Virtual Town Halls Q&A

Neighbors –

Thank you for joining WSP's virtual town halls. We regret not having the opportunity to address all the questions posed during our first session, so below we've provided responses for those left unanswered, in the order in which they were posted. Thank you for your patience with our trying to share this information in a new platform we are still learning to use.

WSP is committed to having a fact-driven dialogue with our neighbors, which is why we joined you yesterday evening and again today. Additional questions can be submitted on our website here. Thank you for sharing your time with us, and we look forward to having more opportunities to discuss our important project with the community.

Warm regards,

Darci Ackerman, Ali Alavi, Patricio Madero and the rest of the WSP team

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1. ***Tara L*: Why not go to Georgia? or Louisiana with WSP and make facilities there or Utah.**

   Indiana and Cass County are centrally located to our clients. There are 90 steel mini mills in the United States and nine of them are in Indiana. Proximity to our customers and clients means lower emissions from transportation and an overall smaller carbon footprint, and a higher likelihood that this material will be recycled. Our sister facility, SDR in Millport, AL manages most of the EAF dust in the southern U.S. Plus, these facilities must be equally safe wherever they are located.

2. ***Butch W*: What becomes of the other trace contaminants found in scrap steel?**

   Much of it remains at the steel mini-mill that melted the scrap steel in the first place. Most of what is in our feedstock becomes entrained in the zinc oxide and iron concentrate products. Trace amounts may still be emitted, but most of what arrives at WSP is recycled into new product.

3. ***David S*: Why was Logansport/Cass County a "second choice" for the recycling plant after Muncie, Indiana?**

   Cass County was not a second choice. After we decided to leave Muncie, we restarted our site selection process in the midwestern United States. The Indiana Economic Development Corporation sent out a type of Request for Proposal to all counties meeting our criteria. We looked at several counties and found the best fit with Cass County due to proximity to our clients, the skilled labor pool we need, availability of land and other factors. As Heritage Environmental Services is based in Indiana, it was also important to us to locate our new facility in Indiana, if possible.

4. ***David S*: Mr. Alavi worked for AR for 22 years, where 22 EPA and OSHA violations were logged from 2000 to 2016. How many EPA and OSHA violations are planned for the first 5 years while operating in Cass County?**

   None. Industrial facilities plan to maintain compliance with environment, health and safety laws and regulations.

5. ***Melissa S:* For us people in the town of Clymers you will kill our water supply and also contaminate it. Are you going to pay for all our wells to be redug ? You realize your facility will kill our small town of Clymers and be harmful to our children? How can u say it won't hurt people.**

   WSP is a true reuse company. There is no wastewater discharged from the WSP process. Stormwater on the site is collected and used onsite, and "grey" water from washing trucks and laundry is recycled. Sewage is discharged to the septic system. Zinc recycling facilities in other communities have not contaminated local water supplies and we are very confident WSP will not contaminate water supplies in Clymers. Various government environmental and natural resource agencies also oversee and enforce protection of the water supply.

6. ***Melissa S*: I put in a question about the water table in Clymers. You will be sucking our wells dry and also ruining our little town. Are you going to re-dig our wells?? How can u say our health won't be affected? You will kill our small town.**

   We will not be affecting local wells. Additionally, our wells are much shallower than the deep wells the community uses.

7. ***Amanda S.*: Suggestion please think about doing this on Facebook live.**

   Thank you for the suggestion. We are always looking for new and improved ways to communicate and engage with residents and will investigate the potential utility of Facebook Live for this type of event in the future. Once COVID-19 related restrictions are lifted, we will also hold an in-person community meeting.

