approved in this location.

Thank you for your consideration,

Curt and Kathy Ladines

GE Residents

Reference: Notice of Construction Application for Order of Approval:

The facility expects to operate 24 hours per day, 5 days per week, along with some occasional weekends. Production capacity is approximately 1 ton per hour maximum.

Emissions Primary emissions of concern are particulate matter from the fluxing agents used in dip galvanizing kettle. Other emissions include small quantities of hydrochloric acid from the pickling tanks. Another potential toxic air pollutant (TAP) used in the process is sodium hydroxide (caustic) that is used in the degreasing/cleaning tank. However, as caustic does not have a vapor pressure value, emissions from the tank are expected to be near zero and well below the Small Quantity Emission Rate (SQER) for sodium hydroxide. Particulate matter emissions from the galvanizing kettle are proposed to be controlled with A 10,000 CFM baghouse with a minimum of 99% control efficiency. Hydrochloric acid emissions are based on worst-case assumptions of the tank being open and emitting **8,760 hours per year.**

Appendix E contains the emissions calculations. **Particulate matter emissions are calculated to be less than 0.028 lb/hr and 0.124 tons per year. Worst-case hydrochloric acid emissions are calculated to be less than 0.026 lb/day, less than the SQER of 0.67 lb/day**