8. ***Susan S.:* Have you looked at the health risk for pm2.5?**

   Yes. Most of the particulate matter makes up the WSP product, and the product collectors and other baghouses ensure as little as possible leaves the facility. You can also see from the drone video that the neighboring land is green and not covered with fugitive dust, indicating particulate matter in general is being controlled. Offsite impacts are well below agency health thresholds, in part because the emission control technology employed is very efficient at minimizing the amount of PM that may leave the process to prevent loss of WSP's product and revenue. You can also track current and historical PM2.5 data at EPA's website, Air Quality Now. I would not expect PM2.5 emissions to pose a problem at WSP.

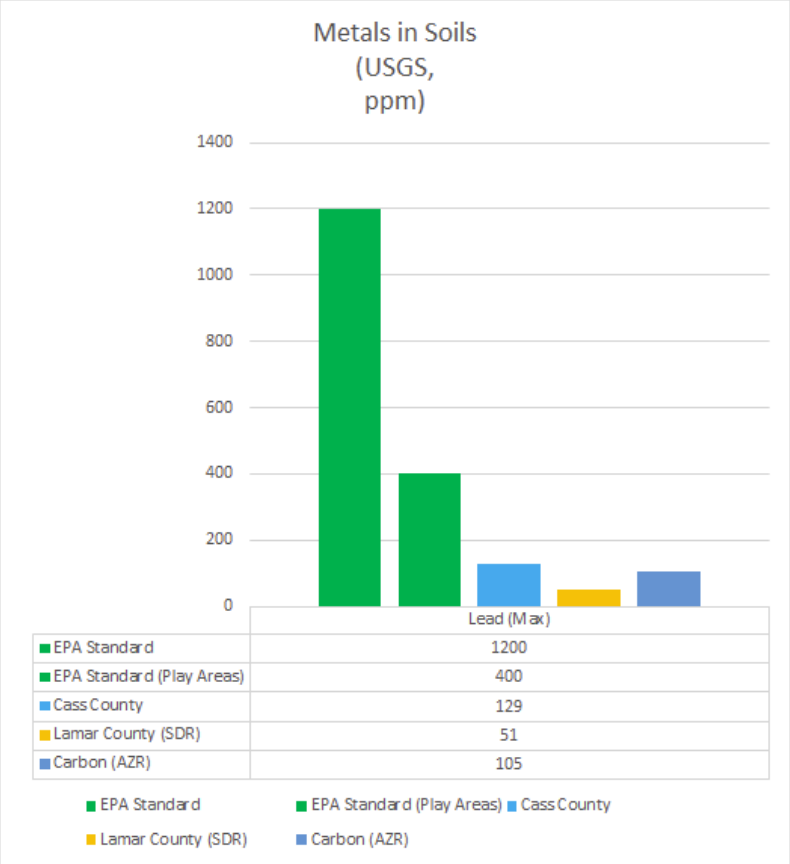
9. ***Bernadine R*: Where this plant be built**

   The new facility will be located near Clymers at 3440 W County Road 300 S, west of Logansport in the Cass County Agri Business Park.

10. ***Scott B***: **Over three years lead emissions tripled from the Millport, AL facility. In 2011 the total was 274 lbs up to 904 lbs in 2014. How does this support your argument that lead will not build up in the soil year over year and not have a negative environmental impact? Note, amounts for other years are not included in the EPA chart. https://echo.epa.gov/air-pollutant-report?fid=110032634102**

The degree to which lead will accumulate in soil depends on many factors. If you look further down the page on the link you sent you can see ten years of data and that 641 pounds of lead were reported two years earlier – about the same as the 660 pounds of lead the LMU plant was permitted to emit when it was operating – which suggests quite a bit of variability in reported

emissions. That is another reason we are fortunate to have offsite data from over 100 years of offsite impacts from the five existing locations, as well as local knowledge of the impacts of the LMU plant. See, for example, the following graph:



It would seem that even hundreds of pounds of lead emitted over decades in Carbon County may not be enough to build up in soil to levels that approach health concern in zinc recycling communities, but as you can see, this is an issue EPA, USGS, and others are watching closely. We should make more use of tools such as airnow.gov, the EPA air toxics database, and others to monitor what is going on in our environment, and also ensure our kids are not overexposed to lead from restoring old homes.

11. *George S*: How many signed on for this Town Hall?

Approximately 110 people joined our first virtual town hall session. We appreciate that so many took the time to do so.

12. *David S*: Is EAFD considered hazardous waste, according to EPA? How "bad" is it compared with other hazardous waste product?

Yes. EAFD is listed as a hazardous waste by U.S. EPA. It has a dirt-like consistency and is relatively benign compared to many other hazardous wastes, for example, from certain sectors of the chemical industry. The Waelz process has been around for decades and, as a high

temperature metal recovery process, has been declared by the U.S. EPA as the Best Demonstrated Available Technology for managing EAF Dust.

13. *Leann M.:* Heritage does hazardous waste disposal and you are buying a lot of land around the WSP site. Are you planning on dumping hazardous waste in our community or are you planning on storing it until you can burn it as a part of your allowable 10% of unquestioned materials to burn?

No. Heritage and WSP are completely separate companies with separate and distinct operations. WSP only will process EAFD and at times, may process other oxidic forms of zinc containing material, such as off-spec high purity zinc oxide, for example, during those rare times when economic conditions cause steel production to drop dramatically. WSP will not “dump hazardous waste” in this or any other community. As an aside, Heritage operates state-of-the-art permitted waste treatment facilities and would only ever responsibly manage waste anywhere it operates.

14. *Leonard W*: WSP, Heritage and Zinc Nacional have all been subject to numerous lawsuits as well as regulatory lawsuits by EPA and State Governments. Lawsuits in Indiana against, Heritage and a current lawsuit as well, as open litigation in other states. a consent decree in the US District Court of Northern Illinois. Your Millport Plant was sued in 2016 by EPA region 4 over multiple violations and you paid a fine. Given you dismal environmental record and numerous court loses, why should we believe this plant will be operated any differently?

WSP has not been subject to any lawsuits or regulatory enforcement actions.

Heritage Environmental and SDR operate in highly regulated industries, and to be clear, Heritage does not operate any zinc recycling facilities. As a result of periodic inspections, environmental agencies issued notices of alleged violations to Heritage and SDR. Both companies disputed the agencies’ legal interpretations and ultimately settled the allegations with no admission of any wrongdoing.

We believe the reference to the consent decree in the Northern District of Illinois is to a matter involving a zinc recycling competitor and not WSP, Heritage Environmental or Zinc Nacional.

15. *Tracy W*: What makes Cass County the right place for WSP?

We believe the current site is perfect for the plant – it's in an industrial park with similar businesses, excellent rail and highway access, and other infrastructure we need for efficient operations. It also is close to nine steel mini-mills, the generators of the feedstock for WSP. More importantly, we’re

confident that we can find the right team to staff this plant from the Cass County area because we've seen the same success story in Hammond and Roachdale.

16. *Butch W*: What happens to the other trace element steel contaminants? Such as, but not limited to Manganese, silicon, nickel, chromium, aluminum, strontium, etc? How are they contained?

Most become entrained in the zinc oxide and iron concentrate products. Trace amounts may still be emitted, but most is recycled and captured into new product.

17. *Dan C*: Has there been any EPA violations at any other WSP facilities?

No. This is the first WSP facility.

18. *David R*: what is the e-mail address and the name of the I.U. professor. Could you post that on your www.wspcasscounty.com site

Yes. Prof. James Klaunig, jklauni@indiana.edu. Dr. Klaunig served as the State Toxicologist for the State of Indiana from 1991 to 2003. He has also served as Director for the Center for Environmental Health at Indiana University School of Medicine, as well as the Director of the Division of Toxicology at Indiana University School of Medicine.

19. *Kevin H*: Have you met with any of our doctors or the administration at Memorial Hospital? If so what feedback have they given?

Yes, we had a videoconference with some physicians at Logansport Memorial Hospital on Friday, May 22, with Drs. Michael Lalla, Bruce Murray, Todd Weinstein, and Craig Pawlowski. They expressed concern over the use of anthracite (coal); we noted that WSP will use about half the amount of coal the LMU power plant used. They noted concerns with adverse effects of high exposure to lead, mercury, and particulate matter; we noted that WSP emissions and offsite exposures are very low – that is, they will not be at levels that could cause adverse effects. The physicians encouraged open discussion with all parties, which this virtual town hall is a part of (and would have happened sooner but for COVID-19 restrictions).

The fundamental health issues are dose-response questions – will exposure to WSP emissions be in any way enough to cause an adverse response? Our data suggest it will not, and we are happy to continue to share detailed supporting information and answer questions.

20. *Stephen M*: So WSP is not connected to the facility in Alabama called Steel Dust Recycling that had a lawsuit filed against them and settled in 2016 regarding EPA environmental enforcement actions?

Yes, WSP is connected by virtue of Steel Dust Recycling (SDR) being a wholly-owned subsidiary of Zinc Nacional. Answering your question goes back to activities that predates ZN's ownership of the SDR facility in Alabama. Below is the history and the facts surrounding the settlement, as well as how WSP will operate in the future as a result:

- When the Alabama facility was originally constructed (2007), before Zinc Nacional's ownership of SDR (2009), the building in which the iron concentrate product was held was not required by regulators to be certified as a containment building. Years later, during Zinc Nacional's subsequent ownership, the regulatory agencies changed their position and

determined that the building must be certified as a containment building. As part of a global settlement, SDR upgraded the building and obtained the required certification. The same building at WSP will be certified as a containment building from the outset.

- SDR initially was registered as a Conditionally Exempt Small Quantity Generator ("CESQG") because materials from maintenance activities, such as used bricks, that were returned to the kiln were not counted towards the amount of material generated on-site. SDR began counting this material and changed its registration to Large Quantity Generator ("LQG"). The WSP facility will register as an LQG from the outset.
- Under the original owners of the Alabama facility, certain one-time notifications were not made. These missed notifications were noted during Zinc Nacional's ownership, and SDR made the necessary notifications. All required notifications will be made at the outset by WSP for its Cass County facility.
- During the inspection, some material generated on-site destined to be fed to the kiln was alleged to have not been labeled properly. SDR corrected the label to the inspector's satisfaction during the inspection.
- During the same inspection, a box of fluorescent light bulbs was found to be open and the agency did not agree with the placement of an aerosol can crusher. Both of these issues were promptly resolved: the box was closed and labeled, and the crusher moved to an agreed upon location.
- There was a process error regarding the paperwork for one shipment of refractory for off-site disposal.
- Collectively, SDR settled these issues without litigation or any admission of wrongdoing for $80,000 in December 2016. The original inspection occurred in 2014.

21. *Bob B:* How far away from the plant will you monitor?

The facility will be equipped with continuous opacity monitors on the product stacks. We have no current plans to continuously monitor otherwise.

22. *Linda W*: Will the monitors be people monitoring smoke or will there be automatic monitors in the community and in the stacks

There will be a Continuous Optical Monitoring System (COMS) to monitor product stack emissions, and certain facility personnel also will be trained to observe any anomalies with respect to emissions.

23. *Ron M*: Will the Iron dust, hauled in, be by trucks or rail and approx. how many daily? and how is it stored?

The zinc-rich EAF Dust (not iron dust), our raw material feedstock that is received at the facility, arrives by both rail and truck. At the peak of Phase I with the first kiln operating, we expect to receive the equivalent of about 20 trucks of EAFD per day by either truck or rail. Rail cars and trucks both will enter the receiving building which is under negative pressure designed to prevent the escape of the raw material. There is no storage of the incoming feedstock; it is received directly into the process.

24. *Susan J*: Can pm2.5 be monitored visually?

An individual grain of PM2.5 is not visible to the naked eye. The facility will employ continuous opacity monitors on the product stacks.

25. *Linda W*: When was the video made of the Millport facility

The video of the SDR facility was filmed in April 2020. In preparation for Earth Day, a client of SDR asked to film footage of the SDR facility and activities to demonstrate the client's commitment to protecting the environment by recycling their baghouse dust at SDR. SDR gave their permission to film the facility.

26. *Laura F*: The facility in Ohio owned by WSP's parent company, Heritage, had a incinerator accident due to the 10% unknown materials entering its facility. What safeguards does this facility utilize to prevent similar accidents?

The Heritage Thermal Services, Inc. (HTS) facility in Ohio is an incinerator and not a zinc recycling facility. The facilities are not operationally similar and therefore will have different contingency or emergency response plans in place. Based on the differences in operations, there is no possibility of a similar event happening at WSP as occurred at HTS in 2013. Also, we have no knowledge of to what the "10% unknown materials entering its facility" refers with respect to the HTS facility. That said, in April of this year, Heritage Thermal Services was awarded for its exceptional performance in environmental, health, safety, and security by the Ohio Chemistry Technology Council (OCTC).

The WSP facility will be designed to comply with environmental laws and regulations and meet or exceed permitted emission limits. WSP will employ a number of advanced capture and emission mitigation technology to protect the health and safety of the local community.

For example, various structures will be under negative pressure, the facility will be outfitted with a number of capture points such that the material can be re-introduced into the process, virtually all operations are conducted indoors and upgraded bags will be used in the product collectors for greater capture efficiency. Permitted air emission limits are set at levels protective of human health and the environment, with a large margin of safety built in.

27. *Kurt B*: What type of byproduct is produced. Is stone and will that be sold? Please describe the byproducts.

Our facility receives EAF Dust, which is pelletized and fed into a kiln, then converted into zinc oxide and an iron concentrate. There are no byproducts from the recycling process. Even the "grey" water from the laundry, stormwater, and shower facilities are used in the recycling process. The end products are sent by rail or truck to our clients. We do not use or produce stone, although the form in which the iron concentrate is produced is like small rocks.

28. *Duane S*: Where will the byproducts be used since this is an agri-business park

There are no byproducts produced by the zinc recycling process using Waelz kilns. Cement production facilities are a major customer for the iron concentrate product to be produced by WSP. As such, it is possible that the Lehigh Cement facility could purchase iron concentrate to use as an ingredient in the production of cement (as an iron source).

29. *Monica K*: Exactly why did you leave Muncie?

We originally chose Muncie as a site for this potential project with the full support of the City of Muncie – including a unanimous vote of approval from the Muncie City Council – and the State of Indiana. We tried to engage in a meaningful dialogue with community leaders, address the concerns of residents and make this project a reality. Unfortunately, a campaign of misinformation tainted

the process. As the county commissioners confirmed with the current mayor of Muncie, WSP withdrew from Muncie due to concerns over certain irregularities and criminal investigations involving certain individual Muncie elected officials in office at that time.

Knowing that we are an asset to our communities and that our sound technology benefits the environment, we have now chosen to locate our facility in a community that is receptive to learning the facts and welcoming us as a good neighbor. This evening's town hall is one of many steps we are taking to start a dialogue on the facts about this facility and the benefits it brings to Cass County.

30. *David S*: When did WSP first contact the Cass County Redevelopment Commissioners, and by what means? Presumably this was in 2019.

On January 26, 2018, the Cass County Redevelopment Commission replied to an RFP from the Indiana Economic Development Corporation (IEDC) and submitted information about the 57-acre Cass County Redevelopment Commission site to the IEDC for State Project #419893. On

December 17, 2019, WSP reached out to Cass County with interest in their original bid from 2018. That was our first contact with Cass County.

Thank you for your questions.

Please submit any additional questions to our website, www.WSPCassCounty.com.